

Privacy Notice
Effective date: February 15, 2023

Coral Smart Pool Inc.–and its affiliates (including Coral Smart Pool Ltd.) (“us”, “we”, or “our”) respects your privacy and takes your personal data seriously. Please read the following to learn more about our policy regarding treating personal data collected through the website and our products and services (“this Policy”). **This Policy applies to the use of coralmlylo.com and coralsmartpool.com Websites (including their sub-domains), our Mobile Applications, Products and Services, as those are defined in the Company's Terms of Use.** Capitalized terms not otherwise defined herein, shall have the meaning assigned to them in the terms of use of our product and services available here <https://coralmlylo.com/terms-and-conditions/>. This Privacy Notice is hereby incorporated into our Terms of Service and is an integral part thereof.

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1. What Personal Data We Collect, How, and How is it Being Processed

- 1.1. The following table describes what personal data we collect through the Website, the Products and Services and for what purposes it may be processed:

Instance in which personal data is collected	Categories of personal data that are processed	Purposes of processing	Legal basis for processing (under GDPR)
When you fill out a "contact us" form on the Website	Name, email address, phone number	<p>To contact you in relation to your message</p> <p>Subject to your consent, to send you marketing communications regarding our Products and Services, to send newsletters and event invitations subject to applicable laws.</p>	Consent (Article 6(1)(a))
When you make a purchase of our products and services	First and last name, email address, physical address for delivery, password of your choice, payment tokens transferred to us according to your preferred payment method (Stripe or PayPal). We won't have access to your credit card or bank account information.	<p>To process your purchase in our accounting and inventory systems</p> <p>To deliver the products to you</p> <p>To provide you with a link to and activate our application for installation</p> <p>To sign you up to our services and set you up in our back end systems</p> <p>To record your consent to our terms and conditions of engagement.</p> <p>To send you updates or messages regarding our services related directly to the product you have purchased.</p>	To fulfill our contract with you (Article 6(1)(b);

		To contact you occasionally with marketing communications regarding our Products and Services, to send promotions, newsletters and event invitations subject to applicable laws (for example, where required, subject to your consent).	Consent (Article 6(1)(a))
Data that you provide passively (by using the Website, by navigating the screens, clicking on buttons etc.) This data is collected using third party services by means of placing cookies, pixels or web beacons. For more information, please look at the Cookies section.	Your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.	To improve, modify and update services and content offered on the Website. To monitor and ensure the orderly and proper operation and development of the Website and associated services. To improve and customize the user experience and the content that is presented on the Website. To support our marketing efforts and to allow providing you with customized content.	Our legitimate business interest (Article 6(1)(f))
When you install our Application during the Product installation and configuration	Email address, mobile phone model , OS version, date of installation, phone name as defined in settings.	To allow your use of the application To connect your application to the systems installed in your premise	To fulfill our contract with you (Article 6(1)(b);

		<p>To allow the functionality of our Product in accordance with your preferences</p> <p>To gather information relevant for the ongoing improvement and modification of our Products and Services,</p> <p>To monitor and ensure the orderly and proper operation of the Product and Services</p> <p>To support development of additional features and Products</p> <p>To improve and customize the user experience</p>	
When you activate and use our Products	<p>Usage and operation statistics such as Time stamps for activation and deactivation</p> <p>log of any events that activated alerts in the Product, log of issues that may indicate a problem (like high system temperature, disk filling up, bad communication, water clarity issues, too many system reboots, hardware component dysfunctionality, etc.)</p> <p>images and video footage including live streaming of video from the pool surroundings and the pool</p>	<p>To allow proper function of the Products and provision of the Services</p> <p>To gather information relevant for the ongoing improvement and modification of our Products and Services</p> <p>To allow provision of support and services to you</p> <p>To monitor and ensure the orderly and proper operation of the Product and Services</p> <p>To support development of additional features and Products</p> <p>To improve and customize the user experience</p>	<p>To fulfill our contract with you (Article 6(1)(b);</p> <p>Our legitimate business interest (Article 6(1)(f))</p>

