Lightkey Privacy Notice

We at Lightkey Sources Ltd. ("**Lightkey**" "**us**", "**we**", or "**our**") recognize and respect the importance of maintaining the privacy of our customers (and their end users). This Privacy Notice describes the types of information we collect from you when you visit our website ("**Site**") and/or use of our software ("**Software**"). This Privacy Notice also explains how we collect, process, transfer, store and disclose the information collected, as well as your ability to control certain uses of the collected information. If not otherwise defined herein, capitalized terms have the meaning given to them in the Lightkey EULA (the "**EULA**") at
https://lightkey.blob.core.windows.net/documents/Lightkey.EULA.rtf
"**You**" means any adult user of the Site and/or Software.

Lightkey Sources Ltd. is the data controller in respect of some of the processing activities outlined in this Privacy Notice. Our registered office is Joseph Rivlin 22, Jerusalem, Israel and our registration number is 515425304. In some situations, when we process information in the context of providing services to some of our customers ("**Customers**") including with regard to each Customer's end users, the applicable Customer serves as a controller with respect to such Customer's end user Personal Data (as defined below).

"**Personal Data**" means any information that refers, is related to, or is associated with an identified or identifiable individual or as otherwise may be defined by applicable law.

Privacy Notice Key Points

The key points listed below are presented in further detail throughout this Privacy Notice. These key points do not substitute the full Privacy Notice.

- **Personal Data We Collect.** When you register, we collect Personal Data provided by you, such as your name, email address, the company you work for and your job title. We also collect Personal Data when you use the Site and/or Software, or contact us with questions or complaints. Some of the data is stored locally and some is submitted to us. When you visit our Site and/or use our Software, we automatically collect your IP address and operating system and other information about your use of the Site and/or Software.
- **How We Use Your Personal Data.** We use the information (including Personal Data) we collect and/or receive mainly to administer and provide the Site and/or Software, contact you with administrative information, contact you with marketing offers, and improve the Site and/or Software.
- **Basis for Processing Your Personal Data.** Processing your Personal Data is necessary for the performance of the EULA and the provision of the services to you. Processing for the purposes of developing new and enhancing our products and services, for the marketing of our products and services, for analytics and usage analysis, for fraud prevention and for security and for our recordkeeping, protection of our legal rights, and complying with our legal obligations – are all necessary for the purposes of legitimate interests that we pursue.
- **Sharing the Personal Data We Collect**. We share the Personal Data we collect with our service providers and subcontractors who assist us in the operation of the Site and/or Software and process the information on our behalf and under our instructions, as well as with our business partners and affiliates who may offer you products and services, based on your preferences (if you indicated your desire to receive these). When we act as a processor on behalf of our Customers, we will share your Personal Data with the applicable Customer.

- **International Transfer**. We use service providers and/or subcontractors and/or cooperate with or have business partners and affiliates located in countries other than your own, and send them your Personal Data. We will ensure that we have agreements in place with such parties that ensure the same level of privacy and data protection as set forth in this Privacy Notice. You hereby consent to such international transfer.
- **Security.** We implement industry standard measures aimed at reducing the risks of damage and unauthorized access or use of Personal Data, but they do not provide absolute information security. Such measures include physical, electronic, and procedural safeguards (such as secure servers, firewalls, antivirus and SSL encryption), access control, and other internal security policies.
- **Your Rights.** Subject to applicable law and additional rights as set forth below, you may have a right to access, update and/or delete your Personal Data and obtain a copy of the Personal Data we have collected about you. You can change your mind at any time about your election to receive marketing communications from us and/or having your Personal Data processed for direct marketing purposes. You also have the right to object at any time to processing your personal data for certain purposes, including marketing purposes. You have the right to withdraw your consent to processing, if provided, at any time by contacting us as detailed in this Privacy Notice.
- **Data Retention.** We retain information for as long as necessary for the purposes set forth in this Privacy Notice. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether those purposes can be achieved through other means, as well as applicable legal requirements.
- **Use of Cookies and Similar Technologies.** We use cookies and similar technologies. You can adjust your settings to determine which cookies you do or do not allow. Changing your settings and/or deleting existing cookies may affect the services.
- **Children.** We do not knowingly collect personally-identifiable information from children under the age of sixteen (16). In the event that you become aware that an individual under the age of sixteen (16) has enrolled without parental permission, please advise us immediately.
- **Third-Party Applications and Services.** All use of third-party applications or services is at your own risk and subject to such third party's privacy policies.
- **Communications**. Subject to your consent and applicable law, we may send you e-mail or other messages about us or our services. You can stop receiving future communications from us by contacting us using the following link: https://www.lightkey.io/contact with a request to UNSUBSCRIBE.
- **Changes to the Privacy Notice**. We may change this Privacy Notice from time and shall notify you of such changes by posting a notification on the Site.
- **Comments and Questions.** If you have any comments or questions about this privacy notice, or if you wish to exercise your legal rights with respect to your Personal Data, please contact us at https://www.lightkey.io/contact.

