



Neurolif Ltd. PRIVACY POLICY

(Last modified: April 04, 2025)

This privacy policy ("**Privacy Policy**") governs the data collection, processing, and usage made by Neurolif Ltd. and Neurolif Inc. together with its subsidiaries and affiliated companies including Advanced Medical DME, LLC. ("**Company**", "**we**" or "**us**").

This Privacy Policy concerns the data we collect from individuals:

- who access and use our websites available at: www.relivion.com , www.neurolif.com, www.advancedmedicaldme.net and/or <https://pmi.relivion-medical.com> (respectively "**Website**" and "**Visitors**");
- users who have installed and are interacting with our mobile application (including its web interface) as part of using the Neurolif's Relivion® - a breakthrough electronic device to deal with migraines (respectively "**App**", "**users**" and "**Relivion Product**" - all together "**Services**");
- when booking a "Relivion Prescription Fulfillment" form for setting up a meeting with one of our representatives ("Prescription Form").

Each of the Visitors and Users, shall also be referred to herein as "**you**."

This Privacy Policy constitutes an integral part of the Website Terms of Use and the Relivion Product's End User License Agreement (together "**Terms**"). Definitions used herein but not defined herein shall have the meaning ascribed to them in the Terms.

If you are a Colorado, Nevada, Virginia or California resident – please make sure to review our [US Privacy Notice](#), to learn more about our privacy practices with respect to the applicable US privacy state law. The Notice includes also a Specific Disclosure for California Residents under the California Consumer Privacy Act of 2018 ("CCPA").

This Privacy Policy does not pertain to personal data relating to our employees and contractors.

If you have any questions about this Privacy Policy, please contact us at: support@relivion-medical.com

AMENDMENTS

We reserve the right to periodically amend or revise the Privacy Policy, which will immediately affect the implementation of the revised Privacy Policy on our Website or App. The last revision date will be reflected in the "Last Modified" heading located at the top of the Privacy Policy. We will make a reasonable effort to notify you if we implement any changes that substantially change our privacy practices. We recommend that you review this Privacy Policy periodically to ensure that you understand our privacy practices and to check for any amendments.

WHO ARE WE AND CONTACTING US

Neurolif, Ltd
Sderot Giborei Israel 12
Netanya, Israel



Neurolif, Inc.
10211 West Sample Road, Suite 217
Coral Springs FL 33065

Advanced Medical DME, LLC
10211 West Sample Road, Suite 217
Coral Springs FL 33065

Tel: +1-888-4Relivion/888-473-5484
Email: support@relivion-medical.com

Questions, comments, requests and complaints regarding this Privacy Policy and the information we hold are welcome and should be addressed to us by using the contact details above. All requests will be dealt with promptly and efficiently.

DATA CONTROLLER / DATA PROCESSOR FOR GDPR PURPOSES

Under the European General Data Protection Regulation ("GDPR"), we are the Data Controller of our direct Customers and website visitors Personal Data, and certain types of User's Personal Data.

Note that the processing of personal data which a customer provides to us for rendering our services (e.g., personal data relating to the customer's own clients), or which we collect on a customer's behalf in rendering our services, is not subject to this Privacy Policy to the extent the processing of such personal data is conducted only on behalf of the client and solely for the purpose of providing the services and according to the customers instruction. In such a case, the customer is generally the "controller" of the personal data and is responsible for providing notice about such processing.

If and when you use our Services as an end-user under other account owner (e.g. a healthcare provider or a clinic who provided you with our products as part of any treatment) we are the Processor of the Personal Data processed on behalf of such account owner, who is the Controller of the Personal Data. Similarly, when we process PHI on behalf of any of our customers who is deemed as a Covered Entity under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), we act as a Business Associate.

COLLECTION OF NON-PERSONAL DATA

We may collect aggregated, non-personal and non-identifiable information which may be made available or gathered via your use of the Services and your interaction with us ("Non-Personal Data"). We are not aware of the identity of the individual from which the Non-Personal Data is collected.

