LIGHTRICKS – Ltx PLATFORM

PRIVACY POLICY

Last Modified: August 10, 2026

(1) INTRODUCTION & SCOPE OF THIS PRIVACY POLICY

Lightricks Ltd., together with its subsidiaries and affiliated companies (collectively, "**Lightricks**", "**Ltx**", "**we**", "**our**", or "**us**"), is committed to ensuring that the Personal Data (as defined herein) we process is stored securely, used appropriately, and that our data processing practices are clearly communicated.

This privacy policy ("**Privacy Policy**") describes how Lightricks collects, stores, uses, and discloses Personal Data in connection with the operation of our Ltx platform available at: https://ltx.io/ offering tools and solutions for AI video production, including web-based tools, AI models and related services (collectively, the "**Platform**"), including information collected in connection with users' who sign up for, access, or use the Platform ("**Platform Users**"), as well as users access to, use of, and interactions with, our websites and digital assets we own or operate, as well as digital campaigns (respectively, "**Website(s)**" and "**Website Users**"). as well as our marketing practices.

Under this Privacy Policy, the Platform, Website, and all services provided through them are collectively referred to as the "**Services**". Platform Users, Website Users, and any other individuals we interact with in connection with the Services are referred to as "**you**" or "**User**".

Please note this Privacy Policy does not apply in the following cases: (i) if our Platform is used as part of a business account, the Personal Data we process for the Platform's video production functionalities (i.e., Inputs and Outputs, as further defined below) is processed by us as a data processor on behalf of such business customer ("**Business Customers**"). In these cases, the processing of Personal Data is subject to the agreements we have with those Business Customers, and not to this Privacy Policy; (ii) our Platform may provide you with the option to access and use certain third-party AI tools and models, including third-party open-source models, foundation models, and other AI tools, or to download certain AI models through third-party marketplaces or other platforms operated by third parties (respectively, "**Third Party Models**" and "**Third Party Platforms**"). Any Personal Data processed through your use of the Third Party Models, or otherwise provided by you through a Third Party Platform, is processed by those third parties as independent controllers. Accordingly, such processing is governed by the applicable terms and policies of those third parties, which Lightricks does not monitor, control, or assume responsibility for (this does not limit the applicability of this Privacy Policy to Personal Data derived or generated through the use of Third Party Models or Third Party Platforms where such data is subsequently imported into, or otherwise accessed and processed by, our Platform, in which case Lightricks' own processing of such Personal Data will remain subject to this Privacy Policy); and (iii) this Privacy Policy does not apply to the use of our mobile applications (or their respective websites or web interfaces), our Popular Pays platform, or any other services or products not expressly referenced herein. Our data collection and privacy practices for such applications, platforms, products, or services are governed by the privacy policy specifically applicable to them, available Here.

This Privacy Policy is an integral part of the Services' terms and agreements referencing this Privacy Policy (collectively, "**Terms**"). Any capitalized terms not defined herein shall have the meaning ascribed to them in the applicable Terms. We encourage you to read this Privacy Policy carefully and reach out to us if you have any further questions.

Any Personal Data you provide is given voluntarily and with your consent (where such consent is required under applicable data protection laws). You acknowledge that you are not under any statutory obligation to provide us with Personal Data. However, we may need to collect or receive certain Personal Data in order to provide, operate, secure, and manage the Services. If you do not provide us with the necessary Personal Data, we may be unable to fulfill certain purposes, such as enabling the use of specific features, as further described in **Section 4** of this Privacy Policy – ***The Types of Personal Data We Process & Purpose of Collection and Use*** – which details the purposes for which each set of Personal Data is collected.

This Privacy Policy further includes or incorporates specific information required under applicable data protection laws for residents of certain jurisdictions, including but not limited to:

If you are located in the EEA or UK, this Privacy Policy further details our lawful basis for processing Personal Data, information regarding cross-border data transfers, your rights related to the Personal Data we process, as well as additional information we are required to disclose to you under the EU and UK General Data Protection Regulations (collectively, "**GDPR**").

If you are a California resident, please also review **Section 14** of this Privacy Policy – ***CCPA Privacy Notice –*** which serves as a *Notice at Collection* as required under the California Consumer Privacy Act ("**CCPA**") and further details the categories of information collected and additional information regarding our privacy practices, including your rights under the CCPA and other California privacy laws.

If you are in Brazil, please review **Section 14** of this Privacy Policy - ***Additional Notice to Brazilian Residents*** **-** to learn more about our privacy practices and your rights in Brazil.

(2) POLICY UPDATES AND AMENDMENTS

We may update and amend this Privacy Policy from time to time at our sole discretion. The most recent version of the Privacy Policy will always be available on our Platform and Website, with the updated date indicated in the "Last Modified" heading. In the event of a material change or if required by law, we will provide notice of such changes through reasonable means. Any material amendments to our privacy practices described in this Privacy Policy will become effective within the period specified in the notice. Unless otherwise stated, any changes will take effect upon publication of the modified Privacy Policy. We recommend that you review this Privacy Policy periodically to stay informed about our most current privacy practices.

