

## OFFERSHOP PRIVACY POLICY

*Last Updated: February 4, 2020*

In order to ensure transparency and give you more control over your personal information, this privacy policy (“**Privacy Policy**”) governs how we, **SAB Turismo LTD** (together, “**SAB Turismo**” “**we**”, “**our**” or “**us**”) use, collect and store personal data we collect or receive from or about you (“**you**”) such as in the following use cases:

- (i) When you browse or visit one of our websites (“**Website**”);
- (ii) When you make use of, or interact with, our Website
  - a. When you contact us via a form
  - b. When you complete our medical questionnaire
- (iii) When you interact with us and/or our service providers through WhatsApp
- (iv) When you interact with us on our social media pages and profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal data. “**Personal data**” or “**personal information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your personal data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

**1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED**

Specific personal data we collect	Why is the personal data collected and for what purposes?	Legal basis (GDPR only, if applicable)	Third parties with whom we share your personal data	Retention period	Consequences of not providing the personal data
<b><i>When you browse or visit our Website</i></b>					
<ul style="list-style-type: none"> <li>• Cookies, analytic tools and log files</li> </ul>	<ul style="list-style-type: none"> <li>• Track traffic flow and patterns of travel in connection with our Website</li> <li>• To understand the total number of visitors to our Sites on an ongoing basis and the types of internet browsers (e.g. Chrome, Firefox, Safari, or Internet Explorer) and operating systems (e.g. Windows or Mac) used by our visitors</li> </ul>	Consent	N/A	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws	<p>Cannot track traffic flow and patterns of travel in connection with our Website</p> <p>Cannot understand the total number of visitors to our Sites on an ongoing basis and the types of internet browsers (e.g. Chrome, Firefox, Safari, or Internet Explorer) and operating systems (e.g. Windows or Mac) used by our visitors</p> <p>Cannot monitor the performance of our Site</p>

	<ul style="list-style-type: none"> <li>To monitor the performance of our Site and to continually improve it</li> <li>To customize and enhance your online experience</li> </ul>				<p>and to continually improve it</p> <p>Cannot customize and enhance your online experience</p>
<b>When you make use of, or interact with, our Website</b>					
<b>When you contact us via a form</b>					
<ul style="list-style-type: none"> <li>Full name</li> <li>Phone number</li> <li>Email address</li> <li>IP address</li> <li>Any information that you decide to provide us</li> </ul>	<ul style="list-style-type: none"> <li>To receive and respond your request</li> <li>To send you information about our services or offerings</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g., to respond to your request)</p>	<p>3<sup>rd</sup> party such as for the following purposes:</p> <p>ImpactTech – CRM</p> <p>GetLinked – <i>Automation software of the lead distribution to the service providers</i></p> <p>Service providers (Call centers) – <i>To contact you in relation with our services</i></p> <p>Clinics – <i>To provide you our services</i></p>	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot receive and respond your request</p> <p>Cannot send you information about our services or offerings</p>
<b>When you complete our medical questionnaire</b>					
<ul style="list-style-type: none"> <li>Name</li> <li>Age</li> <li>Gender</li> <li>Nationality</li> </ul>	<ul style="list-style-type: none"> <li>To assess you as a candidate for a medical procedure</li> </ul>	<p>Consent</p>	<p>Clinics – <i>To provide you the services</i></p>	<p>Until we no longer need the information and proactively delete it or you send</p>	<p>Cannot assess you as a candidate for a medical procedure</p>

<ul style="list-style-type: none"> <li>• Medical information (smoking, alcohol consumption)</li> <li>• Medical background (diseases, deficiencies, infectious diseases, allergies)</li> </ul>			<p>Medical tourism agents – <i>To contact you in relation of the services</i></p>	<p>a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	
<b>When you interact with us and/or our service providers through WhatsApp</b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Phone Number</li> <li>• Any other data that you decide to provide us</li> </ul>	<ul style="list-style-type: none"> <li>• To establish a connection between you and our service providers about our services</li> </ul>	<p>Legitimate interest (e.g., to establish a connection between you and our service providers about our services)</p>	<p>3<sup>rd</sup> party such as for the following purposes:  Service providers (Call centers) – <i>To contact you in relation with the services</i>  Clinics – <i>To provide you the services</i></p>	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot establish a connection between you and our service providers about our services</p>
<b>When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)</b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Phone Number</li> <li>• Email Address</li> <li>• Country of Residence</li> <li>• IP Address</li> <li>• Any other data you decide to provide us</li> <li>• Your social media profiles</li> </ul>	<ul style="list-style-type: none"> <li>• To respond to your requests in our social media channels</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. respond to your</p>	<p>3<sup>rd</sup> party such as for the following purposes:  GetLinked – <i>Automation software of the lead distribution to the service providers</i>  ImpacTech – <i>CRM</i></p>	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot respond your request in our social media channels</p>

		requests in our social media channels)	Service providers – <i>To contact you in relation with the services</i>		
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Finally, please note that some of the abovementioned personal data will be used for fraud detection and prevention, and for security purposes. The abovementioned personal data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize your personal data. “Anonymous Information” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