Also, we may sometimes process and anonymize or aggregate personal data and identifiable information in a manner that shall create a new set of data that will be Non-Personal Data. Such a new data set can no longer be associated with any identified person and can be used by us for any purpose upon our sole discretion and subject to applicable law.



Non-Personal Data may be used by us without limitation and for any purpose, including for commercial, research, or statistical purposes, without further notice to you.

COLLECTION OF PERSONAL DATA

During your use of the Services and your interaction with us, we will collect individually identifiable information, namely information that identifies an individual or may with reasonable effort be used to identify an individual (“**Personal Data**” or “**Personal Information**” as defined under applicable law). This may include online identifiers, name, emails, etc., subject to applicable law.

If we combine Personal Data with Non-Personal Data, we will treat the combined data as Personal Data.

PROCESSING OF PERSONAL DATA – PURPOSES AND LAWFUL BASIS

We have included in the table below information about which data is processed, how we process and use your data and the lawful basis for which we do so subject to the GDPR.

Type of Data	Purpose of Processing	Lawful Basis	Processing Operations
As part of purchasing the Relivion Product directly from us			
<p>If you purchase or check your suitability for the Relivion Product through the Website and directly from us, you will be required to provide us with certain data before and during the purchase process:</p> <p>Initial details and questionnaire, including: demographic and general data such as age, gender, height and weight; Clinical data and information regarding your migraines, such as headaches per month, medications, migraine triggers, etc.; other data related to your health status and the reasons that led you to use our Services, as provided by you during the subscribing process</p>	<p>We will use this data to ensure your suitability for our Services, to assist you in the purchase process and initial use of the Relivion Product.</p> <p>Purchase data will be collected and processed to allow you to complete the purchase and receive the Relivion Product.</p> <p>We may further use the data as part of the management and continuous improvement of our Services, our intake process of new users and analysis of our customers’ type and preferences.</p>	<p>Such data is being processed for the fulfillment of your contract with us – providing you with the Relivion Product and allowing you to use in an optimal manner.</p> <p>Any use for the Services general management and improvement of the Services shall be done under our legitimate interest.</p> <p>Recordkeeping of financial data or quality assurance data may be kept under our legal</p>	<p>We will collect the data, analyze your answers, adjust the Services for your needs and preferences, use your financial data for charging you for your purchases and invoicing you, updating our records with your data, and aggregate, statistically analyze or anonymize it for any further use as detailed above.</p>

<p>and usage of the App. Such data may be collected through the Website and designated forms or through other interaction with our team via phone calls, email, etc.</p> <p>Telehealth reference information: such as relevant healthcare provider (“HCP”) to whom you will be referred for receiving proper prescription, reimbursement data, the prescription and HCP’s instructions, etc.</p> <p>Purchase data: such as name, address, payment method, etc.</p>	<p>Some data will be kept as part of our record keeping.</p>	<p>obligations, such as our bookkeeping obligations or the MDR pertaining for the management of CE registered products.</p> <p>** if we share any data with the relevant HCP upon your choice, such data may be processed by such HCP under its sole control and applicable lawful basis.</p>	
<p>As part of becoming a User of the Relivion Product and the APP and sign up for an account:</p>			
<p>If you are or wish to become a user of the Services, you will be required to provide us with certain information such as:</p> <ul style="list-style-type: none"> • Identification and contact data: Full name, Email address, Username and password, etc. • Demographic data: Date of Birth, Height, Weight, Gender, etc. • Clinical data: Headache per month, medications, migraine triggers, etc. • Other data related to your health status and the reasons that led you to use our Services, as provided by you during the 	<p>We will use the identification data to designate your App account and allow you to use the App.</p> <p>Further, we will use the demographic and health data to allow you to use the Relivion Product and the App supporting their operation, in the best way for your needs and current situation.</p> <p>Also, your email address will be used to send you needed information related to our App (e.g., notify you regarding any updates to our App, etc.) and promotional and marketing emails.</p>	<p>Our lawful basis under the GDPR for collecting this information is the performance of a contract (i.e., providing you the Services as per your request).</p> <p>When we use your email to provide you with further information of a marketing nature, i.e., regarding our products and services, we will do that under the necessity of processing for our legitimate interests,</p>	<p>For opening of an Account and subscribing to our Services: Collection of your data, storage, analysis of the data and customizing the App, Relivion Product and Services for your characteristics and needs. We will also archive and save that data to allow the continuity of the Services provided to you.</p> <p>We will use your data for email delivery to communicate any relevant information.</p>