Personal Data We Collect

The user's data that Lightkey collects could be divided into two main types: (1) Locally Collected Data, and (2) Submitted Data.

Locally Collected Data:

This data is collected ONLY within the user's machine and will never be sent or collected by

Lightkey's servers in any way. This data includes the user's documents, along with the typing data of such documents (word documents, presentations, emails, etc.). This data is required to provide the best possible suggestion services. In other words, the user's documents and emails, along with their typing data, will NOT be sent or collected by Lightkey's servers in any way, as they are the user's private property.

Lightkey may also analyze the user's recently created/modified documents, presentations and emails, saved either locally or on a network drive, in order to speed up the initial process of learning the user's typing and language patterns. As explained before, such analysis is required to provide the user with the best possible suggestion services.

Submitted Data (not applicable in 'Lightkey for Business' where NO data is submitted):

The following data will be sent to Lightkey's servers. It falls under the following categories: (1) user identifiers, (2) user written feedback or installation errors, (3) derived statistical and usage data, (4) user settings and preferences:

1. User identifiers: there are two main identifiers that are collected: (a) GUID identifier that will be created and used between the user's machine and Lightkey's servers; and (B) IP identifier. In addition, hardware specification and application metadata are also collected.
2. User Written Feedback / Installation errors: the user can voluntarily submit feedback about Lightkey's Site and/or Software. In such case, the feedback will be collected and sent to Lightkey along with the user's identifiers as defined in part (1) of this section.
3. Derived Statistical and Usage Data: the statistical data includes numerical based data that describes (a) the interaction between the user and Lightkey's prediction functionality (for example, the number of manual keystrokes vs the number of predicted keystrokes, the number of accepted suggestions vs the number of ignored suggestions, the number of words created, etc.), (b) the user's typing patterns - keystrokes count only (for example, the number of keystrokes on certain Modifier, Navigation and/ or Edit keys such as Spacebar, Enter, Delete, Ctrl, Arrow, etc.) and (c) user's mouse events - count only (for example, number of mouse clicks). The usage data includes data regarding Lightkey's (a) installation process (b) performance (c) errors and (d) the usage distribution of selected categories and languages, etc. The Statistical and Usage Data are broken-down per supported application (for example Word, PowerPoint, Gmail, etc.).
4. User settings and preferences: this data contains settings and preferences such as suggestion preferences, selected categories, selected languages to work with, etc.

Additional Kinds of Personal Data we Receive

We also collect Personal Data when you request information from us, sign up for newsletters or our email lists, complete online forms, pay for the Software or contact us for any other reason. Some Personal Data is provided by an existing user who is your friend or contact, in order for us to contact you with an offer regarding our Software or services. Examples of the Personal Data that we collect from you when you engage in any of the activities detailed above, may include your name, address, phone number, e-mail address, and your PayPal account information. Such Personal Data may be collected by us through the Site and/or Software.

In addition, when you use the Site, certain information may be automatically gathered about your computer or mobile device, such as operating system, IP address, device ID, and subject to your consent as may be required under applicable law, (geo) location.

We analyze and combine the various data that we collect or receive, including Personal Data, for purposes of marketing.

It is your voluntary decision whether to provide us with any such Personal Data, but if you refuse to provide such information we may not be able to register you to the Site and/or Software.

How We Use Your Personal Data

General
We and any of our trusted third-party subcontractors and service providers use the Personal Data we collect from and about you for any of the following purposes: (1) to provide you with the Site and/or Software; (2) to respond to your inquiries or requests, contact and communicate with you; (3) to develop new products or services and conduct analyses to improve our current content, products, and services including improving the quality and accuracy of the Site and/or Software, for example in order to improve word prediction, spelling correction, etc.; (4) to contact you with informational newsletters and promotional materials relating to our Site and/or Software; (5) to review the usage and operations of our Site and/or Software; (6) to use your data in an aggregated, non-specific format for analytical purposes (as detailed below); (7) to prevent fraud, protect the security of our Site and/or Software, and address any problems with the Site and/or Software; (8) to provide customer support; and (9) to satisfy our legitimate interests, while at all times ensuring that your rights and freedoms are not affected.