		For your review of the video streaming, as well as footage and images related to alerts provided by the Product	To fulfill our contract with you (Article 6(1)(b);
		to train and improve our AI algorithms.	Your Consent (Article 6(1)(a))

When you contact our support and when you use repair services	Your first and last name, email address, phone number, physical address, type of system or product you have, information regarding your mobile phone and app versions	To monitor and ensure the orderly and proper operation of the Product and Services To provide you with technical support and resolve issues To monitor and improve our support operations	To fulfill our contract with you (Article 6(1)(b));
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- 1.2. You are not obliged under any applicable law to provide us any of the above information and you may be able to opt not to disclose your personal data to Company. However, not providing Company with certain data may mean that we cannot provide you with certain functionalities or process any requests or in some cases provide the Products or Services altogether.
- 1.3. In addition to the above uses of your personal data, we will also process your personal data for the following purposes:
- 1.4. We use all the above personal data to operate, maintain, and provide to you the Website and Application as well as the Services features and functionality and to provide you with the services as requested by you.
- 1.5. To prevent, detect and fight fraud or other illegal or unauthorized activities.
- 1.6. To ensure legal compliance – from our side (to legal requirements that apply to us and to our obligations under the Terms of Use) and from your side (Compliance with legal requirements applicable to you and with the Terms of Use).
- 1.7. We will not use your personal data for any personal profiling and automated decision making regarding you based on such profiling.
- 1.8. We limit access by our employees to your information only to those who were specifically authorized by the Company to access your information, as part of their job.
- 1.9. We use anonymized, aggregate data, in order to gain insight on how you and other users use the Website, Application and Products and Services and try and improve them, as well as to plan our marketing and advertisements.
- 1.10. All of the above processing is based on our legitimate business interest (GDPR Article 6(1)(f), except for point 1.6 which is partially based on our legitimate business interest (concerning compliance with terms of use) and partially is processing that is necessary to comply with legal obligations that apply to us (GDPR Article 6(1)(c).

2. How we Share Your Personal Data

- 2.1. No Sale to Third Parties. We do not, and will not, sell any of your personal data to any third party for advertising, marketing or any other purpose.
- 2.2. Service Providers: we employ other companies and people to perform tasks on our behalf and need to share your information with them in order to provide the services to us. The categories of third party recipients of the personal data from us are as follows: Cloud hosting services, email campaign automation, marketing automation, social media advertisement, CRM platform, analytics tools and services (including analytics of video footage and of stills images), web page building tools, payment gateway services, technical support, repair services and customer support service providers. Our service providers do not have any right to use your personal information collected from our Website, Application, Products and Services beyond what is necessary for the purpose of facilitating our provision of the functionality thereof to you.
- 2.3. Compliance with the Law: We may disclose your information if we believe it's necessary in order to comply with the law, such as to comply with a subpoena, regulation or legal request, respond to a government request, to address fraud or security issues, to protect the safety of any person, to enforce our agreements with you; to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing or to protect our own rights or property. This includes sharing such information with our legal counsels. If you are located in the EU, we may only do so based on legal requirements specified above of EU authorities.
- 2.4. Business Transfers: If we are in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be transferred as part of that transaction to a successor in interest and may be accessed and reviewed by the applicable legal authorities as well as legal counsels and other professional counsels involved such as accountants, and other officers of the government or of the applicable judiciary instance. In addition, your information may be provided for review in the course of due diligence for an investment or other financing of our Company.
- 2.5. Anonymized Information: We may provide third parties with aggregated but anonymized information and analytics about our customers however, before we do so, we will make sure that it does not identify you.