subscribing process and usage of the App.		after ensuring that your rights and interests are being ensured and protected.	We encrypt the data in our systems for security and confidentiality purposes.
Through and during the use of the Relivion Product and the App			
<p>Data which you will provide:</p> <ul style="list-style-type: none"> • Migraine data: level of pain, for how long, etc. • Background data: triggers and actions performed before, etc. • Treatment data: pain level and location at the beginning, symptoms, and pain level and effectiveness. • Other information as requested in the App and as provided voluntarily by you. <p>Data which will be fed to the system and App by your healthcare provider upon your authorization:</p> <ul style="list-style-type: none"> • Recommendations for treatment; • Instructions for using the Relivion Product; • Other data subject to the healthcare 	<p>We will use this data to adjust the Relivion Product and App for your needs and optimize your benefit from its use.</p> <p>As part of that and per your authorization and free will, we will transfer the data to your healthcare provider for review and recommendations.</p> <p>We also may use this data for upgrading and developing our Services.</p> <p>Your geolocation data will be used for checking the weather and other relevant indicators in your surroundings. Such collection will be limited to the usage time of the Relivion Product and App.</p>	<p>Our lawful basis under the GDPR for collecting this information is the performance of a contract (i.e., providing you the Services as you requested).</p> <p>As for improving and developing our services, the lawful basis for using your data for those purposes is the necessity of processing for our legitimate interests. We are using your data for those needs only after ensuring that such use is done in a minimal, secured, and where possible, de-identified manner.</p>	<p>Processing actions – data collection, storage, analysis (including big data analysis), treatment and usage optimization and customization, and record keeping of the data. We will also transfer some of your data to your healthcare provider through online transmission, where you have requested us to do so.</p> <p>As for improving and developing our Services, we are doing so using AI and big-data analysis of your data, together with other users' data. We do so in a manner which is, to the extent possible, minimal and de-identified, to</p>

<p>provider's sole discretion.</p> <p>Data will be collected automatically by the Relivion Product and the App:</p> <ul style="list-style-type: none"> • what treatment was performed by the product; • date and time; • location of treatment (e.g., city); • technical data such as intensity, scalp impedance, modulation, posture and mobility during the treatment, etc. • Usage data: such as IP, time of usage, interface preferences, etc. 		<p>Usage data is being processed: (a) for providing you with Customer Services in relevant cases, under the contract between us; (b) for our internal needs and for the general management of our Services as part of our legitimate interest, in a minimal manner, mainly aggregated and statistical.</p>	<p>ensure that your identity itself is not inherently used for such improvement and development.</p> <p>Usage data is being stored, recorded, and analyzed in an aggregative and statistical manner to provide us with general insights regarding the use of our Services.</p> <p>We may encrypt the data in our systems for security and confidentiality purposes.</p>
Through and during the use of our web interface connected to the App			
<p>If you are a user using our web interface - e.g., a healthcare provider using the interface for managing its patients (Relivion users) and providing treatment recommendations - we may also collect the following usage data regarding your use:</p> <ul style="list-style-type: none"> • Identification and contact info: Full name, Email address, Username and password, OTP data, etc. • Clinical site data (address, phone, etc.); • Usage data: IP, time of usage, interface preferences, etc. 	<p>We will use this data to allow you (or your healthcare provider) to use the App and web interface for supporting your patients and other users' use of the Relivion Product as per their and your request.</p>	<p>Our lawful basis under the GDPR for the collection of this information is the performance of a contract (i.e., providing you the Services as you requested) and the necessity of processing for our legitimate interests.</p> <p>Also note, that sometimes when doing so, we act merely as a Processor on behalf of a healthcare provider who is our customer. In those cases, we act</p>	<p>Processing actions – data collection, storage, analysis (including big data analysis), treatment and usage optimization and customization, and record keeping of the data. Healthcare provider's instructions can be transferred and sent to your Relivion Product and App for execution of the healthcare treatment recommendations.</p> <p>Usage data is being stored, recorded, and also analyzed in an</p>

