

Windward Privacy Notice

We at Windward Ltd. ("**Windward**" "**us**", "**we**", or "**our**") recognize and respect the importance of maintaining your privacy and, as a result, we have established this Privacy Notice. This Privacy Notice describes the types of information we collect from you when you visit and use our website (the "**Site**"). This Privacy Notice also explains how we may process, transfer, store and disclose the information collected, as well as your ability to control certain uses of the collected information. "**You**" means any adult user of the Site, using the Site on behalf of an entity, individual or yourself or any parent or guardian of any minor whom you allow to use the Site, and for whom you will be held strictly responsible.

Windward Ltd. is the data controller in respect of the processing activities outlined in this Privacy Notice. Our registered office is 2 HaShalosh St. Tel Aviv, Israel and our company registration number 51-438690-3. Additional entities who may be serving as separate, independent controllers are listed below.

Privacy Notice Key Points

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

- **Information we collect.** We collect any information you submit to us when using the Site. We also (automatically) collect information about your use of the Site. If you contact us for questions, information or complaints, we will collect the information related to your inquiry.
- **Basis for processing your information.** Processing your information is necessary in order to enable you to use the Site. Processing for the purposes of analytics and usage analysis, for recruiting, for the marketing of our products and services, for provision of newsletter (subject to your subscription thereto) 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.
- **Using the information we collect.** We use the information we collect mainly to administer and provide the Site to you, contact you with administrative information, contact you with marketing offers, send you our newsletter (should you indicate your desire to receive such newsletters), contact you for recruiting purposes (if you have provided us with your information for such purpose) and improve the Site.
- **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 process the information on our behalf and under our instructions, as well as with our business partners and affiliates, who act as independent separate controllers of the data.
- **International Transfer.** We may use service providers and/or subcontractors located in countries other than your own, and send them your Personal Data (as defined below). We will ensure that these subcontractors and service providers will be subject to non-disclosure and non-use obligations and we shall ensure we have agreements in place with such subcontractors and service providers ensuring the same level of privacy and data protection as set forth in this Privacy Notice. You hereby consent to such international transfer.
- **Your rights.** Subject to applicable law, you may have a right to access, update or delete your Personal Data and obtain a copy of it. You also have the right to object at any time to processing your personal data for certain purposes, including marketing purposes.
- **Retention.** We retain Personal Data for as long as necessary for the purposes set forth in this Privacy Notice.
- **Security.** We implement measures to reduce the risks of damage and unauthorized access or use of information, but they do not provide absolute information security.

- **Changes to the Privacy Notice.** We may change this Privacy Notice from time to time and shall notify you of such changes.

Information We Collect

We collect and/or store information from you when you choose to use our Site, request information from us, sign up for newsletters or our email lists, complete online forms, send us information, such as your resume and/or other documents or contact us for any other reason.

"**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. Examples of the Personal Data that we may collect from you may include your name, email address and phone number. Such Personal Data may be collected by us through the Site.

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 or device identifier, your browsing history on the Site and, subject to your consent where required under applicable law, your (geo) location. It is your voluntary decision whether to provide us with any such Personal Data, but if you refuse to provide such information we may be unable to provide you with certain services.

Basis for Processing Your Personal Data

Processing your Personal Data is necessary for the provision of the Site to you, including responding to your inquiries or requests, contacting and communicating with you and providing customer support.

Processing for the purposes of analytics and usage analysis, recruiting, for the marketing of our products and services, for provision of a newsletter (subject to your subscription thereto), 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.

How We Use Personal Data

General

We and any of our trusted third-party subcontractors and service providers may use the Personal Data we collect from and about you for any of the following purposes: (1) to respond to your inquiries, requests and resume submission, contact and communicate with you; (2) develop new products or services and conduct analyses to improve our current content, products, and services; (3) contact you with informational newsletters and promotional materials relating to our Site and business (4) review the usage and operations of our Site; (5) use your Personal Data in an aggregated, non-specific format for analytical purposes (as detailed below); and (6) prevent fraud, protect the security of our Site, and address any problems with the Site.

Analytics

We, or our service providers or subcontractors, may use analytics tools ("**Tools**"), including "Google Analytics" to collect information about the use of the Site. Such Tools collect information such as how often users visit the Site, what pages they visit when they do so, and what other sites and apps

they used prior to coming to this Site. We use the information we get from the Tools to improve our Site. 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/>.

Disclosure of Personal Data

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

Business Partners, Service Providers, Affiliates, and Subcontractors

We may disclose information, including Personal Data we collect from and/or about you, to our trusted service providers, business partners, affiliates, subcontractors, who may use such information to: (1) help us provide the Site to you and any services available on the Site, such as recruiting services and newsletters; and (2) aid in their understanding of how users are using our Site; and (3) to provide to you targeted offers and advertising on our Site as well as on other sites you choose to visit, based upon content on our Site you have clicked on/your preferences.

