

PRIVACY POLICY

[Last Updated: August 24, 2023]

Sipple Care Inc. and its affiliated companies and subsidiaries (collectively "**Company**", "**we**", "**us**" or "**our**") respects your privacy and recognizes that your privacy is important.

This privacy policy ("**Privacy Policy**") explains the Company's practices regarding the collection, processing, usage and transfer of Personal Data, that are applicable towards any visitor of its website available [here](#) ("**Visitor**" or "**you**" and "**website**" or "**Services**"). Please note that this Privacy Policy does not govern the use or the applicable privacy policies of any of our products and services except for the website.

This Privacy Policy provides information generally relevant for any visitor of our website, including as required under applicable privacy regulations such as the EU General Data Protection Regulation ("**GDPR**") and the Israeli Privacy Protection Law, 1981. Further information relevant for specific US states residents, including California residents under the California Consumer Privacy Act (CCPA), is provided in our additional [US Privacy Notice](#).

You are not required by law to provide us with any Personal Data. However, please note, that some of our Services require the processing of certain Personal Data and without such data we may not be able to provide you with all or part of the Services.

Data Controller, Data Protection Officer & Representative

Sipple Care Inc., incorporated under the laws of Delaware, USA, is the "Data Controller" (as such term is defined under the GDPR or equivalent privacy legislation) of the Personal Data collected from visitors of the Website.

If you have any question, inquiry, request or concern related to this Privacy Policy or the processing of your Personal Data, you may contact us, and our privacy team as follows:

- By Email: privacy@sipplecare.com; or
- By Mail: 10 Club Rd, 06878 CT, USA

The Data We Collect & Our Lawful Basis for Processing Your Personal Data

Depending on your interaction with us, meaning if you browse our website, we collect two types of data:

"Non-Personal Data" meaning, information which does not identify a specific natural person and cannot reasonably be used for such identification. We collect Non-Personal Data regarding use of the website, such as the scope, frequency, latency, pages accessed and viewed, time and date stamp, interactions with content and materials displayed through our website, language preference, and other technical information regarding the device used to access the website, for example type of device, type of browser, operating system, etc. This data is considered as Non-Personal Data when collected on an aggregate basis, or otherwise not combined with online identifiers.

Also, we may sometimes process and anonymize or aggregate Personal Data and identifiable information in a manner that shall create a new set of data that will be Non-Personal Data, and can no longer be associated with any identified natural person.

Non-Personal Data may be used by us without limitation and for any purpose, including for commercial, research, or statistical purposes, in order to maintain and develop our website, including among others, for ensuring the technical functioning of our website, to help prevent fraudulent use of the website, etc.

"Personal Data" meaning, individually identifiable information, namely information that identifies an individual or may with reasonable effort be used to identify an individual. This may include online identifiers, first and last name, email address, etc. If we combine Personal Data with Non-Personal Data, we will treat the combined data as Personal Data.

We have included in the table below information about the types of Personal Data processed, how we process and use Personal Data, the lawful basis for which we do so subject to the GDPR and processing operations.

Type of Data	Purpose of Processing & Operation	Lawful Basis
<p>Contact Communications</p> <p>If you voluntarily contact us through any means of communication, we make available (e.g., send us an email, or use any other online form available on our website such as "sign up for a trial"), you will be requested to provide us with your contact information such as your name, phone number, email address, Company, etc..</p>	<p>We process your contact information solely for the purpose of contacting you, responding to your inquiries and provide you with the support or information you have requested.</p> <p>The correspondence with you may be processed and stored by us in order to improve our internal operations, as well as in the event we reasonably determine it is needed for future assistance or to handle any dispute you might have with us.</p>	<p>We process such data subject to our legitimate interest.</p>
<p>Newsletter & Updates Registration</p> <p>In the event you sign up to receive our newsletter or other promotional materials, you will be requested to provide your contact details, such as email address.</p>	<p>We will use the information you provide in order to include you in our mailing list and send you marketing materials, updates and news about our products and operations.</p>	<p>Our lawful basis for the processing of this data is your consent.</p> <p>You may withdraw your consent at any time by clicking the "unsubscribe" link which will be included in the email we will send you. You may also contact us through the above means of contact and request to unsubscribe.</p>
<p>Questionnaires and Surveys</p> <p>we may occasionally invite you to participate in surveys or complete online questionnaires related to our products and services. These may touch upon topics such as your baby's feeding habits or nutritional preferences.</p>	<p>we will use that data to develop, improve and enhance our Apps and products.</p> <p>All data will be depersonalized, stored securely, and used solely those purposes.</p> <p>Among other things, we may use the analysed results to train our</p>	<p>As your participation is completely voluntarily, we will collect and process your questionnaire data upon your consent.</p> <p>You can always withdraw your consent by sending us message</p>

