

Ashtrom Renewable Energy (hereinafter: the “Company”) respects the privacy of users of the website it manages and operates at <https://tierrabonita.ashtromrenewableenergy.com> (hereinafter: the “Website”).

These Privacy Policy and Cookies Policy (collectively, the “Privacy Policy”) govern the manner in which the Group collects, uses, and manages information from and related to Users.

The information provided below is intended to inform users about the Company's privacy protection policy on the Website. This Privacy Policy, as detailed herein, explains the information the Company collects about Website users, the purposes for which such information is collected, how the Company may use the information, the third parties to whom the Company may transfer information, and the methods by which the Company manages and safeguards this information.

The information provided by the user to the Company is based on the user's voluntary consent and is not mandated by legal obligation. This information will be retained in the Company's database solely for the purposes outlined in this Privacy Policy. By using the Website and/or the services offered by the Company therein, the user consents to this Privacy Policy, including the storage and management of information in the aforementioned database. The information in the database will be used in accordance with the provisions of this Privacy Policy or as permitted by law, for the purposes detailed below.

1. Definition of Information

In this Privacy Policy, “information” refers to any data collected by any of the Group Companies or provided to them by the User or on the User's behalf, including data collected through the User's use of the Site and its services, and which is protected under the Privacy Protection Law, 5741-1981 (the “Law”).

2. Sources from which the Group Collects Information about the User

2.1 Information the User submits to the Company.

2.2 Information received from the Company in connection with services provided by the Company on the Site.

2.3 Information collected when the User requests to join the Company's distribution list (newsletter).

2.4 Information collected through the User's use of the Website.

3. The User's Information Collected by the Group

The Company will collect the following information about Users, in whole or in part:

- 3.1 Full name and contact details (phone, mobile phone, email).
- 3.2 Any additional information submitted by the User and/or received by the Company in connection with the User's use of the Website, including information collected through cookies as detailed in section 9 below.
- 3.3 Information collected when the User requests marketing materials and/or receives promotional content, price offers, and/or marketing information from the Company.

Purpose of Information Collection and Use by the Company

The Company collects User information for one or more of the following purposes:

- 3.4 For the provision and management of services offered by the Company or on its behalf on the Website.
- 3.5 For the operation and management of the Website, including marketing, advertising, sales promotion, and purchase incentives.
- 3.6 To enable the User to perform actions through the Website.
- 3.7 For the development and the operation of the Website.
- 3.8 For the maintenance of the Website and monitoring User activity.
- 3.9 To improve the quality of services provided by the Company.
- 3.10 To contact the User.
- 3.11 For compiling statistical data and transferring information, including statistical or other data, to third parties.
- 3.12 For analysis, research, and statistical compilation.
- 3.13 To conduct surveys among Users.
- 3.14 To display and tailor advertisements and messages to Users, including on the internet and social networks, to match their preferences.
- 3.15 To analyze profiles of Website users for product marketing purposes, including but not limited to online channels.
- 3.16 To send advertisements, product and service information, promotions, discounts, and marketing materials electronically.
- 3.17 For direct mail purposes, as defined by law.
- 3.18 For the Company's internal needs.
- 3.19 To defend against lawsuits, demands, and claims against the Company, its representatives, and third parties.
- 3.20 To enforce the terms of use and this Privacy Policy.
- 3.21 To comply with the provisions of applicable law.

4. Transfer of Information

- 1.1 The Company will not transfer or disclose information to third parties except as specified in this Privacy Policy.
- 1.2 Any transfer of information to third parties will include only relevant data, limited to the purpose for which it is being shared, and will be carried out proportionately for a specified, explicit, and legitimate purpose.

1.3 The Company may transfer all or part of the information to third parties in one or more of the following cases:

4.1.1 The Company, as part of the Ashtrom Group of Companies (see link below: _____), may share information as follows: When information is received from a company within the Ashtrom Group, that company is permitted to transfer the information to Ashtrom Group Ltd. Likewise, Ashtrom Group Ltd. may transfer such information to any relevant Group companies for the purpose of customizing services and/or products to the User and improving the quality of services and/or products.

4.1.2 Third parties that provide services to the Company, including support services for security and information technology (IT) systems, information storage, payment processing, website development, survey and research services, advertising and marketing services (including, but not limited to, internet and social media platforms), legal or other external professional advisors, and additional third parties providing services related to the Company's operations.

4.1.3 If the Company receives an order, including a court order, requiring it to disclose the User's details or information in accordance with applicable law.

