

CCPA Notice

applicability: Pursuant with the California Consumer Privacy Act of 2018 as amended and revised by the California Privacy Rights Act of 2020 (collectively “**CCPA**”), and any other California privacy laws, this CCPA Notice applies to ApexFlow Solution SDK LTD. (“**ApexFlow**”, “**we**”, “**us**”, or “**our**”) Properties’ visitors, customers and direct and indirect users (“**Consumers**” or “**you**”) who are California residents. Any terms defined in the CCPA have the same meaning when used in this CCPA Notice.

This CCPA Notice applies to California residents’ Personal Information, which we collect directly or indirectly while interacting with our website and additional Properties, using our Services or in order to provide our Services, or employee and business-to-business Personal Information.

This CCPA Notice is an integral part of our Privacy Policy, and thus, definitions used herein shall have the same meaning as defined in the Privacy Policy referencing you to this CCPA Notice.

PART I: A COMPREHENSIVE DESCRIPTION OF THE INFORMATION PRACTICES:

(A) CATEGORIES of PERSONAL information WE COLLECT

We collect Personal Information which is defined under the CCPA as any information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device, all as detailed in the table below.

Personal Information further includes Sensitive Personal Information (“**SPI**”) as detailed in the table below.

Personal Information does not include: Publicly available information that is lawfully made available from government records, that a consumer has otherwise made available to the public; De-identified or aggregated consumer information; Information excluded from the CCPA’s scope, such as: Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and the Driver’s Privacy Protection Act of 1994.

We have collected the following categories of personal information within the last twelve (12) months:

Category

A. Identifiers.

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

C. Protected classification characteristics under California or federal law.

D. Commercial information.

E. Biometric information.

F. Internet or other similar network activity.

G. Geolocation data.

H. Sensory data.

I. Professional or employment-related information.

J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).

K. Inferences drawn from other personal information.

L. Sensitive personal information.

Example

A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.

A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, face prints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

Physical location, approximate location derived from IP address or movements.

Audio, electronic, visual, thermal, olfactory, or similar information.

Current or past job history or performance evaluations.

Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Government-issued identifying numbers, financial account details, genetic data, precise geolocation, race or ethnicity, religious or philosophical beliefs, union membership, mail, email, text messages, biometric data, health data, and sexual orientation or sex life.

Collected

Yes: Online identifier, unique online identifier, IP address, real name, account name, email address.

No

No

No

No

Yes: Browsing history, search history, access time and data, search queries within the Properties and directing URLs.

Yes: Approximate location.

No

No

No

No

No

(B) CATEGORIES OF SOURCES OF PERSONAL INFORMATION

(C) USE OF PERSONAL INFORMATION

We may use the Personal Information collected as identified above, for the following purposes:

- to fulfill or meet the reason you provided the Personal Information (support, respond to a query, etc.); •
- monitor and improve our Services; •
- provide the Services; •
- market our Services; •
- analyzing our Services and your use of the Services; •
- respond to law enforcement; or •
- as otherwise as detailed in our Privacy Policy. •

We will not collect additional categories of personal information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

(D) DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE

We may disclose your Personal Information to a contractor or service provider for a business purpose. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract; we further restrict the contractor and service provider from selling or sharing your Personal Information.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for a business purpose:

Business Purpose (as defined under CCPA)

Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.

Helping to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes.

Debugging to identify and repair errors that impair existing intended functionality

Short-term, transient use, provided the personal information that is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.

Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider

Undertaking internal research for technological development and demonstration.

Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned or controlled by the business.

Category (corresponding with the table above)

Category A

Category A Category F Category G

Category A Category F Category G

Category A Category G

Category A Category F Category G

Category A Category G

Category A Category G

Category of Recipient

Advertising networks; data analytics providers; social media networks.

Affiliated companies, operational partner, security and fraud prevention providers, operating systems.

Analytic providers, operational partner, security and fraud prevention providers, operating systems.

Advertising networks; data analytics providers; social media networks.

Search Partners (we share the search term so that they can display the search results requested) and publishers (we share reports on the use of our Services, the search terms and ads the users click and use. All in an aggregated manner).

Developers, operating systems, cloud and hosting providers, SaaS platforms for task management and development, customer support and optimization tools.

