

Privacy Statement

Recently updated in August 2023

OrCam thinks highly of your privacy, and we are committed to protecting and safeguarding our clients' and users' Personal Data.

This statement describes how OrCam Technologies, including its affiliates and subsidiaries (collectively, “OrCam” or “Us” or “We”), processes Personal Data regarding our clients and users in connection with services provided by us, our website, the OrCam MyEye and OrCam READ mobile application, OrCam’s devices (except the OrCam Learn Device), and/or other services (respectively, the “App(s)” and collectively, “Services”), the types of Personal Data we collect and process, to what purposes we use and process your Personal Data, how your Personal Data is protected, and with whom your Personal Data may be shared.

It is important for Us to enable you to understand our privacy policy and your rights in connection with the Personal Data we hold about you. You should also be aware that we use cookies and similar technologies to collect and save information when you visit our website, available at: www.orcam.com, to ensure that we give you the best possible experience. To learn more about the use of such technologies, please see our [Cookie Policy](#) below.

If you feel that a concern you have in connection with your privacy has not been met by the following Privacy Statement, please contact Us at: privacy@orcam.com and let Us know.

If you choose to use OrCam’s website, download the App, use, interact with, register or provide data to Us in connection with the Services, you explicitly agree to the use of such data in accordance with this Privacy Statement. You may not use the Services or submit any data to Us if you do not agree to any of the terms hereunder. This Privacy Statement shall not be construed in any manner to derogate from our Terms of Use or any other agreement made by and between OrCam and you. Please be aware that this Privacy Statement does not apply to the practices of any third parties to whom OrCam may disclose Personal Data (as defined below) pursuant to the terms of this Privacy Statement.

THE HIGHLIGHTS:

You are not required by law to provide Us with any Personal Data. Sharing Personal Data with Us is entirely voluntary.

Our Services are intended for Users over the age of 16 or equivalent minimum age for providing consent to processing of Personal Data in the relevant jurisdiction. Children under such age are not permitted to register to or use our Services. If you are under such age you should cease to use the Services immediately.

You may be entitled to request to review, amend, erase or restrict the processing of your Personal Data, pursuant to data protection laws applicable to you. Please note that in case you request to erase or restrict the processing of your Personal Data, your use of the Services may be restricted or disabled.

Following topics are included in our Privacy Statement. You may click on any topic and be directed to the relevant information:

What is Personal Data, and what data is collected about me by OrCam?

What will OrCam do with my Personal Data?

Legal basis of processing Personal Data

Sharing personal data with others

How does OrCam protect my Personal Data?

How long will OrCam retain my Personal Data?

What can I do to control my Personal Data?

Will OrCam transfer my Personal Data internationally?

Persons under 16

Applicable Laws

How can I contact OrCam?

1. What is Personal Data, and what data is collected about me by OrCam?

“**Personal Data**“, means any information which identifies or can be used to identify a natural person, including, but not limited to, first and last name, phone number, email address, IP address, billing information, etc., and any information provided by you via your use of the services or when you interact with Us, and other information when needed for the purpose of providing the services, for our internal records and analysis purposes and for research and developments, excluding any publicly available information lawfully made available from government records, deidentified or aggregated consumer information, or information excluded from the California Consumer Privacy Act (the "**CCPA**").

OrCam collects the following types of Personal Data:

Data you give Us about yourself

When you contact Us or purchase our products through our website, you will be requested to provide Us with certain information, contact details (name, email address, ID, mailing address, and phone number), your location, payment details, date of birth, relevant medical condition, your interest in our products, and other information.

When you register for an account on the App, we collect and process the information you provide during registration, such as you contact details.

If you contact our customer service for assistance in connection with any questions you may have or handling registration or warranty issues, as well as contact Us for other purposes such as providing feedback, we will retain information provided to Us by you in this context. Such information may include, in addition to your contact details and the nature of your customer service issue, data concerning your device model and serial number, your location, statistics regarding your operation with the device, and the way you operate your device.

We also collect automatically certain information in connection with the use of the App and the device, such as hardware, software or internet network information, operating system, versions, settings (i.e. language), statistics regarding your use of the App and the device as well, and location information, data regarding the date and time of your interaction with the App and the device, and additional information about the way you interact with the App and the device, such as features used, pages visited, content viewed, down time, reset, etc. This information is used by Us for diagnostic purposes, to analyze how the App and the device are used and to ensure the operation of the App, the device and our Services.

