

ICREATE PRIVACY POLICY

[Last Updated: January 22, 2024]

This Privacy Policy ("**Privacy Policy**") is an integral part of our [Terms of Use](#) ("**Terms**") and governs the processing of information by iCreate Internet Campaigns Management Ltd. operating under the brand name Plan Your Trip ("**iCreate**", "**Company**," "**we**," "**us**," or "**our**") while you ("**you**" or "**user**") access, use or interact with website available at: <https://icreatemarketing.cloud/> ("**Website**") and the services provided therein (collectively, the "**Services**").

Any capitalized terms not defined herein shall have the meaning ascribed to them in the Terms.

iCreate may update or revise this Privacy Policy from time to time. Modifications to this Policy will be posted on the Website or addressed directly to where the Company, upon its sole discretion, finds it required.

This Privacy Policy explains how the data is collected, used, or shared with others, how it is safeguarded, and how an individual may exercise their lawful rights related, among others, and where applicable, as required according to the EU General Data Protection Regulation ("**GDPR**"). This Privacy Policy applies to Personal Data collected and processed by us as part of the Services as a Data Controller – where we own such data. Note that, this Privacy Policy does not govern the use of our Services by our Customers, where such use relates to their end-customers or third-parties. In these cases, we merely act as a Data Processor on our customer's behalf, and each such customer is responsible to provide his end users with a Privacy Policy detailing his use and conduct in their data.

You are not required by law to provide us with Personal Data (as defined below). Providing Personal Data to us is entirely voluntary, provided however, that we will not be able to provide you with certain services or information without obtaining your Personal Data (for example, we will not be able to contact you in response to your inquiry if we will not have your contact details).

iCreate shall be entitled to (however not obligated), to retain and store Personal Data in its databases, as detailed under this Privacy Policy, and subject to applicable law.

1) CONTACT DETAILS

iCreate Internet Campaigns Management Ltd., incorporated under the laws of the state of Israel, is the Controller (as such term is defined under the GDPR or equivalent privacy legislation) of the Personal Data we collect from you.

For any question, inquiry or concern related to this Privacy Policy or the processing of your Personal Data, you may contact as follows:

Our Contact Information: info@iCreate.marketing.

By Mail: 7 Mezada St. (Beser 4), Bnei-Brack Israel.

2) WHICH DATA DO WE COLLECT AND FOR WHAT PURPOSE?

"Non-Personal Data": means non-identifiable data, including statistical, aggregated and "de-identified" data, which can no longer be associated with any individual (even if it was derived from Personal Data). This includes technical data transmitted to us by your device when you access and interact with our

services, such as the type of browser, operating system, type of device used, the time and date you access our services, navigation, and language preference, etc. Non-Personal Data is primarily used for technical analysis, research, and development of our services to provide, maintain, develop and enhance it, and is not used to identify individuals. Under this Privacy Policy, we can use any aggregated, statistical and de-identified data with no limitation. Such data may be included in our proprietary information and is not deemed personal data under the law.

"Personal Data": means individually identifiable information which identifies or may identify, with reasonable effort, an individual, including online identifiers, such as your name, address, phone number, and online identifiers (such as IP address).

Please see below the table which specifies the Personal Data we collect and how we use it.

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
<p><u>Contact Us</u> If you voluntarily contact us for your interest in our services, for support, "Starting a Free Trial" or for any other inquiry, including through any form on the Website (e.g., "Contact Us", or "Chat With Support") you may be required to provide us with certain information such as your name, email address, company, referral subject and other related data ("Contact Information").</p> <p>If you are contacting us on behalf of another person, we value your assistance and care for others, but please note that it is your responsibility to make sure that any person whose Personal Data you provide is aware of the principles of this statement and agrees that you will provide Personal Data to us on this basis.</p>	<p>We will use this data to respond to your inquiry or to provide you with information regarding our services as part of our marketing efforts.</p> <p>We may further process the content of our correspondence to improve our customer service, and if we believe it is required to provide you with any further assistance (if applicable).</p> <p>We will collect the data, store it in our data systems, such as CRM or enterprise email, analyze it, provide access to our relevant staff members, and keep records of our correspondence as part of our business records keeping.</p>	<p>If you are just a potential customer or anyone interested in our services, we will process such Contact Information subject to our legitimate interest.</p> <p>If you are an actual customer of our services contacting us for support or any similar inquiry, we will process your data for the fulfillment of the contract between us – providing you with our services.</p> <p>After addressing your inquiry, we may retain your data in our systems as part of our business records-keeping under our legitimate interest.</p>
<p><u>Accessing and using the Services</u> If you an active Customer of our Services, the Website also allows you to access our service's web-interfaces, use the Services or try them. As a user of any of our services, we may connect your data collected on the Website to your account data as a user of our services ("User Account Data").</p>	<p>We will use and process your User Account Data, such as username and password, in order to provide you access to the Services. Further, we will collect data about the Services usage, such as dates and times of use, actions performed in our systems, to provide you with better services and understand your</p>	<p>We will process your User Account Data to fulfill our agreement(s) with you and as per our legitimate interest when it is related to protecting, and ensuring the security of, our systems.</p>

