

Privacy Policy

The Website buligocapital.com ("**Web**") is operated by Buligo Capital Ltd. (referenced below as "**Company**", "**We**" or "**Us**", as applicable).

1. GENERAL

We respect your privacy and are committed to use the Personal Information You may have shared with Us on the Web in accordance with this Privacy Policy and applicable laws, and to reasonably protect such Personal Information.

This privacy policy ("**Privacy Policy**") sets out the guidelines pursuant to which We may collect, use, store, disclose, protect, or otherwise handle any information that You may have provided or shared with Us on the Web.

This Policy applies to any user and/or registered user that uses the Web in any way or form ("**User**" or "**You**").

By using the Web, You acknowledge that you have reviewed both our Terms and Conditions and this Privacy Policy and agree to be bound by them, and without derogating from the above, You hereby authorize Us to collect, manage, store and use any information provided by You to Us on the Web in accordance with this Privacy Policy and applicable laws. If the Users do not agree to any term or clause listed below, they must immediately refrain from continuing to use the Web and/or from entering it.

Please be aware that this Privacy Policy does not apply to the practices of any third parties to whom We may disclose Personal Information pursuant to the terms of this Privacy Policy.

This Privacy Policy may be occasionally updated. If we make any substantial changes in the manner we use your Personal Information, then we will provide a proper notice within this Privacy Policy.

2. DATA AND PERSONAL INFORMATION WE MAY COLLECT

While using the Web, including performing a registration procedure, creating a profile, logging in to your profile on the Web or using any of its various services, You may be required to provide information, including Personal Information (as defined hereafter).

Personal Information - any information that We may collect from You and that You share with Us on the Web in respect of yourself and/or others, that may be used to identify any individual.

The Personal Information types are collected in accordance with your use of the Web and may include:

- Contact and identifiable information, such as: Full name, address, e-mail address, phone number, etc.
- Comments, reviews, feedback, eulogies, responses and/or derived correspondences with Us or any other User on the Web.
- Any other information provided by You when You use the Web.
- Any other information provided by You when You login to your account ("Investor Login") such as: Full name e-mail address, company name, ID number, corporate number .
- Any other information you provide in the investor personal portal after you have logged in, such as: accredited investor statement, approvals including third-party approvals; Anti Money Laundering information and documents – ID photocopy, certificate of incorporation, operating

agreement, utility bill; bank account details; beneficiary owners identity information and documents; w-8 and w-9 documents.

We may collect, use, store, disclose, protect, or otherwise process any Personal Information by lawful means, in a reasonable manner, and in accordance with this Privacy Policy. Any Personal Information, whether of You or of any third party, provided by You to Us on the Web, constitutes (i) your consent to our use, disclosure and processing of the Personal Information in accordance with this Privacy Policy and applicable laws, and (ii) a representation on your side of its accuracy and truthfulness and a warranty that You have all necessary rights to share such Personal Information with Us and that We are entitled to rely on such representation. For the avoidance of doubt, We are not responsible for any Personal Information that is shared by You.

The Personal Information You shared with Us on the Web and/or collected by Us will be stored in our registered database, for the purposes listed in section 3 below and in accordance with applicable law. You acknowledge that You are not required to provide us with any Personal Information under applicable law. By sharing any Personal Information with Us on the Web, You understand and confirm that You do so at your own risk, under your own free will the appropriate necessary consents, and You release Us from any liability in this regard.

In order to register, create a profile and/or log in to your profile on the Web, You will be required to enter your username and password. You must keep your username and password completely confidential and undertake not to disclose them to any other person. It is clarified that Users shall be fully and exclusively responsible for any use made of the Web using their username and password. In addition, when Users upload and retain Personal Information about any third parties, they declare that they have obtained all the necessary consent and/or other waivers, if applicable, of those third parties to use such information.

3. **PURPOSE OF INFORMATION COLLECTING AND PROCESSING**

We may use and process the information provided by You to Us and/or the information collected on the Web, including your Personal Information, for various purposes, including as follows:

- To operate the Web and to provide service to our Users, and to fulfil our obligations towards Users, including by sharing with our partners and any third parties necessary for the performance of our services;
- To perform authorized financial transactions with our Users, as applicable;
- To support the Web's Users, address their applications, inquiries, questions, requests, comments, responses etc.;
- To communicate with our Users via operational messages and alerts by various means, in relation to your profile, transactions, security, privacy, and any other administrative issues relating to the use of our services, including any modification in our services offering, as applicable, including by e-mail, text and/or push messages etc.;
- To improve and enrich the quality of the services offered on the Web and create new services and content as well as modify or cancel existing services;
- To send marketing messages on our behalf, subject to the Users' explicit consent and subject to their being able to request their removal at any time;
- To study Users' interaction with the Web for the purpose of assessing the Web performance and/or effectiveness;
- To prevent illegal and/or unauthorized use of the Web and to protect our legal interests and provide information to any competent authority of any relevant jurisdiction, in accordance with applicable laws, without any claim from our Users against Us in this respect;

- For any other purpose required or permitted by any applicable law or specified in this Privacy Policy and/or in any other circumstances, with your prior consent.

