

Privacy policy

This privacy policy ("Privacy Policy") describes Where's Cookie's ("we", "our" or "us") data collection practices in connection with this site (as well as its subdomains, features, and services available thereon, the "Site"), and in connection with your use or engagement with any feature, content, offer, element or service we make available to you via the Site (the "Services").

We may change this Privacy Policy at any time. We will post the modified Privacy Policy on the Site, and the "Last Updated" statement at the top shall reflect the effective date of the modified version. If you access or use the Site following such date, you consent to the modified Privacy Policy. If we make significant changes, we will make sure to provide more prominent notice to you, such as posting a notification on the Site, seven (7) days before the changes become effective. In this case, the changes will be effective seven (7) days after such notification was published.

1. Terms of Use. This Privacy Policy forms an integral part of Our Services' Terms of Use. (the "Terms"). Any capitalized term in this Privacy Policy that we don't define, will have the meaning given to it in the Terms.

For the purposes of this Privacy Policy, "Personal Information" means information that may be used, either alone or in combination with other information, to personally identify an individual, such as a first and last name, an email address, phone number, a home or other physical address, and other contact information. In some jurisdictions and given the specific use we make with the information, an IP address may also be considered Personal Information. In this case, we will be treating the IP address as personal information in all handling and safeguarding aspects.

You are not legally obligated to provide us with Personal Information nor are you required to use the Site in the first place. By using the Site and engaging or interacting with the Services, you consent to this Privacy Policy and to our information practices described herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the Site or the Services.

2. Our Legal Bases of Processing. We process and use Personal Information in accordance with applicable data protection laws.

Our legal grounds for processing your Personal Information will typically be one or more of the following:

2.1. Contract performance. By accessing or using the Site, you express your intent to use our Services and ask us to provide them. To do so, we need to process some of your Personal Information - for example, personal information regarding your home town in order to provide you with moving offers from our Partners (as described in section 3.1.1).

2.2. Legitimate Interests. Your Personal Information may be used if we have legitimate business reasons to do so. To operate, improve, and promote the Services (for example, by customizing your experience or by analyzing usage trends) and to protect our business (for example, by managing fraud or ensuring the Site is secure).

2.3. Legal Obligations. We may use your Personal Information in certain circumstances to comply with regulatory obligations (for example, addressing complaints from users or authorities).

3. Information We Process. When you visit the Site, or use the Services, we may collect certain information about your visit and usage of the Site and the Services, in one or more of the following ways:

3.1. Information You Provide to Us. Some of the Services require you to submit Personal Information in order to use them. You must specifically and actively consent to such Services and features (e.g., submitting your personal information and preferences to be contacted by our Partners (as described in section 3.1.1) regarding personalized offers, subscribing to newsletters that are offered on certain Sites) and some information will be collected upon your consent to this Privacy Policy, as described below.

3.1.1. Third Party Forms and Services. The Site lists, rates and compares a variety of service providers, partners, platforms, brands and commercial entities (collectively, "Partners"), as well as their products and services (collectively, "Products"). We may provide you with offers and Products of Partners via an online request to be filled by you, upon your intent choice and consent, and such information will be used to facilitate your connection and/or engagement with the relevant Partners ("Lead"). Information you submit will also be provided directly to our Partners and will be used according to their privacy policies as well as this one. The Personal Information you provided will be used by Us as described in section 2 above.

3.1.2. Contact Us. If you send us a request by sending an email or by other means, you may provide us with certain Personal Information, such as your name and email address. Such information, including the content of your request, will be used for the purposes of addressing your request and for our legitimate business purposes, as described in sections 4 and 5 below.

3.2. Information We Collect from You. We collect information about your use of the Services and your interaction with the Site or the Services in the following ways:

3.2.1. Device Information. For delivering and compatibility purposes, so as for language, geographic location and time zone, we collect device information such as: device type and version, operating system type, language, version, and information that can be extracted out of a user agent, such as browser type and screen resolution.

3.2.2. Interactions and Usage. In order to provide the Services, operate the Site, keep improving it, and be able to sync with our Partners and affiliates, we collect information about your interaction and use of the Services, such as: URLs from which you were directed to the Site and to which you are referred from the Site, internal URLs of the Site (such as your views or clicks), date/time stamp of Site use, the timing for clicks and page-views.