		<p>under such customer lawful basis, since he is the Controller of data.</p> <p>Usage data is being processed: (a) for providing you with Customer Services in relevant cases, under the contract between us; (b) for our internal needs and for the general management of our Services as part of our legitimate interest, in a minimal manner, mainly aggregated and statistical.</p>	<p>aggregative and statistical manner to provide us with general insights regarding the use of our Services.</p> <p>We may encrypt the data in our systems for security and confidentiality purposes.</p>
When and if you will contact us with any inquiry or request			
<p>If you voluntarily contact us in any manner, whether for support, to submit a request or for other inquiries, whether by sending us an email or through other means of communication, e.g., any online form available on the Website, you may be asked to provide us with your contact information such as your full name, email address and country.</p>	<p>We will use this data and our contact history solely to respond to your inquiries and provide you with the support or information you have requested. We will retain our correspondence with you for as long as needed, subject to applicable law.</p> <p>In certain cases, where we have such legal obligation, we may further process and retain complaint related data to address our legal obligations as the manufacturer of a medical device.</p>	<p>The lawful basis for processing your information will be the contract between you and us, meaning we will use the data for addressing your requests and inquiries.</p> <p>Where such data is retained for legal purposes such as quality and monitoring of a medical product, our lawful basis is our legal obligation (e.g., under EU MDR).</p> <p>If you are not an active user of our Services, and yet you contact us with any</p>	<p>We are collecting your data, transmitting it to our system(s), storing it in our system(s) (including third party systems, e.g., CRM), and responding to you by email or any other means of contact provided by you. We record of all our correspondence with you.</p>

		<p>request or inquiry, we will process and retain your data under our legitimate interest as part of our daily business conduct and after ensuring that your privacy and rights are kept.</p> <p>After completing any such request, we will retain your information as part of our business records under our legitimate interest.</p> <p>Some of our Services' data might be processed under our legal obligation, such as safety requirements, e.g., Regulation (EU) 2017/745 on medical devices (MDR).</p>	
Online identifiers and other Technical Data			
<p>When you access our website or interact with our App, we may collect certain online identifiers, including your IP address, Advertising ID, and IDFA.</p> <p>We may also collect technical Non-Personal Data transmitted from your device (e.g., actions in the Website or App, your browser type, language used, type of operating system, type of device, etc.) and approximate geographical location (country).</p>	<p>We use this data for our legitimate interests of (i) operating, providing, maintaining, protecting, managing, customizing, and improving the Website and how we offer it; (ii) enhancing your experience; (iii) auditing and tracking usage statistics and traffic flow; (iv) protecting the security of the Website, as well as our and third parties' rights (subject to applicable law requirements); and (v) advertising purposes</p>	<p>Such processing is part of our legitimate interests as a commercial business.</p> <p>If we use third-party cookies on the Website or collect online identifiers, we will obtain your consent if required under applicable law.</p>	<p>Collection of data, aggregation and statistical analysis, report generation, record keeping and storage.</p>

