



Privacy Policy

This Privacy Policy applies to Picky, our iOS and Android mobile application (our “App”). In the below policy, we inform you about the scope of the processing of your Personal Data.

General Information

a) What law applies?

In principle, we will only use your personal data in accordance with the applicable data protection laws, in particular Israel's Protection of Privacy Law, 5741-1981 (“PPL”) and the EU counterpart the General Data Protection Regulation (“GDPR”).

b) What is Personal Data?

Personal Data is any information relating to personal or material circumstances that relates to an identified or identifiable individual. This includes, for example, your name, date of birth, e-mail address, postal address, or telephone number as well as online identifiers such as your IP address and device ID.

c) What is processing?

"Processing" means any operation or set of operations which is performed upon Personal Data, whether or not by automatic means. The term is broad and covers virtually any handling of data.

d) Responsible for data processing

The responsible party within the meaning of the PPL and the GDPR is Picky, Noam Cohen, (“Picky”, “we”, “us”, or “our”). If you have any questions or if you wish to exercise your rights, please feel free to email contact@pickyil.online.

e) The Legal Bases for processing Personal Data

In accordance with the the PPL and the GDPR, we have to have at least one of the following legal bases to process your Personal Data: a) you have given your consent, b) the data is necessary for the fulfillment of a contract / pre-contractual measures, c) the data is necessary for the fulfillment of a legal obligation, or d) the data is necessary to protect our legitimate interests, provided that your interests are not overridden.

Technical Data

a) Downloading the App

The App can be downloaded from the "Google Playstore" a service offered by [Google LLC](#), or the Apple "App Store" a service of [Apple Inc.](#) Downloading it may require prior registration with the respective App store and/or installation of the respective App store software.

b) Installing the App

As far as we are aware, Google collects and processes the following data: License check, network access, network connection, WLAN connections, and location information. However, it cannot be ruled out that Google also transmits the information to a server in a third country. We cannot influence which personal data Google processes with your registration and the provision of downloads in the respective App store and App store software. The responsible party in this respect is solely Google as the operator of the Google Play Store.

As far as we are aware, Apple collects and processes the following data: device identifiers, IP addresses, location information, it cannot be excluded that Apple also transmits the information to a server in a third country. We cannot influence which personal data Apple processes with your registration and the provision of downloads in the respective app store and app store software. The responsible party in this respect is solely Apple as the operator of the Apple App Store.

c) Device information

Google and Apple may collect information from and about the device(s) you use to access the App, including hardware and software information such as IP address, device ID and type, device-specific and App settings and properties, App crashes, advertising IDs (AAID), information about your wireless



Privacy Policy

and mobile network connection such as your service provider and signal strength; information about device sensors such as accelerometer, gyroscope, and compass.

d) Authorizations and access

We may request permission to access your Internet Connection, Network and geo location (precise). The legal basis for data processing is our legitimate interest and the provision of contractual or pre-contractual measures. You can deny access on your device via the Settings/Notifications/ options of your device; however, this means that our App may not function as intended.

e) Firebase

We use the Google [Firebase](#) developer App and related features and services provided by Google. By integrating Google services, Google may collect and process information (including personal data). It cannot be excluded that Google also transfers the information to a server in a third country. We cannot influence which data Google collects and processes. Firebase's key security and privacy information can be found here: <https://firebase.google.com/support/privacy> The legal basis is the implementation of the user contract for the use of the App

f) Appwrite

We use Appwrite ([Appwrite Code Ltd](#)) and its Authentication, Database and Storage functions and features. By integrating Appwrite, Appwrite may collect and process certain information (including usage analytics and statistics, log files, personal data such as your phone number, name, Device ID and IP address). It cannot be excluded that Appwrite also transfers the information to a server in a third country. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers with Appwrite. The legal basis is the provision of a contractual service and the provision of our App.

Data processing by us

Contacting us

If you send us feedback, or a support request, your email address will only be used for correspondence with you and only to clarify your support case. Your data will not be passed on to third parties. The data of your request will be deleted after completion. In the course of the support you have requested, it may be necessary for you to provide us with some of your personal data so that we can fulfill our contractual obligations. The data transmitted in this context will be deleted after the end of the support. The legal basis for this processing is your consent and our legitimate interest.

Registration and sign up

If you register, we will request your phone number, name. The entry of your data is encrypted so that third parties cannot read your data when it is entered. We also use a one time password (OTP) Authentication system (Appwrite) which is a protocol that generates encrypted security tokens and enables users to verify their identity and then generates a unique encrypted authentication token. Of course you can delete your account at any time using the Delete Account Feature in our App. The legal basis for the data processing is the fulfillment of our contractual obligations.

Share the Parking

We enable you to share a parking space, your name and phone number with Third Parties. If you do so our App using the Appwrite services will track your precise location in real time and calculate the route for that Third Party. We are not responsible for the privacy practices of such Third Party. Please be aware that Third Parties can collect Personal Data from you and in particular that location data could be revealing your life habits as well as your centers of interest and may possibly reveal sensitive information such as religion through the place of worship, or sexual orientation through the places visited. The legal basis for the data processing is the fulfillment of our contractual obligations as well as your consent.



Privacy Policy

PickyCoins

Each time you use the app to locate and reserve a parking space, you earn PickyCoins. The data provided for our reward program is mandatory information, without which participation in the PickyCoins reward program is not possible. This allows us to evaluate your use of our reward program in order to manage your rewards. The legal basis for this is our legitimate interest to provide participants in the rewards program with information tailored to their needs. Failure to provide the data means that you cannot use the function.