Data you give Us about someone else

In the event you interact with Us on behalf of a person close to you, you may wish to provide Us with Personal Data regarding that person. While we value your assistance and care for others, please note that it is your responsibility to make sure that any person whose Personal Data you provide is aware of the principles of this statement and agrees that you will provide Personal Data to Us on this basis.

Please note that we may not be able to provide all services to the person on whose behalf you contacted Us without receiving his/her direct consent. Therefore, we may request your assistance in communicating with that person.

Data collected automatically

When you visit our website or install our App, certain information will be collected automatically, using cookies, web beacons, and similar technologies. To learn more about the use of such technologies, please see our Cookie Policy below.

Personal Data collected automatically may include IP address, hardware, software or internet browser information, operating system, versions, settings (i.e. language), statistics regarding your use of our services and location. We also collect data regarding the date and time of your visit in our website, Apps and social media pages, information about the way you interact with our website or Apps, such as pages you visited, content viewed by you, etc.

While you are using the App or the Services, images captured by the device, as well as sound recordings of your interaction with the device are collected automatically and transmitted to the company's servers. These kinds of data will be used, inter alia, to provide you with certain functionalities, including descriptive notes regarding your surroundings. The data will also be used to improve our App and Services and for research and development (R&D) purposes, for which the data will be pseudonymized and retained separately from your identifying information.

Data we receive from others

In the event you purchased our products indirectly through a partner or distributor of OrCam, we may receive Personal Data about you in connection with such purchase and the use of our product. For example, when a distributor transfers data concerning a client in the context of customer support issues.

2. What will OrCam do with my Personal Data?

Non-Personal Data.

Non-Personal Data is used mainly for click stream analysis in order to constantly improve and maintain our Services, including among others, in order to measure and understand the level of engagement to our services, for general business analytics and in order to provide a more personalized experience and tailored content, for ensuring the technical functioning of our network, to help prevent fraudulent use of our Services and for developing new services.

Personal Data.

Personal Data is used only for the following limited purposes:

Provision of our Services and products to users, to communicate with users regarding customer service issues, or to provide updates with respect to material changes to this Privacy Statement or our Terms of Use.

Responding to questions or comments and to help resolve any problems.

For the purposes of our legitimate interests, to the extent permitted under applicable law.

To protect the security or integrity of our databases and the Services, and to take precautions against legal liability.

To improve our products and Services, and to develop new features, products and services.

To improve your experience on our website and mobile app, and customize our Services to your interests.

To protect and enforce our legal rights and the rights of our users and third parties.

Back up of User Content

The OrCam MyEye and OrCam READ Apps enables Users to create certain personalized labels for their use, such as identification of people and products by names chosen by the User ("User Content"). User content may be encrypted and stored in our cloud services, to provide our Users with back up of their content.

We do not access, review or monitor User Content. We do not use User Content or process it in

any way other than providing the User with encrypted backing of his/her data.

You are solely responsible and liable for any User Content. OrCam does not control and is not aware of the content of any User Content, and shall not be responsible or liable in connection with such content.

3. Legal basis of processing Personal Data

Certain processing activities conducted by Us are based on the necessity of such activities for the performance of the agreement and obligations between Us and our users. For example, we need your contact details and billing information in order to enable the purchase of our product. We also need certain medical information about you in order to ensure that the product you purchase will be suitable to your needs.

Other processing activities are based on the grounds that they are necessary for the purposes of our legitimate interests or the legitimate interests of third parties, except where such interests are overridden by the interests or fundamental rights and freedoms of users.

There may be certain processing activities based on your consent to this Privacy Statement. In connection with such activities, you may rescind your consent, by sending Us an email to: privacy@orcaml.com .

Please note that in the event you rescind your consent to the processing of Personal Data, we may not be able to provide you with some or all of the Services and products.

If you choose to register to purchase OrCam's products on the Website, you will be requested to provide Us with certain Personal Data, such as contact information and information regarding the characteristics of your condition. For example, we may ask if a User suffers from any hearing loss, in addition to low vision. This information is requested in order to establish whether our products will be suitable for the User. When a User continues with the purchase process and submits this information, the determination of compatibility of our products will be made automatically. In certain jurisdictions such processing of Personal Data is defined as profiling, or automatic decision making. If relevant to you under applicable law, you may be entitled to object to such processing, and may do so by sending Us a notice to: privacy@orcaml.com .