3.2.3. Log Files. We collect information through server log files, but also by deploying tracking technologies within the Site, such as pixel tags. We do this to analyze trends, and track users' engagement and interaction with the Site and respective Services. The information collected may include internet protocol (IP) addresses that your Internet Service Provider allocated to your device. We collect IP for a limited time and for specific purposes: first, is to better understand your geographic location (country, region, and language) and to be able to provide the Services in your language; second, we use automated tools to analyze IP addresses and flag fraudulent ones; third, we may retain your IP address to evidence any consents you have given us or the Partners.

3.2.4. Cookies and Similar Technologies. The Site may use "cookies" and other anonymous web tracking technologies (such as "web beacons") implemented by us or by third-party service providers. A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that website to recognize your browser. Cookies may store your online preferences and other information about the interaction you make on the Site. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent to your browser. However, some features or services in the Site may not function properly without cookies and become unavailable for you in such cases. A pixel tag is a type of technology placed on a website for the purpose of tracking activity on websites, or when emails are opened or accessed (if applicable), and is often used in combination with cookies. .

3.3. Information we receive from Third Parties. Like many Internet-based services, the Site and the Services are operated and provided in collaboration, sync and interaction with third parties, including Partners, affiliates and other entities. In order to enable and facilitate such sync, as well as to provide you with tailored offers and services from Partners, we may receive information from third parties, such as: an internal user identifier

that our system generates for each user, details of Products you purchased, or applied for, from the Partners, and a summary of action taken by you (e.g. click, purchase, view, form submission or a phone call). On some Sites, you will be able – upon your choice – to consume the Service on a click-by-call basis. In this case, a third-party vendor/s facilitates the call transmission, tracking and feedback for success. In such cases, the phone number from which you called will be provided to us (with no other information about you attached), for limited time and for purposes of resolving referrals and successful calls with our Partners. Except for this purpose, we do not make any other use of such information, unless you will give us your explicit consent.

4. The Way We Use Personal Information. In addition to the uses of information we collect (including Personal Information, jointly “your Information”) described elsewhere in this Privacy Policy, we also use Personal Information in the following ways:

- administer and make available the Site and Services to you;
- further develop and generally improve the Site and the Services;
- counting and tracking purposes of referrals and ads;
- validation of users as humans and anti-fraud monitoring;
- respond to your inquiries and other communications with you;
- identify or authenticate your access and use of the Site;
- market to you personalized offers;

5. Sharing Your Information with Third Parties.. We do not share Personal Information about you with third parties, except for the following circumstances:

5.1. Data Storage and Security Platforms (“Data Platforms”). We use third-party cloud and storage services to store and retain all Information that we collect about you. It means that we send or otherwise share your Information to/with third-party entities that are located anywhere in the world, including in the U.S., for the purpose of storing such information on our behalf, or for other processing needs. Such entities include Amazon Web Services (whose privacy policy is available at: <https://aws.amazon.com/privacy/>). We use Data Platforms that maintain strict privacy protection and data security policies, and strict compliance with applicable data protection laws.

5.2. Third-Party Service Providers. We may send or otherwise share your Information to/with various third-party service providers that help us with our business operations (for example, customer service operators and email or phone administration providers), that help us understand how our users use the Site and Services, operate and improve them, these providers will process your Personal Information only on our behalf.

5.3. Enforcement. We may share your Personal Information with any third-party if we believe that disclosure of such information is helpful or reasonably necessary to: (a)

comply with any applicable law, regulation, legal process, or governmental request; (b) enforce our Terms of Use, including investigations of potential violations thereof; (c) detect, prevent, or otherwise address fraud or security issues; and/or (d) protect against harm to the rights, property or safety of Where's Cookie, our affiliated entities, our users, yourself, and/or the public.

5.4. Offerors. In case you will choose and be interested to receive offers from our Partners, based on your Personal Information, the Services may offer you to submit an online request, ("Request"). In such a case, we will send your Request information or otherwise share it to/with our Partners and service providers in order for such Partners to provide you with personalized offers and to contact you with the information you have requested. When you submit a Request, both Where's Cookie and offerors may contact you directly with quotes or offers via all means of communication provided by you: mail, email, telephone, text message, and others. You may receive telemarketing calls from offerors or third parties on their behalf (including using an automatic telephone dialing system or an artificial or prerecorded voice) as a consequence of submitting a request through our services, even if your telephone number is registered on a state, corporate or federal do not call registry. You acknowledge that: (a) the Partners may contact you using the Request information which you submitted; (b) we do not control the way in which Partners may contact you, or the subject matter of such contact; and (c) each Partner is required to provide its own privacy policy, and so it would not necessarily adhere to this Privacy Policy.