<p>*** please see the following paragraph regarding Cookie usage</p>			
<p>Recruitment Data if you apply for any position in our Company</p>			
<p>If you apply for any position in our Company through the Website or elsewhere. We may collect information regarding your job status, education, CV, and other information to be collected as part of any recruitment process.</p>	<p>We will use such information for the recruitment process and for checking your suitability for job opportunities in our Company. Also, we may keep it afterward as part of our business records.</p>	<p>The lawful basis for such processing will be the contract between us - we process your data as per your application to a position within our Company.</p> <p>After the recruitment process, we may keep your information under our legitimate interests as part of our ongoing business records and for future protection from any potential legal suit.</p>	<p>Collection of data, analysis of such data, correspondence with you through the means of contact you have provided us with, record keeping of data.</p>
<p>When you provide your details as part of a “Relivion Prescription Fulfillment” form</p>			
<p>When you use our online prescription form (“Relivion Prescription Fulfillment”) upon your sole discretion for setting up a meeting with any for our representative, we will collect your Name, Email, Address, Phone Number, Date and Time of the scheduled meeting and any other notes provided by you.</p>	<p>The purpose of such collection of data will be setting up a meeting with one of our representatives in which we can explain to you about the Relivion, answer your questions, refer you to a relevant healthcare provider and assist you with anything related to your designated use of the Relivion and the App.</p>	<p>The lawful basis for processing your information will be the contract between you and us, meaning we will use the data for promoting your engagement with us to purchase and use the Relivion.</p> <p>In case you eventually won't purchase and use any</p>	<p>Collection of data, Scheduling a meeting and adapting our business proposal to your needs. Also, we may retain your data as part of our record keeping.</p>



		of our products, we will retain your data as part of our internal record keeping, under our legitimate interests as a commercial business.	
<u>Newsletter, Updates, Email Marketing and Event Registration</u>			
<p>We may present you with the option to sign up to receive our newsletter, other promotional materials, subscribe or sign up to our events. You will be requested to provide your contact details, such as email address, name, organization, etc.</p> <p>SMS consent or phone numbers collected for SMS purposes will not be shared under any circumstances for marketing purposes.</p>	<p>We will use the information you provide to include you in our mailing list and send you the materials you have signed up to receive. We may do so with the assistance of a third-party delivery services, acting on our behalf.</p> <p>Except for such use of external vendors, SMS and email consent will not be shared with any 3rd party and affiliates for marketing, nor will any phone numbers or emails be shared for such third-party purposes.</p>	<p>If you have provided us with your phone number, we may also use that phone number for SMS delivery, always in accordance with applicable law while providing you with the ability to opt-out where required under such law.</p>	<p>Our lawful basis for the processing of this data is your consent.</p> <p>You may withdraw your consent at any time by clicking the “unsubscribe” link which will be included in the email we send to you. You may also contact us through the above means of contact and request to unsubscribe.</p> <p>*** in certain cases, and subject to applicable law, we may send you email marketing and promotional messages without obtaining your consent.</p>

COOKIES USAGE

Like many other websites, the Website and parts of our System use cookies to improve your experience while you navigate the Website. We may use various types of Cookies or SDKs in our App to collect and analyze data (together “**Cookies**”):

- Essential Cookies – which are necessary for the site to work properly (usually appears under our name/cookie tag);
- Functional Cookies – designated to save your settings on the site - your language preference or other view preferences (also, under our name/cookie tag);

- Session Cookies – used to support the Website's functionality – such Cookies are stored only temporarily during a browsing session and are deleted from your device when you close the browser.
- Targeting Cookies - these cookies are used to collect information from you to help us improve our products and services and serve you with targeted advertisements that we believe will be relevant to you (e.g., Google's Cookies).
- Social networks Cookies - Social Plug-In Cookies (e.g., Facebook, Twitter, LinkedIn Cookies, or pixels, etc.) enable sharing your usage information with your social network's accounts.
- Analytics Cookies - give us aggregated and statistical information to improve the Website and System and further develop them e.g., Google analytics, Google Firebase Catalytic, etc.
- Third-party services used by us – for example, an external service supporting our career and recruiting options through the Website (e.g., Comet or Workday), or an external service which allows us to show short videos on our Website (e.g., YouTube or Vimeo).

Please note that the data collected by the use of Cookies may be linked to and combined with any other data, including Personal Data.

Also note, that Cookie's data is usually collected through third-party services, like Google, Facebook, etc. In those cases, your Personal Data might be transferred to those third parties, which might use it, as a "joint controller" of the data, meaning that the data is also "owned" and processed by them under their terms and conditions. Under those terms and conditions and the direct accounts or subscriptions you have with those third parties, your Personal Data might be linked to other data collected by the relevant third party and processed in its systems, for its purposes, and under its management. For example, suppose you have a Facebook account, the Personal Data collected through Facebook's Cookies in Our Website might be linked to other data Facebook collects and might be used by Facebook per the independent agreements between you and Facebook.