## 2. HOW WE PROTECT AND RETAIN YOUR PERSONAL DATA

- 2.1. Security. We have implemented appropriate technical, organizational and security measures designed to protect your personal data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 2.2. Retention of your personal data. In addition to the retention periods mentioned above, in some circumstances we may store your personal data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your personal data or dealings. We have an internal data retention policy to ensure that we do not retain your personal data perpetually. Regarding retention of cookies, you can read more in our cookie policy.

## 3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your personal data as follows:

- 3.1. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;

- 3.2. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your personal data to such third party (whether actual or potential) in connection with the foregoing events;
- 3.3. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your personal data in connection with the foregoing events;
- 3.4. Where you have provided your consent to us sharing or transferring your personal data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality);
- 3.5. Where we need to share and transfer your personal data when such transfers are necessary for the performance of a contract between you and us or the implementation of pre-contractual measures taken at your request.

#### **4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA**

##### **4.1. Storage:**

4.1.1. ImpactCRM: Microsoft Cloud Azure – UK

4.1.2. GetLinked : AWS – Ireland / Cloudflare – US (Privacy Shield)

4.2. Access from Israel: Access from Israel is covered by the European Commission’s Adequacy Decision regarding Israel. You can read more here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).

4.3. External transfers: Where we transfer your personal data outside of EU/EEA (for example to third parties who provide us with services), we will obtain contractual commitments from them to protect your personal data. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of Personal Data transferred from within the EU to the United States. We may also transfer your personal data outside of EU/EEA when such transfers are necessary for the performance of a contract between you and us or the implementation of pre-contractual measures taken at your request.

#### **5. YOUR PRIVACY RIGHTS.**

The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- You have a right to access personal data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we rectify any personal data we hold that is inaccurate or misleading;
- You have the right to request the erasure/deletion of your personal data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your personal data, for example for the establishment, exercise or defense of legal claims;

- You have the right to object, to or to request restriction, of the processing;
- You have the right to data portability. This means that you may have the right to receive your personal data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You also have a right to request certain details of the basis on which your personal data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

You can exercise your rights by contacting us at [privacy@offershop.io](mailto:privacy@offershop.io). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

## 6. USE BY CHILDREN

We do not offer our products or services for use by children and, therefore, we do not knowingly collect personal data from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any personal data to us without involvement of a parent or a guardian. For the purposes of the GDPR, we do not intend to *offer information society services directly to children*. In the event that we become aware that you provide personal data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at [privacy@offershop.io](mailto:privacy@offershop.io).

## 7. INTERACTION WITH THIRD PARTY PRODUCTS

We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a **“Third Party Service”**). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party

Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

## 8. LOG FILES

We use log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We use such information to analyze trends, administer the Website, track users' movement around the Website, and gather demographic information.

## 9. ANALYTIC TOOLS

- **Google Analytics.** The Website uses a tool called “Google Analytics” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personal information. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

We reserve the right to remove or add new analytic tools.

## 10. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

- 10.1. **California Privacy Rights:** California Civil Code Section 1798.83 permits our customers who 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 an email to [privacy@offershop.io](mailto:privacy@offershop.io). Please note that we will respond to one request per customer each year, unless otherwise required by law.
- 10.2. **Our California Do Not Track Notice:** We do not track consumers over time and across third party websites and therefore do not respond to Do Not Track signals. We do not allow third parties to collect personally identifiable information about an individual consumer’s online activities over time and across different web sites when a consumer uses the Services.
- 10.3. **Deletion of Content from California Residents:** If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or personal information you have publicly posted. If you wish to remove such content or personal information and you specify which content or personal information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you may not be able to restore removed content. In addition, such removal does not ensure complete or

comprehensive removal of the content or personal information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

10.4. Your privacy rights: Please see Section 5 above.

## **11. CONTACT US**

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [privacy@offershop.io](mailto:privacy@offershop.io).

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