

# DavidShield's Privacy Notice

Please read this statement carefully as it could impact your privacy rights. By checking the box "I agree" in our online platform, you grant DavidShield Life Insurance Agency (2000) Ltd. your consent to process your personal data, which you have provided us or will be required to provide us at a later date (hereinafter: "Personal Data").

## 1) Processing of Personal Data of children under the age of 18

This privacy notice cannot be accepted by children under the age of 18. By Agreeing to this statement you indicate that you are over the age of 18 and you consent to also process the Personal Data of your children or legal dependents under the age of 18 (if applicable) in accordance to this privacy notice.

## 2) How and why we need your Personal Data

Your Personal Data is collected from the personal digital spaces we provide you (app, webpage and self-service webpage), by our sales department, or by our services representatives.

We use the Personal Data we collect and receive to provide our service, to study and analyze the functionality of our services, website and mobile app and to analyze users' activities, to provide support, to measure service activity, to conduct surveys and send questionnaires, to maintain our service, to make it better and to continue developing the service.

We may use your email address to contact you when necessary, to send you reminders and to provide you information and notices about our service.

We obey the law and expect you to do the same. If necessary, we may use your Personal Data to enforce our terms, policies and legal agreements, to comply with court orders and warrants, and assist law enforcement agencies, to collect debts, prevent fraud, misappropriation, infringements, identity thefts and any other misuse of our service, and to take any action in any legal dispute and proceeding.

Though you are not required by law to provide us your Personal Data, failing to provide us with any necessary Personal Data might jeopardize our ability to provide you with essential services, including providing you with health insurance coverage and/or managing pending claims you may have filed with us.

We will not use or disclose your Personal Data for purposes other than those specified in this privacy notice. We will do our best to protect the privacy of your Personal Data.

## 3) The Personal Data you provide

As a potential insured member, we may ask you to provide certain personal details, such as your name, your contact details, and your email address, details about your family members, profession, medical history and/or current status and financial information. We will explicitly indicate the fields that are mandatory to complete.

As an insured member we may ask you to provide additional personal details, such as medical documents and legal documents.

When you contact us, or when we contact you, we may receive and process any personal information that you provide us. We may participate in correspondences you have with treating and/or advising physicians for rendering you further services and/or examining eligibility for insurance.

Please use caution when uploading the content through our mobile app and/or our self-service website and/or through emails. Please also avoid any involuntary disclosure of your Personal Data or disclosure of others' Personal Data without their consent.

## 4) The Personal Data that we collect

When you access our website or mobile app, our servers log certain 'traffic/session' information from your device, such as the country from which you use the Service, the browser type, operating system, geo-location and the Internet Protocol (IP) address. We also collect information about your activity, for example your log-in and log-out time, the duration of sessions, viewed web-pages or specific content on web-pages, etc.

We use standard analytics tools of Google Analytics and IBM. The privacy practices of these tools are subject to Google's own privacy policy at: <http://www.google.com/analytics/learn/privacy.html> and IBM's privacy policy at: <https://www.ibm.com/watson/data-privacy/>. Google Analytics and IBM use cookies to provide its service. For further information about cookies, please see the 'Cookies' section below.

## 5) Who might be exposed to your Personal Data?

In order to provide you with the services under our agreement, we may expose the following categories of recipients to your Personal Data:

- Medical providers
- Parent companies, subsidiaries, and other affiliated company
- Third party administrative services providers
- Third party information technologies providers (such as cloud providers)
- Legal representatives
- Insurance consultants
- Corporate contact personnel (applicable to groups/business insurance policies)
- Insurance brokers and agents
- Law enforcement departments (after providing us with a valid legal request for disclosure)
- Insurance companies that ultimately will be responsible to pay your insurance claim (if applicable)
- Relevant financial institutions such as: banks, credit cards processors, clearing houses, Payment Service Providers (gateway companies), and card issuers

## 6) Where do we process your Personal Data?

Your Personal Data is processed in Netanya, Israel. If we provided services to you in the EU territory, please note that in 2011 the EU commission rendered a decision pursuant to article 25(4) of the data protection directive 95/46 EC under which Israel was acknowledged as "providing an adequate level of protection for Personal Data ..."<sup>1</sup> Please be aware that the categories of potential recipients listed above may process your Personal Data in places other than Israel or the EU. In some instances you may visit third countries yet to be recognized by the EU commission, or Israel as "providing adequate level of data protection". Should you require our services in these locations, you hereby provide us your explicit consent to transfer your data to any vendor in these locations which assist us in providing you with our services.