3. Data Transfers and Global Processing

- 3.1. The Website and Application as well as the Services provided along with the Products may be operated in countries other than your own location, and your personal data may be accessed and/or processed from and/or transferred to countries other than your own location. We may do this where data is accessed/processed:
 - 3.1.1. by Company and its affiliates for operational, administrative, compliance purposes or customer support teams in our various locations;
 - 3.1.2. By our service providers, for the purposes we specified under the section "Service Providers".
- 3.2. The safeguards we deploy for performing such transfers across boundaries:

- 3.2.1. Adequacy. If you are located outside of Israel, and choose to provide information to us, please note that we transfer the data, including personal data, to Company headquarters located Israel and process it there. Any transfers to Israel may be made on the basis of an adequacy decision made by the European Commission.
- 3.2.2. Model Clauses. With some of our processors, we use standard contractual clauses approved by the European Commission or the UK that are binding standards of processing of personal data committed to contractually by third parties processing information for us and on our behalf.
- 3.2.3. Consent. In the absence of an adequacy decision or Model Clauses, and in the absence of any other right to transfer your data, your consent shall serve as the basis for such transfer. By accessing and using the Website, you agree and understand that your information may be transferred from the EEA or other countries in which you may be using or accessing the Website, to other jurisdictions outside your own location (including outside the EEA). The transfer will be to such third parties as described under Section 2 (How we share your personal data).
- 3.3. Company will take steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice and no transfer of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.
- 3.4. Currently we process data in Israel, although some of our service providers, such as AWS in EEA and Google in the US.

4. Data Subject Rights

- 4.1. It is your responsibility to ensure that all personal data submitted to Company is correct. Company would like to make sure you are fully aware of all of your data protection rights. Depending on your location and on the laws that are applicable to you, you may be entitled to some or all of the following rights:
- 4.2. **The right to access** – You have the right to request Company for copies of your personal data, which includes the right to obtain confirmation as to whether or not personal data concerning you are being processed and, where that is the case, access to the personal data and the purposes of the processing; categories of personal data concerned; recipients or categories of recipient to whom the personal data have been or will be disclosed; where possible, the envisaged period for which the personal data will be stored; the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data or to object to such processing; the right to lodge a complaint with a supervisory authority; where the personal data are not collected from the data subject, any available information as to their source; the existence of automated decision-making, including profiling; the appropriate safeguards relating to the transfer of your personal data outside the EEA,. We may charge you a small fee for this service under certain conditions.
- 4.3. **The right to rectification** – You have the right to request that Company correct any information you believe is inaccurate. You also have the right to request Company to complete the information you believe is incomplete.
- 4.4. **The right to erasure** – You have the right to request that Company erase your personal data, under certain conditions.

- 4.5. **The right to restrict processing** – You have the right to request that Company restrict the processing of your personal data, when: (a) you contest the accuracy of your personal data, for a period allowing Company to verify the accuracy of said data; (b) if you believe personal data has been unlawfully processed and you wish to restrict processing rather than delete it; (c) Company no longer needs the personal data but you require to keep it in order to establish, exercise or defend a legal claim; or (d) you have exercised your right to object the processing (below) for a period allowing Company to consider whether your legitimate grounds override those of Company.
- 4.6. **The right to object to processing** – You have the right to object to the processing of your personal data at any time – this means you have the right to stop or prevent Company from processing your personal data (it could be in relation to part or all of your personal data, and for part or all of the processing purposes). When relating to processing for marketing purposes, you have an absolute right to object; while for other purposes, the existence of the right depends on what lawful basis the processing relies on.
- 4.7. **The right to data portability** – You have the right to request that Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- 4.8. If allowed by applicable laws, you have the right to withdraw your consent at any time when Company processes your personal data based on your consent on any of these rights. However, withdrawal does not affect the legitimacy and effectiveness of how we process your personal data based on your consent before the withdrawal is made; nor does it affect any data processing based on another lawful bases other than your consent.
- 4.9. You may exercise these rights to the extent these rights apply to you by emailing Company to: privacy@coraldd.com or use any of the contact information listed below. We will undertake to respond to your request within the applicable time frame prescribed by applicable law. Although we will make reasonable efforts to accommodate your requests, in some circumstances we may deem your request unfounded or not eligible under applicable law. In such instances we reserve the right to refuse your request. We shall require, as prerequisite to fulfilling any request, to verify your identity which we may do by asking you to provide certain information or identification to ensure that all data subjects' privacy is protected.
- 4.10. If you think that the way we process your personal information does not comply with applicable data protection laws, you are of course invited to contact us and we will consider your request, but in any event you may contact the relevant competent data protection authority. You can obtain the contact information for all of the EEA data protection authorities at https://edpb.europa.eu/about-edpb/board/members_en.