Statistical Information
By analyzing all information we receive, including all information concerning users, we may compile statistical information across a variety of platforms and users ("**Statistical Information**"). Statistical Information helps understand trends and customer needs so that new products and services can be considered and so that existing products and services can be tailored to customer desires. We may share such Statistical Information with our partners, as an anonymous aggregated collection of data, on commercial terms that we can determine in our sole discretion.

Analytics
We and/or our service providers or subcontractors, use analytics tools ("**Tools**"), including "Google Analytics" to collect information about the use of the Site and/or Software. Such Tools collect information such as how often users visit the Site and/or Software, what pages they visit when they do so, and what other sites and mobile applications they used prior to visiting the Site and/or Software. The Tools may collect certain Personal Data, and may link such Personal Data to specific information stored in our customer database. We use the information we get from the Tools to improve our Site and/or Software. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use located at http://www.google.com/analytics/terms/us.html and the Google Privacy Policy located at http://www.google.com/policies/privacy/.

Legal Uses
We may use your Personal Data as required or permitted by any applicable law.

Basis for Processing Your Personal Data

Processing your Personal Data is necessary for the performance of the EULA and the provision of the services to you, including responding to your inquiries or requests, contacting and communicating with you and providing customer support. When you make a payment for a subscription, use our

services or engage in any other transaction with us, we may also process your Personal Data to perform that contract.

Processing for the purposes of developing new and enhancing our products and services, for analytics and usage analysis, for the marketing of our products and services, for fraud prevention and security and for our recordkeeping and protection of our legal rights – are all necessary for the purposes of legitimate interests that we pursue. In conducting such processing activities, we balance these legitimate interests against the rights and interests of our users. If you would like more information regarding how we make such determinations, please contact us through the contact information specified below.

Please note that we may process your Personal Data for more than one legal basis depending on the specific purpose for which we are using your Personal Data. Please contact us if you would like details about the specific legal ground we are relying on to process your Personal Data.

Sharing the Personal Data We Collect

We share your information, including Personal Data, as follows:

Business Partners, Service Providers, Affiliates, and Subcontractors
We disclose information, including Personal Data we collect from and/or about you, to our trusted service providers, business partners, affiliates, subcontractors, who use such information to: (1) help us provide you with the Site and/or Software; and (2) aid in their understanding of how users are using our Site and/or Software.

Such service providers, business partners, affiliates, and subcontractors include:

Name	Role	Location
Microsoft Azure	Cloud Storage & DB Services	USA
Wix	Web Hosting	USA
PayPal	Payment Services	USA
Google	Analytics	USA

Business Transfers
We may transfer our databases containing your Personal Data if we sell our business or part of it, including in cases of liquidation. Information about our users, including Personal Data, may be disclosed as part of, or during negotiations of, any merger, sale of company assets or acquisition and shall continue being subject to the provisions of this Privacy Notice.

Law Enforcement Related Disclosure
We will fully cooperate with any law enforcement authorities or court order requesting or directing us to disclose the identity, behavior or (digital) content and information of or related to an individual, including in the event of any user suspected to have engaged in illegal or infringing behavior. We may also share your Personal Data with third parties: (i) if we believe in good faith that disclosure is appropriate to protect our rights, property or safety (including the enforcement of the EULA and this Privacy Notice); (ii) to protect the rights, property or safety of third parties; (iii) when required by law, regulation subpoena, court order or other law enforcement related issues; or (iv) as

is necessary to comply with any legal and/or regulatory obligation. You can request such Personal Data as specified herein by emailing us at https://www.lightkey.io/contact.

Other Uses or Transfer of Your Information
We allow you to use our Site and/or Software in connection with third-party services, sites, and/or mobile applications. If you use our Site and/or Software with or through such third-parties, we may receive information (including Personal Data) about you from those third parties. Please note that when you use third-parties outside of our Site and/or Software, their own terms and privacy policies will govern your use of those services.

International Transfer

We use subcontractors and service providers and have business partners and affiliates who are located in countries other than your own, (as set forth above) and send them information we receive (including Personal Data). We conduct such international transfers in order to provide our services using internationally recognized providers. We will ensure that these third parties will be subject to written agreements ensuring the same level of privacy and data protection as set forth in this Privacy Notice, including appropriate remedies in the event of the violation of your data protection rights in such third country.

Whenever we transfer your Personal Data to third parties based outside of the European Economic Area (EEA), we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give Personal Data the same protection it has in the EEA.
- Where we use providers based in the US, we may transfer data to them if they have been certified by the EU-US Privacy Shield which requires them to provide similar protection to Personal Data shared between the Europe and the US or any other arrangement which has been approved by the European Commission.