4.1.4 In the event of any dispute, demand, claim, or legal proceeding between the User (or anyone on their behalf) and the Company (or anyone on its behalf).

4.1.5 In the event of a transfer, sale, assignment, or acquisition of the Company and/or its assets, in whole or in part, with or without consideration, including instances where ownership of the Website and/or its contents, in whole or part, is transferred to third parties. This may include, but is not limited to, cases of Company merger with third parties, changes in control, whether full or partial, as well as in scenarios involving the assessment of the feasibility of such transactions.

4.1.6 If a claim is made, or the Company suspects that a User has committed an act or omission that may harm the Company, its representatives, any third parties, or other users.

4.1.7 If a claim is raised, or the Company suspects that a User is using the Website to commit an illegal act or to enable, facilitate, assist, or encourage such an act.

4.1.8 In any instance where the Company believes that disclosing the information is necessary to prevent harm to the Company, the User, or any third party.

4.2 The Company may transfer information to third parties and/or store information with third parties, as described above, outside the State of Israel, including in countries where the level of information protection may differ from that of Israeli law. Without deviating from the provisions of this policy, the User's use of the Website indicates

consent to this Privacy Policy, including the transfer, storage, and preservation of information by third parties located outside Israel.

4.3 Without deviating from the provisions of this Privacy Policy, the Company and its representatives shall bear no liability and are exempt from any liability in connection with any damage, loss, or expense, of any kind or nature, whether direct, indirect, incidental, or consequential, caused or that may be caused to Users and/or any third party, in relation to service providers. This includes any matters related to information collection, usage, transfer to third parties, storage, and security by service providers, among others.

5. Information Security

The Company employs technical and physical measures for privacy and information security in accordance with accepted standards. However, it is acknowledged that the electronic storage and transmission of information, including over the Internet, can never be completely secure. Users submitting information to the Company, particularly via the Internet, do so with full awareness and acceptance of the risks inherent in such transmission. The Company does not guarantee that the Website will be entirely immune from unauthorized access to stored information. In any event, if the User has reason to believe that the transfer of information to the Company is no longer secure, please notify us by using the contact details provided in Section 15 of this Privacy Policy.

6. Limitation of Liability

The Company and its representatives shall bear no liability and are exempt from any responsibility for any damage, loss, or expense of any kind or nature, whether direct, indirect, incidental, or consequential, that has been or may be caused to Users and/or any third party in connection with the collection, use, transfer to third parties, storage, security, or any other handling of information.

7. Information Retention Period

The Company will retain User information for the duration necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

8. Information about Other People

If the User provides the Company with personal information regarding other individuals, including family members or other third parties, the User must do so only after: (a) informing these individuals about the content of this Privacy Policy; and (b) obtaining the necessary consent for the collection, use, disclosure, and transfer of their personal information in accordance with this Privacy Policy and applicable legal requirements.

9. Cookies

The Website uses cookies and other technologies for one or more of the purposes outlined in this Privacy Policy. For further details on the use of cookies and related technologies on the Website, please refer to the Cookies Policy here: -----

2. The Right to Review and Correct Information

The right to review and correct personal information is granted in accordance with applicable law. If the User wishes to review or correct their information, they may do so by contacting the Company using the contact details provided in Section 15 of this Privacy Policy.

10. Applicable Law and Jurisdiction

2.1 The terms and provisions detailed in this Privacy Policy and the Cookies Policy, along with any amendments or revisions, as well as the use of the Website, shall be governed by the laws of the State of Israel, without reference to its choice of law provisions.

2.2 Exclusive jurisdiction for any dispute and/or claim arising from or related to the use of the Website and this Privacy Policy is vested in the courts of Tel Aviv-Yafo.

11. Changes and Updates

The Company may, at its sole discretion, modify this Privacy Policy from time to time without providing prior notice or warning. The most recent version of the Privacy Policy published on the Website will be binding on the User. The User's continued use of the Website following any updates to the Privacy Policy will constitute acceptance of the updated Privacy Policy, including any changes made.

12. Miscellaneous

12.1 The User may not transfer their rights and/or obligations under this Privacy Policy to any other party. The Company, however, may transfer its rights and/or obligations to another party.

12.2 This Privacy Policy does not derogate from any rights granted to the Company and/or its representatives under any applicable law.

13. Contact

If the User has any further questions or comments regarding this Privacy Policy, they are welcome to contact the Company via email at privacy@ashtrom.co.il.