5. Cookies & Similar Technologies

- 5.1. A cookie is a small text file that is stored in your web browser that allows Company or a third party (such as third-party service providers) to recognize you. Cookies can either be session cookies or persistent cookies. A session cookie expires automatically when you close your browser. A persistent cookie will remain until it expires, or you delete your cookies.

5.2. Cookies that we may use can generally be categorized as follows:

5.2.1. Necessary Cookies: These cookies are necessary to load the Website or to allow users to use Website’s certain features.

5.2.2. Analytics Cookies: These cookies track information about how the Website is being used so that we can make improvements and report on our performance.

5.2.3. Preference Cookies: These first party cookies store your Website preferences.

5.2.4. Marketing Cookies: These are usually third party cookies by advertising platforms or networks in order to: (i) deliver ads and tracks ad performance, and (ii) enable advertising networks to deliver ads that may be relevant based upon your activities.

5.3. We may use additional tracking technologies to help understand user activities and preferences. For example, we use web beacons (also known as clear gifs, pixel tags or web bugs) to track user activities and communicate with cookies. You cannot opt out of web beacons used in webpages, but you can limit their use by opting out of the cookies they interact with. You can opt out of web beacons used in emails by setting your email client to render emails in text mode only.

5.4. We use the following cookies and other tracking technologies on our Website and Application. We will update this list from time to time

coralmylo.com

	Name of cookie	Source (if third party cookies)	Purpose - what this cookie is doing	Expiration (lifetime of cookie)	Type (e.g ., http, html, pixel)
Necessary	__stripe_mid	https://js.stripe.com/v3/?ver= 3.0	This cookie is necessary for making credit card transactions on the	1 year	HTTP

			website. The service is provided by Stripe.com which allows online transactions without storing any credit card information		
	__stripe_sid	https://js.stripe.com/v3/?ver=3.0	This cookie is necessary for making credit card transactions on the website. The service is provided by Stripe.com which allows online transactions without storing any credit card information	1 day	HTTP

	CONSENT	https://play.google.com/log?format=json&hasfast=true&authuser=0	Used to detect if the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for GDPR-compliance of the website.	2 Yea rs	HTT P
	CONSENT	https://www.youtube.com/embed/_ao2z0oxnre	Used to detect if the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for GDPR-compliance of the website.	2 Yea rs	HTT P
	M	https://m.stripe.com/6	Determines the device used to access the web site. This allows the website to be formatted accordingly.	399 day s	HTT P
	wc_cart_hash_#	https://coralmylo.com/wpcontent/plugins/woocommerce/assets/js/frontend/cat-fragments.min.js?ver=7.1.1	For Woocommerce operation	Persi stent	HT ML

	wc_fragments_#	https://ajax.googleapis.com/ajax/libs/jquery/3.4.1/jquery.min.js	For woocommerce operation	Persistent	HTML
Analytics	_ga	https://www.googletagmanager.com/gtag/js?id=G-3P9Y50BTBX	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	399 days	HTTP
	ga#	https://www.googletagmanager.com/gtag/js?id=G-3P9Y50BTBX	Used by Google Analytics to collect data on the number of times a user has visited the web site as well as dates for the first and most recent visit.	399 days	HTTP
	_fbp	https://www.facebook.com/tr/?id=816510823006585ev=PageViewdl=https%3A%2F%2Fcoralmylo.com%2Frl=https%3A%2F%2Fcoralmyocom%2Fif=falsets=1672230105747cd[source]=woocommercecd[version]=7.1.1cd[pluginVersion]=3.0.6sw=1024sh=768v=2.9.90r=stablea=woocommerce-7.1.1-3.0.6ec=0o=286fbp=fb.1.1672230105746.381757918it=1672230105072coo=falserqm=GET	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	3 Months	HTTP
	DEVICE_INFO	https://coralmylo.com/	For analytics usage	179 days	HTTP
	VISITOR_INFO1_LIVE	https://www.youtube.com/embed/_ao2z0oxnre	Tries to estimate the users' bandwidth on pages	179 days	HTTP