What Are Your Choices Regarding Cookies?

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser, or use the designated Cookies Bar in the Website. Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

For the Chrome web browser, please visit [this page from Google](#)

For the Internet Explorer or the Edge web browser, please visit [this page from Microsoft](#)

For the Firefox web browser, please visit [this page from Mozilla](#)

For the Safari web browser, please visit [this page from Apple](#)

For any other web browser, please visit your web browser's official web pages.



Where Can You Find More Information About Cookies?

You can learn more about cookies and the following third-party websites:

- All About Cookies: <http://www.allaboutcookies.org/>
- Network Advertising Initiative <http://www.networkadvertising.org/>

SHARING DATA WITH THIRD PARTIES

We do **not** share any **Personal Data** collected from you with third parties or any of our partners except in the following events:

- **Sharing of Data with a relevant Healthcare provider:** As explained before, and as per your authorization, we will share your usage and treatment data with your healthcare provider to allow him to optimize your treatment and usage of our Services properly;
- **Legal Requirement:** We will share your information in this situation only if we are required to do so to comply with any applicable law, regulation, legal process, or governmental request (e.g., to comply with a court injunction, comply with tax authorities, etc.);
- **Policy Enforcement:** We will share your information, solely to the extent needed to (i) enforce our policies and agreements; or (ii) to investigate any potential violations thereof, including without limitations, detect, prevent, or act regarding illegal activities, other wrongdoings, suspected fraud or security issues;
- **Company's Rights:** We will share your information to establish or exercise our rights, to prevent harm to our rights, property, or safety, and to defend ourselves against legal claims, when necessary, subject to applicable law;
- **Third Party Rights:** We will share your information, solely to the extent needed to prevent harm to the rights of our users, yourself, or any third party's rights, property, or safety;
- **Business Purpose:** we may disclose your personal information to a third party for a business purpose, as detailed above.
- **Service Providers:** we share your information with third parties that perform services on our behalf (e.g., customer service, tracking, servers, service functionality, marketing, and support, etc.). These third parties may be located in different jurisdictions.
- **Corporate Transaction:** we may share your information in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Privacy Policy;
- **Authorized Disclosures:** we may disclose your information to third parties when you consent to a particular disclosure. Please note that once we share your information with another company, that information becomes subject to the other company's privacy practices.

YOUR DATA SUBJECTS' RIGHTS UNDER PRIVACY PROTECTION LAWS

Under applicable privacy laws, individuals have certain rights that apply to us to provide information or make amendments to how we process data relating to them. Those rights might include:



- right to access your Personal Data - you can ask us to confirm whether or not we have and use your Personal Data, and if so, you can ask for a copy of your data;
- right to correct your Personal Data - you can ask us to correct any of your Personal Data that is incorrect, after verifying the accuracy of the data first;
- right to erase your Personal Data - you can ask us to erase your Personal Data if you think we no longer need to use it for the purpose we collected it from you. You can also ask for such erasure in any case in which the process of your data was based on your consent, or where we have used it unlawfully, or where we are subject to a legal obligation to erase your Personal Data. any request for such erasure will be subject to our obligations under the law (e.g., our obligation to keep some records for tax or customs purposes);
- right to restrict our use in your Personal Data - you can ask us to restrict our use of your Personal Data in certain circumstances;
- right to object to how we use your Personal Data - you can 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 in using the information;
- you can always require us to refrain from using your data for direct marketing purposes;
- you can ask us to transfer your information to another organization or provide you with a copy of your Personal Data (Portability Right);

We may not always be able to do what you have asked and, not all those rights apply in every jurisdiction. We do encourage you to contact us with any such request so we can work toward a mutual solution.

You have the right to lodge a complaint at any time before the relevant supervisory authority for data protection issues. However, we would appreciate the chance to deal with your concerns before you approach the authorities.

