# **Inova Privacy Policy**

Updated May 11, 2022

Inova Diamonds LTD ("Company" or "We" or "Inova") respects your privacy and is committed to protecting it through our compliance with this privacy policy. We are a B2B provider offering integrated technologies and services to retailers, and e-commerce brands, especially in the jewelry industry. We encourage you to read our Privacy Policy.

This Privacy Policy lets you know how we use, collect, and disclose your information in connection with your use of our Virtual Try-On ("VTO" or "AR) and other technologies and services accessed through a website or mobile application. We are committed to maintaining the privacy and security of your information in compliance with all applicable laws.

# Children Under the Age of 16

Our technologies, such as Virtual Try-On, are not intended for children under 16. If you are under 16, do not use or provide any information, and don't use our Virtual Try-On technologies. We do not knowingly collect personal information from children under 16. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, contact us: <a href="mailto:support@inova.diamonds">support@inova.diamonds</a>

# The information we collect

We collect the information you voluntarily provide to us, including when you use our Virtual Try-On technologies and services. We also automatically collect information about you in connection with your usage of our technology via web analytics, cookies, and other tracking and analytical technologies to provide you with the best service.

#### Hand, wrist, face, and other related images and scans:

To use the Virtual Try On technology, we need to receive an image or images from you to place the jewelry piece or watch, or any other wearable. You may decide to consent to the capture, processing, and storage of images to use our Virtual Try-On. By proceeding and taking images or agreeing to use our technology, you consent to capture your hand, wrist, face, and any body part that you wish to use for the Virtual Try-On technology. We shall use any such information to show virtual jewelry pieces, watches, or any other wearables on that image and provide customized information and recommendations.

We use the images to analyze them to show you how the item will look through our services. We maintain your images on our systems or service providers, such as web hosting services.

#### Cookies, other technologies:

"Cookies" are small amounts of data sent to your browser from a website's computer/server and stored on your device. By using our services, you agree to and consent to cookies and other similar tracking and analytical technologies.

We may automatically collect information such as your Internet Protocol (IP) address, your device identifier information, and a date/time stamp and session identifier for your visit. Some of this information may be collected using cookies or other tracking technologies and stored on our systems or those of our service providers. We may use both first and third-party cookies and session and cookies. Cookies and other technologies permit authenticating you, uniquely identifying each user session when you access our Virtual Try-On services, and compiling aggregated and anonymized statistics to analyze how our services are used. If you prefer, you can usually choose to disable cookies on your browser but doing so may prevent you from using the full features of the services or may cause the services not to function correctly.

#### Information provided by third parties or service providers:

Third parties such as our customers, partners, or service providers may provide us with information about you. This may include information concerning your device and session when you access our services.

However, we do not receive, collect or store your name, address, telephone number, email address, and other personal ordering information that you may provide to the provider or a third party.

# Store and retain information:

We retain your images for a maximum of two (2) years following collection. We will permanently destroy your images or scans no later than the end of the two-year period. We might remove the images prior to the two years.

We retain your usage, device, session, and other technical information: for as long as reasonably necessary to provide you with the best service; and as necessary to comply with our legal obligations; as necessary to maintain statistics of usage; and as otherwise required by applicable law, rule or regulation, We retain some of your information in a depersonalized or aggregated form **but not in a way that it could be used to identify you.** 

#### How and when we disclose information to Third Parties:

We may now or in the future contract with other business partners or service providers to provide services to us, such as technology services and web hosting providers, and we may need to give them access to information in order for them to perform services for us. Unless we tell you differently, these companies do not have any right to use the information we share with them beyond what is necessary to assist us and provide services to us. Besides, we may at times share aggregated and anonymized statistics concerning our services with our customers, partners, and service providers. We will not disclose statistics in a manner that would allow a third party to identify you individually. If we or our assets were acquired, or if we go out of business, user information would be one of the assets that are transferred or acquired by a third party.

We are not responsible for the privacy practices of any third party that we cannot control.

#### How we secure your information:

We take security very seriously and have reasonable security and technical safeguards to protect your information. However, we do not guarantee or warrant that the techniques we employ will prevent unauthorized access to information about you that we store.

#### **Our Hosting and Servers:**

Be aware that you are consenting to your data being transferred to various third-party service providers around the world, including the United States. We do not ourselves host any of the services and technologies – all hosting is done by third-party providers. This means that data your information is hosted with such third-party service providers on servers that they own or control. Regardless of where such third-party service providers are located, some are located in the United States, their servers may be located anywhere in the world including the United States. Your data may even be replicated across multiple servers located in multiple countries.

# **California Privacy Rights**

California Civil Code Section permits our customers who are California residents to request certain information regarding our disclosure of Personal Information. However, the information we collect via the Virtual Try-on technology might not be defined as private information that can identify you. If you are a California resident, you may direct any questions concerning your individual information to: <a href="mailto:support@inova.diamonds">support@inova.diamonds</a>

#### GDPR, General Data Protection Regulation:

This notice is set to provide the residents of the European Union with the information and rights on the private information under the GDPR. Since our Virtual Try-On technology may not collect the data that can personally identify you, for some of the Virtual Try-On products, we will collect and store face images/face scans (products like earrings, necklaces and other items that require the face image).

We will only process your Personal Data if we have a lawful basis. As stated before, the information we generally collect is technical identifying information of your usage of our technologies, like your IP address, device information, and the images you provided to us in order to use the Virtual Try-On technology.

You may contact us at any time considering your rights and questions on your data, or if you wish to make a formal request for the information, we hold about you at: <a href="mailto:support@inova.diamonds">support@inova.diamonds</a>

#### Changes to the Privacy Policy

We may make changes to this Privacy Policy from time to time. The date the privacy policy was last revised is identified at the top of the page. Please make sure to check this Privacy Policy.

# **Our Contact Information**

For any information, you can reach us at: <a href="mailto:support@inova.diamonds">support@inova.diamonds</a>; our address is Jabotinsky 3, Ramat Gan, Israel Diamonds Exchange, floor D, Maccabi Building.