

# SHORASHIM PRIVACY POLICY

**Effective Date: June 12, 2020**

Shorashim, Inc., Shorashim Tochniot Mifgash, and their related entities and affiliates (collectively, “**Shorashim**,” “**we**”, “**us**”, and “**our**”) is committed to protecting your privacy when you (also referred to as “**your**”) use the websites (the “**Site(s)**”), access external websites linked to from the Sites, and engage with us via phone, mail, and email. When you access, browse, or use the Sites – including but not limited to when you register for one of our activities – or engage with us via phone, mail, or email, information will be collected, transferred, processed, stored, and disclosed in accordance with this privacy policy (the “**Policy**”).

By accessing, browsing, or using the Sites, or by engaging with us via phone, mail, email, or any other media, you expressly consent to the collection, transfer, use, processing, and storage of your information (including personally identifiable information) as described in this Policy. IF YOU DO NOT AGREE WITH THIS POLICY OR THE INFORMATION COLLECTION, USE, AND DISCLOSURE PRACTICES DESCRIBED IN THIS POLICY, DO NOT ENGAGE WITH US VIA PHONE MAIL, OR EMAIL AND DO NOT USE THE SITES OR CLICK TO INDICATE THAT YOU AGREE TO THESE TERMS WHEN SUCH CONSENT IS REQUESTED; in which case, we will be unable to provide you with the services of Shorashim.

## 1. Information Collection Practices

### 1.1. Information Provided by You

1.1.1. Shorashim Website Use, Subscription, Registration, Application, and Donations – When completing forms on the Sites in order to contact us or to subscribe to our communications, when registering a profile on the Sites, when using the Sites to complete an application to participate in a program administered by us, when using the Sites to make a financial contribution to us (“Donate” or “Donation”), or in a variety of other circumstances, you may be asked to provide personally identifiable information, such as, but not limited to, your full name, age,

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date of birth, email address, telephone number, address, employment and occupation, the names and contact information for third parties (such as a parent/guardian or friends), other information related to your background, religious affiliation, and preferences, and you may also be asked to provide health information as needed in consideration of the activities taking place on your trip or in connection with the program you have applied for (collectively, the “**Personal Information**”). By providing any such Personal Information, you consent to our collection, transfer, processing, storage, disclosure, and general use of such Personal Information in accordance with this Policy.

1.1.1.1. Registration Through Social Sites – Rather than entering certain Personal Information directly on the Sites in order to register, we may provide the option to register by utilizing your credentials on a social media website such as Facebook (a “**Social Site**”). When you provide credentials for a Social Site via our Sites, we may use those credentials to obtain Personal Information about you from that Social Site and the Social Site may automatically track your activities within our Sites. You may still be asked to provide additional Personal Information to the extent the Social Site does not have all of the Personal Information we require. By registering your credentials through a Social Site in the manners noted, you consent to the transfer of your associated Personal Information to us and our collection, transfer, processing, storage, disclosure, and general use of such Personal Information in accordance with this Policy.

1.1.2. Donation Processing – If you Donate on the Site, you will be redirected to a third-party payment site in order to do so (the “**Payment Processor**”). In addition to providing Personal Information to the Payment Processor, you will also need to provide information related to your credit or debit card transaction, including but not limited to the name appearing on the credit or debit card, the credit or debit card billing address, the credit or debit card shipping address, the credit or debit card number, the credit or debit card expiration date, the credit or debit card security code, related information, and/or other electronic payment information (the “**Credit Card Information**”). By providing any such Credit Card Information to

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Donate or at any other time, you consent to our collection, transfer, processing, storage, disclosure, and general use of such Credit Card Information in accordance with this Policy.

1.1.3. Information You Provide to Birthright Israel – To the extent you have applied to participate in a Birthright Israel International (Taglit) or Birthright Israel North America (collectively, “Birthright Israel”) trip you may, at various times, be asked to provide information to Birthright Israel. Please remember that any information you provide to Birthright Israel will be governed by Birthright Israel’s privacy policies and storage and processing of such information is the sole responsibility of Birthright Israel.