Leaderboard

We may also process your name and phone number in connection with our leaderboard. In this case and only if your PickyCoins score qualifies for our leaderboard, your PickyCoins score and name will be visible to our users and we may also contact you to organize your reward. The legal basis for the processing of your Personal Data is the establishment and implementation of the user contract for the use of the service as well as your consent.

Earning PickyCoins

We enable you to interact with our social media profiles and to share certain content in order to earn PickyCoins. If you contact or connect with us via social media, we and the relevant social media platform are jointly responsible for the processing of your data and enter into a so-called joint controller agreement. The Personal Information collected is processed to handle your participation in our reward program and the bases are both your consent and our legitimate interest.

When you visit our social media profiles and interact with us and others

When you visit our social media profiles, we, as the operator of the profile, process your actions and interactions with our profile (e.g., the content of your messages, enquiries, posts or comments that you send to us or leave on our profile or when you like or share our posts) as well as your publicly viewable profile data (e.g., your name and profile picture). Which Personal Information from your profile is publicly viewable depends on your profile settings, which you can adjust yourself in the settings of your social media account. The legal basis is our legitimate interest and your consent.

Data management and technical support

If you create a support ticket, we will request personal and, where applicable, non- personal data in accordance with your request, this may include your name, email address and other order related data you voluntarily provide. The data provided is not shared with third parties and cannot read your data when it is entered. If you submit a support ticket, we process the data for the purpose of processing and handling your ticket. The legal basis of the data processing is our obligation to fulfill the contract and/or our legitimate interest in processing your support ticket. You can delete data provided at any time in the ticket or by contacting us.

Administration, financial accounting, office organization, contact management

We process data in the context of administrative tasks as well as organization of our business and your reward system, managing your obligations and compliance with legal obligations, such as archiving. In this regard, we process the same data that we process in the course of providing our contractual services. The processing bases are our legal obligations and our legitimate interest.

Using Apple Pay for payments When you add Apple Pay as a payment method, or make a payment, your Apple Pay wallet details such as DPAN (Device Personal Account Number), card type, card expiry, holder name, CAVV (unique token generated by Apple Pay), ECI (Electronic Commerce Indicator) are in encrypted form passed through our App. Your payment will be processed via Apple Pay and payment will solely be processed through the payment system of Apple Pay. As such, we have no access to your DPAN, CAVV, ECI, or any other payment or transaction information. The use of Apple Pay as a payment method is based on your consent, which you can revoke at any time with effect for the future by removing the payment method . When using Apple Pay as a payment method,



Privacy Policy

we transmit transaction data, information on the object of purchase, time and location of the request, details of the transaction to Apple Pay. Data processing in the context of a transaction is carried out to fulfill the transaction. Information on how Apple Pay processes your personal data can be found at <https://www.apple.com/legal/privacy/data/en/apple-pay/>.

General Principles

a) *Sharing*

We will not disclose or otherwise distribute your Personal Data to third parties unless this is a) necessary for the performance of our services, b) you have consented to the disclosure, c) or the disclosure of data is permitted by relevant legal provisions. In addition, we may disclose your Personal Data: in connection with law enforcement, fraud prevention or other legal proceedings; as required by law or regulation; if Picky (or a part of Picky) is sold to or merged with another company; or if we have reason to believe that disclosure is necessary to protect Picky.

b) *International Transfer*

We may transfer your Personal Data to other companies as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organizational measures to protect the Personal Data we transfer.

c) *Data Security*

Our data processing is subject to the principle that we only process the Personal Data that is necessary for the use of our services. In doing so, we take great care to ensure that your privacy and the confidentiality of all Personal Data are always guaranteed.

Nonetheless, databases or data sets that include Personal Data may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, we will notify all affected individuals whose Personal Data may have been compromised, and the notice will be accompanied by a description of the action being taken to reconcile any damage as a result of the data breach. Notices will be provided as expeditiously as possible after which the breach was discovered.

Your Rights and Privileges

a) *Privacy rights*

Under the PPL, you have the following rights:

- *Right to request for information,*
- *Right to inspect information,*
- *Right to amendment of information,*
- *Right to lodge a complaint,*
- *Right to opt out from marketing,*
- *Right to be informed on how your data is processed,*
- *Right to have information relating to marketing deleted*

Under the GDPR, you can exercise the following rights:

- *Right to information*
- *Right to rectification*
- *Right to deletion*
- *Right to data portability*
- *Right of objection*
- *Right to withdraw consent*
- *Right to complain to a supervisory authority*
- *Right not to be subject to a decision based solely on automated processing.*

If you wish to exercise any of your rights, please contact us.



Privacy Policy

b) Updating your information and Withdrawing your consent

If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion, or object to its processing, please do so by contacting us.

c) Access Request

In the event that you wish to make a Data Subject Access Request, you may inform us in writing of the same. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the respective legal regulations mentioned above).

d) What we do not do

- *We do not request Personal Data from minors and children;*
- *We do not use Automated decision-making including profiling; and*
- *We do not sell your Personal Data.*

e) Complaint to a supervisory authority

The Privacy Protection Authority ([PPA](#)) is the relevant authority in Israel. If you believe that the processing of your Personal Data is not lawful, you can lodge a complaint with a data protection supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the PPA or any other supervisory authority

Changes and Questions

This Privacy Policy was last updated on Thursday, 22nd of August, 2024, and is the current and valid version. However, from time to time changes or a revision to this policy may be necessary.

If you feel that the above is not sufficient or if you have any queries as regards the collection, processing or use of your Personal Data, we are looking forward to hearing from you. We will make every effort to reply as soon as possible and take into consideration any suggestions from your end.