

ONGAGE - CCPA PRIVACY NOTICE

[Last Modified: December 22, 2022]

APPLICABILITY: The California Consumer Privacy Act of 2018 (“**CCPA**”), the California Privacy Rights Act of 2020 effective January 1, 2023 (“**CPRA**”), any other California privacy laws, and this CCPA Notice apply to visitors, employees, users, applicants for employment, and independent contractors, and others who are California residents (“**consumers**” or “**you**”). Any terms defined in the CCPA and CPRA have the same meaning when used in this CCPA Notice. This CCPA Notice applies to California residents’ Personal Information, which we collect directly or indirectly while using our service or in order to provide our services, or employee and business-to-business Personal Information.

This CCPA Notice is an integral part of our Privacy Policy, and thus, definitions used herein shall have the same meaning as defined in the [Privacy Policy](#).

PART I: A COMPREHENSIVE DESCRIPTION OF THE INFORMATION PRACTICES:

(A) CATEGORIES OF PERSONAL INFORMATION WE COLLECT

We collect Personal Information which is defined under the CCPA as any information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device, all as detailed in the table below.

Personal Information further includes Sensitive Personal Information (“**SPI**”) as detailed in the table below.

Personal Information does not include: Publicly available information that is lawfully made available from government records, that a consumer has otherwise made available to the public; De-identified or aggregated consumer information; Information excluded from the CCPA’s or CPRA’s scope, such as: Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and the Driver’s Privacy Protection Act of 1994.

We have collected the following categories of personal information within the last twelve (12) months:

Category	Example	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes: real name, unique personal identifier, online identifier, IP address, email address.
B. Personal information categories listed in	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state	Yes: name, telephone number, address, email address.

the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	No
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes: transactions conducted, however, not the payment information.
E. Biometric information.	Genetic, physiological, behavioural, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes: information on a customer's interaction with our website, platform.
G. Geolocation data.	Physical location, approximate location derived from IP address or movements.	Yes: approximate geolocation.
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No

I. Professional or employment-related information.	Current or past job history or performance evaluations.	No. we currently do not have employees in California.
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities, and aptitudes.	No
L. Sensitive personal information.	Government-issued identifying numbers, financial account details, genetic data, precise geolocation, race or ethnicity, religious or philosophical beliefs, union membership, mail, email, text messages, biometric data, health data, and sexual orientation or sex life.	No

(B) CATEGORIES OF SOURCES OF PERSONAL INFORMATION

- Directly and indirectly from activity on our website and Platform: For example, directly from you when you inquire about our Services via our website, or indirectly, when we collect your usage data or browsing data automatically from measurement tools.
- Directly from you: For example, from forms you complete (such as the Data Subject Request), contact us, requesting a demo, etc.
- From third-parties: For example, from vendors who assist us in performing services for consumers, advertising networks, internet service providers, data analytics providers, social networks, and data brokers. Further, our Customers will provide us with the Recipients contact information and network activity.
- Publicly accessible sources.

(C) USE OF PERSONAL INFORMATION

We may use the Personal Information collected as identified above, for the following purposes: To fulfill or meet the reason you provided the Personal Information (support, respond to a query; monitor and improve our services; analyze which types of ads should be provided as part of the services; provide the services; marketing our services; analyzing our services and your use of the services and website; respond to law enforcement; or otherwise as detailed in our [Privacy Policy](#).

We will not collect additional categories of personal information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

(D) DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE

We may disclose your Personal Information to a contractor or service provider for a business purpose. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. We further restrict the contractor and service provider from selling or sharing your Personal Information. In the preceding twelve (12) months, we disclosed the following categories of Personal Information for a business purpose:

#	Category (corresponding with the table above)	Category of Recipient	Business Purpose
1	Category A Category B Category D	Cloud computing and storage vendors.	Storage, hosting.
2	Category F Category G	Government Entities/ Law Enforcement	Subject to a law request, such as tax and social security authorities.
3		Operating systems	Operating the services.
4	Category A Category F Category G	Data analysis providers	Providing analytic data on the use of our website and services. We limit the providers ability to share such information, as detailed above.
5	Category A Category F Category G	Marketing providers and social networks.	Marketing which is not cross-contextual, ad delivery.
6	Category A	Security and analytic service providers.	Debugging, security, fraud prevention.
7	Category A Category F Category G	Various service providers	Improving the Services, development and optimization.
8	Category A	Customer support providers.	Customer and technical support.

	Category B		
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(E) SALE OR SHARE OF PERSONAL INFORMATION

In the preceding twelve (12) months, we do not “sell” information as most people would commonly understand that term, we do not, and will not, disclose your Personal Information in direct exchange for money or some other form of payment.

For retargeting and analytic purposes, when we promote our Services, we use third-party tools that are able to market our Services online (“**Campaigns**”), measure those Campaigns, identify individuals that are interested in our Services, etc. this is done by placing cookies, pixel or other tracking technology on our website and sharing with these vendors the online identifiers and online behavior information. The CCPA defines “sharing” as “communicating orally, in writing, or by electronic or other means, a consumer’s personal information” to “a third party for cross-context behavioral advertising, whether or not for money or other valuable consideration”. In other words, we may share your Personal Information with a third party to help promote our services and understand your use of our website.

In the preceding twelve (12) months, we “sell” or “share” the following categories of Personal Information for a business purpose:

Category (corresponding with the table above)	Category Recipient	Purpose of Sale or Share
Category A	Marketing tools and vendors.	Share for targeted advertising.

(F) CHILDREN UNDER AGE 16

We do not knowingly collect information from children under the age of 16.