1.2. Automatically Collected Information – We will automatically collect some additional personally identifiable information about you when you use the Sites (the “**Automatically Collected Personal Information**”) and we incorporate tools into our Sites that allow such Automatically Collected Personal Information to simultaneously be collected and used by our “**Ad Serving Providers**” and by our “**Analytics Providers**,” as further defined herein. Automatically Collected Personal Information may include, but will not be limited to, your diagnostic log information, log-in location, IP address, operating system and language, referring/exit pages and URLs, browsing history, number of clicks, landing pages, cookie information, the pages you requested and viewed, the amount of time spent on particular pages, what questions you have answered in a program application, and the date and time. This information is collected for the purposes described in this Policy, including to better understand our constituent base and to improve the quality of the Sites. By using the Sites, you consent to our collection, transfer, processing, storage, disclosure, and general use of the Automatically Collected Personal Information in accordance with this Policy.

1.2.1. Ad Serving Providers – We use third-party Ad Serving Providers to serve ads and/or collect data on our behalf across the Internet and on our Sites. Some of these Ad Serving Providers may collect information about your visits to our Sites

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and your interaction with our products and services to tailor marketing messages on our Sites or to trigger real time interaction, customize our Sites, or enhance your profile. Some of these Ad Serving Providers may be able to collect personal information that you share with our Sites automatically via a web form and prior to your pressing a submit button, and they may be able to use Automatically Collected Personal Information from your visits to our Sites to send marketing messages to you in a way that may personally identify you. This information is collected through the use of a cookie, a javascript tag, and/or pixel, as later defined within, which is industry standard technology used by most major websites. The Automatically Collected Personal Information collected by these Ad Serving Providers may include your device's IP address, user agent, email addresses (where hashed or otherwise rendered pseudonymous), and other user and device-level pseudonymous information. Please keep in mind that your browser settings may not permit you to control the technologies utilized by these companies. If you would like more information about these practices, please click: [http://optout.aboutads.info/#!/.](http://optout.aboutads.info/#!/)

1.2.2. Analytics Providers – We use third-party Analytics Providers (such as Google) to collect information about usage of our Sites and about users of our Sites, including demographic and interest-level information. Analytics Providers use cookies and pixels, as defined herein, in order to collect demographic and interest-level information and usage information from Site users, including information about the pages viewed, time spent, browser, operating system, and IP address. Cookies and pixels allow the Analytics Providers to recognize when a user visits any of the Sites and when the user exits any of the Sites to explore another website or Social Site. The Analytics Providers use the information they collect from the Sites and other websites to share, with us and other website operators, conglomerated and anonymized information about users, including age range, gender, geographic regions, general interests, and details about devices used to visit websites and purchase items. We do not link information we receive from Analytics Providers with any of your Personal Information or Automatically Collected Personal Information. Please be sure to review any such privacy policies and terms of service to understand an Analytics Provider's collection, use, and sharing practices. For

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more information regarding Google’s use of cookies, pixels, and collection and use of information, see the Google Privacy Policy (<https://www.google.com/policies/privacy/>). If you would like to opt out of Google Analytics tracking, please visit the following link: Google Analytics Opt-out Browser Add-on (<https://support.google.com/analytics/answer/181881?hl=en>).

1.2.3. Cookies – A cookie is a small text file that is stored on a user’s computer. Our Ad Serving Providers and Analytics Providers use cookies to record information about your activities when you use the Sites in order to “remember” you when you return to the Sites. Some cookies remain on your device until you delete them. Others expire when you leave the Sites. You may set your browser setting to attempt to reject cookies, but if you do so you will not be able to use the Sites. See the Section titled “Online Tracking and your Choices” below for more information on how the Sites may respond to your browser settings. We do not control the use of cookies by our Ad Serving Providers, our Analytics Providers, or by other third parties.

