

Privacy Policy – Hospikol Day

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Welcome to Hospikol Day (hereinafter: "the System" or "the Product"), operated by Hilma Tech – Hi-Tech for Society Ltd. (Public Benefit Company) (hereinafter: "the Company").

The Company respects the privacy of the System's users and acts to protect the personal information collected and processed within it, in accordance with the provisions of the Privacy Protection Law, 5741-1981 (hereinafter: "the Privacy Protection Law"); the Privacy Protection Regulations (Data Security), 5777-2017 (hereinafter: "the Data Security Regulations"); and any other applicable law.

Use of the System, including registration, creating a user account, entering information, receiving access to services, or using functions offered through it, constitutes agreement to the provisions of this privacy policy.

This policy forms an integral part of the terms of use of the System, and its purpose is to detail what information is collected in the course of using the System, how it is used, to whom it may be disclosed, and what rights the user has with respect to information concerning them.

1. Collection and Disclosure of Information

When using the System, the Company may collect and process personal information as well as technical information relating to the manner of use of the System.

"Personal information" is information relating to an identified person or a person who can be identified, directly or indirectly, including in combination with additional information held by the Company or by another party.

Information collected may be provided by the user directly, collected automatically during use of the System, or received from another authorized party using the System or providing a service through it.

Personal information may include, among other things: full name; email address; phone number; login details; user identifiers; organization or institution details; information provided in registration or contact forms; information entered by the user; information generated as a result of use of the System; activity and progress data; outputs created in the System; and any additional information that enables identification of a user.

In addition, technical and operational information may be collected, including IP address, device type, browser type, operating system, usage times, actions performed in the System, security data, usage data, and analytics data.

Please note: you are under no legal obligation to provide personal information; however, without providing certain information, it may not be possible to use the System or some of the services offered through it.

The user represents that the information provided by them is true, complete, and accurate, and that they are entitled to provide the information and to make use of it within the System.

2. Source of Medical Information and Identity of the Responsible Party

In the course of System use, the Company may process, in addition to the foregoing, sensitive personal information, including medical or health-related information concerning an identifiable person (hereinafter: "Medical Information" or "PHI").

Medical information may include, among other things: information relating to a person's health condition; medical or treatment information; diagnoses; test results; treatment data; medical questionnaires; professional assessments; medical recommendations; information collected in the context of a treatment or professional relationship; and any other information relating to a person's health.

Where medical information does not include a full name, but the person to whom it relates can be identified by combination with additional information, it shall be regarded as personal information for all purposes.

The Company will process medical information only for the purposes for which it was collected or made available to it, and will take appropriate measures to protect it in accordance with its sensitivity.

To the extent the System is operated on behalf of an organization, medical institution, treatment body, employer, or other professional entity (hereinafter: "the Organization"), personal information or medical information may be entered into the System by the Organization or someone on its behalf.

In such cases, the Organization may be the party that determines the purposes of use of the information and the scope of processing required, and the Company will act in accordance with the instructions given to it and the purposes for which the information was made available to it.

3. Purposes of Use of Information

The Company uses information collected for the purpose of: operating the System and providing the services; creating and managing user accounts; identifying and authenticating users; managing permissions; tailoring the service to the user's needs; producing outputs, reports, feedback, or recommendations; providing support; improving the System; analyzing usage; information security; preventing unauthorized use; complying with legal requirements; protecting the Company's legal rights; and other purposes related to operating the System.

To the extent medical information is used, the Company will not use it for purposes unrelated to providing the service, unless permitted by law, appropriate consent has been given, or the information has undergone an appropriate anonymization process.

4. Use of Medical Information for Statistical, Research, and Service Improvement Purposes

The Company may use aggregated information or information that has undergone an anonymization process, such that a specific person cannot be identified through it, for the purpose of statistical analyses, research, service improvement, and development of the System.

The Company will not use identified medical information for these purposes, except in accordance with the provisions of the law and appropriate authorizations.

5. Access Permissions to Personal and Medical Information

The Company restricts access to the personal and medical information collected within the System in accordance with the principles of need-to-know access and data minimization.

Access to information will be granted only to authorized users who require it for the performance of their role, and in accordance with the permissions defined for them in the System.

Depending on the nature of the System, there may be various holders of access permissions, including: system administrators; organization or institution administrators; authorized users; professionals; support and maintenance teams; and additional parties who require access for the purpose of operating the System and providing the services.

In systems that include medical information, the Company may implement role-based access control mechanisms, under which the level of access to

information will be determined according to the user's role, the purpose of use, and the information required to perform the action.

The Company will act to minimize the scope of access to medical information and to prevent access that is not required for the purpose of providing the services.

6. Use of Artificial Intelligence (AI)

The System may include artificial intelligence (AI) components, in accordance with the needs of use of the System.

In the course of operating AI components, information may be processed through systems operated by the Company and/or through external service providers.

To the extent AI components that process personal or medical information are used, the Company will examine the manner of use of the information, the scope of information transferred, the purposes of processing, and the protections applied to it.

The Company will not use identified medical information for the purpose of training, improving, or developing artificial intelligence models, unless permitted in accordance with the provisions of the law, in accordance with consents given, or after the information has undergone an appropriate anonymization process.

AI outputs may be partial, inaccurate, or incomplete, and should not be regarded as a substitute for professional, medical, or other judgment, as applicable.