Any information and/or documents you submit to us on the "Careers" page of our Site is sent directly to and processed by Comeet Technologies Inc. ("**Comeet**"), subject to the Comeet Privacy Policy located at <http://support.comeet.co/privacy-policy/>.

Data Controllers

When you use our Site and/or Services, we also disclose your Personal Data to additional third parties, such as business partners, which act as independent, separate controllers with respect to the collection of your Personal Data. The details and contact information of such controllers are as set forth below.

Albacross	Kungsgatan 26, 111 35 Stockholm, Sweden. +46 70-839 35 71
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International Transfer

We may use subcontractors and service providers who are located in countries other than your own, and send them information we receive (including Personal Data). All of our subcontractors will be subject to written agreements ensuring the same level of privacy and data protection as set forth in this Privacy Notice.

Business Transfers

We may transfer our databases containing your Personal Data if we sell our business or part of it.

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, 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 if we believe in good faith that disclosure is appropriate to protect our rights, property or safety (including the enforcement of the Privacy Notice), or to protect the rights, property or safety of third parties and 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 legal@wnwd.com. We may also share information in order to comply with legal and/or regulatory obligations, to protect and defend our rights and property and/or with your permission.

Data Retention

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 above. Certain Personal Data collected through cookies is stored for a period of twenty-four (24) months.

How we Protect Personal Data

We make efforts to follow generally accepted industry standards to protect the Personal Data submitted to us, both during transmission and once we receive it. 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 Concerning Your Personal Data

You have certain rights in relation to the Personal Data that we or other controllers hold about you. For any requests to exercise such rights with respect to information held by other controllers, please contact the applicable controller directly. If you wish for us to notify all independent controllers, please specify that request when you contact us in order to exercise any of your rights. 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 hold about you and, in some cases, to have the Personal Data 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 us to) 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 all the information you ask for, 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 have us 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.** 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 below. 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. We may retain certain Personal Data (including following your request to delete) for audit, record-keeping purposes, and other purposes, as permissible by applicable law. We may also retain your information in an anonymized form.
- **Right to object.** Subject to applicable law, you may have the right to object to processing of your Personal Data for certain purposes, including for the purpose of direct marketing.
- **Supervisory Authority.** If you are a European Citizen, you may have the right to submit a complaint to the relevant supervisory data protection authority.

Cookies

We use cookies and similar technologies to help personalize the ads we serve you. Third parties through which we provide the Services and/or our business partners may be placing and reading cookies on your browser or using web beacons to collect information in the course of advertising being served on different websites. When visiting this Site, you shall be notified of 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 visitor's browser. The browser provides this piece of text to the device of the originating visitor when this visitor returns. We may use cookies to help help serve you ads relevant to your interests, which we have identified based on your activity and viewing history on our Site. ""

- 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 until you delete it.
- We use third-party cookies, which may be placed by a third party.
- Information may also be collected through web beacons, which are small graphic images ("pixel tags"), which usually work together with cookies in order to identify users and user behavior. These may be shared with third parties.

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, web beacons, 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
Advertising	These cookies are placed in order to deliver content, including ads relevant and meaningful to you and your interests. They may also be used to deliver targeted advertising or to limit the number of times you see an advertisement. This can help us track how efficient advertising campaigns are, both for our own Services and for other websites. Such cookies may track your browsing habits and activity when visiting our Site and those of third-parties.

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 the Services may not function properly when cookies are disabled or removed.

Third Party Cookies: Albacross Nordic AB

Third Party Applications and Services

Portions of the Site may involve linking to or using web applications or services belonging to third parties. The Site may also provide you with links to access the applications of third party vendors or companies. We have no control over third-party applications or services, and all use of third-party

applications or services is at your own risk. Additionally, we cannot accept responsibility for any payments processed or submitted through such third party applications and/or services, if applicable, or for the privacy policies of any such applications and/or services. We are not responsible for content or available by means of such applications and/or services. We do not endorse any products or offered by third parties and we urge our users to exercise caution in using third-party applications and/or services.

Communications

Subject to your consent as may be required under applicable law, we may send you e-mail or other messages and/or a newsletter about us or our products and services, including through one of our service providers. You may remove your Personal Data from our mailing list and stop receiving future communication from us by following the UNSUBSCRIBE link located at the bottom of each communication or by emailing us at info@wnwd.com. You will also be given the opportunity to unsubscribe from commercial messages in any such e-mail or message we send.

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

We may update this Privacy Notice from time to time to keep it up to date with legal requirements and the way we operate our business, and we will place any updates on this web page. Please come back to this page every now and then to make sure you are familiar with the latest version. By continuing to access or use the Site or use the Services after those changes become effective, you agree to be bound by the revised Privacy Notice.

Comments and Questions

If you have any comments or questions about our Privacy Notice, or if you wish to exercise any of your rights, please contact us at legal@wnwd.com.

Last updated: March 2019