Developers, operating systems, cloud and hosting providers, SaaS platforms for task management and development, customer support and optimization tools.

(E) SALE OR SHARE OF PERSONAL INFORMATION

In the preceding twelve (12) months, we did not “sell” information as most people would commonly understand that term. We do not, and will not, disclose your Personal Information in direct exchange for money or some other form of payment. We may “share” Personal Information for “interest-based advertising” or “cross-context behavioral advertising”. The CCPA defines “sharing” as “communicating orally, in writing, or by electronic or other means, a consumer’s personal information” to “a third party for cross-context behavioral advertising, whether or not for money or other valuable consideration”. In other words, we may share your Personal Information with a third party to help serve personalized content or ads that may be more relevant to your interests, and to perform other advertising-related services such as enabling our partners to serve such personalized content.

Further, as we promote our Service through online campaigns, we place third-party marketing and analytic cookies on our website, sharing the unique identifier with such partners for analytic and marketing purposes may also fall under the definition or “share and sell”, and therefore, we offer the opportunity to opt-out through the cookie setting presented on our website’s footer. For additional information regarding the tracking technologies, we use on our website please review our cookies list presented in the website’s footer.

In the preceding twelve (12) months, we “sell” or “share” the following categories of Personal Information for a business purpose:

Category (corresponding with the table above)

Category A, Category F, Category G

Category Recipient

Ad-network, Marketing Cookies, Analytic Cookies.

Purpose of Sale or Share

Share for cross-context behavioral advertising.

(F) CHILDREN UNDER AGE 16

We do not knowingly collect information from children under the age of 16.

(G) DATA RETENTION

The retention periods are determined according to the following criteria:

For as long as it remains necessary in order to achieve the purpose for which .1
the Personal Information was initially processed. For example: if you
contacted us, we will retain your contact information at least until we will
address your inquiry.

To comply with our regulatory obligations. .2

To resolve a claim we might have or a dispute with you, including any legal .3
proceeding between us, until such dispute will be resolved, and following, if
we find it necessary, in accordance with applicable statutory limitation
periods.

Please note that except as required by applicable law, we will not be obligated to
retain your data for any particular period, and we may delete it for any reason and at
any time, without providing you with prior notice if our intention to do so.

Online identifiers are usually kept for a few days. Other information usually will not be
retained for more than 24-months.

When we destroy your Personal Information, we do so in a way that prevents that
information from being restored or reconstructed.

PART II: EXPLANATION OF YOUR RIGHTS UNDER THE CCPA AND HOW TO EXERCISE THEM

(H) YOUR RIGHTS UNDER THE CCPA

If you are a California resident, you may exercise certain privacy rights related to
your Personal Information. You may exercise these rights free of charge except as
otherwise permitted under applicable law. We may limit our response to your
exercise of these privacy rights as permitted under applicable law, all as detailed
herein and the in the Data Subject Request (“**DSR**“) available [here](#).

California Privacy Right

The right to know what Personal Information the business has collected.

Deletion Rights.

Correct Inaccurate Information

Opt-Out of Sharing for Cross-Contextual Behavioral Advertising

Opt-out from selling

Limit the Use or Disclosure of SPI

Opt-Out of the Use of Automated Decision Making

Non-Discrimination

Data Portability

Details

The right to know what Personal Information the business has collected about the consumer, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom the business discloses Personal Information, and the specific pieces of Personal Information the business has collected about the consumer.

The right to delete Personal Information that the business has collected from the consumer, subject to certain exceptions.

The right to correct inaccurate Personal Information that a business maintains about a consumer

You have the right to opt-out of the “sharing” of your personal information for “cross-contextual behavioral advertising,” often referred to as “interest-based advertising” or “targeted advertising”.

the right to opt-out of the sale or sharing of Personal Information by the business

Under certain circumstances, If the business uses or discloses SPI, the right to limit the use or disclosure of SPI by the business.

In certain circumstances, you have the right to opt-out of the use of automated decision making in relation to your Personal Information.

The right not to receive discriminatory treatment by the business for the exercise of privacy rights conferred by the CCPA, including an employee’s, applicants, or independent contractor’s right not to be retaliated against for the exercise of their CCPA rights, denying a consumer goods or services, charging different prices or rates for goods or services, providing you a different level or quality of goods or services, etc. We may, however, charge different prices or rates, or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to us by your Personal Information.