To the extent necessary under EU privacy laws and regulations, we will implement data onward transfer instruments, such as the Controller to Processor Standard Contractual Clauses (SCCs), the Controller to Controller SCCs, the Privacy Shield Framework and a statement of compliance with the Privacy Shield Principles, and such other lawful instruments to transfer personal information, as may be available from time to time.

## 7) Public access to your personal information

Prior to our first communication with you, we may have received, or granted access, to your Personal Data from social media and other public online platforms on which you publicly published your Personal Data. This personal information may include, but is not limited to, your personal and contact information, geographical location and other types of data that appears, publicly, in your social media and other public accounts.

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<sup>1</sup> See article 1 of Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011D0061>

#### 8) **How long will we store your Personal Data?**

We need your Personal Data to adjudicate any claims you may file with us and or with the insurance company (for example to receive insurance reimbursements). We will store your Personal Data for at least the minimum amount of time required by the regulations of your jurisdiction (for example, the Israeli authorities require us to store our Israeli members' Personal Data for 7 years after last engagement with the insured member). To the extent permitted according to applicable regulation, we will delete your data upon a written request from you. We may refuse to do so.

#### 9) **Personal Data security**

We will use our best efforts to protect the confidentiality of your Personal Data. We use reasonable data security measures in line with the high industry standards. We also adopted strict rules that include technical and physical administrative measures for protecting your Personal Data, including protecting against Personal Data misuse and against unauthorized hacking.

However, no system can ever be fully protected from unauthorized intruders, THEREFORE WE WILL NOT BE LIABLE FOR ANY SYSTEM FAILURE OR PERSONAL DATA HACKING THAT WAS NOT FORESEEABLE TAKING INTO ACCOUNT THE SURROUNDING CIRCUMSTANCES, EXISTING TECHNOLOGIES AND REASONABLE COSTS.

#### 10) **Web services disclaimer**

Our websites might include links to external third party websites. PLEASE NOTE THAT WE ARE NOT RESPONSIBLE FOR THE PRIVACY PROTECTION, POLICIES, AND USE OF ANY SOFTWARE OFFERED IN THESE EXTERNAL WEBSITES. WE WILL NOT BE RESPONSIBLE FOR ANY DIRECT OR INDIRECT DAMAGES CAUSED FROM THE USE OF THIRD PARTY WEBSITES.

#### 11) **Cookies**

Cookies are a unique internal marker that we send to your browser. Cookies do not constitute a computer software and they do not have the ability to read information that is on your computer or to carry out any actions whatsoever on your computer. We may send you cookies from time to time. By sending you cookies, our site identifies you when you contact us again on the same site – thereby enabling us to give you faster, more efficient service; Cookies also save you time from repeatedly having to fill in your personal details, which we already store in confidence.

Every browser allows you to manage your cookies preferences. Please bear in mind that disabling cookies may complicate and/or even prevent you from using our service.

#### 12) **Accessing your Personal Data**

At any time, you may contact us at: [csr@davidshield.com](mailto:csr@davidshield.com) or by calling us, and request to access the Personal Data that we keep about you. We may need to ask you to provide us certain credentials to make sure that you are who you claim you are. If you find that the Personal Data on your account is not accurate, complete or updated, then please provide us the necessary information to correct it. In some cases you can also revise your personal information through our self-services website.

If you'd like us to delete Personal Data that you have provided, please contact us at: [csr@davidshield.com](mailto:csr@davidshield.com) and we will respond in a reasonable time. Please be advised that we may retain and use your Personal Data as necessary to comply with our legal obligations, resolve disputes and enforce our agreements. In addition, after we delete your Personal Data, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems.

This deletion will not change or delete Personal Data which may have already been shared with third parties, as permitted in this privacy notice or any other agreement between you and us. We may redact from the data which we will make available to you, any personal information related to others.

### 13) Your Data Subject's rights.

As a data subject who is located in the EU, you may:

- Access the data as specified in section 12 above.
- Contact us if you want to withdraw your consent to the processing of your Personal Data. 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 Data. We may postpone or deny your request if your Personal Information is in current use for providing our services (for example you have a pending claim) and/or according to other legitimate purposes such as compliance with regulatory requirements.

If you exercise one (or more) of the above-mentioned rights in section 13 above, in accordance with the provisions of applicable law, you may request to be informed that third parties that hold your Personal Data, in accordance with the relevant parts of this Policy, will act accordingly.

