

Privacy Policy

Last Updated: March 2018

Coral Detection Systems Ltd. (“**we**”, “**us**”, “**our**” or the “**Company**”) is firmly committed to ensure that any personal information you (“**user**” or “**you**“) share with us, through our Website, Application, Services and Product is safeguarded and protected.

By accessing or using our Website or Application, by using the Services or by purchasing the Product, you expressly consent to the terms of this privacy policy (the “**Privacy Policy**”), and to the collection, use and disclosure of your information, including Personal Information (as specified below), in accordance with the terms of the Privacy Policy. If you disagree to any term provided herein, please do not use our Services.

In addition to this Privacy Policy, please also review our Terms, available at [***the Terms of Use page***], which this Privacy Policy is incorporated thereto by reference, along with such other policies of which you may be notified of by us from time to time. Capitalized terms not defined herein shall have such meaning as ascribed to them under the Terms.

This Privacy Policy does not apply to the practices of companies that we do not own or control, or to individuals whom we do not employ or manage, including any of the third parties to which we may disclose information as set forth in this Privacy Policy.

In our Privacy Policy you will learn about:

- What information we collect?
- How we may collect your information?
- How we use the information we collect?
- With whom we share the information, and for what purpose?
- For how long we retain the information we collect?
- Direct Marketing
- How do we safeguard your information?
- Updates or amendments to the Privacy Policy
- How to contact us

1. **What Information do we collect?**

- Information you give us. You may be asked to provide personal information, namely information that identifies an individual or may with reasonable effort identify an individual (“**Personal Information**”). This Personal Information may include: your name, phone number, email address and any other information you wish to provide; we may use such information to enable you to use features on the Website.
- Information we get from your use of our Services.
 1. we collect certain information pertaining to users, which may be made available or gathered via the user’s use of the Website, including for example, the activity of the user on the Website, type of operating system used by user, type of User’s device and its operating system and version, User’s ‘click-stream’ on the Website, time spent on various screens of the Website, etc. (“**Non-personal Information**”). We are not aware of the identity of the user from which the Non-personal Information was collected. Non-personal Information which is being collected consists of technical information transmitted by your device and aggregated usage information, and contains certain software and hardware information about your device, the referring page that linked you to our Website, including the type of browser and operating system your device uses, operator, language preference, access time, and the domain name of the Website from which you linked or registered to the Website.
 2. We may collect your Personal Information consisting of data derived from the Product and your use of the Services. When your Product is coupled with a mobile device, we may collect information from your Application, which may include, *inter alia* (i) the status and diagnostics information from the Product; (ii) data, still images or freeze frames of unusual movement of persons in the pool unit, unusual motion detection or drowning events, and interaction of the Product with the pool unit environment (for example, turbid water quality) (collectively, the “**Analysis**”). Note that images collected as part of Analysis are of low resolution and are not intended to identify facial features of any person in your pool unit. While we make significant efforts to protect your privacy, please contact us at info@coraldd.com if you believe image-based Analysis includes identifying facial features of any person.

- **Eligibility.** The Services and Product are not directed or intended for minors under 18 years of age. We do not knowingly collect or solicit Personal Information from individuals under 18 years of age. If you are under 18 years of age, you should not provide Personal Information through the Website, Services and Product without the consent of a parent or guardian under law, as applicable. If we later obtain actual knowledge that a user is under 18 years of age, we will take steps to remove that user's Personal Information from our systems.

2. **How we may collect your information?**

3. We collect Personal Information submitted directly by your entry and access to the Website, Application, Services and Product, including by filling out an order form or a contact form for or by otherwise contacting us.
 4. We collect Personal Information through your use of the Website, Application, Services and Product. Generally, Analysis data will be recorded and locally saved onto your mobile device through the Application for a reasonable period of time. Such Analysis is also backed up from time to time through certain hosting services of our Third Party Service providers. Collection of such Analysis data is saved for such reasonable period of time to enable us to improve the Services provided to you.
- We collect non-Personal Information transmitted automatically from your mobile device using various standard technologies, such as cookies, digital identifiers, log files, web beacons or other similar technologies. Our Website may automatically send cookies to your system. We may store information which correlates with those cookies, for the purposes stipulated below. You may block and remove our cookies through your browser and operating system, but this may impair and hinder the Website functionality and availability. We may use logs and cookie information to improve quality and design of the Website, including without limitation, saving you the trouble of re-entering data, and quarries, personalize and customize your experience on the Website, track your use of the Website and generate statistics regarding the Website.

3. **What is a "cookie"?**

4. When you use our Website we may assign your device with a log file or a cookie (session or persistent). A “cookie” is a small piece of information that a Website assign to your computer’s hard drive while you are viewing a web Website.
5. Cookies are very helpful and can be used for various different purposes. These purposes include allowing you to navigate between pages efficiently, enable automatic activation of certain features, remembering your preferences and making the interaction between you and the Website quicker and easier. Cookies are also used to help ensure that the advertisements you see are relevant to you and your interests. You can find more information about cookies at allaboutcookies.org. You may remove our cookies by following the instructions of your browser preferences; however, if you choose to disable cookies, some features of our Website may not operate properly and your online experience may be limited.