You may request to receive a copy of your Personal Information, including specific pieces of Personal Information, including, where applicable, to obtain a copy of the Personal Information you provided to us in a portable format.

To learn more about your California privacy rights, please visit <https://oag.ca.gov/privacy/privacy-laws>.

(i)HOW CAN YOU EXERCISE THE RIGHTS?

While providing our Services, we act as a “third-party business”; therefore, we do not have a direct interaction with the end-user, however we provide option to opt out of Sharing for Cross-Contextual Behavioral Advertising or Selling Personal Information by using the following opt-out options:

You can always exercise your rights by submitting the [DSR](#). However, you are not required to use the DSR where certain right can be exercised independently, for example:

I. Use the “Do Not Sell or Share My Personal Information” placeholder through the first-party business, i.e., through the cookie consent manager presented on the browser or app you are using.

II. **ApexFlow** is committed to providing consumers notice and choice regarding ApexFlow data processing practices. ApexFlow allows to opt-out where and to the extent applicable according to the CCPA, from its sale or share the Personal Information, through the designated link available through the website footer name “Do Not Sell and Share My Personal Information”.

III. To opt out of the sale or share of Personal Information, you may also directly opt out from third party retargeting cookies or other ad-technology trackers through self-regulatory services. For more information, please visit:

Digital Advertising Alliance (US) [here](#).

Digital Advertising Alliance (Canada) [here](#).

Digital Advertising Alliance (EU) [here](#).

Network Advertising Initiative [here](#).

IV. You can also opt out of interest-based advertising with some of the service providers we use, such as Google [here](#), Google Analytic [here](#).

V. In addition, you may opt out from our Search Partners at the following links:

Microsoft (Bing): Microsoft’s **opt out** information which will enable you to limit data collection by Microsoft is available [here](#).

Oath (Yahoo): Oath’s **opt out** information which will enable you to limit data collection by Oath is available [here](#).

We also are able to affirmatively the [Global Privacy Control](#) preference.

VI. California consumers may use the opt out tool available [here](#) to send requests under the CCPA for their website browser or app used to opt out of the sale of their Personal Information by some or all of the participating companies.

(i) AUTHORIZED AGENTS

“Authorized agents” may submit opt out requests on a consumer’s behalf. If you have elected to use an authorized agent, or if you are an authorized agent who would like to submit requests on behalf of a consumer, the following procedures will be required prior to acceptance of any requests by an authorized agent on behalf of a California consumer. Usually, we will accept requests from qualified third parties on behalf of other consumers, regardless of either the consumer or the authorized agent’s state of residence, provided that the third party successfully completes the following qualification procedures:

When a consumer uses an authorized agent to submit a request to know or a request to delete, a business may require that the consumer do the following:

- Provide the authorized agent signed permission to do so or power of attorney.
- Verify their identity directly with the business.

Directly confirm with the business that they provided the authorized agent permission to submit the request. •

A business may deny a request from an authorized agent that does not submit proof that they have been authorized by the consumer to act on their behalf.

(k) CONTACT US

ApexFlow SDK Ltd. Aluf kalman Magen st 3 Tel Aviv, Israel
<https://apexflowsdk.com/#contact>

(L) UPDATES

This notice was last updated on January 7, 2024. As required under the CCPA, we will update our Privacy Policy **every 12 months**. The last revision date will be reflected in the “Last Modified” heading at the top of this Privacy Policy.

PART III: OTHER CALIFORNIA OBLIGATIONS

Do Not Track Settings: Cal. Bus. And Prof. Code Section 22575 also requires us to notify you how we deal with the “Do Not Track” settings in your browser. As of the effective date listed above, there is no commonly accepted response for Do Not Track signals initiated by browsers. Therefore, we do not respond to the Do Not Track settings. Do Not Track is a privacy preference you can set in your web browser to indicate that you do not want certain information about your web page visits tracked and collected across websites. For more details, including how to turn on Do Not Track, visit: www.donottrack.us.

California’s “Shine the Light” law (Civil Code Section § 1798.83): permits employees that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send us the [DSR](#).