Please contact us through the contact information listed below if you would like further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

You hereby consent to such international transfer described above.

Security

We make efforts to follow generally accepted industry standards to protect the Personal Data submitted to and collected by us, both during transmission and once we receive it, including by implementing the below:

Safeguards - The physical, electronic, and procedural safeguard we employ to protect your data include secure servers, firewalls, antivirus and SSL encryption of data.

Access Control - We dedicate efforts for a proper management of system entries and limit access only to authorized personnel on a need to know basis of least privilege rules, review permissions quarterly, and revoke access immediately after employee termination.

Internal Policies - We maintain and regularly review and update our privacy related and information security policies.

Personnel - We require new employees to sign non-disclosure agreements according to applicable law and industry customary practice.

Encryption - We encrypt the data in transit using secure SSL/TLS protocols.

Database Backup – Our databases are backed up on a periodic basis for certain data and which are verified regularly. Backups are encrypted and stored within the production environment to preserve their confidentiality and integrity and are tested regularly to ensure availability, and are accessed only by authorized personnel.
However, no method of transmission over the Internet, or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Your Rights - How to Access and Limit Our Use of Certain Information

You have certain rights in relation to the Personal Data that we hold about you, as detailed below. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information and/or comply with any of your requests, as detailed below:

- **Right of Access and Data Portability.** You have a right to know what Personal Data we collect about you and, in some cases, to have the information communicated to you. Subject to the limitations in applicable law, you may be entitled to obtain from us a copy of the Personal Data you provided to us (excluding information that we obtained from other sources) in a structured, commonly-used, and machine-readable format, and you may have the right to (request that we) transmit such Personal Data to another party. If you wish to exercise this right please contact us letting us know what information in particular you would like to receive and/or transmit. Subject to applicable law, we may charge you with a fee. Please note that we may not be able to provide you with all the information you request, for instance, if the information includes Personal Data about another person. Where we are not able to provide you with information that you have asked for, we will endeavor to explain to you why. We will try to respond to any request for a right of access as soon as possible.
- **Right to Correct Personal Data.** Subject to the limitations in applicable law, you may request that we update, correct or delete inaccurate or outdated Personal Data and/or that we suspend the use of Personal Data, the accuracy of which you may contest, while we verify the status of that Personal Data. We will correct your Personal Data within a reasonable time from the receipt of your written request thereof.
- **Deletion of Personal Data ("Right to Be Forgotten").** In certain circumstances you have a right to have Personal Data that we hold about you deleted. Should you wish to have any Personal Data about you deleted, please contact us, using the contact information specified in this Privacy Notice. Subject to applicable law, we will delete Personal Data provided to us by a user within a reasonable time from the receipt of a written (including via email) request by such user to delete such collected Personal Data. We cannot restore information once it has been deleted. Please note that to ensure that we do not collect any further Personal Data, you should also delete our Software from your mobile devices and terminate your account with us and clear our cookies from any device where you have used our Software. We may retain certain Personal Data (including following your request to delete) for audit

and record-keeping purposes, as well as other purposes, all as permissible and/or required under applicable law. We may also retain your information in an anonymized form.

- **Right to Restrict Processing**: You may request at any time that we limit the processing of your Personal Data if you believe that either: (i) the Personal Data is inaccurate and wish us to limit processing until we verify its accuracy; (ii) the processing is unlawful, but you do not wish us to erase the Personal Data; (iii) we no longer need the Personal Data for the purposes for which it was collected, but you still need it for the establishment, exercise, or defense of a legal claim; (iv) you have exercised your Right to Object (below) and we are in the process of verifying our legitimate grounds for processing. We may continue to use your Personal Data after a restriction request either: (a) with your consent; (b) for the establishment, exercise or defense of legal claims; or (iii) to protect the rights of another natural or legal person.
- **Direct Marketing Opt Out.** You can change your mind at any time about your election to receive marketing communications from us and/or having your Personal Data processed for direct marketing purposes. If you do, please notify us by contacting us as detailed in this Privacy Notice. We will process your request as soon as reasonably possible, however it may take a few days for us to update our records before any opt out is effective.
- **Right to Object.** Subject to applicable law, you may have the right to object to processing of your Personal Data including for the purpose of direct marketing.
- **Withdrawal of Consent.** You may withdraw your consent in connection with any processing of your Personal Data based on a previously granted consent.
- **Supervisory Authority**. If you are a European Citizen, you may have the right to submit a complaint to the relevant supervisory data protection authority.