4. **What are we using it for?**

5. We may use cookies, log files, web beacons and other technologies to collect Non-Personal Information with respect to your activity on our Website and Application to track your use of our Website and Application, your type of browser, pages you visited, the time and date of your visits or the links you click on.
6. We may also allow third parties, e.g. Website providers (i.e. third parties that perform Websites on our behalf; e.g. customer Website, marketing assistance, analytics, ad tracking, Website functionality and support, surveys, etc.), ad networks and advertising companies, to display advertisements on our Website. These parties may also use the technologies stated above to collect information about our users. We do not provide any Personal Information to third parties, unless indicated otherwise in our Privacy Policy.

5. **How we use the information we collect?**

6. To provide you with our Website, Services and certain features, for example, we may collect Analysis to enable users to recover on demand still images of reported drowning incidents from their pool units.;
7. To respond to your inquiries, orders, support request, feedbacks or questions, and update you with important information, and respond to claims concerning our Website or Services;

- To communicate with you (via email, phone number, etc.) and to send push notifications to a user's device after the user has agreed to accept such notifications from the Company. Users may deactivate push notification by changing the notification settings on their device.
1. To resolve disputes and enforce our policies, including investigation of potential violations thereof, or in accordance with any applicable law or regulation, or for the purpose of law enforcement;
 2. To perform research, technical diagnostics, analytics or statistical purposes, all for the purpose of improving the Services, Product and operations of the Website;
 3. To provide you with the most relevant additional Website and offers;
- To detect, prevent, or otherwise address fraud, security or technical issues.

6. **With whom we share the information, and for what purpose?**

- We share your information, including Personal Information, with our affiliated companies and our Third Party Service providers, who are allowed to use the information only for the purposes stipulated above, or with our affiliated companies and business partners for performing the Services for us (e.g. hosting services, conducting promotions, marketing assistance, technical support, analytics, etc.).
- The information will be disclosed only to the extent required to perform the purposes as stipulated herein.
- You hereby warrant and consent that your Personal Information may be transmitted, used or stored with our authorized Third Party Service providers, for the purposes disclosed herein, which are located across the world.

7. **Other Disclosures**

- We may share your information, including Personal Information, in the event that we are required by law enforcement or other governmental agency; in response to a subpoena, warrant or an investigative demand, or a court order, or with respect to any legal process; in order to enforce intellectual property rights or to exercise other legal rights; to establish or exercise our rights to defend against legal claims;

if we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud or other wrongdoing, safety of person or property, violation of our policies, to enforce our policies or as otherwise required in order to comply with the applicable laws and regulations. In such circumstances, we may raise or waive any legal objection or right available to us.

8. Affiliates and corporate transaction

- We may share Information, including Personal Information, 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 Privacy Policy.

9. Aggregated Information

- Non-Personal Information, aggregated information or Personal Information in non-human readable form (de-identified) may be shared with third parties (including ad networks, advertising companies and Website providers) in any of the above circumstances, as well as for the purpose of developing or delivering tailored or targeted advertising (whether via our Website, or websites or applications of third parties), or for the purpose of improving our Website, conducting business analysis or other business purposes. This information may be combined with information we collect from other sources, to the extent that the information remains Non-Personal Information.

10. Third party collection of information

- Our policy only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties via our Website (e.g. by clicking on a link to any other website or location) or via other websites throughout the internet, different rules may apply to their use or disclosure of the information you disclose to them. We prompt you to review the

privacy policies of those Websites before providing your Personal Information to them.

11. For how long we retain the information we collect?

- We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion. To remove your Personal Information, please contact us at info@coraldd.com.
- Please note that unless you instruct us otherwise we retain the information we collect (including your Personal Information) for as long as reasonably needed to provide the Website and Services and to comply with our legal obligations, resolve disputes and enforce our agreements.

12. How do we safeguard your information?

- The security of your Personal Information is important to us. We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect the Personal Information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is absolutely secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security or confidentiality.

13. Updates or amendments to the Privacy Policy

- This Privacy Policy may be subject to periodical revisions or amendments at our sole discretion; we encourage you to review the Privacy Policy regularly. The last revision will be reflected in the “Last Updated” heading. Any change of this policy will be posted in this Privacy Policy. Your continued use of our Websites following any such amendments will be considered as your consent to the amended Privacy Policy.

14. **How to contact us**

- If you feel that your privacy was treated not in accordance with our Privacy Policy, or if you believe that your privacy has been compromised by any person, in the course of using the Website, please contact us at: info@coraldd.com.