1.2.4. Pixels – Pixels are tiny graphics with unique identifiers that are used to track the online movements of web users. Unlike cookies, which are stored on a user’s computer hard drive, pixels are small graphics that are about the size of the period at the end of the sentence that are embedded invisibly on Sites pages. Our Ad Serving Providers and Analytics Providers may place pixels on pages of our Sites that track what other websites you visit (both before and after visiting the Sites). Our Ad Serving Providers and Analytics Providers use information obtained from pixels to help us improve our business and the Sites. We do not control the use of pixels by our Ad Serving Providers, our Analytics Providers, or by other third parties.

## 2. Information Use Practices

2.1. In General – In general, we may use any Personal Information, Credit Card Information, or Automatically Collected Personal Information, for the following reasons:

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- 2.1.1. Enabling you to participate in a program administered by us;
- 2.1.2. Operating, maintaining, and improving the Sites (including providing you a more personal experience);
- 2.1.3. Troubleshooting; 2.1.4. Conducting research; 2.1.5. Resolving disputes;
- 2.1.6. Collecting Donations; 2.1.7. Detecting and protecting against errors, fraud, and criminal activity;
- 2.1.8. Assisting law enforcement; 2.1.9. Enforcing this Policy and any other terms or conditions related to the Sites;
- 2.1.10. Any other purpose as further enumerated in this Policy or that we describe to you at the time of collection.

2.2. Communications – We may use your Personal Information and Automatically Collected Personal Information to send you emails or other communications related to programs administered by us, the Sites, or in response to your inquiries or requests. You may not opt-out of receiving service-related messages that are not promotional in nature. We may also send you marketing emails, surveys, or newsletters, including via mail, to notify you about products or services that may be of interest to you. If you would like to stop receiving marketing emails from us, please click on the unsubscribe link at the bottom of any marketing email you receive or please contact us via phone or mail. If you opt-out, you will only continue to receive service-related emails.

2.2.1. Providing Support with Regard to Donations – In the event that we need to provide support in connection with a Donation made, we only receive the information from PayPal via email, the name appearing on your credit card, your billing address, the date of the transaction, the amount, and an associated

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transaction ID (the “**Transaction Information**”). All other Credit Card Information is not given to Shorashim.

2.3. Anonymizing Information – We may use aggregated Personal Information and Automatically Collected Personal Information in an anonymized way (“**Anonymized Information**”) for any lawful purpose, including analyzing trends, research, administration of the Sites, tracking movement around the Sites, and to improve our business and the Sites.

2.4. Retaining Your Information – In general, we will store your Personal Information, Automatically Collected Information, and Transaction Information, indefinitely, or as long as legally required or allowed under applicable law. Shorashim may associate or link your Personal Information, Automatically Collected Personal Information, and your Transaction Information, to other information or records we separately have in our possession.

2.5. Data Transfer – Our Sites and related systems are housed on servers in United States. If you are located outside of these countries, information we collect from you (including through cookies) may be transferred to, processed in, and stored in these countries, which may not offer the same level of privacy protection as the country where you reside or are a citizen.

2.6. Information Sharing – In general, Shorashim does not sell or rent any of your Personal Information, Automatically Collected Personal Information, Credit Card Information, or Transaction Information with third parties for any purpose. However, Shorashim may share certain of the information provided by you and/or collected from you for the limited purposes noted herein, namely:

2.6.1. Sharing with Other Organizations – We may disclose your Personal Information and Automatically Collected Personal Information to affiliated and related entities or organizations, partners, and other not-for-profit entities, including with Birthright Israel.