DATA RETENTION

Unless you instruct us otherwise and subject to applicable laws, we retain the information we collect for as long as needed to provide our services and to comply with our legal obligations, resolve disputes and enforce our agreements if applicable. Basically, and as a minimum, that means that your data will be retained as long as you have an Account in our systems and use our Services.

Also, and after the termination of your Account, we may keep some of your Personal Data as a user of our Services for more extended periods to protect our legal interests or under any safety or other legal requirements. For example, under EU legislation relating to Medical Devices (Regulation (EU) 2017/745) we must retain some data relating to our Services for a period of 10 years after the last placement of a product in the EU market.

As for Cookies data and technical marketing data, usually the data will be retained in an identified manner for periods of 14-36 months, subject to the relevant system. However, note that as explained before, once you delete the Cookies from your computer or otherwise restrict the use of cookies, we will have no linkage between your identity and your Cookies data (yet, the third-party provider may have such data relating to you, under the separate terms between you and any such third party, e.g., Facebook's terms of use as a user of Facebook).

Recruitment data will be retained up to 7 years after the last recruitment activity, for allowing to protect ourselves from any potential legal suit, in accordance with Israel's statute of limitations.



Please note that where we act as a Processor on behalf of an account owner, the retention periods are under the sole discretion of the account owner, as the Data Controller.

SECURITY

We use physical, technical, and administrative security measures for the services that we believe comply with applicable laws and industry standards to prevent your information from being accessed without the proper authorization, improperly used or disclosed, unlawfully destructed or accidentally lost.

However, unfortunately, the transmission of information via the internet and online data processing cannot be 100% secure. As such, although we will do our best to protect your Personal Data, we cannot guarantee the security of data transmitted via the Website, App and any transmission of your data shall be done at your own risk.

DATA PROCESSING LOCATION

We may store or process your Personal Data in a variety of countries, including the United States.

Any transfer of data that originates in the European Union ("EU") to a country outside of the European Economic Area (EEA), shall be made in compliance with the provisions of chapter 5 of the GDPR, e.g.:

- transfer to a country that is recognized as providing an adequate level of legal protection;
- transfer under a proper agreement containing the Standard Contractual Clauses published and authorized by the relevant EU authorities;
- where we can be satisfied that alternative arrangements are in place to protect your privacy rights through the use of any other mechanism under the GDPR.

It is important to note that we are headquartered in Israel, a country that the European Data Protection Board considers offering an adequate level of Personal Data protection regulation.

If you are a resident of a jurisdiction where the transferring of your Personal Data requires your consent, your consent to this Privacy Policy includes your express consent for such transfer of your data.

LINKS TO OTHER SITES


Our Website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every Website you visit.

CHILDREN

Our App and Website are not directed, nor is it intended for use by children (the phrase "child" shall mean an individual that is under age defined by applicable law which concerning the



European Economic Area ("EEA ") is under the age of 16 and with respect to the U.S.A, under the age of 13) and we do not knowingly process a child's information. We will discard any information that we receive from a user who is considered a "child" immediately upon our discovery that such a user shared information. Please contact us if you have reason to believe that a child has shared any information with us.

Authorization			
	Name	Signature	Date
Issued by:	Itamar Cohen		08APR2025

Document Signatures

Participant Name	Participant Type	Action	Task Performed On
Michal Kedar-Datel (VP Clinical Affairs & RA/QA)	Approver	Approve Document	2025-04-09 14:47
Scott Drees (CEO)	Approver	Approve Document	2025-04-09 17:55

Revision History

Version	Effective Date	Prepared by	Rationale/Summary of Changes
4.0	2023-02-28	Lilach Aizen	Initial Version
5.0	2023-08-09	Michal Kedar-Datel	as per revised selling process Adding US Privacy Notice, updating policy per states specific privacy laws
6.0	2025-04-09	Michal Kedar-Datel	Adding the Proliv Rx website (www.Neurolief.com), adding explanatory text related to SMS and newsletters and some spelling and grammatical corrections