Data Protection Overview

Data protection legislation sets out rules and standards for the use and handling of personal data about living identifiable individuals (i.e., "data subjects", "consumer", etc.) by organizations and companies. The laws apply to all sectors, both public and private. It applies to all electronic records as well as many paper records.

Since 25 May 2018, the EU General Data Protection Regulation ("GDPR") came into effect and set out a worldwide standard for processing personal data.

We, Radix Technologies Ltd. ("Company", "Radix" or "we") are committed to ensure that our services comply with the various data protection regulations such as, not limited to, the GDPR, the California Consumer Privacy Act of 2018 ("CCPA"), which is in effect as of January, 2020., etc.

For this purpose, we have designated an internal team, which are accompanied by our CEO, CTO and legal consultants, to ensure all required actions are taken in order to achieve compliance with various data protection regulations. We further pay close attention to regulatory guidance around data protection regulation compliance and making changes to our product features and contracts when they're needed.

THIS WEBSITE PAGE IS NEITHER A MAGNUM OPUS ON DATA PRIVACY NOR LEGAL ADVICE FOR YOUR COMPANY TO USE IN COMPLYING WITH DATA PRIVACY REGULATIONS. INSTEAD, IT PROVIDES BACKGROUND INFORMATION TO HELP YOU BETTER UNDERSTAND HOW WE, AT RADIX, HAVE ADDRESSED SOME IMPORTANT LEGAL POINTS.

What does Radix do to comply with Data Protection Regulations?

- Appointed a Data Protection Officer ("**DPO**")
- Continuously review our security measures to ensure any personal data we collect and process on our systems is adequately protected.
- Ensure our <u>privacy policy</u> clearly explains our commitment to the GDPR and CCPA and is transparent about how we use personal data, and gives individuals information about how they can exercise their data subject rights.
- Provide our customers and partners with <u>Data Processing Agreements</u>, including <u>Standard Contractual Clauses</u> and update our contracts with third party vendors to ensure they are GDPR/CCPA compliant.
- Maintain a formal process providing individuals a way to fulfill their requests concerning the personal data processed by us or on behalf of our customers, all subject to our <u>User Right Policy</u>.

Learn More About our Compliance with Data Protection Regulations:

Privacy by Design

Company, as a controller, only processes personal data to the extent necessary and in accordance with applicable privacy laws. We solely process personal information on our partners and customers and visitors of our website, all subject to our privacy policy. Nonetheless, as a processor (as defined in the GDPR) or service provide (as defined under the CCPA) we may process certain personal or even sensitive data, on behalf of our customers, through our products, services, apps or extensions. We have ensured compliance with needed requirements as a processor or service provider and contractually obligate to comply with applicable legislation, for more information please see our Data Processing Agreement available here.

We ensured that there is an applicable lawful basis for any and all processing of personal data as a controller and limited the use and transfer of personal data to strictly necessary purposes.

Technological Organizational and Security standards

The Company has completed an in-depth audit and data mapping process and implemented internal technical and organizational measures to safeguard against unauthorized access to personal data and protect us in case of a security incident.

Our full security and privacy programs are further outlined in our security page.

Employee Training

We have annual employee training and display an online employee security policy so that at all times the employees' have the tools to manage the data and access to the data in a secure and compliant manner. Employees that have access to personal data are solely designated, trusted employees that go through adequate screening to gain our trust.

User Rights

In accordance with data protection regulations, individuals may exercise various rights such as: the right to access personal data, request the erasure of personal data, restrict sharing and selling of data, all as detailed in our <u>User Right Policy</u>.

In order to exercise any of the above rights please contact our DPO at: privacy@radix-int.com or fill in our form and send it to: privacy@radix-int.com

European Data Transfer

On July 16, 2020, Europe's highest court ("CJEU") invalidated the EU-US Privacy Shield. Additionally, on September 8, 2020, the Swiss Data Protection Authority announced in a

position statement that it no longer considers the Swiss-U.S. Privacy Shield adequate for the purposes of transfers of personal data from Switzerland to the U.S.

We ensure any data transfer is done in a secure manner, in compliance with the latest <u>EDPB</u> recommendations concerning data transfer as well as contractually sign a Data Processing Agreement which incorporate the <u>Standard Contractual Clauses</u> which remain a valid data export mechanism and which automatically apply in accordance our Data Processing Agreement.

Over the coming months, we anticipate that EU data protection regulators will issue additional guidance on the CJEU decision, including what the supplementary measures could consist of for those transferring data in reliance on the SCCs. In addition, the current form of the SCC was written before the GDPR went into effect and will be updated at some point in time. We will continue to keep a close eye on forthcoming guidance to stay up to date and assess whether we need to make any changes to our existing practices.