Type of Data	Purpose of Processing & Operation	Lawful Basis
<p>Participation in these surveys and questionnaires is entirely voluntary.</p> <p>Should you choose to participate, we may request specific information from you. This could include your contact details, demographic information, and specific data relevant to the questionnaire, such as your baby's feeding patterns, weight, nutrition, and other related metrics.</p> <p>In addition, we may ask you to record your baby's feeding using two devices: one for audio and one for video & audio and provide us with those recordings. The recordings aim to capture feeding sounds, facial expressions, jaw, and throat movements.</p> <p>As part of the surveys and questionnaire you may be requested to provide data which may be deemed as Sensitive data or "Special Categories of Data" as such term is defined under the GDPR. Such data may include health-related data, children's data or information regarding ethnicity.</p>	<p>algorithms and machine learning models.</p>	<p>through the means of contact available here. However, note that we will still be able to use the aggregated, statistical and de-identified data derived from your personal data.</p>
<p>Online Identifiers and Advertising and Targeting data</p> <p>When you interact with the website, we may collect online identifiers such as your Internet Protocol address (IP), Cookie-ID, etc., and other information that relates to your activity</p>	<p>Collection of device identifiers is needed for the following purposes:</p> <p>(i) Internal statistics and analysis, for which device identifiers might be combined with usage data, for example, to analyze how many visitors have accessed certain content and</p>	<p>Our lawful basis for the processing this data for technical and security purposes is based on our legitimate interests.</p> <p>Where required under applicable laws, we will obtain your consent for the purpose of data collection through our use of third-party cookies for</p>

Type of Data	Purpose of Processing & Operation	Lawful Basis
<p>through the website, such as pages viewed, click stream data, login time and date stamp, etc. This data might be collected directly by us or by through our use of third parties' cookies and advertisement platforms.</p> <p>Similarly, we may collect Ad calls, which is a code shared with advertisers, include zip code, advertiser ID, the webpage the end user came from, the IP address, approximate location which assists the advertiser to determine which ads to place. The ad call will also include the end user's preference regarding interest based advertisement as further explained herein.</p>	<p>from which country (where the country is extracted from the IP address) in order to enhance and improve our website and its content;</p> <p>(iii) Marketing and advertising purposes. Our partners will process this data to manage and deliver advertisements and content more effectively and personally, including contextual, behavioral and interests-based advertising based on your activity, preferences or other data available to us or to our business partners and advertisers, including for re-targeting purposes.</p>	<p>analytics and advertising purposes. In any such case, you may withdraw consent or change your preferences at any time by using the cookie settings tool available on our website.</p> <p>For more information about Interest Based Advertisement practices please read below.</p>

How We Collect Information

Depending on the nature of your interaction with us through the website, we may collect information as follows:

- ***Automatically*** – we may use cookies (as elaborated in the section below) or similar tracking technologies (such as pixels, tags, agent, etc.) to gather some information automatically.
- ***Provided by you or about you voluntarily*** – we will collect information if and when you choose to provide us with the information, such as through online registration, contact us form, etc. all as detailed in this Privacy Policy.
- ***Provided from third-parties*** – where permitted under applicable law and provided your consent for cookie usage, we may enrich the Personal Data collected about you with data provided by third parties.

Cookies

When you access or use the website, we use “cookies” or similar tracking technologies, which store certain information on your device (i.e., locally stored). The use of cookies is a standard industry-wide practice. A “cookie” is a small piece of information that a website assigns and stores on your computer while you are viewing a website. Cookies are used by us for various purposes, including allowing you to navigate between pages efficiently, as well as for statistical purposes, analytic purposes and advertising. You can find more information about our use of cookies here: www.allaboutcookies.org.

