



PRIVACY POLICY

Last updated: November 11, 2024

This Privacy Policy (the "**Privacy Policy**") describes how Chronom A.I LTD. ("**Chronom**", "**we**", "**us**", "**our**") collects, uses, processes, shares and stores the following categories of Personal Data:

- (i) "**Customer Data**" means personal data provided by a business customer with whom Chronom has signed an agreement and that Chronom processes on behalf of and under the instruction of such legal entity ("**Customer(s)**") for the provision and use of Chronom products and services as described in the [Terms Of Services](https://www.chronom.ai/terms) <https://www.chronom.ai/terms> ("**Platform**").
- (ii) "**User Data**" means personal data provided by a Customer and processed and managed on behalf of such Customer concerning individuals authorized by such Customer to sign up, access and use the Platform ("**User**", "**you**" or "**your**").
- (iii) "**Visitor Data**" means personal data concerning any individual who visits or otherwise interacts with our website <https://www.chronom.ai/> ("**Website**") ("**Visitor**", "**you**" or "**your**").

This Privacy Policy supplements our [Terms Of Service](#) and [Cookie Policy](#). <https://www.chronom.ai/cookies>

If you have questions or concerns regarding this Privacy Policy, please contact us at: support@chronom.ai

PLEASE SEE OUR FULL PRIVACY POLICY BELOW IN ORDER TO BETTER UNDERSTAND OUR PRACTICES IN DETAIL.

This Privacy Policy is divided into the following sections:

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1. DATA CONTROLLER/DATA PROCESSOR

- 1.1. The GDPR distinguishes between the data controller, who determines the purposes and means of processing; and the data processor, who processes the data on behalf of the data controller. Below we explain how these roles apply to our Platform and Website.
- 1.2. Chronom is the data controller of **Visitor Data** and we assume the responsibilities of data controller, as set forth in this Privacy Policy.
- 1.3. Chronom is the data processor of **Customer Data** and **User Data**, which we process on behalf of our Customer who is the data controller of such Personal Data. Accordingly, Chronom processes Customer Data and User Data strictly in accordance with our Customers' reasonable instructions and as further stipulated in our agreement with the Customer.
- 1.4. Chronom may also process certain **User Data** as data controller, which is processed by Chronom for its own purposes (as described in Section 3 below), as an independent data controller.
- 1.5. Our Customers are solely responsible for determining whether and how they wish to use our Platform, and for ensuring that all Users using our Platform on the Customer's behalf or at the Customer request, as well as all individuals whose personal data may be included in Customer Data processed through the Platform, have been provided with adequate notices and given required consent to the processing of their personal data, where such consent is necessary, and that all legal requirements applicable to the collection, use or other processing of personal data through our Platform are fully met by the Customer.

2. WHAT PERSONAL DATA DO WE PROCESS?

- 2.1 **Definition.** When we use the term "personal data" in this Privacy Policy, we mean any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly.
- 2.2 **Collection of Personal Data – General Provisions.** We hereby inform you, and you hereby acknowledge that you have no legal obligation to provide us with any personal data when you use the Website and the Platform, and the provision of it is solely based on your free will. However, without receipt of data it may not be possible to operate the Website and the Platform and provide you with its related services.
- 2.3 **Data Collection and Processing.** We process the following categories of personal data:

- 2.3.1 **Visitor Data.** We process the following categories of personal data directly from you through the Website: identification data (i.e., first and last names); contact details (i.e., email address) and any other information you decide to add to the chatbox (e.g., date and subject of your request, technical issues, etc.). We also automatically collect internet or other electronic network activity information (e.g., Internet protocol (IP) address; date and time of the visit; time and length of visits to certain pages; page interaction information, such as scrolling, clicks, and mouse-overs; methods used to browse away from the page; traffic data; location) through cookies and other tracking technologies; for more information on cookies used on our Website, please see our [Cookie Policy](https://www.chronom.ai/cookies) <https://www.chronom.ai/cookies>.
- 2.3.2 **User Data.** We process the following categories of personal data provided by the Customer for the provision of the Platform: identification data (i.e., first and last names) and contact details (i.e., work email address). We also automatically collect internet or other electronic network activity information (e.g., Internet protocol (IP) address; date and time of access to the Platform; time and length of use of the Platform; interaction information, such as scrolling, clicks, and mouse-overs; methods used to browse away from the page; traffic data; location) through cookies and other tracking technologies; for more information on cookies used on our Platform, please see our [Cookie Policy](https://www.chronom.ai/cookies) <https://www.chronom.ai/cookies>.
- 2.3.3 **Customer Data** may include personal data provided or generated on the Platform and processed on Customers' behalf and under Customers' instructions in accordance with our agreement(s) with each Customer.