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2.6.2. Sharing with Payment Processors – Whenever you make a Donation, your Credit Card Information will be shared with and used by a third-party payment site in order to process your donation (the “**Payment Processor**”). The Payment Processor may also ask you for additional information in order to process a Donation. Because the Payment Processor is an independent third-party, they may ask you to agree to their online privacy policies and terms of service prior to allowing you to process your online Donation. Please be sure to review any such privacy policies and terms of service to understand the Payment Processor’s collection, use, and sharing practices.

2.6.3. Sharing with Ad Serving and Analytics Providers – As previously noted, by using the Sites, your Automatically Collected Personal Information may be collected by and shared with our Ad Serving and Analytics Providers.

2.6.4. Sharing with other Third-Party Providers – Because we engage other third-party contractors or service providers to enable you to participate in trips or another program administered by us (e.g., airlines) and to perform other services for Shorashim (collectively, the “**Third-Party Providers**”), we may share your Personal Information, Automatically Collected Personal Information, and Transaction Information with such Third-Party Providers in connection with their provision of services for us; this may include sharing your information with Third-Party Providers that will send you promotional materials related to our products and communicate with you for other marketing purposes. Use of any such information by a Third-Party Service Provider will be subject to the Third-Party Service Provider’s policies. Please be sure to review any such privacy policies and terms of service to understand the Third-Party Service Providers’ collection, use, and sharing practices.

2.6.5. Sharing of Anonymized Information – We may share your Anonymized Information with Ad Serving Providers, Analytics Providers, Payment Processors, Third-Party Providers, or other third-party entities, for any lawful purpose, including analyzing trends, research, administration of the Sites, tracking user



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movements around the Sites, and to improve our business, products, services, and the Sites.

2.7. Legal Requirements – In some cases, we may disclose any of your Personal Information, Automatically Collected Personal Information, or Transaction Information: i) as required by law; ii) if we believe that disclosure is needed to protect our rights; iii) to government regulators; iv) to law enforcement authorities; v) in connection with any judicial proceeding, court order, subpoena, or legal process served on us or the Sites; vii) to address health needs; and viii) to respond to a physical threat to you or another person.

2.8. Insolvency and Business Transitions – If we ever file for bankruptcy or engage in a business transition such as a merger with another company, or if we purchase, sell, or reorganize all or a part of the Sites or our business or assets, we may disclose your Personal Information, Automatically Collected Personal Information, and Transaction Information to third parties, including to prospective or actual purchasers, in connection with one of these transactions. Any successor entity may become entitled to all information about you that we have stored.

2.9. Disclaimer – We cannot ensure that your information will never be disclosed in ways not otherwise described in this Policy. For example, third parties may unlawfully intercept or access transmissions or private communications. You affirm your understanding that no transmission of data over the Internet can be 100% secure.

3. Online Tracking and your Choices – As discussed above, because we, the Social Sites you may choose to log into our Sites through, our Ad Serving Providers, and our Analytics Providers, automatically collect Site usage information through the use of cookies, pixels, and other tracking technologies, your selection of the “Do Not Track” option provided by your browser may not have any effect on our collection of Automatically Collected Personal Information. One way to attempt to “opt-out” of the collection of any information through cookies and some (but not all) other tracking technology is to actively manage the settings on your browser to

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delete and disable cookies and other tracking/recording tools. However, getting a “Do Not Track” signal to work as you might want is difficult and may not be possible. Using browsers as an example, not all tracking technologies can be controlled by browsers; unique aspects of your browser might be recognizable even if you disable a tracking technology; not all settings will necessarily last or be effective; even if a setting is effective for one purpose data still may be collected for another; and even if one website observes a “Do Not Track” signal, that website usually will not be able to control other websites.