(3) DATA CONTROLLER & CONTACT INFORMATION

Lightricks Ltd. is the "***data controller***" (as this term or its equivalent is defined under applicable data protection legislation) of the Personal Data collected through the Services covered by this Privacy Policy. This means that we determine the purposes and means of processing the Personal Data. Where the Terms governing the Services you use, define the contracting company as Ltx Inc., this affiliated entity is also the data controller of Personal Data collected as part of such Services.

If you have any questions, inquiries, or concerns regarding this Privacy Policy or the processing of your Personal Data, you may contact us as follows:

Lightricks Data Protection Officer:

By Email: dpo@ltx.io

By Mail: Lightricks Ltd., Yesha'yahu Leibowitz 30, Jerusalem, Israel (Attn: Data Protection Officer).

Data Protection Representative – For Data Subjects in the EU and UK:

We have appointed Data Protection Representatives ("**DPR**") in Germany and the UK to address data protection matters concerning EU and UK data subjects.

EU DPR Contact Information – Inquiries regarding our EU privacy practices may be sent to our EU DPR as follows:

By Email: dpr@lightricks.com

By Mail: Lightricks GmbH, c/o Mazars Tax GmbH, Theodor Stern Kai 1, 60596 Frankfurt am Main, Germany (Attn: EU Data Protection Representative).

UK DPR Contact Information – Inquiries regarding our UK privacy practices may be sent to our UK DPR as follows:

By Email: uk-dpr@lightricks.com

By Mail: Lightricks (UK) Ltd (ICO Registration number: ZB253341), 37 Broadhurst Gardens, London, England, NW6 3QT, United Kingdom (Attn: UK Data Protection Representative).

(4) TYPES OF PERSONAL DATA WE PROCESS & PURPOSE OF COLLECTION AND USE

We collect information related to your use of and interactions with our Services.

This information may include both data that does not identify you or any specific natural person and cannot reasonably be used for such identification ("**Non-Personal Data"**), as well as data that identifies an individual or may, with reasonable effort, be used to identify an individual ("**Personal Data**"). If we combine Personal Data with Non-Personal Data, we will treat the combined data as Personal Data.

Non-Personal Data may include technical information regarding your device or browser, type of operating system, scope and frequency of use, interactions with the Platform and Website, and other technical information regarding the device used. Such information will be considered Non-Personal Data when collected on an aggregate basis and/or not combined with any identifiers. We may further process and anonymize Personal Data so that it becomes Non-Personal Data. Non-Personal Data may be used by us without limitation and for any purpose. Some of this information may be considered "de-identified" under U.S. privacy laws. When we rely on data that has been de-identified, we will take reasonable measures to ensure that the de-identified information cannot be associated with an individual, household, or device, and we will not attempt to re-identify it.

We may collect different categories of Personal Data, depending on the nature of your interaction with the Services. **Below, we detail the Personal Data we collect, how and for which purposes we process and use your Personal Data, as well as our lawful basis for processing (subject to the GDPR, if applicable).**

Please note that, in addition to the purposes set forth below, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity theft, and any other misuse of the Services, as well as to enforce the Terms, protect the security or integrity of our databases and the Services, and take precautions against legal liability. We will not collect additional categories of Personal Data or use Personal Data for any purpose that is materially different, unrelated, or incompatible without obtaining your consent, unless required or permitted by applicable law.

(i) Platform Account Registration, Third-Party Platforms & Associated Business Data

Personal Data Sets:

To access and use our Platform's Services, you will be requested to sign up and create an account ("**Platform Account**"). You may choose to sign up with your email address or *through Social Sign-In* using your accounts on such platforms or social media accounts, such as Google, and depending on the type of Service you use, we may request you to provide additional information such as your name, organization name and phone number. Certain Platform Users, acting on behalf of Business Customers, shall be permitted to sign-in for access via Single Sign-On (SSO) exclusively through the domain provided by their organization. If you to sign up using Social Sign-In, you give us your permission to retrieve relevant information about you, depending on the privacy settings of your account on such platforms, which may include your full name, email address, profile picture, phone number, and other public profile information. Where the Services are used under a professional use subscription, we may also process additional business information provided by you or gathered from other business intelligence platforms, such as your job position or title, organization, and LinkedIn profile (collectively, "**Platform Account Data**"). In addition, if you use our Services through Third Party Platforms (for example, through which you download our AI model or use our API based services), these Third Party Platforms may share with us your account information on such platforms, such as your name, email address, and phone number ("Third Party Platforms Registration Data").

Purpose of Collection and Use:

We collect and use the Platform Account Data for the following purposes: to create and designate your Platform Account, to secure your Platform Account including authentication and validation purposes, as well as for Account management and administration.