4. Sharing Personal Data with others

Non-Personal Data

Non-Personal Data, aggregate and statistical or otherwise anonymized data may be shared without limitation with third parties at our discretion, such as Google Analytics. This information does not contain any Personal Data and is used to develop content and services for our Users.

Personal Data

We share Personal Data only under the following limited circumstances:

With our distributors and service providers, in order to provide high quality service to you, we will ask in some cases (depending on regions and some other cases like native language) a representative of OrCam (a distributor, consultant or other business partner) to be in touch with you regarding your inquiries and needs. In such cases we will share with this representative certain Personal Data – usually your name and contact details but also other relevant information.

With payment providers and financial institutions, who assist Us in connection with validating payments and credit cards, in order to process your payments and complete your order.

With third parties who assist Us in operating the Services, conducting our business, expanding our business, or servicing you, and for personalizing your experience of the Services and products.

Otherwise, only with your prior consent.

To comply with a legal requirement, for the administration of justice, to protect your vital interests or the vital interests of others, to protect the security or integrity of our databases or the Services and products, to take precautions against legal liability, or in the event of a corporate sale, merger, reorganization, dissolution or similar event, to enforce applicable Terms of Service, to address fraud, security, or technical issues, to protect against harm to the rights, property or safety of OrCam, our customers, or the public as required or permitted by law.

5. How does OrCam protect my Personal Data?

All information collected by us, will be maintained in confidence and protected by using appropriate data protection mechanisms.

We are taking appropriate actions to protect against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data transmitted, stored or otherwise processed by us. We use customary software systems and procedures, whether by ourselves or by our business partners, including security and technical procedures to protect your Personal Data.

6. How long will OrCam retain my Personal Data?

We reserve the right to retain any Personal Data for as long as reasonably necessary in order to: (i) fulfill the purposes described herein; (ii) in the defense or assertion of legal claims and liability; (iii) for the analyses and improvement of the Services and products; and (iv) to comply with applicable law. Non-Personal Data and statistical or anonymized data may be retained by Us without limitation.

7. What can I do to control my Personal Data?

There are multiple ways in which you can be in control of your Personal Data collected by Us subject to applicable law.

Reviewing and amending your Personal Data. You are entitled to review your Personal Data. You may exercise this right by sending Us a request in connection with your Personal Data to: privacy@orcaml.com. In the event any Personal Data is incorrect or outdated, you may update and correct such data by providing Us with appropriate notification. You can ask Us to receive a copy of the Personal Data we hold about you. (privacy@orcaml.com)

Right of erasure and restriction. You may also be entitled request the erasure or the restriction of your Personal Data, and we will comply with such requests, to the extent required under applicable law.

Personal Data Portability of Personal Data. To the extent applicable to you and to the Services and products, you may request the portability of your Personal Data, and we will comply with such requests, to the extent required under applicable law.

Changes to previous consents. In cases where we process your Personal Data on the basis of your consent, you may withdraw that consent at any time. In cases where we use your Personal Data for legitimate business interest, you can object at any time to processing.

If you can't find such actions within our website, application, social media or otherwise then you can contact Us at the below contact details.

You are also entitled to file a complaint with the appropriate supervisory authority in connection with concerns you may have with regards to your privacy and Personal Data.

8. Will OrCam transfer my Personal Data internationally?

Our databases are currently located in the USA.

Some of our processing activities are made in Israel. Please note that the European Commission

has determined that the State of Israel ensures an adequate level of privacy and data protection, therefore, in accordance with the GDPR, the transfer of Personal Data to Israel is lawful and does not require any specific authorization.

Any further transfer of Personal Data outside the EEA to a third country (other than Israel) shall be made in accordance with applicable law, including by providing adequate protections, or otherwise implementing appropriate safeguards to ensure the protection of our users' privacy

9. Persons under 16

Our site, app Services and products are intended for a general audience and are not directed to persons under 16 years old. If a parent or guardian becomes aware that his or her child has provided Us with Personal Data without their consent, he or she should contact Us immediately. We do not knowingly collect or solicit Personal Data from people under 16 years old. If we become aware that a person under 16 years old has provided Us with Personal Data, we will delete such data from our databases.