3. FOR WHAT PURPOSES DO WE USE PERSONAL DATA?

We will use personal data for the following purposes:

Visitor Data		
Purposes of processing	Examples of use	Legal Basis <i>for EU Visitors only</i>
To book a demo of our Platform (‘Book a Demo’ Form)	<ul style="list-style-type: none"> to schedule a demonstration of our Platform to potentially purchase our Platform 	Legitimate interest of Chronom to provide its Platform

Visitor Data		
Purposes of processing	Examples of use	Legal Basis <i>for EU Visitors only</i>
To manage requests (including through the chatbox)	<ul style="list-style-type: none"> to answer your questions to contact you if necessary 	Legitimate interest of Chronom to manage its requests
Improving the Website and your experience	<ul style="list-style-type: none"> to monitor and analyze your use of the Website to count visits and traffic sources to analyze how Visitor behaves on our Website research and further development, analysis and statistics 	Legitimate interest of Chronom in improving its Website and Visitor's experience
Supporting and enhancing data security measures of the Website	<ul style="list-style-type: none"> to prevent and mitigate the risks of fraud, error or any illegal or prohibited activity technical administration and troubleshooting of the Website to diagnose and repair Website errors, and, in cases of abuse, track and mitigate the abuse 	Legitimate interest of Chronom in operating and securing its Website and Visitor's experience

User Data		
Purposes	Example of use	Legal Basis <i>for EU Users only</i>
Providing our Services	<ul style="list-style-type: none"> to install the Platform in Customer's IT system in case of on-premise or on cloud managed by Chronom to create User's account to login and access the Platform 	User Data that we process on behalf of our Customers (as listed in Section 1) is processed only on behalf of Customers. Therefore, Customers, as data controllers, are responsible for determining legal basis.
Improving the Platform and User's experience	<ul style="list-style-type: none"> to monitor and analyze the use of the Platform to count visits and traffic sources to analyze how Users behaves on our Platform research and further development, analysis and statistics 	Legitimate interest of Chronom in improving its Platform and User's experience
Supporting and enhancing data security measures of the Platform	<ul style="list-style-type: none"> to prevent and mitigate the risks of fraud, error or any illegal or prohibited activity technical administration and troubleshooting of the Platform to diagnose and repair Platform errors, and, in cases of abuse, track and mitigate the abuse 	Legitimate interest of Chronom in operating and securing its Platform and Users's experience
Customer Data		
Customer Data that we process as data processor on behalf of our Customers (as listed in Section 1) is processed only on behalf of Customers. Therefore, Customers, as data controllers are responsible for determining the purposes and EU legal basis.		

Visitor Data and User Data		
Purposes	Example of use	Legal Basis <i>for EU Users only</i>
Pre-litigation or litigation management	<ul style="list-style-type: none"> to take action against any identified security breach; to manage any dispute or litigation; to seek advice from lawyers, auditors, and other professional advisers. 	Legitimate interest of Chronom in defending its rights and interests
Compliance with legal and regulatory obligations	<ul style="list-style-type: none"> to respond to law enforcement and governmental agency requests, to comply with applicable legal and regulatory requests and obligations (including investigations); to exercise legal and contractual rights, and initiate or respond to, or establish, exercise, and defend, legal and contractual rights claims. 	Legal and regulatory obligations to which Chronom is subject

4. WITH WHOM DO WE SHARE PERSONAL DATA?

4.1 Service Providers and Subcontractors (including hosting, data security services, fraud detection and prevention services, product analytics, session or activity recording services, remote access services, content transcription and analysis services, performance measurement, insurers). We will share personal data to perform services on our behalf or complementary to our own, depending on each of their specific roles and purposes in facilitating and enhancing our Website and Platform.