In addition, we collect and use the Platform Account Data and Third-Party Platforms Registration Data for the following purposes:

- To communicate with you and send you transactional and operational messages (for example, billing, invoices, and other operational notices).
- Subject to applicable laws, to send you promotional messages and offers, for example, customer success and relationship communications, marketing communications, materials, and other information regarding our Platform and Services. As part of our marketing practices set forth above, we may use your information to serve you targeted and personalized advertisements for our Services on third-party online platforms and social media. This is done by securely matching your information (in hashed form) against user records held by those platforms and creating a custom audience list for our marketing campaigns. You may change your preferences at any time, including opting out of marketing communications using the "unsubscribe" method available in the marketing message you will receive, or, if you wish to be removed from our custom audience targeting list on third-party platforms, you may contact us at dpo@ltx.io (please ensure to request "custom audience opt-out"). However, please note that even if you have opted out of our marketing communications, we may still use your contact details to send you service-related and operational communications and you may still see general ads of our Platform and Services on third-party platforms that are not based on such data.
- To perform, facilitate, and optimize our marketing campaigns, ad management and sales operations.

Lawful Basis (where the GDPR applies):

Processing Platform Account Data or Third Party Platform Registration Data to designate your Platform Account (where applicable), provide the Services, and send you related operational communications is based on contract necessity. Processing for security and authentication, as well as for direct marketing purposes, is based on our legitimate interest (provided that, where required under applicable laws, we will obtain your consent for such processing).

(ii) Charges, Billing, and Transactions Data

Personal Data Sets:

Certain Services are subject to payment of subscription or other fees. The processing of payments is made by third-party payment processing services (such as Adyen, PayPal, and Stripe), and we do not collect, store, or have access to your full payment details; however, we process commercial transaction data such as records of purchases and prices, billing address, contact telephone number, email address, and your approximate location extracted from the IP address (e.g., country and zip code). In addition, where the fees are calculated and billed based on consumption, we will collect Online Identifiers and Device and Usage Data (as defined below), including through the use of cookies and similar technologies, to track and record such usage of our Services (collectively "**Charges and Transactions Data**").

Purpose of Collection and Use:

We use Charges and Transactions Data to calculate the fees for our Services or to limit your usage to the agreed upon or purchased services plan, to process your payments, and to provide the applicable Service you have purchased, as well as for billing and record-keeping purposes. The information related to your payment methods and transactions is processed by third-party payment processors and will be further governed by such third parties' own privacy policies and terms, which we recommend you review.

Lawful Basis (where the GDPR applies):

Processing Charges and Transactions Data to calculate charges and for billing purposes is based on contract necessity. We use Charges and Transactions Data for record-keeping purposes to comply with our obligations under applicable laws (where, depending on the billing entity, it might be further based on legitimate interest). We may further use such information to have evidence and records of consumption in the event such are requested by the User or a Business Customer, or in the event of a dispute regarding the charged fees, as well as to analyze our Services and their performance (e.g., tier popularity) and to customize and improve our offers and Services, based on our legitimate interests.

(iii) Online Identifiers, Device and Usage Data

Personal Data Sets:

When you access, browse, use, or otherwise interact with our Services, including the Website, use the Platform, or interact with our communication channels, certain information regarding your access and use is processed, including information that is automatically collected and generated through the use of our, or our third-party service providers' and marketing partners', cookies and tracking technologies (see **Section 6** of this Privacy Policy – ***Cookies and Similar Technologies***).

This information includes online identifiers associated with or transmitted from your browser and device, such as Internet Protocol (IP) address, cookie identifiers, user agent, and similar unique online identifiers generated by us and associated with your Platform Account, tags, etc. ("**Online Identifiers**").

Online Identifiers, such as IP address, are further used to generate certain information, for example, to extract your approximate location (e.g., country and zip code) and business intelligence information. For example, by identifying the IP as a business organization's IP, we may receive additional information related to such organization.

We also gather information regarding your browser and device (for example, type of device, operating system, etc.) as well as information regarding your use and interactions with the Services that may be automatically collected. This information may include features used, access time and date stamp, session duration, content viewed on our Websites or Services, your interactions within the Services, including clickstream data and video screen recordings, crash data, how often you use the Service, the URL or advertising campaign from which you reached our Services, time, language preferences, etc. ("**Device and**

Usage Data"). If Device and Usage Data is associated with an Online Identifier, it is processed by us as Personal Data.

Purpose of Collection and Use:

We collect and use Online Identifiers and Device and Usage Data for the following purposes:

- Our Services' functionality, operation, security, and fraud prevention, debugging, and resolving technical issues and errors.
- To promote, market, and advertise our Services, including sending you marketing promotions such as new features, additional offerings, special opportunities, or any other information we think you will find valuable based on your usage of the Services, including interactions with the Platform, Website, or promotional campaigns, or through digital campaigns, including targeted advertisements presented on other digital assets visited by the User. For example, when we market the Services, we use cookies and other tracking tools, including those of third-party providers, that collect information such as the individual's journey, when they clicked our ad, and if they subscribed or engaged with such campaign or ad.
- To calculate fees based on consumption and have evidence and records of consumption.
- To enhance, improve, and customize our Services and the way we offer them. For example, we analyze how Users use our Platform or the most viewed content on our Websites to improve the way we present such content and to analyze the performance of our marketing campaigns.