10 Applicable Laws

The provisions included in this Notice relating to matters regulated under the GDPR will apply only to the processing of Personal Data which is subject to the GDPR in accordance with the applicability provisions contained therein. If the GDPR does not apply to the processing of your Personal Data, some of the provisions above may not apply to you.

We may change this statement from time to time, as will be described in this statement.

However, we will not derogate from any rights you have under this statement or applicable law without your prior consent.

11. OrCam stores the Personal Data as long as it is necessary to fulfil the purpose for which the data has been collected. This means that OrCam deletes your Personal Data when such information is no longer necessary unless we have a legitimate interest to retain such data for longer periods or are required to do so by any applicable law. Statistics which has been anonymised may be saved thereafter.

12. Data Subject Rights

If you are a resident of the EU/EEA, you may at any time request the rectification or erasure of your Personal Data. Please note however that deletion could mean that OrCam cannot provide you any requested services. You have the right to request a copy of your Personal Data from our record. You have the right to request a limitation of the use of your Personal Data (for example if you deem the information to be incorrect) or the termination of use of your Personal Data (for example as regards the use of the information to improve our services).

If you wish to do so, you can send Us an e-mail with your request to: privacy@orcaml.com and We will make reasonable efforts to fulfill your request within a reasonable period of time, and pursuant to any applicable privacy laws.

Note that unless you instruct Us otherwise, We may retain and use your Personal Data for as long as reasonably required for the purposes of which such Personal Data was collected, including without limitation, for future analytics and analysis, comply with Our legal or business requirements or obligations, to resolve disputes, to enforce Our Terms of Service, all as permitted under any applicable privacy laws. Notwithstanding the foregoing, Personal Data may be kept by Us for a period exceeding that if it is required to do so to satisfy any applicable law, regulation, legal process, subpoena, or governmental request.

Aggregate and/or anonymous information derived from your use of the OrCam's website, may remain on Our servers indefinitely.

Rights of California Residents

Right to Access Personal Data Collected, Disclosed or Sold:

You have the right to ask Us to disclose to you certain information regarding our collection and use of your personal Data over the past 12 months. Once we receive and confirm your verifiable consumer request (as described below), we will disclose to you:

The categories of Personal Data we sold about you;

The categories of Personal Data we disclosed about you;

The categories of sources for the Personal Data we collected about you;

Our business or commercial purpose for collecting or selling that Personal Data;

The categories of third parties with whom we shared that Personal Data;

The specific pieces of Personal Data we collected about you; and/or

If we sold or disclosed your Personal Data for a "business or commercial purpose", as defined in the CCPA, lists of sales, identifying the categories of Personal Data that each category of recipient purchased or obtained.

Right to Request Deletion of Personal Data

You have the right to request that we delete any of your Personal Data that we collected from you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete, and direct our service providers to delete, your Personal Data from our records, unless an exception applies.

We may deny your request to delete your Personal Data if retaining the information is necessary for Us or our service providers to:

Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;

Debug or identify and repair errors that impair existing intended functionality;

Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law;

Comply with the California Electronic Communications Privacy Act;

Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;

Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with Us;

Comply with a legal obligation; and/or

Make other internal and lawful uses of the Personal Data that are compatible with the context in which you provided such information.

Right to Non-Discrimination

We will not discriminate against you for exercising any of your rights under the CCPA. Unless permitted by the CCPA, we will not:

Deny you goods or services;

Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;

Provide you a different level or quality of goods or services; or

Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Right to Opt-out of the Sale of Personal Data

You have the right to opt-out of the sale of Personal Data we have collected about you.

Within the past 12 months, we have disclosed to the following third parties your Personal Data:

Affiliates;

Service providers; and/or

Third parties to which you authorized Us to disclose Personal Data in connection with products or services provided to you.

California Shine the Light Law

California Civil Code Section 1798.83 permits our visitors who are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please contact our [Customer Service](#).

13. How can I contact OrCam?

If you have any questions about this Privacy Statement or our data collection practices, please contact Us at the following email address: privacy@orcaml.com; if you are a EU/EEA resident, the following DPR email address: eudpr@orcaml.com; if you are a UK resident, the following DPR email address: ukdpr@orcaml.com.

OrCam Technologies Ltd.