Data Retention

Subject to applicable law, we retain information as necessary for the purposes set forth above. We may delete information from our systems, without notice to you, once we deem it is no longer necessary for the purposes set forth in this Privacy Notice. We may also retain your information in an anonymized form. In addition, retention by any of our processors may vary, in accordance with the processor's retention policy.

To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether those purposes can be achieved through other means, as well as applicable legal requirements.

Please contact us through the contact information listed below if you would like details regarding the retention periods for different types of your Personal Data.

Cookies and Similar Technologies

Third parties through which we provide the services and/or our business partners may be placing and reading cookies on your browsers to collect information in the course of advertising being served on different websites. When visiting this Site and/or Software, you shall be asked to accept the terms of this Privacy Notice, including the use of and placement of cookies and other similar technologies on your device as specified herein.

What are Cookies?

A cookie is a small piece of text that is sent to a user's browser or device. The browser provides this piece of text to the device of the originating user when this visitor returns.

- A "session cookie" is temporary and will remain on your device until you leave the Site.
- A "persistent" cookie may be used to help save your settings and customizations across visits. It will remain on your device for much longer or until you delete it.
- First-party cookies are placed by us, while third-party cookies may be placed by a third party. We only use first-party cookies.

We may use the terms "cookies" to refer to all technologies that we may use to store data in your browser or device or that collect information or help us identify you in the manner described above.

How We Use Cookies

The specific names and types of the cookies, and other similar technologies we use may change from time to time. However, the cookies we use generally fall into one of the following categories:

Type of Cookie	Why We Use These Cookies
Necessary	These cookies are necessary in order to allow the Site and/or Software to work correctly. They enable you to access the Site and/or Software, move around, and access different services, features, and tools. Examples include remembering previous actions (e.g. entered text) when navigating back to a page in the same session. These cookies cannot be disabled.
Security	These cookies can help us identify and prevent security risks. They may be used to store your session information to prevent others from changing your password without your login information.
Performance	These cookies can help us collect information to help us understand how you use our Site and/or Software, such as whether you have viewed messages or specific pages and how long you spent on each page. This helps us improve the performance of our Site and/or Software.
Analytics	These cookies collect information regarding your activity on our Site and/or Software to help us learn more about which features are popular with our users and how our Site and/or Software can be improved.

How to Adjust Your Preferences

Most Web browsers are initially configured to accept cookies, but you can change this setting so your browser either refuses all cookies or informs you when a cookie is being sent. In addition, you are free to delete any existing cookies at any time. Please note that some features of our services may function improperly when cookies are disabled or removed.

First Party Cookies

Google Analytics for the following purposes: to track users' interactions and to collect information about how they use the Web site. The information gathered (including your IP address) are transmitted and stored in the U.S. in the server of Google. This information is used to track users' interactions and collect information about how they use the Web Site, draft reports to the benefit of the managers and/or owner of the Web Site, supply services related to the activities of the Web Site and the Internet, more broadly. Google may transfer the information to third parties, where required by law or in case Google assigns to third parties the task of processing the mentioned information. The Users' IP addresses gathered by Google will not be associated to any other personal data.

Third-Party Applications and Services

All use of third-party applications or services is at your own risk and subject to such third party's privacy policies.

Communications

Subject to your consent and applicable law, we may send you e-mail or other messages and/or a newsletter about us or our services. You will be given the opportunity to unsubscribe from commercial messages and stop receiving future communication from us by contacting us using the following link: https://www.lightkey.io/contact with a request to UNSUBSCRIBE. Please note that we reserve the right to send you service-related communications, including service announcements and administrative messages relating to your account, without offering you the opportunity to opt out of receiving them. Should you not wish to receive such communications you may cancel your account.

Children

We do not knowingly collect personally-identifiable information from children under the age of sixteen (16). In the event that you become aware that an individual under the age of sixteen (16) has enrolled without parental permission, please advise us immediately.

Changes to the Privacy Notice

When visiting this Site and/or Software, you shall be asked to accept the terms of this Privacy Notice. If you do not agree with the terms hereof, please do not use the Site and/or Software. We may update this Privacy Notice from time to time –we encourage you to review it periodically. By continuing to access or use the Site and/or Software after those changes become effective, you agree to be bound by the revised privacy notice. We will post the updated Privacy Notice on this page. Please come back to this page every now and then to make sure you are familiar with the latest version. Any new Privacy Notice will be effective from the date it is accepted by you.

Comments and Questions

If you have any comments or questions about this privacy notice, or if you wish for us to amend or delete your Personal Data, or exercise any other of your legal rights, please access our contact page at https://www.lightkey.io/contact

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