Lawful Basis (where the GDPR applies):

Processing Online Identifiers and Device and Usage Data for Services' functionality, security, and necessary operational purposes is based on our legitimate interest.

When the processing of Online Identifiers and Device and Usage Data is carried out through cookies, and for non-strictly necessary purposes such as marketing, analytics, or tracking, we will obtain your consent to process Personal Data (where required under applicable laws). You may withdraw consent at any time through our cookie preference management tool available on the Website.

Processing of Online Identifiers and Device and Usage Data for the calculation of subscription or other fees, is based on contract necessity.

(iv) Inputs, Outputs & Face and Voice Models

Personal Data Sets:

The Services accessible through the Platform include artificial intelligence ("**AI**") technology for creating and editing videos.

This AI technology allows you to use various features, such as text-to-image, editing, synthetic voice speech, or other face or voice manipulation features, to create content, including videos, film production, and other AI-generated materials (collectively "**Outputs**").

To create the Outputs, we process the original text, prompts, images, photos, videos, audio files, or other audio recordings that you upload ("**Inputs**"). In addition, in order to create the Outputs and to improve and optimize the results, our AI technology further generates and processes types of information known as "metadata," meaning information extracted from your Inputs and describing certain elements of such Inputs, such as estimated demographic data (for example, age or age group, gender, and skin tone of the character or voice in the Input), and other labels or tags of items in such Inputs. It also uses face detection

to analyze Inputs (images and videos) to estimate the posture and location of faces or of parts and areas of faces and other non-identifying characteristics of faces that appear in frame.

Furthermore, as part of our AI technology and its features used to create the Outputs, we will process the voice recordings or photos and images you upload as Inputs, as well as the "metadata" described above, to generate facial features information (such as facial geometry, topology, and face embedding) or a voice print, in order to create a model of the face and a voice print that appears in your Input, and may further use face and voice recognition technology ("**Face and Voice Model**"). Face and Voice Models are not used to identify you or anyone else. However, Face and Voice Models may be deemed "biometric identifiers" or "biometric information" according to the laws of your jurisdiction, and will only be processed with your consent, subject to the terms of such laws and this Privacy Policy.

Face and Voice Models will be permanently deleted within 2 years after the last time you have used our Services, unless we are legally required to maintain the data for a longer period. We will further delete Face and Voice Models if you withdraw consent, request us to delete all your information and your account, or in accordance with our retention policies. We do not share Face and Voice Models with third parties except in the limited circumstances described under this Policy (see **Section 7** of this Privacy Policy – ***Data Sharing***).

Inputs and Outputs are retained to maintain the sequence and deliverables of the Services we provide to you and for such to remain accessible for you through the Platform at any time and from any device until you decide to delete them by requesting us to delete all your information and your Platform Account, provided that we may delete such Inputs or Outputs earlier according to our internal retention policies.

Purpose of Collection and Use:

We collect and use the data for the following purposes:

- We process the Inputs and Face and Voice Models, metadata, and other information you voluntarily choose to provide to deliver the Services and generate the Outputs. We further retain and store the Face and Voice Models to enable you to repeat experiences using them as part of the Services, including creating additional Outputs you request through your use of the Platform and Services.
- Subject to the Terms, we may process Personal Data included in the Inputs, the gathered metadata and Outputs, as well as the Face and Voice Models, for AI training and machine learning purposes – to train our AI algorithm and technology, develop and create models (such as diffusion models, GAN, and others) and features, as well as to improve our AI tools and Services.
- We process certain inferred demographic data, tags, labels, or other characteristic-related data, as well as data related to the features or effects used, to improve, enhance, and customize our offers and Services.

Lawful Basis (where the GDPR applies):

Processing Inputs, Outputs, and associated metadata for the purpose of providing the Services is based on contract necessity.

Processing Face and Voice Models for the provision of the Services is based on your consent. Note, however, that the core functionality of the Platform's capabilities and features is based on creating these Face and Voice Models and thus, if you do not provide your consent, we will not be able to provide the Services, and accordingly, you will not be able to use the Platform. You have the right to withdraw your consent at any time, as set forth under **Section 8** of this Privacy Policy – ***Your Rights***. However, as explained above, in such event, we will not be able to provide the Services.

Processing Face and Voice Models and the Personal Data included in the Inputs for the purpose of AI training and machine learning is based on your consent. You have the right to withdraw your consent at any time, as set forth under **Section 8** of this Privacy Policy – ***Your Rights***.

The inferred demographic data and metadata, labels, tags, and other metadata, as well as Inputs and Outputs used for internal development, Services improvement, and personalization, are processed subject to our legitimate interest.

(v) Contact Information, Communications & Communications Data.

Personal Data Sets:

We process Users' and potential users and prospects' contact information, such as, as applicable to the communication, name, email address, phone number, position, organization you work with, and country ("**Contact Information**").