- You may ask to transfer your Personal Data in accordance with your right to data portability.
- You may object to the processing of your Personal Data for direct marketing purposes.
- You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you and/or similarly significantly affecting you. Our premium rates may be based on your citizenship status, age and, in some jurisdictions, gender, to the extent permitted under applicable law. These factors may affect your insurance risk. Although some decisions may be based on automated processing of your Personal Data, we may choose to override them manually.
- You have a right to lodge a complaint with a data protection supervisory authority.

We do periodical assessments of our data processing and privacy practices, to make sure that we comply with this policy, to update the policy when needed, and to verify that the policy is displayed properly and accessible.

If you have any concerns about the way we process your Personal Data, you are welcome to contact our data protection team at: [csr@davidshield.com](mailto:csr@davidshield.com) or write to us to: DavidShield Life Insurance Agency (2000) Ltd. 8 A Haztoren st, Netanya Israel. We will look into your enquiry and make good-faith efforts to resolve any existing or potential dispute with you. If you remain unhappy with the response you received, you can also refer the matter to the relevant supervisory Authority.

Note: we process personal data under the following lawful grounds: (i) when processing of your personal data is necessary for us to perform the agreement with you and to take steps at your requests prior to entering into the agreement between us; (ii) the processing of your personal data is necessary for us to comply with legal obligations to which we are subject; (iii) when processing of your personal data is necessary for legitimate interests, such as cyber security and data protection, fraud detection, service

maintenance and control, support, back-up, data disaster recovery. Processing of your personal data under these lawful grounds, are not subject to your consent to this policy.

#### 14) **Disclosure of Personal Data in case of emergency**

In cases of an emergency, we may choose to disclose your Personal Data to a third party if all of the following apply:

- a) We are approached by a third party, who is your close relative or is otherwise connected to you, asking us to disclose your Personal Data (we will verify by reasonable means the third party's connection to you).
- b) We are unable to contact you after reasonable efforts, depending on the nature and scope of the emergency.
- c) We conclude after reasonable evaluation that the requested disclosure is necessary in order to protect your vital interests.

#### 15) **Notification of changes**

We may change the terms of this privacy notice occasionally. We will notify you via our website or mobile app, and will ask for your approval of these changes if they have a direct impact on your rights under this privacy policy. PLEASE READ ALL OCCASIONAL CHANGES TO THIS POLICY AS THEY MAY EFFECT YOUR PRIVACY RIGHTS.

#### 16) **Less secured communication during emergencies**

- 17) You might need our services during unfortunate circumstances such as emergency medical care, hospitalization, during various types of check-ups with your doctors and more. During these times, and within the scope of our services, you will need to share with us Personal Data relating to your specific problem. While we prefer using secured communication channels through which you may provide us, and we may send you, Personal Data, we also understand that these channels will not always be available to you during times of need. Thus, if you are interested in sending us, and receiving from us, Personal Data about you via unsecured communication channels (such as Whatsapp, S.M.S and any other IM or unsecured channel) we will require your explicit written consent to use these channels. PLEASE NOTE THAT WE WILL NOT BE LIABLE FOR ANY SYSTEM FAILURE OR PERSONAL DATA HACKING WHILE USING THESE CHANNELS AND IN ACCORDANCE WITH YOUR CONSENT TO USE THESE CHANNELS YOU RETAIN THE SOLE AND FULL RESPONSIBILITY FOR USING THESE UNSECURED METHODS OF COMMUNICATIONS.

#### 18) **Your payment method**

A) If you purchased an insurance cover with us via a credit/debit card please note that we comply with the Payment Card Industry Data Security Standard (PCI DSS). Accordingly, we have implemented data security and organizational measures that protect your payment information such as credit/debit card number and keep them in confidence.

B) If you provided us with your bank account information for future insurance payments we will keep those in confidence in accordance with the data protection standard described in this statement.

#### 19) **Direct Marketing**

You can opt out from our marketing distribution list by sending us a request to [csr@davidshield.com](mailto:csr@davidshield.com) or by clicking the remove option in our notices. Opting out from the marketing distribution list will have no effect on your contractual rights.

**Data Controller:** DavidShield Life Insurance Agency (2000) Ltd.  
Address: 8 A Haztoren st, Netanya Israel. Phone: +972-9-8920950

**DavidShield's EU representative:** [eurep@davidshield.com](mailto:eurep@davidshield.com)

**Data Protection Officer:** [dpo@davidshield.com](mailto:dpo@davidshield.com)