There are several types of cookies, and among others:

- **Essential, Functionality, Operation & Security Cookies.** These cookies are essential for enabling Visitor movement around the website, for the website to function properly, and for security purposes (i.e., used to authenticate Visitors, prevent fraudulent use, and protect Visitor data from unauthorized parties). This category of cookies either cannot be disabled, or if disabled, certain features of the website may not work.
- **Analytic, Measurement & Performance Cookies.** These cookies are used to collect information about how Visitors use our website, in order to improve our website, content, and the way we offer them, as well as assess performance of the content and marketing campaigns. These cookies enable us, for example, to assess the number of Visitors who have viewed a certain page as well as their country of origin. It enables our website to remember information that changes the way it behaves or looks, such as your preferred language.
- **Preference, Targeting & Advertising Cookies.** These cookies are used to advertise across the internet and to display relevant ads tailored to Visitors based on the parts of the website they have visited (e.g., the cookie will indicate you have visited a certain webpage and will show you ads relating to that webpage).

You may find more information about the cookies we use as well as opt-out of cookies or change your preferences ant any time by using the cookies setting tool available on our website.

Where we use third-party advertising cookies, such third-party may independently collect, through the use of such tracking technologies, some or all types of Personal Data detailed above, as well as additional data sets, including to combine such information with other information they have independently collected relating to your online activities across their network of websites, for the purpose of enhanced targeting functionality and delivering personalized ads, as well as providing aggregated analytics related to the performance of our advertising campaign you interacted with. These third parties collect and use this information under their own privacy policies and we are not responsible for their privacy practices.

Data Sharing – Categories of Recipients We Share Personal Data With

We share your Personal Data with third parties, including with trusted partners or service providers that help us to manage our business operation, website, etc. You can find here information about the categories of such third-party recipients.

Categories of Recipients	Additional Information
Our Affiliated Companies	We may share Personal Data with our affiliated companies and subsidiaries in order to provide joint services, for example, marketing, customer support, recruitment, etc. We may further share certain types of Personal Data about you as may be necessary to help detect and prevent potentially illegal acts, violations of our policies, fraud and/or data security breaches.
Our Service Providers	We share your Personal Data with our trusted service providers and business partners that perform business operations for us on our behalf (as data processors) and pursuant to our instructions. This includes, for example, the following categories of service providers:

Categories of Recipients	Additional Information
	<ul style="list-style-type: none"> ● Advertising and marketing service providers, who help us with advertising measurements, email marketing, etc.; ● Data storage providers, with whom we entrust the hosting and storage of our data; ● General IT and SaaS providers – providing us with IT systems for the management of our daily conduct; ● Customer support providers, who help us perform such functions as customer support and customer service; ● Data analytics and data management providers, who help us improve, personalize and enhance our operation. ● Data security partners, who help us detect and prevent potentially illegal acts, violations of our policies, fraud and/or data security breaches and ensure compliance with legal obligations.
Legal and Law Enforcement	We may disclose certain Personal Data to law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other Visitor to legal liability, and solely to the extent necessary to comply with such purpose.
Corporate Transactions	<p>In the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation, or asset sale) we will share the Personal Data we store with our acquiring company.</p> <p>We will obligate the acquiring company to assume the rights and obligations as described in our Privacy Policy.</p>

When we share information with service providers and partners, we ensure they only have access to such information that is strictly necessary for us to operate the website. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only while ensuring compliance with all applicable data protection regulations (such service providers may use other non-personal data for their own benefit).

Cross-Border Data Transfer

We may store or process your Personal Data in several territories, including, for example in Israel, the UK, EU, US or in other countries (whether directly or through the use of our vendors). Thus, your Personal Data may be transferred to and processed in countries other than the country from which you accessed our websites or otherwise the country of your jurisdiction. We will always take appropriate measures to ensure that your Personal Data receives an adequate level of data protection upon its transfer in accordance with applicable law.

Further, when Personal Data collected within the EU is transferred outside the EU (and not to a recipient in a country that the European Commission has decided provides adequate protection) it shall be transferred under the provisions of the [standard contractual clauses](#) approved by the

European Union. If you would like to understand more about these arrangements and your rights in connection therewith, please contact us at our email.