(G) DATA RETENTION

The retention periods are determined according to the following criteria:

1. For as long as it remains necessary in order to achieve the purpose for which the Personal Data was initially processed. For example: if you contacted us, we will retain your contact information at least until we will address your inquiry.
2. To comply with our regulatory obligations. For example: transactional data will be retained for up to seven years (or even more under certain circumstances) for compliance with our bookkeeping obligations purposes.
3. To resolve a claim, we might have or a dispute with you, including any legal proceeding between us, until such dispute will be resolved, and following, if we find it necessary, in accordance with applicable statutory limitation periods.

Please note that except as required by applicable law, we will not be obligated to retain your data for any particular period, and we may delete it for any reason and at any time, without providing you with prior notice if our intention to do so.

PART II: EXPLANATION OF YOUR RIGHTS UNDER THE CCPA AND HOW TO EXERCISE THEM

(H) YOUR RIGHTS UNDER THE CCPA

If you are a California resident, you may exercise certain privacy rights related to your Personal Information. You may exercise these rights free of charge except as otherwise permitted under applicable law. We may limit our response to your exercise of these privacy rights as permitted under applicable law, all as detailed herein and the in the Data Subject Request Form available [here](#).

California Privacy Right	Details
The right to know what Personal Information the business has collected.	The right to know what Personal Information the business has collected about the consumer, including the categories of personal information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom the business discloses Personal Information, and the specific pieces of Personal Information the business has collected about the consumer.
Deletion Rights.	The right to delete Personal Information that the business has collected from the consumer, subject to certain exceptions.
Correct Inaccurate Information.	The right to correct inaccurate Personal Information that a business maintains about a consumer
Opt-Out of Sharing for Cross-Contextual Behavioral Advertising.	You have the right to opt-out of the “sharing” of your personal information for “cross-contextual behavioral advertising”, often referred to as “interest-based advertising” or “targeted advertising”.
Opt-out from selling.	the right to opt-out of the sale or sharing of Personal Information by the business
Limit the Use or Disclosure of SPI.	Under certain circumstances, If the business uses or discloses SPI, the right to limit the use or disclosure of SPI by the business.
Opt-Out of the Use of Automated Decision Making.	In certain circumstances, you have the right to opt-out of the use of automated decision making in relation to your Personal Information.
Non-Discrimination.	The right not to receive discriminatory treatment by the business for the exercise of privacy rights conferred by the CCPA, including an employee’s, applicants, or independent contractor’s right not to be retaliated against for the exercise of their CCPA rights, denying a consumer goods or services, charging different prices or rates for goods or services, providing you a different level or quality of goods or services, etc. We may, however, charge different prices or rates, or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to us by your Personal Information.
Data Portability.	You may request to receive a copy of your Personal Information, including specific pieces of Personal Information, including, where

	applicable, to obtain a copy of the Personal Information you provided to us in a portable format.
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To learn more about your California privacy rights, please visit: <https://oag.ca.gov/privacy/privacy-laws>.

(I) HOW CAN YOU EXERCISE THE RIGHTS?

We provide a cookie banner and consent management that incorporates a browser setting that notifies our website of your privacy preferences. You may opt out of Sharing or Selling your Personal Information, Please review our [cookie policy](#) for more information about your rights.

You may be exercised by using the Data Subject Request Form available [here](#), the instructions for submitting, the general description of the process, verification requirements, when applicable, including any information the consumer or employee must provide are all detailed in the DSR Form available [here](#), and send it to our privacy team at: dpo@ongage.com.

(J) AUTHORIZED AGENTS

“Authorized agents” may submit opt out requests on a consumer’s behalf. If you have elected to use an authorized agent, or if you are an authorized agent who would like to submit requests on behalf of a consumer, the following procedures will be required prior to acceptance of any requests by an authorized agent on behalf of a California consumer. Usually, we will accept requests from qualified third parties on behalf of other consumers, regardless of either the consumer or the authorized agent’s state of residence, provided that the third party successfully completes the following qualification procedures:

- a. When a consumer uses an authorized agent to submit a request to know or a request to delete, a business may require that the consumer do the following:
 - 1. Provide the authorized agent signed permission to do so or power of attorney.
 - 2. Verify their own identity directly with the business.
 - 3. Directly confirm with the business that they provided the authorized agent permission to submit the request.
- b. A business may deny a request from an authorized agent that does not submit proof that they have been authorized by the consumer to act on their behalf.

(K) NOTICE OF FINANCIAL INCENTIVE

We do not offer financial incentives to consumers for providing Personal Information.

CONTACT US:

- By Email for privacy inquires: DPO@ongage.com
- By “contact us” page available at: <https://www.ongage.com/contact-us/>
- By Email for general inquires: support@ongage.com
- By mail to: HaNechoshet St. 6, Tel Aviv-Yafo, 6971070, Israel.

UPDATES:

This notice was last updated on December 21, 2022, as required under the CCPA, we will **update** the CCPA Notice **every 12 months**. The last revision date will be reflected in the “Last Modified” heading at the top of this CCPA Notice.

PART III: OTHER CALIFORNIA OBLIGATIONS

Direct Marketing Requests: California Civil Code Section 1798.83 permits you, if you are a California resident, to request certain information regarding disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please use the Data Subject Request Form available [here](#).

Do Not Track Settings: Cal. Bus. And Prof. Code Section 22575 also requires us to notify you how we deal with the “Do Not Track” settings in your browser. As of the effective date listed above, there is no commonly accepted response for Do Not Track signals initiated by browsers. Therefore, we do not respond to the Do Not Track settings. Do Not Track is a privacy preference you can set in your web browser to indicate that you do not want certain information about your web page visits tracked and collected across websites. For more details, including how to turn on Do Not Track, visit: www.donottrack.us.

California’s “Shine the Light” law (Civil Code Section § 1798.83): permits employees that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send us the Data Subject Request Form available [here](#).