5.5. Affiliates, Merger, Sale or Bankruptcy. We may share your information with our group companies (e.g. parent company, subsidiary, sister company or other affiliated entities). In the event that Where's Cookie or one of our affiliated entities is acquired by, or merged with, a third-party entity, or otherwise sells all or part of our/its assets, we may (and hereby reserve the right to) transfer or assign the Personal Information and other information we have collected or received. In such a case, the acquiring entity will handle the Service data practices and provide you with any of your rights as per the law that applies to you.

We may also share some non-Personal Information with the following type of third parties and under the following circumstances:

5.6. Analytic Tools. We may use analytics tools, including Google Analytics and Tableau. These tools help us understand users' behavior on our Site and Services, including tracking page content, and click/touch, movements, scrolls and keystroke activities. For further information about cookies, please see our Cookie Policy.

6. Links to and Interaction with Third-Party Properties. The Site may link to third-party websites (such as those of Partners), content, and other online properties (collectively,

"Third-Party Properties"). Data associated with your clicking through to such Third-Party Properties, as well as any Personal Information you provide on such Third-Party Properties, is provided to the third-party. We are not responsible for the privacy practices of such third parties, or for such Third-Party Properties, Products, and respective data collection practices. We encourage you to read the terms and conditions and privacy policy of each Third-Party Property that you choose to use or interact with.

7. Choices and Opt-Out. It is your choice to provide us with your information for the uses described in this Privacy Policy. You can decide at any time to exercise your rights with respect to your Personal Information according to the law that applies to you. For example (where applicable and relevant):

7.1. Cookies and Tracking Technologies. You may set your browser to refuse and/or block any cookies from the Site or third-party services (for more details please refer to Section 3.2.4 hereof).

7.2. User Rights. When applicable, you may request to access and update or remove your Personal Information from our servers.

7.3. EU Data Subject Rights. If you are an EU resident, any Personal Information we collect about you according to this Privacy Policy is handled and treated in compliance with the GDPR. As an EU-based user you may:

- Access the Personal Information that we keep about you. We will need to ask you to provide us certain with credentials to make sure that you are who you claim you are. If you find that the Personal Information is not accurate, complete or updated, then please provide us with the necessary information to correct it.
- Contact us if you want to withdraw your consent to the processing of your Personal Information. Exercising this right will not affect the lawfulness of processing based on consent before its withdrawal.
- Request to delete or restrict access to your Personal Information. If you exercise one (or more) of the above-mentioned rights, in accordance with the provisions under the law, you may request to be informed that third parties that hold your Personal Information, in accordance with this Privacy Policy, will act accordingly.
- Object to the processing of your Personal Information for direct marketing purposes, in case your Personal Information is used for such purpose.
- Have a right to lodge a complaint with a data protection supervisory authority.

8. Information Security. We, and respective third-party services/affiliate entities implement data security systems and procedures to secure the information transmitted, processed and stored on the Site, our computer servers and systems. For example, the Site is encrypted by using SSL and so as any other information at transport, we periodically review our information and data collection practices to ensure constant

monitoring, we use third-party processing and serving services that implement various information security standards and certifications (at rest and transmission), and we monitor and filter access to data when it comes to personnel in our organization. Such systems and procedures reduce the risk of security breaches, but they do not provide absolute security, as there is no such thing when it comes to the worldwide network. Therefore, we cannot guarantee that the Site and our servers are immune to unauthorized access to the information stored therein and to other information security risks.

9. Children's Privacy. The Site or the Services are not designed to attract users under the age of 18. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 18. If we learn that we have collected Personal Information from a child under 18, we will use commercially reasonable efforts to delete that information as quickly as possible.

10. Commitment. Protecting your privacy online is an evolving practice, and we use our best efforts to evolve our Site in a manner that meets these requirements and best practices as per all jurisdictions in which the Site is available.

11. Contact Us. If you have any comments or questions about our privacy practices, or if you wish to exercise any of your legal rights as set out herein, please contact us at kshilop@gmail.com.