In addition, some of the third parties used for cookies management in our website, may store and process data globally, including in the US (e.g., Google Analytics servers). When granting consent for such cookies through the cookies tool on the website, you hereby acknowledge and approve such cross-border transfer, in accordance with such third party's privacy practices.

Data Retention

We retain the Personal Data we collect as long as it remains necessary for the purposes set forth above, all in accordance with applicable laws. In certain circumstances, we will retain your Personal Data for longer and even unlimited periods of time and mainly:

- Where we are required to retain Personal Data in accordance with legal, regulatory, tax, or accounting requirements;
- Where we deem retention is necessary to obtain an accurate record of your dealings with us in the event of any complaints or challenges; or
- If we reasonably believe there is a prospect of litigation relating to your Personal Data.

Aggregative, statistical and de-identified data which is Non Personal Data, may be kept and used by us with no limitation.

We may, at our sole discretion, delete or amend information from our systems, without notice to you, once we deem it is no longer necessary for such purposes.

Privacy Rights

We acknowledge that different people have different privacy concerns and preferences. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. We provide you with the ability to exercise certain choices, rights and controls in connection with your Personal Data. Depending on your relationship with us (e.g., if you are a visitor or user of the Services, a recruiting company, etc.), your jurisdiction and the applicable data protection laws that apply to you, you may have the following rights:

- Right to access your Personal Data;
- Right to rectification and amendment;
- Right to deletion/erasure;
- Right to restrict processing, or avoid any marketing activities;
- Right to data portability;
- Right to object to the processing of Personal Data;
- Right to avoid and Profiling and Automated decision making (to the extent relevant).

If you wish to exercise any of your applicable rights, please fill in our Data Subject Right form available [here](#) and send it to us at: privacy@sipplecare.com.

Certain rights can be easily executed independently by you without the need to contact us, and for example:

- You can opt-out from receiving our marketing emails by clicking the "Unsubscribe" link located in the footer of our emails;

- You can use the cookie settings tool on our website to change your preferences or opt-out from any sell of your data (to the extent relevant in accordance with your jurisdiction).

Where we are not able to provide you with the information for which you have asked, we will endeavour to explain the reasoning for this and inform you of your rights, including the right to complain to the supervisor authority (in the event you are EEA resident) or the Israeli authorities and courts. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any such information in accordance with applicable law.

Security

We take great care in implementing physical, technical, and administrative security measures for the website that we believe comply with applicable regulation and industry standards to prevent your information from being accessed without the proper authorization, improperly used or disclosed, unlawfully destructed, or accidentally lost.

If you feel that your privacy was not dealt with properly or was dealt with in a way that was in breach of our Privacy Policy or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data, please contact us at our email. We will make a reasonable effort to notify you and the appropriate authorities (if required by applicable law) if we discover a security incident related to your Personal Data.

Third Party Websites

Our Privacy Policy only addresses the use and disclosure of Personal Data we collect from you. To the extent that you disclose your Personal Data to other parties via our website (e.g., by clicking a link to any other website or location), different rules may apply to their use or disclosure of the Personal Data you disclose to them, and this Privacy Policy does not apply to any such third-party products and services. You agree that we shall have no liability whatsoever with respect to such third-party sites and your usage of them.

Eligibility and Children Data

As part of a questionnaire or survey we may request a participant, upon his sole discretion, to provide certain information, including Audio and Video recordings, of the participant's baby. Such data collection is always subject to the participant's consent as the legal guardian of the baby. Never provide us any child's data unless you are the legal guardian (e.g., parent) of such a child.

Except for that, as part of generally operating the website we do not knowingly collect information from children under the age of 16.

Changes and Updates

We reserve the right to change this Privacy Policy at any time, so please re-visit this page frequently. In the event of any substantial change of this Privacy Policy, we will make reasonable efforts to post a clear notice on the website and obtain your consent where required under applicable. Changes to this Privacy Policy are effective as of the stated "*Last Updated*" date and your continued use of our website, thereafter will constitute acceptance of, and agreement to be bound by, those changes.