			with integrated YouTube videos.		
	YSC	https://www.youtube.com/embed/_ao2z0oxnre	Registers a unique ID to keep statistics of what videos from YouTube the user has seen .	Session	HTT P
	ytidb::LAST_RESULT_ENTRY_KEY	https://www.youtube.com/embed/_ao2z0oxnre	Stores the user's video player preferences using embedded YouTube video	Persistent	HT ML
	yt-remote-cast-available youtube.com HTML Session	https://www.youtube.com/embed/_ao2z0oxnre	Stores the user's video player preferences using embedded YouTube video	Persistent	HT ML
	yt-remote-cast-installed	youtube.com	Stores the user's video player preferences using embedded YouTube video	Session	HT ML
	yt-remote-connected-devices	https://coralmylo.com/	Stores the user's video player preferences using embedded YouTube video	Persistent	HT ML
	yt-remote-device-id	https://coralmylo.com/	Stores the user's video player	Persistent	HT ML

			preferences using embedded YouTube video		
	yt-remote-fast-check-period	youtube.com	Stores the user's video player preferences using embedded YouTube video	Session	HTML
	yt-remote-session-app	youtube.com	Stores the user's video player preferences using embedded YouTube video	Session	HTML
	yt-remote-session-name	youtube.com	Stores the user's video player preferences using embedded YouTube video	Session	HTML
	myloleavepopup		Cookie records how user interacts with popup that shows on mouse leave and based on interaction blocks popup from showing to specific time period	indefinitely	HTTP

	Name of cookie	Source (if third party cookies)	Purpose - what this cookie is doing	Expiration (lifetime of cookie)	Type (e.g., http, html, pixel)
Necessary	CONSENT	https://playgoogle.com/log?format=jsonhasfast=trueauthuser=0	used to detect if the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for GDPR-compliance of the website.	2 Years	HTTP
	elementor	https://coralsmartpool.com/wp-content/plugins/elementor/assets/js/frontend.min.js?ver=3.7.8	used in context with the web site's WordPress theme. The cookie allows the website owner to implement or change the website's content in real-time.	Persistent	HTML
Preferences	yt-player-bandwidth	https://coralsmartpool.com/	Used to determine the optimal video quality based on the visitor's	Persistent	HTML

			device and network settings.		
Analytics	_ga	https://www.googletagmanager.com/gtag/js?id=G3P9Y50BTBX	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	399 days	HTTP
	ga#	https://www.googletagmanager.com/gtag/js?id=G3P9Y50BTBX	Used by Google Analytics to collect data on the number of times a user has visited the web site as well as dates for the first and most recent visit.	399 days	HTTP
	yt-player-headers-readable	https://www.youtube.com/iframe_api	Used to determine the optimal video quality based on the visitor's device and network settings.	Persistent	HTML
Marketing	DEVICE_INFO	https://www.youtube.com/iframe_api	Video operation	180 Days	HTTP
	VISITOR_INFO1_LIVE	https://www.youtube.com/iframe_api	Tries to estimate the users' bandwidth on pages with integrated YouTube videos.	179 days	HTTP