Contact Information is collected if you contact us with any inquiries or request to connect, be provided with information regarding our Services, sign up for our offers, or to receive our marketing materials and newsletter, etc., either through an online form available on our Website, by sending us an email, or by any other means. Regarding potential users and prospects, we may gather such information through third-party aggregators, which provide contact and business information for marketing and sales promotions and similar sources.

We will further process and store the contacts of communications with you, including email correspondence and, where applicable, call and meeting recordings and transcripts of such calls, and may also process data related to such communications, such as interactions with email communications (access time and date), etc. ("**Communications Data**"). Any recording of calls or meetings shall be made subject to obtaining your consent where required under applicable laws.

Purpose of Collection and Use:

We collect and use Contact Information and Communications Data for the following purposes:

- For responding to your inquiries or requests, or sending you the information and materials you have requested or signed up to receive.
- Contact Information related to potential users and prospects may be used to send marketing materials related to our Services in which you have shown your interest, or we assume will be relevant to you, including promotions, such as new offerings, special offers, etc. We further process the prospect's Contact Information gathered through third-party sources to contact you and offer you information regarding our Services that we think will be of interest to you based on your organization position, etc., and to further promote and enhance our sales and marketing efforts.
- Communications Data may be processed and stored by us to have records of our communications, to manage, measure, and improve our marketing and sales efforts, and enhance our Services, including through the use of AI tools. We may further use and retain Communications Data in the event we believe it is required to continue to store it, for example, in the event of any claims or to provide you with further assistance (if applicable).
- Internal analytics and statistics, used to enhance and improve our Services, and the way we offer them.

Lawful Basis (where the GDPR applies):

Processing Contact Information and Communications Data to respond to your inquiry or request in the event you have contacted us, or to send you information or materials you have signed up to receive, is based on your consent. For other purposes set forth above, including for prospect's marketing

communications, Contact Information and Communications Data are processed and stored subject to our legitimate interests. You can opt out of or withdraw consent, as applicable, from receiving our marketing communications at any time using the "unsubscribe" or other option we provide within the body of the message. Where required, we will obtain your consent for call recordings.

(vi) Customer Support & Participation in Survey

Personal Data Sets:

When you contact us for customer support, we will process your contact information, as well as any information you choose to provide, as part of our communications and correspondence.

We may ask you to provide feedback on our Services through various means of communication such as through our Platform, marketing communications, or otherwise through third-party survey platforms. If you choose to address our request for such feedback or participate in our survey, we will collect your feedback (as provided, i.e., in writing or otherwise any call recording) and may collect, as applicable, additional information related to the feedback provided such as the Input, Output or feature of our Platform used which is the subject matter of the feedback, contact information such as your name, email address, etc.

Purpose of Collection and Use:

We collect and use the information provided through customer support or participation in surveys for the following purposes:

- To provide the customer support needed and communicate with you. We will retain such communications and, where applicable, the call recordings and transcripts, for as long as needed, to have evidence of the support provided, offers made or agreed upon, and for any future needs, as well as to further improve our Services and support. We may use AI tools to assist us in analyzing our interactions to improve our Services and customer support.
- To improve and enhance our Service, train our team, as well as optimize and customize the Services.

Lawful Basis (where the GDPR applies):

Processing the data for customer support purposes is based on contract necessity. Processing for the purpose of record keeping and service improvement is based on our legitimate interest.

When you participate in our survey, we process your data subject to your consent. You may withdraw your consent at any time by contacting us through the contact information provided herein.

Please note that the actual processing operation for each purpose of use and lawful basis detailed above may differ. Such processing operations usually include a set of actions made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. The transfer of Personal Data to third-party countries, as further detailed below under Section 12 of this Privacy Policy – *International Data Transfer*, is based on the same lawful basis as stipulated above.

(5) HOW WE COLLECT YOUR INFORMATION

Depending on the nature of your interaction with us, we may collect the above detailed Personal Data from you, as follows:

- Automatically, when you visit our Websites or interact with our Platform and Services, including through the use of cookies and similar tracking technologies (as detailed under **Section 6** of this Privacy Policy – ***Cookies and Similar Technologies***), as well as, where applicable, information created by our AI tools.
- When you voluntarily choose to provide us with information, such as when you create an account or contact us, all as detailed in this Policy.
- From third-party service providers, such as analytics service providers, or obtained by us from third-party business platforms.