4. Information Security Measures –Shorashim maintains: i) appropriate and reasonable physical, electronic, and managerial procedures; ii) commercially appropriate and reasonable storage mechanisms (including backup, archive, and redundant data storage, on-site and off-site); and iii) appropriate and reasonable precautions, in order to safeguard and secure Site user information as collected and stored, and to prevent the disclosure of, and loss or alteration of, any such information to unauthorized third parties. Shorashim also endeavors to reasonably ensure that any party with which it shares your information, as permitted by this Policy, also employs similar procedures, mechanisms, and precautions. However, no Internet or mobile transmission is ever fully secure or error free and therefore Shorashim cannot guarantee that your information will not be accessed, deleted, or altered by an unauthorized third party, neither while it is in Shorashim’s sole control nor in the event it has been shared as permitted under this Policy. Because most Internet and mobile transmissions are not encrypted, you should take special care in deciding what information you send via the Internet or other mobile transmission and that when you provide such information, it is at your own risk.

5. Children – The Sites are not for or directed towards children. The Sites are not intended for anyone under the age of 17, and we do not intend to and will not knowingly collect any Personal Information from children under the age of 13. Children under the age of 13 are prohibited from using the Sites. If we learn that we have collected Personal Information from a child under the age of 13, we will remove that information immediately and delete it from our servers (subject to

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applicable law and this Policy). If you believe content from a child under the age of 13 has been provided via the Sites, please notify us by contacting us at [info@shorashim.org](mailto:info@shorashim.org).

6. California Shine the Light Law – California Civil Code Section 1798.83 permits California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed “personal information” (as defined under that statute) of that California resident, for direct marketing purposes, in the preceding calendar year, and the categories of that kind of personal information that was disclosed to them. If you are a California resident and you wish to make such a request, you may contact us by using the contact information in the “Privacy Questions” section at the bottom of this Policy.

7. California Minors – If you are a California resident who is under age 18 and you are unable to remove publicly-available content that you have submitted to us, you may request removal by contacting us at: [info@shorashim.org](mailto:info@shorashim.org). When requesting removal, you must be specific about the information you want removed and provide us with specific information, such as the URL for each page where the information is located, so that we can find it. We are not required to remove any content or information that: i) federal or state law requires us or a third party to maintain; ii) was not provided by you; iii) is anonymized so that you cannot be identified; iv) you don’t follow our instructions for removing or requesting removal; or v) you received compensation or other consideration for providing the content or information. Removal of your content or information from the Sites does not ensure complete or comprehensive removal of that content or information from our systems or the systems of Birthright Israel, Payment Processors, Ad Serving Providers, Analytics Providers, Third-Party Providers, or of any other entity that we have shared your information with or that has collected it automatically through tools incorporated into the Sites. We are not required to delete the content or information posted by you; our obligations under California law are satisfied so long as we anonymize the content or information or render it invisible to other users and the public.

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8. European Union Residents – If you are a resident of the European Union, the collection, storage, and retention of your information may also be subject to the provisions of the European General Protection Regulation (the “GDPR”). We endeavor to act in accordance with all applicable provisions of the GDPR and to provide you with concise, transparent, understandable, and easily accessible information on the conditions for processing your Personal Information, Automatically Collected Personal Information, and Payment Information in clear and simple terms. You understand that the information we store, collect, and process about you is necessary to conduct our operations and facilitate your participation in our programs, including but not limited to information required to ensure eligibility, as well as for other legitimate purposes allowed under the GDPR. **If you reside in the European Union, in addition to any other rights or responsibilities you may have in connection with your agreement to the terms of this Privacy Policy, your rights are as follows:**

8.1. The right to information on the processing of your Personal Information, Automatically Collected Personal Information, and Payment Information.

8.2. The right to access and rectify your Personal Information, Automatically Collected Personal Information, and Payment Information. The right of access allows you to obtain from us confirmation that your Personal Information, Automatically Collected Personal Information, and Payment Information has or has not been processed as well as the conditions of such processing, and to receive an electronic copy (for any additional copy, we are entitled to demand payment of any reasonable fees based on the administrative costs incurred).

8.3. The right to obtain from us the rectification of your Personal Information, Automatically Collected Personal Information, and Payment Information.