	<p>needs and adjust the Services accordingly.</p> <p>Also, we may use such data to verify your identity through the username and password you have provided, monitor your activity through our security measures and tools, and manage your account within the relevant product.</p>	<p>** please note that any use of our services is also subject to the separate agreement(s) between us and our relevant customer with whom we engaged to allow the use of our products and services (“Account Owner”).</p>
<p><u>Online Identifiers</u></p> <p>We use third-party cookies on the Website. As further detailed below, these cookies assist us with improving our systems and services. The Personal Data processed is an online identifier, either a cookie ID, the IP address, etc., alongside the relevant data regarding your usage of the Website (e.g., date and time of usage, pages visited, referrer webpage, device unique identifier, etc.)</p>	<p>We will use your Online Identifiers to improve our systems and services.</p> <p>We will collect your information and analyze it, whether directly or through the use of third-party systems and services. We will aggregate and analyze the data to produce insights regarding your usage and your suitability to our services as a potential customer or contact point. We will use this data and insights as part of our marketing efforts.</p>	<p>Strictly necessary cookies which are required for the proper and basic operation of the Website will be processed in our legitimate interest.</p> <p>Other cookies data, including any targeting and marketing cookies, will be subject to a proper disclosure or consent mechanism, provided through the Cookie banner on our website.</p> <p>For more information regarding cookies, see below “Cookies Usage”.</p>

Please note that the actual **processing operation** per each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations, made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. Transfer of Personal Data to third-party countries, as further detailed in the Data Transfer section, is based on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of our service, as well as to protect the security or integrity of our databases and Website, and to take precautions against legal liability. Such processing is based on our legitimate interests.

3) **COOKIES USAGE**

As explained above, we use cookies to improve your experience while using the Website and Services. Cookies are small text files implemented on the user's computer or web browser that allow some tracking and identification of the user to collect data regarding the user's data usage.

We may use various types of Cookies:

- Essential Cookies – which are strictly necessary for a website to work correctly (usually appear under our name/cookie tag).
- Functional Cookies – designated to save your settings on the Website or Services - your language preference or other view preferences (also, under our name/cookie tag).
- Session Cookies – used to support the Website's functionality – such Cookies are usually stored only temporarily during a browsing session and are deleted from your device when you close the browser.
- Targeting and Marketing Cookies - These cookies are used to collect information from you to help us improve our services and to serve you with targeted advertisements that we believe will be relevant to you (e.g., Google, HubSpot).
- Social networks Cookies - Social Plug-In Cookies (e.g., Facebook, Twitter, LinkedIn Cookies, or pixels, etc.) enable sharing your usage information with your social network's accounts.
- Analytics Cookies - give us aggregated and statistical information to improve the services and further develop them (e.g., Google Analytics, Google Firebase Catalytic, 6Sense, etc.)
- Third-party services used by us – for example, an external service supporting our recruiting options through the Website (e.g., Comeet or Workday), or an external service that allows us to screen short videos on the Website (e.g., YouTube or Vimeo).

Please note that the data collected by the use of Cookies may be linked to and combined with any other data, including Personal Data.

In addition, Cookies data is usually collected through the use of third-party services, like Google, Facebook, etc. In those cases, your Personal Data might be transferred to those third parties, which might link it and use it together with other information they have on you from other sources. Such data is "owned" and processed separately by those third parties under their terms and conditions and the direct accounts or subscriptions you have with those third parties. For example, if you have a Facebook account, the Personal Data collected through Facebook's Cookies on the Website might be linked to other data that Facebook collects from you as a Facebook user, and might be used by Facebook per the independent agreements between you and Facebook.

The specific cookies we currently use, and your choices with regard to such use are detailed [HERE](#).

4) HOW WE COLLECT INFORMATION

According to the nature of your interaction with our services, we may collect information as follows:

- Provided by you voluntarily – we will collect information if and when you choose to provide us with information, such as completing any contact form.
- Provided by your admin as a user of any of our products and services – if you are a user of our services, some of your data, including data related to your User Account Data, may be provided to us through your admin., i.e., the relevant Account Owner.

- Automatically – we may use cookies and similar tracking technologies (as elaborated in the Cookies Section above) to gather some information automatically when you access the Website.
- Provided to us by third parties – as part of our digital marketing efforts as described above.

5) DATA SHARING– CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH

We share your data with third parties, including with trusted partners or service providers that help us provide our services. Below you can find information about the categories of such third-party recipients.