(6) COOKIES AND SIMILAR TECHNOLOGIES

We use cookies, tracking pixels (also known as clear GIFs and web beacons), and other technologies. A cookie is a small text file that a website places and stores on your device while you are viewing a website. These tracking technologies are used for various purposes, including:

- **Strictly Necessary Cookies:** these cookies are necessary for our Website and Platform to function or for the provisions of the Services to Users or Business Customers and cannot be switched off.
- **Functional Cookies:** these cookies enable certain non-strictly necessary functions as well as provide enhanced functionality and personalization (e.g., remembering your preferences so you don't have to reset them each time you visit). They may be set by us or by third-party providers whose services we have added to our pages.
- **Performance and Analytics Cookies:** these cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Services and marketing campaigns. They help us to know which pages are the most and least popular, how Users move around the Platform or Website, and from which marketing campaign they arrive.
- **Marketing and Targeting Cookies:** these cookies allow us to know whether you've seen an ad or a type of ad, how you interacted with such an ad, and how long it has been since you've seen it. We also use cookies to help us with targeted advertising. We may partner with ad networks and other ad serving providers that serve ads on our behalf and on behalf of others on other platforms and websites. Some of those ads may be personalized, meaning that they are intended to be relevant to you based on information ad networks and ad serving providers collect about your use of our Services and other sites over time, including information about relationships among different browsers and devices. This type of advertising is known as interest-based advertising.

The information generally collected and stored by cookies includes Online Identifiers, Device and Usage Data (as defined under **Section 4** of this Privacy Policy – ***Types of Personal Data We Process & Purpose of Collection and Use***), preferences, and technical information related to your device or browser.

Such cookies and tracking technologies can be placed by us (known as "first-party cookies") or by third parties such as our marketing partners, social media, analytics providers, etc. (known as "third-party cookies"). In addition, the duration of such cookies and tracking technologies – meaning the period until they are deleted – can be either when you close your browser (known as "session cookies") or longer periods according to their purpose and settings (known as "persistent cookies"). You can delete or block cookies through your browser or device settings.

The third-party cookies we currently use, and their purpose, are listed under the cookie preference management tool available on our Website, which you may further use to opt out of cookies or change your

preferences at any time. Also note that most browsers will allow you to erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. Please refer to the support page of your browser to learn more about how you can adjust your privacy and cookies preference settings. Please note that once you choose to opt out of or disable cookies, some features of the website may not operate properly, and your online experience may be limited.

Where we use third-party advertising cookies, such third parties may independently collect, through the use of such tracking technologies, some or all types of Personal Data detailed above, as well as additional data sets, including combining such information with other information they have independently collected relating to your online activities across their network of websites, for the purpose of enhanced targeting functionality and delivering personalized ads, as well as providing aggregated analytics related to the performance of our advertising campaigns you interacted with. These third parties collect and use this information under their own privacy policies.

(7) DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH

We share your Personal Data with third parties, including our partners or service providers that help us provide our Services. The categories of such third-party recipients, the type of Personal Data we share, and the purpose of sharing are as follows:

- **Service Providers:** we may disclose Personal Data to our trusted service providers that provide technology or platforms that are essential for providing the Services, such as hosting and server services, communications and content delivery networks, cybersecurity services, fraud detection services, billing and payment processing services, activity recording services, AI tools, support and customer relationship management systems. We also share Personal Data with our legal, financial, and compliance advisors. These service providers are prohibited from using your Personal Data for any purposes other than providing us with requested services.
- **Marketing Service Providers & Partners:** we share Online Identifiers, Device and Usage Data, Platform Account Data, and Contact Information with our marketing service providers, who either process certain data on our behalf to target you and offer you our Services, or provide us with tools to do so.
- **Affiliated Companies & Corporate Transactions**: we share Personal Data internally within our group to fulfill certain purposes for which Personal Data is collected and retained, or in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation, or asset sale). The types of Personal Data that will be shared can be any data processed by us, as needed; however, our affiliated companies or acquiring company will assume the rights and obligations as described under this Privacy Policy.
- **Enforcement of our Rights, Security and Fraud Prevention & Law Enforcement**: we may disclose certain Personal Data to law enforcement, governmental agencies, or authorized third parties, in order to comply with applicable laws or in response to a verified request or order. We may further disclose Personal Data to enforce our policies and agreements, as well as defend our rights, including the investigation of potential violations thereof, alleged illegal activity, or any other activity that may expose us, you, or other users to legal liability, and solely to the extent required. In addition, we may disclose Personal Data to detect, prevent, or otherwise address fraud, security, or technical issues, solely to the extent required. The types of Personal Data that will be shared are as needed to fulfill the purposes set forth above, for example, subject to a law enforcement authority request.

(8) YOUR RIGHTS

We acknowledge that different people have different privacy concerns and preferences. Our goal is to be clear about what information we collect so that you can make meaningful choices about how it is used. We allow you to exercise certain choices, rights, and controls in connection with your information. Depending on your relationship with us, your jurisdiction, and the data protection laws that apply to you, you have the right to control and request certain limitations or rights to be executed.