8.4. Subject to the exceptions provided by applicable law, you have the right to ask us to delete your Personal Information, Automatically Collected Personal Information, and/or Payment Information when one of the following grounds applies:

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8.4.1. Your Personal Information, Automatically Collected Personal Information, and/or Payment Information are no longer necessary for the purposes for which they were collected or otherwise processed;

8.4.2. You wish to withdraw your consent on which the processing of your Personal Information, Automatically Collected Personal Information, and/or Payment Information was based and there is no other basis justifying such processing;

8.4.3. You consider and can establish that your Personal Information, Automatically Collected Personal Information, and/or Payment Information has been unlawfully processed;

8.4.4. Your Personal Information, Automatically Collected Personal Information, and/or Payment Information must be deleted in accordance with a legal obligation.

8.5. The right to restrict the processing of your Personal Information, Automatically Collected Personal Information, and/or Payment Information. The applicable regulations provide that this right may be invoked in certain cases, in particular the following:

8.5.1. When you dispute the accuracy of your Personal Information, Automatically Collected Personal Information, and/or Payment Information

8.5.2. When you consider and can establish that the processing of Personal Information, Automatically Collected Personal Information, and/or Payment Information is unlawful, but you oppose the deletion of Personal Information, Automatically Collected Personal Information, and/or Payment Information and demand instead that the processing be limited;

8.5.3. When we no longer need your Personal Information, Automatically Collected Personal Information, and/or Payment Information but they are still necessary for you to establish, exercise, or defend your legal rights;

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8.5.4. When you object to the processing that would be based on the legitimate interest of Shorashim, during the verification whether the legitimate grounds pursued by the controller prevail over those of the person in question.

8.6. The right to data portability. Namely, this allows you to receive the Personal Information, Automatically Collected Personal Information, and/or Payment Information you have provided to us with in a structured, commonly used format, and to transmit this Personal Information, Automatically Collected Personal Information, and/or Payment Information to another data controller without us hindering it.

8.7. The right to withdraw consent. Namely, when we process your Personal Information, Automatically Collected Personal Information, and/or Payment Information on the basis of your consent, this latter may be withdrawn at any time using the means provided for this purpose (procedure indicated below of this Policy). On the other hand, and in accordance with applicable law, the withdrawal of your consent is only valid for the future and cannot therefore call into question the lawfulness of the processing carried out before this withdrawal.

8.8. If you are a resident of the European Union and you wish to make such a request under any of the rights noted in this Section 8, you may contact us by using the contact information in the “Privacy Questions” section at the bottom of this Policy. In any such communication, please note that you are making the request as a resident of the European Union.

8.9. For all residents of the European Union, in the event of a conflict between the rights noted in this Section 8 and any rights or responsibilities you may have in connection with other Sections of this Privacy Policy, the rights noted in this Section 8 shall control.

9. Managing Your Personal Information, Automatically Collected Personal Information, and Payment Information – You may request access to or correct an error or omission in your Personal Information, Automatically Collected Personal

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Information, and/or Payment Information. If you are a resident of the European Union you can also withdraw your consent in connection with your Personal Information, Automatically Collected Personal Information, and/or Payment Information in connection with your rights as noted in Section 8. You may communication any relevant information requests by contacting us at [info@shorashim.org](mailto:info@shorashim.org) or writing to us at: Shorashim, Inc., 1415 North Dayton Street, #4DE, Chicago, Illinois 60642. We will make good faith efforts to resolve requests under this Section except where the request is unreasonable, requires disproportionate technical effort or expense, jeopardizes the privacy of others, or would be impractical.

10. Modification of the Policy – We will occasionally update this Policy. When we post changes to this Policy, we will revise the "Effective Date" at the top of this Policy. We recommend that you check this Policy from time to time to inform yourself of any changes in this Policy.

11. Privacy Questions – If you have questions or concerns about our privacy practices, please email us at: [info@shorashim.org](mailto:info@shorashim.org).