4.2 Governmental, Administrative or Judiciary Authorities. We may disclose personal data in case of a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect our legitimate business interests, including the security or integrity of our products and services.

- 4.3 Lawyers and Interested Parties.** We will share personal data in case of the management of possible disputes and other legal matters where appropriate.
- 4.4 Corporate Transactions.** We may share personal data in connection with any proposed or actual reorganization, restructuring, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Chronom business, assets or stock (including in connection with any bankruptcy, insolvency or similar proceedings).
- 5. HOW IS YOUR PERSONAL DATA TRANSFERRED OUTSIDE OF THE ECONOMIC AREA AND ISRAEL?**
- 5.1 General provisions.** We may store or process your personal data in several jurisdictions other than the country of your jurisdiction. In some jurisdictions, the level of protection of your personal data may be lower than in the country of your jurisdiction.
- 5.2 EEA Transfers.** When we transfer personal data from within the European Economic Area ("EEA") to countries or international organizations that are based outside the EEA, the transfer takes place on the basis of an adequacy decision by the European Commission, or in the absence of an adequacy decision, other legally permitted safeguards under the GDPR, such as standard contractual clauses.
- 5.3 Israeli Transfers.** When we transfer personal data from the State of Israel to a third country outside Israel, the transfer takes place on the basis of: (i) a country declared as offering equivalent level of protection by the Israeli Privacy Protection Authority; (ii) another approved transfer mechanism under the Israeli regulations; or (iii) your consent to transfer your personal data to other jurisdictions, understanding that in some countries the level of protection may be lower than in Israel.
- 6. HOW LONG DO WE STORE PERSONAL DATA FOR?**
- 6.1** We retain personal data for as long as we deem it as reasonably necessary in order to provide you with our Website and Platform, as required by applicable laws and/or to fulfill our legitimate interests.
- 6.2** Other circumstances in which we will retain your personal data for longer periods of time include: (i) where we are required to do so in accordance with legal requirements, or (ii) for us to have an accurate record of your interaction with us in the event of any inquiries or contact requests, or (iii) if we reasonably believe there is a prospect of litigation. Please note that except as required by applicable law, we will not be obligated to retain your personal data for a particular period, and we may delete it for any reason and at any time, without providing you with prior notice of our intention to do so.

- 6.3 Customer Data and User Data that we process on behalf of our Customers (as listed in Section 1) is processed only on behalf of Customers. Customers, as data controllers are responsible for determining the retention period. Therefore, we will process the Personal Data under their instruction and will delete it from the Platform in accordance with our agreement with such Customer. If you wish to delete your account on the Platform, please contact the relevant Customer directly.

7. HOW DO WE KEEP PERSONAL DATA SECURE?

- 7.1 Chronom has implemented technical and organizational measures to protect personal data, in particular against potential data breaches, either by accident or unlawfully, and against the destruction, loss, modification, unauthorized access or divulcation. However, we do not promise or guarantee that any personal data will be absolutely protected from unauthorized disclosure or use.
- 7.2 If you have found a vulnerability or would like to report a security incident, you may send an email to support@chronom.ai
- 7.3 **Customer Data.** When the Customer chooses the Chronom cloud solution, we implement appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration unauthorized disclosure or access. In order to keep personal data secure, we implement the following main measures: encryption at transit and rest and an isolated network environment. In case of on-premise solution the server is managed by Customers, which as data controllers are responsible for determining the security measures. If you have questions or concerns regarding security measures for on-premise solution, please contact the respective Customer directly.

8. WHAT RIGHTS DO YOU HAVE REGARDING PERSONAL DATA?

- 8.1 **General Provisions.** Individuals have certain rights concerning their personal data, depending on their jurisdiction. If you wish to exercise your rights, you may contact us at: support@chronom.ai. We will consider all such requests and provide our response within a reasonable period (and in any event within any time period required by applicable laws). When you ask us to exercise any of your rights under this Privacy Policy and the applicable laws, we may need to ask you to provide us with certain credentials to make sure that you are who you claim you are, to avoid disclosure to you of personal data which is related to others that you are not authorized to receive, and to ask you questions to better understand the nature and scope of personal data that you request to access. We may redact from the personal data we will make available to you any personal data related to others.