7. Disclosure of Information to Third Parties and Use of Service Providers

The Company does not sell personal information to third parties. The Company may transfer personal information to parties acting on its behalf for the purpose of operating the System and providing the services, including service and infrastructure providers, such as: hosting and cloud providers; computing infrastructure providers; information security providers; support and maintenance providers; user management system providers; analytics providers; communication providers; AI service providers; and additional providers required for the purpose of operating the System.

When an external party processes personal information on behalf of the Company, the Company will act to enter into an appropriate agreement with it, including, among other things, undertakings regarding information security, confidentiality, restriction of use of the information, and processing

of the information in accordance with the Company's instructions and the provisions of the law.

Providers who receive access to medical information will be selected taking into account the sensitivity of the information and in accordance with information security considerations and the suitability of the service to the needs of the System.

The Company may also transfer information in cases where required by law, pursuant to a court order, at the demand of a competent authority, or for the purpose of protecting its legal rights.

The Company may transfer personal or medical information at the customer's request to a third-party system for the purpose of operating a system or mirroring information.

8. Transfer of Information Outside of Israel

Some of the personal information collected in the course of using the System may be stored or processed through service providers operating outside of Israel.

In such cases, the Company will act in accordance with the provisions of Israeli law applicable to the transfer of personal information outside of Israel, including examining the existence of an adequate level of protection in the country to which the information is transferred, or taking other appropriate measures, in accordance with the circumstances and the provisions of the law.

To the extent the information transferred includes medical information or other sensitive personal information, the Company will take into account the sensitivity of the information in examining the manner of transfer and the protections required.

9. Use of Cookies and Similar Technologies

The System may use cookies, pixels, technological identifiers, measurement tools, and similar technologies for the purpose of its proper operation, security, and improvement of the services provided through it.

The use of such technologies may include:

- Essential technologies – required for operating the System, managing user logins, maintaining usage status, information security, and preventing unauthorized use.
- Functional technologies – used to save user preferences, tailor the service, and improve the user experience.

- Analytics technologies – used to measure usage, analyze performance, produce statistical data, and improve the System.
- To the extent third-party analytics tools are used, certain technical information may be transferred to such providers in accordance with this policy.

The user may change their browser settings with respect to the use of cookies. However, blocking certain technologies may affect the availability or functioning of some of the services.

10. Databases and Information Security

Information collected in the course of using the System is stored in databases managed by the Company and/or by parties on its behalf.

The Company acts in accordance with the provisions of the Privacy Protection Law and the Data Security Regulations, and implements information security measures in accordance with the nature of the information processed, its scope, the purposes of its use, and the level of risk involved in its processing.

Security measures may include, among other things: management of access permissions; authentication mechanisms; restriction of permissions according to role; documentation and monitoring of actions in the System; security of systems and infrastructure; protection against unauthorized access; data backup; handling of security updates; and periodic review of security measures.

To the extent external parties holding or processing information on behalf of the Company are used, the Company will act in accordance with the provisions of the law regarding engagement with such parties, including examining their security measures and regulating their obligations with respect to the information.

However, the Company cannot guarantee absolute security of information systems or completely prevent information security incidents. In the event of an information security incident requiring reporting in accordance with the provisions of the law, the Company will act in accordance with the obligations applicable to it, including reporting to the Privacy Protection Authority and/or to the data subjects, as required.

11. Retention of Information

The Company will retain personal information for the period of time required for the purpose of providing the services, managing the Product's activity,

managing the Company's activity, operating the System, complying with legal requirements, preserving its legal rights, and handling disputes.

With respect to medical information or other sensitive personal information, the Company will periodically examine the need for continued retention of the information in accordance with the purposes for which it was collected, its level of sensitivity, and the provisions of the law.

Periodically, the Company will examine the necessity of the information it holds, and information that is no longer required will be deleted, destroyed, or undergo an anonymization process, to the extent possible and in accordance with the provisions of the law.

12. Access to, Correction, and Deletion of Information

In accordance with the Privacy Protection Law, the user is entitled to review the information held about them, and to request its correction to the extent the information is not correct, complete, clear, or up to date. Requests regarding access, correction, or other rights in connection with personal information will be examined in accordance with the provisions of the law and the circumstances of the matter.

To the extent there is a legal obligation to retain certain information, the Company will be entitled to continue to hold it in accordance with the provisions of the law.

Such requests may be sent to: privacy@hilma.tech, or by communicating with the hospital / medical center at which the System is used and with which the user is affiliated.

The Company will act to handle requests in accordance with the provisions of the law and in communication with the hospital / medical center to which the information is linked.

13. Processing of Information Concerning Minors – To the Extent Relevant

To the extent the System is intended for minors or may include information concerning minors, the Company will act in accordance with the provisions of the law and the authorizations required with respect to the processing of such information.

The Company does not knowingly collect information about minors other than in accordance with the required authorizations.

To the extent it comes to the Company's attention that such information has been collected unlawfully, the Company will act to examine the treatment required in accordance with the circumstances and the provisions of the law.

14. Links and External Services

The System may include links to services, websites, or systems of third parties. Use of these services is subject to the privacy policy and terms of use of those third parties, and the Company is not responsible for their activity, the manner in which they collect information, or the security of the information managed within them.

15. Changes to the Privacy Policy

The Company may update this privacy policy from time to time, in accordance with changes in the System, in the manner of the Company's activity, or in legal requirements. The updated version of the policy will be published in the System and will take effect on the date of its publication, unless otherwise specified.

16. Contact

For any question, request, or inquiry regarding privacy and personal information, you may contact us by email: privacy@hilma.tech