CATEGORY OF RECIPIENT	DATA THAT WILL BE SHARED	PURPOSE OF SHARING
N2P Group	analytics, marketing and usage data	We may disclose some of our customer’s data with our sister companies and subsidiaries in the N2P Group, to allow us to manage our business as a global group. Your data will be always managed under strict procedures and processes ensuring it is being taken care as required under law and with great respect to your privacy and rights.
Trusted Agents and Service Providers	All data	We may disclose Personal Data to our trusted agents and service providers (including, but not limited to, our Cloud Service Provider, our Analytics Service Provider, our CRM provider, etc.) so that they can perform the requested services on our behalf. These entities are prohibited from using your personal information for any purposes other than providing us with requested services.
Any acquirer of our business	All data	We may share Personal Data, in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Policy.
Legal and law enforcement	Subject to law enforcement authority request	We may disclose certain data to law enforcement, governmental agencies, or authorized third parties, in response to a request relating to terror acts, criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other user to legal

		liability, and solely to the extent necessary to comply with such purpose.
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Compliance with Google API Services User Data Policy

Disclosure: The app. 'iCreate Adwords Project' use and transfer to any other app of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.”

iCreate is committed to complying with Google's API Services User Data Policy, including the Limited Use requirements. This commitment is reflected in our handling of data obtained through Google APIs:

Data Usage: The data received from Google APIs is used strictly for the purposes it was intended for, as per our agreement with users and Google's policy.

No Prohibited Use: We do not use Google user data for any prohibited activities, such as selling personal data, or for any purpose other than what is explicitly agreed upon by our users.

Data Access and Transfer: Access to Google user data within our organization is limited to authorized personnel who need this data to perform their job functions. We do not transfer Google user data to any third parties unless necessary for providing the agreed services.

Privacy and Security Measures: We have implemented robust privacy and security measures to ensure the safety and confidentiality of the Google user data in our possession.

Transparency and User Control: Users can access, manage, and delete their data associated with Google APIs through their account settings on our platform. We provide clear instructions on how these controls can be exercised.

Policy Updates: Any changes to our use of Google user data will be communicated through updates to this policy and direct notifications to our users as necessary.

For more information about Google's API Services User Data Policy, including the Limited Use requirements, please visit [Google's policy page](#).

Where we share information with services providers and partners, we ensure they only have access to such information that is strictly necessary. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only, while ensuring compliance with all applicable data protection regulations (such service providers may use other non-personal data for their own benefit).

6) DATA TRANSFER

Any information you provide us may be transferred to and processed in countries other than the country from which you accessed the Website or Services. If you are a resident of the European Economic Area ("EEA") we will take appropriate measures to ensure that your Personal Data receives an adequate level of data protection upon its transfer outside of the EEA. If you are a resident of a jurisdiction where the transferring of your Personal Data requires your consent, then your consent to this Privacy Policy includes your express consent for such data transfer.

7) USER RIGHTS

We acknowledge that different people have different privacy concerns and preferences. Our goal is to be clear about what information we collect so that you can make meaningful choices about how it is used. We provide you with the ability to exercise certain choices, rights, and controls in connection with your information. Depending on your relationship with ICreate, data protection and privacy laws provide you with some of the following principal rights regarding your Personal Data, including (and depending on your jurisdiction): The right to access your Personal Data that we process; The right to ensure your Personal Data is accurate, complete and up to date; The right to have your Personal Data amended (by correcting, deleting or adding information); The right to object to the processing of your Personal Data, to the extent applicable; The right to send or "port" your Personal Data; The right to file a complaint with a supervisory authority in your jurisdiction; The right to withdraw consent, subject to legal or contractual restrictions and reasonable notice; etc.

You may exercise any or all of your above rights in relation to your Personal Data by contacting us at: support@icreate.marketing.

Where we are not able to provide you with the information for which you have asked, we will endeavor to explain the reasoning for this and inform you of your rights, including the right to complain to the supervisor authority (in the event you are an EEA resident). We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any such information in accordance with applicable law.

8) RETENTION

We retain Personal Data we collect as long as it remains necessary for the purposes set forth above, all in accordance with applicable laws, or until an individual expresses a preference to opt-out.

Other circumstances in which we will retain your Personal Data for longer periods of time include: (i) where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements; (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges; or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data. Please note that except as required by applicable law, we may at our sole discretion, delete or amend information from our systems, without notice to you, once we deem it is no longer necessary for such purposes.

9) SECURITY

We implement extensive security measures to reduce the risks of damage, loss of information, and unauthorized access or misuse of Personal Data. We implement appropriate data collection, storage, and processing practices and security tools to protect Personal Data against unauthorized access, alteration, disclosure, or destruction. You should be aware that no security measures are completely

fail-proof, and it is impossible to prevent any and all threats to the security of data and systems. Therefore, you should be aware that any processing of digital Personal Data holds certain inherent risks, and we cannot guarantee that our services and databases will be immune to any wrongdoings, malfunctions, unauthorized interceptions or access, malware attacks or other kinds of abuse and misuse.

10) CHILDREN

Our Services are not intended for use by children and we do not knowingly collect or maintain information about anyone under the age of 16. Please contact us at: support@icreate.marketing if you have reason to believe that a child has shared any information with us.