8.2 Data Rights for Israeli Data Subjects. If you are based in Israel, you are entitled to request us to:

- (i) **review and access** your personal data that we process.
- (ii) **update, amendment, and deletion** of personal data which is incomplete, incorrect, outdated or unclear.

8.3 Data Right for EEA/UK Data Subjects. If you are based in the EEA, you are entitled to request us to:

- (i) **access** your personal data in order to obtain clear, transparent and understandable information on how we process your personal data and on your rights (as provided in this Privacy Policy), as well as a **copy** of your personal data.
- (ii) **rectify** your personal data in case your personal data are obsolete, inaccurate or incomplete.
- (iii) **object** the processing of your personal data when the processing is based on Chronom's legitimate interest. Chronom will no longer process your personal data unless Chronom demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, such as the respect of a legal obligation (e.g. legal obligation involving the retention of documents), or for the establishment, exercise or defense of legal claims.
- (iv) in certain circumstances under applicable laws, **restrict** the processing of some of your personal data during a limited period of time.
- (v) **withdraw your consent** when it has been obtained and processing is based on consent.
- (vi) in certain circumstances under applicable laws, **request data portability**, meaning that you can receive the personal data originally provided by you in a structured and commonly used format or that you can request the transfer of the personal data provided by you to another data controller.
- (vii) in certain circumstances under applicable laws, **delete** your personal data (also known as the **right to be forgotten**).
- (viii) **submit a complaint** to your national data protection authority. If you have a complaint about how we use your personal data, we would always prefer you to contact us first. However, you may also make a complaint to your local data protection authority in the

EEA. If you are unsure which data protection authority to contact, please contact us at support@chronom.ai.

8.4 Customer Data and User Data Provisions. Customer Data and User Data that we process on behalf of our Customers (as listed in Section 1) is processed only on behalf of Customers. Therefore, Customers, as data controllers are responsible for responding to your requests to exercise your rights. If you send your request to us, we will transfer it to the relevant Customer, in accordance with our agreement with such Customer. You may also send your request to exercise your rights directly to the relevant Customer.

9. DOES THIS PRIVACY POLICY APPLY TO THIRD PARTY LINKS?

- 9.1 You may, during your use of the Website, access links to or other websites operated by third parties outside of Chronom. Please note that this Privacy Policy only applies to personal data that we (or third parties on our behalf) collect from or about you and we cannot be responsible for personal data collected, stored or otherwise processed by third parties.
- 9.2 Third party websites and services have their own terms of use and privacy policies, and you should read these carefully before you submit any personal data to these websites or services.
- 9.3 We do not endorse or otherwise accept any responsibility or liability for the content of such third-party websites or third-party terms and conditions or privacy policies.

10. SOCIAL MEDIA WIDGETS

Our Website may include social media features, such as the LinkedIn™ button. These features will collect your IP address and which page you are visiting on our Website. They will also set a cookie to enable the feature to function properly. Social media features are hosted by a third party. Your interactions with these features are governed by the privacy policy of the company, social media platform or third-party service, providing it.

11. WHAT IS OUR POLICY REGARDING MINORS?

The Website and Platform are not intended for use by minors, and we do not knowingly collect and process personal data relating to minors. If these age requirements are not met, you are required to avoid using the Website and/or Platform.

12. HOW DO WE APPROACH CHANGES TO THIS PRIVACY POLICY?

- 12.1 We will change this Privacy Policy from time to time.

12.2 Any changes we make to our privacy policy in the future will be posted on this page and, if we have your e-mail address, we may also notify you by email of any material changes.

12.3 The effective date of any change of Privacy Policy will be clearly marked on the top of each new Privacy Policy posted. We strongly encourage you to review this Privacy Policy periodically to ensure that you understand our most updated privacy practices.

13. HOW TO CONTACT US?

If you have questions, concerns or comments regarding this Privacy Policy or the data protection practices in connection with the Website and the Platform, please contact us at: support@chronom.ai

14. DATA CONTROLLER'S DETAILS

Chronom A.I LTD

Sapir 2, Hertzliya, Israel

E-mail: support@chronom.ai