(i) Your rights

The principal rights that may apply to your Personal Data (subject to your jurisdiction and additional conditions) may include:

- **Right to Be Informed, Right to Know, and Right to a List of Specific Third Parties**: you have the right to be provided with information regarding our Personal Data collection and privacy practices, as we detail under this Privacy Policy. You may also have the right, at our option, to receive a list of the specific third parties to which we have disclosed either your Personal Data or any Personal Data. This Privacy Policy also details our Personal Data handling practices.
- **The Right to Access/Inspect Your Personal Data**: you have the right to ask us to confirm whether or not we collect and use your Personal Data, the right to know which Personal Data we specifically hold about, and to ask for a copy of your Personal Data in a portable and, to the extent technically feasible, readily usable format or otherwise access it.
- **Right to Correct/Rectify Your Personal Data:** considering the nature and purposes of the processing of the Personal Data, you have the right to ask us to correct inaccuracies or update your Personal Data we hold, or request deletion of inaccurate Personal Data. Please note that Output may contain Personal Data about you that you deem inaccurate, and if you would like us to correct the inaccuracy, you may submit a correction request; however, given the technical complexity of how our AI tools work, we may not be able to correct the inaccuracy in every instance. In that case, you may request that we delete your Personal Data from the Outputs, as detailed below.
- **Right to Delete Your Personal Data (the Right "To Be Forgotten")**: you have the right to request the deletion of certain Personal Data we process, if specific conditions are satisfied, for example, if you think we no longer need to use it for the purpose we collected it; in the event that the collection was based on your consent; where we have used it unlawfully, or; where we are subject to a legal obligation to delete your Personal Data. Deletion request will be subject to our rights and obligations under applicable law (for example, our legitimate interests to maintain record keeping, completing transactions, providing a service that you have requested, taking actions reasonably anticipated within the context of our ongoing business relationship with you, fulfilling the terms of a written warranty, detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity; debugging; exercising right provided for by law; engaging in public or peer-reviewed scientific, historical, or statistical research in the public interest, etc.). You are not required to create an account with us to submit a deletion request.
- **Data Portability Right:** you have the right to request to be provided with a copy of your Personal Data in a portable format and, to the extent technically feasible, a readily usable format that allows you to transmit the Personal Data without hindrance.
- **Right to Withdraw Consent**: when we collect and process your Personal Data based on your consent, you have the right to withdraw such consent at any time.

- **Right to Opt-Out/Opt-Out of Sale**: you have the right to opt-out of receiving our marketing communications, if applicable, by unsubscribing through the message received. You further have the right to opt out of the "*sale*" of Personal Data (i.e., to opt out of targeted advertising by us) as further explained under **Section 9** of this Privacy Policy – "***Sale" of Personal Data***. We do not profile you in a manner that has a significant effect on you or other individuals; therefore, we do not provide an opt-out option from such use of Personal Data.
- **Right to Object to the Processing of your Personal Data:** you have the right to object to any use of your Personal Data which we have justified by our legitimate interest if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest.
- **Right to Restrict Processing of your Personal Data:** you have the right to ask us to restrict or limit the purpose for which we process your Personal Data, where certain conditions are satisfied (for example, where you contest the accuracy of the Personal Data, for a period enabling us to verify its accuracy).
- **Right to Appeal or Lodge a Complaint**: If we decline to take action on your request to exercise your rights related to your Personal Data, we will inform you without undue delay within the timeframe set out under the applicable law. Our notice will include a justification for declining your request as well as information on how you may appeal, if applicable. Within the timeframe set under applicable law as of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to your appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint to the applicable authority or the Attorney General of your jurisdiction. Where the GDPR applies, you have the right to lodge a complaint with the applicable Data Protection Authority in the EU or the Information Commissioner in the UK.

(ii) How to Exercise Your Privacy Rights

You may submit a request to exercise most of your privacy rights under applicable privacy laws by contacting our privacy team at: dpo@ltx.io.

Certain rights can be easily exercised independently by you without the need to contact us. For example, you can opt out of receiving our marketing messages by clicking the "unsubscribe" link or following other opt-out instructions provided in the message; you can use the cookies preference management tool on our Website to change your preferences and opt out of cookies, including opting out of the "sale" of Personal Data.

We will respond to and fulfill your request within the timeframe required under applicable laws. When you submit a request, we will take steps to verify your identity and your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information to verify your identity, or, where necessary, to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for denial and how to remedy any deficiencies, where applicable.

Authorized agents may initiate a request on behalf of another individual by contacting us at: dpo@lightricks.com. Authorized agents will be required to provide proof of their authorization, and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

(9) "SALE" OF PERSONAL DATA

Under US privacy laws, the term "sale" refers to disclosing or making available Personal Data to a third party in exchange for monetary or other valuable consideration, including for targeted advertising purposes. We do not "sell" Personal Data as most people would commonly understand that term, i.e., we do not disclose your Personal Data in direct exchange for money or some other form of payment. However, subject to the definition of the term "sale" under such US privacy laws, our practice of sharing the categories of Personal Data detailed above, when we use cookies or other third-party advertising services, is considered as "selling" Personal Data. The categories of Personal Data shared for this purpose include: Online Identifiers such as IP and Cookie ID; Internet and electronic network activity information (Device and Usage Data – such as your engagement with our Services); Geolocation data (such as country level extracted from IP) (all terms as defined under **Section 4** of this Privacy Policy – ***Types of Personal Data We Process & Purpose of Collection and Use***). You have the right to opt out of such "sale" at any time by changing your preference using the cookies preferences tool available on our Website.