	YSC	https://www.youtube.com/iframe_api	Registers a unique ID to keep statistics of what videos from YouTube the user has seen	Session	HTTP
	yt.innertube::nextId	https://coralsmartpool.com/	Registers a unique ID to keep statistics of what videos from YouTube the user has seen	Persistent	HTML
	yt.innertube::requests	https://coralsmartpool.com/	Registers a unique ID to keep statistics of what videos from YouTube the user has seen .	Persistent	HTML
	ytidb::LAST_RESULT_ENTRY_KEY	https://www.youtube.com/iframe_api	Stores the user's video player preferences using embedded You Tube video	Persistent	HTML
	yt-player-bandaaid-host	https://coralsmartpool.com/	Used to determine the optimal video quality based on the visitor's device and network settings	Persistent	HTML
	yt-remote-cast-available	youtube.com	Stores the user's video player	Session	HTML

			preferences using embedded You Tube video		
	yt-remote-cast-installed	youtube.com	Stores the user's video player preferences using embedded You Tube video	Session	HTML
	yt-remote-connected-devices	https://coralsmartpool.com/products/	Stores the user's video player preferences using embedded You Tube video	Persistent	HTML
	yt-remote-device-id	https://coralsmartpool.com/products/	Stores the user's video player preferences using embedded You Tube video	Persistent	HTML
	yt-remote-fast-check-period	youtube.com	Stores the user's video player preferences using embedded You Tube video	Session	HTML
	yt-remote-session-app	youtube.com	Stores the user's video player preferences using embedded You Tube video	Session	HTML
	yt-remote-session-name	youtube.com	Stores the user's video player	Session	HTML

			preferences using embedded You Tube video		
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- 5.5. We may set cookies that monitor links to our Website that we send to you (if you have consented to receiving emails from us or we otherwise are allowed to send those emails to you). These cookies are used to track visitors to our Website sourced from these emails. To avoid these types of cookies, please follow the explanation below on how to change your browser cookies settings.
- 5.6. In addition we may use a tracking technology (pixels) in emails to understand how often our emails are opened and clicked on by our customers. If you do not wish this tracking to be effected, please change your email software or service (such as outlook, Gmail etc.) settings to not automatically download images (to the extent it is not already your default) In some instances, depending on your email or browser settings, cookies in an email may be automatically accepted (for example, when you have added an email address to your address book or safe senders list). Please refer to your email browser or device instructions for more information on this.
- 5.7. You can change your browser's settings to delete cookies that have already been set and to not accept new cookies. To learn more about how to do this, visit the help pages of your browser. Some useful information can also be found here: <https://www.allaboutcookies.org/> Please note, however, that if you delete cookies or do not accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

6. Security of Processing

- 6.1. We use appropriate physical, management, and technical measures to protect your data from unauthorized access, disclosure, use, modification, damage, or loss. We also provide training on security and privacy protection for employees to raise their awareness of personal data protection. However, please note that no security measure is perfect, therefore, you should take special care in deciding what information you disclose.

7. Data retention

- 7.1. We will retain your personal data for no longer than is necessary for the purposes stated in this Policy, unless otherwise extending the retention period is required or permitted by law or subject to our retention policies as may be in place from time to time. The data storage period may vary with scenario, product, and service.
- 7.2. The standards Company uses to determine the retention period are as follows: the time required to retain personal data to fulfill business purposes, including providing products and services; maintaining corresponding transaction and business records; controlling and improving the performance and quality of the Site; handling possible user queries or complaints and locating problems; whether the user

agrees to a longer retention period; and whether the laws, contracts, and other equivalencies have special requirements for data retention.

8. Changes to This Privacy Notice

- 8.1. We may update our Privacy Notice from time to time. We will notify you of any changes by posting the new Privacy Notice on this page. We may notify you through different channels, for example, posting a notice on our Website or sending you direct notification.
- 8.2. You are advised to review this Privacy Notice periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

9. California and Delaware “do not track” Disclosures

We do not monitor or respond to Do Not Track browser requests. Hence please ensure to change any settings of your browser and/or our Services, whenever you wish cookies to cease.

10. General

- 10.1. If you have any questions or suggestions, to exercise any of your rights, or if you have any other questions or complaints about our use of your personal data and your privacy please contact us at info@coraldd.com.
- 10.2. Where your personal data is processed by Company in accordance with this Privacy Notice, Coral Smart Pool Inc. Of Hamelacha 3, Binyamina, ISRAEL, is the controller of the related personal data.