(10) DATA RETENTION

In general, **unless a different retention period is described above**, we retain the Personal Data we collect for as long as it remains necessary for the purposes set forth above, when permissible by law or regulation, or until you request deletion of your information, where applicable.

Other circumstances in which we may retain your Personal Data for longer periods, when permissible by law or regulation, include: where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements; for us to have an accurate record of your dealings with us in the event of any complaints or challenges; or if we reasonably believe there is a prospect of litigation relating to your Personal Data.

Please note that, except as required by applicable law or our specific agreements with you, we will not be obligated to retain your Personal Data for any particular period, and we are free to securely delete it or restrict access to it for any reason and at any time, with or without notice to you.

(11) SECURITY MEASURES

We implement appropriate and industry-standard technical, organizational, and security measures to reduce the risks of damage to (or loss of) information, or any unauthorized access or use of information. This includes a protocol for responding to a data security incident that may compromise the security of Personal Data, including biometric data and identifiers, and providing notice to impacted individuals. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your Personal Data, it is not guaranteed, and you cannot expect that the Services will be immune to information security risks or attacks. Also, as the security of information depends in part on the security of the computer, device, or network you use to communicate with us, the security of your Personal Data depends on you as well. Please make sure to take appropriate measures to use secure networks and devices and to protect your access credentials.

Please contact us at*:* dpo@ltx.io if you feel that your privacy was not handled properly, in a way that was in breach of our Privacy Policy, or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data. We will make a reasonable effort to notify you and the appropriate authorities (if required by applicable law) in the event that we discover a security incident related to your Personal Data.

(12) INTERNATIONAL DATA TRANSFER

Your Personal Data collected by us is accessed by us from our premises and team's locations, as well as processed and stored by our third-party service providers, affiliated companies, and partners, as detailed above. Therefore, your Personal Data might be transferred to countries other than the country from which you accessed our Platform, Services, or Website. We will take appropriate measures to ensure that the transfer of such Personal Data will provide sufficient safeguards, including contractual commitments on behalf of our partners and service providers. You may exercise your rights, where applicable, to receive information regarding the transfer mechanism that was used during such transfer.

Where the GDPR applies to our processing of your Personal Data, if Personal Data collected within the EEA or UK is transferred outside such territories, we will do so pursuant to the Standard Contractual Clauses approved by the European Union or the ICO, as applicable, or other transfer mechanisms approved by these authorities.

(13) ELIGIBILITY AND CHILDREN'S PRIVACY

The Services are not intended for use by children (the phrase "child" shall mean an individual under the age defined by applicable law), and we do not knowingly process children's information. We will discard any information we receive from a User that is considered a "child" immediately upon discovering that such a User shared information with us. Please contact us at: dpo@ltx.io if you have reason to believe that a child has shared any information with us.

(14) JURISDICTION-SPECIFIC NOTICES

The information provided below supplements the information contained in this Privacy Policy and applies to residents of such states. These additional disclosures are intended to provide you with further information regarding our handling of your Personal Data and certain consumer rights.

(i) Additional Notice to California Residents:

This section applies only to California residents pursuant to the CCPA.

Please see the ***CCPA Privacy Notice*** which discloses the categories of "*personal information*" collected, purpose of processing, source, categories of recipients with whom the "*personal information*" is shared for a "*business purpose*", whether the personal information is "*sold*" or "*shared*", the retention period, and how to exercise your rights as a California resident.

(ii) Additional Notice to Brazil Residents:

We have created this section specifically for Users in Brazil. Users in Brazil have certain privacy rights as specified under Brazilian law, including the Lei Geral de Proteção de Dados Pessoais ("**LGPD**"). Our Privacy Policy and the privacy controls we offer to all Users are in line with these laws and other applicable regulations, including those arising from regulatory activities of the National Data Protection Authority ("**ANPD**") – this notice makes sure we cover the Brazil-specific requirements. For example, all Users can request, in addition to the provisions set forth in Section 8 of this Privacy Policy – ***Your Rights*** - : (i) the anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed Personal Data; and (ii) information about the public and private entities with which data has been shared.

When the LGPD applies, you have the right to file a complaint with the ANPD if your request is not fulfilled or is denied by Lightricks.

In the event of security incidents involving Personal Data collected in Brazil, we will adopt mitigation and/or remediation measures and will communicate with you and the ANPD in cases that may result in significant risk or damage, in compliance with the requirements set forth in the LGPD and other applicable regulations.

When Personal Data collected in Brazil is transferred outside this jurisdiction, to a country that has not received an adequacy decision from the Brazilian Data Protection Authority, we will ensure that such transfer complies with the requirements of the LGPD, including the adoption of appropriate safeguards or reliance on a legal basis permitted under the LGPD.

Data Controller information is available above in **Section 3** of this Privacy Policy.