4. **INFORMATION SHARING AND DISCLOSURE**

We are committed to protecting your privacy and will not share or disclose information about You, unless otherwise permitted under the following terms and/or circumstances:

- When We have your consent to share such information;
- When We need to share your information to provide the product and/or service You have requested as part of our contractual relationship;
- When We need to send the information to companies who operate on our behalf to provide a product and/or service You have requested as part of our contractual relationship (they are prohibited from using that information for any other purpose);
- For the purpose of sending marketing, advertising and other materials by its business partners and other third parties that may be of interest to Users, provided that their express consent has been obtained in accordance with the applicable law;
- For the purpose of analysis and statistics, provided that such disclosure is done anonymously and is non-personal identifiable;
- In the event of sale or transfer, in whole or in part, of the Company's or any of its affiliate's shares or assets, change of control and in cases of mergers or in case of negotiations with respect to the foregoing;
- In the event that the Company deems that the disclosure of the information is necessary in order to prevent serious damage to the bodies or property of the users or of any other party;
- If required to do so by applicable law, or in the good-faith belief, that (i) disclosing such information is necessary to comply with any applicable law or respond to any court order, search warrant or equivalent, or where in reasonable belief an action is needed in order to protect the personal safety of any individual; and (ii) such disclosure is appropriate or necessary in order to enforce the Terms and Conditions, take precautions against liabilities, investigate and defend against any third party claims or allegations, assist government enforcement agencies, protect the security or integrity of the Web and servers and protect our rights and property.

All Personal Information as described above may be stored on servers and/or transferred (for the above purposes) to recipients which may be located outside of the state of Israel, and in some cases may have a lower level of protection than that within the applicable law. You acknowledge and agree to such transfer of Personal Information, and We will take the necessary measures to ensure a sufficient level of protection.

Other than as described above, any other transfer of your Personal Information to third parties will be subject to your consent.

The Web may contain links to third parties' websites, apps and services, which are outside our control and are not covered by this Privacy Policy. We do not assume responsibility for the privacy practices of such other applications or apps to which it may link, and encourage You to review those privacy policies yourself.

5. **COOKIES**

We may also collect Personal and Non-Personal Information through automatic means, for instance by using industry-wide technologies such as cookies (a string of information that can be stored on your device, if your device is set to permit storage of cookies), or other similar tracking technologies, which store certain local information on your device to help Us learn more about how You use the

Web and enhance your experience, and may also include the date, time, or duration of your visit in the Web and/or other sites You accessed, as well as your IP address, your browser ID, and your location data, and all other types of data recorded through cookies. We may use third-party service providers in order to process such information.

Cookies are alphanumeric identifiers that are transferred to and stored in your electronic device through your web browser for record-keeping purposes. Some cookies allow making it easier for You to navigate, while others are used to enable a faster log-in process or to allow Us to track your activities.

We use cookies to ensure You get the best experience on the Web. You can choose to enable or disable Cookies in your internet browser or delete them. If You choose to enable or delete them, it may have an impact on your User experience on the Web.

6. **DATA RETENTION & SECURITY**

- We store Personal Information if it is necessary to fulfil the purpose for which the information has been provided and/or collected. This means that We delete your Personal Information when such information is no longer necessary.
- Statistics and analysis including Aggregate and/or anonymous information derived from your use of the Web, may be saved thereafter and may remain on our servers indefinitely.
- We take commercially reasonable measures in providing secure transmission of your information across the internet to our servers, and in securing the data which relates your information while at rest.
- We may use Cloud Service Providers for our servers and/or storage. In such cases, we rely on the security measures taken by the Cloud Service Provider for the physical security, the integrity, redundancy and the data protection of the data which relates your information.
- However, You should be aware that there is always some risk involved in transmitting information over the internet and that there is also some risk that others could find a way to thwart our and/or the Cloud Service Provider security systems. As a result, while we strive to protect your information, we cannot ensure or warrant the security and privacy of your Personal Information or other content You may have provided while using the Web, and You do so at your own risk. We encourage You to exercise discretion regarding the Personal Information You choose to disclose.

7. **DATA SUBJECT RIGHTS**

- You may at any time request Us to provide You with access to your Personal Information, and also a review and rectification of your Personal Information, insofar as such information is incorrect, incomplete or out of date, where applicable. If You wish to do so, You can send us an e-mail with your request to: info@buligocapital.com and We will make reasonable efforts to respond within a reasonable period of time, and pursuant to any applicable laws.
- Note that unless You instruct us otherwise, we may retain and use your Personal Information for as long as reasonably required for the purposes of which such Personal Information 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 and Conditions, all as permitted under any applicable privacy laws.

8. **PRIVACY CHANGES AND INQUIRIES**

- We may change and revise this Privacy Policy from time to time, in order to reflect technological, business, legal or regulatory changes. It is clarified that to the extent that substantial changes are made in relation to the use of the Personal Information You provided and/or collected by Us, proper notice will be published within this Privacy Policy. The use of the Web following the

aforementioned changes will indicate your consent to these changes, and therefore We recommend that You will review this Privacy Policy from time to time.

- If you have any questions or queries about this Privacy Policy or regarding the way We collect or process Personal Information, you may contact Us via e-mail at: info@buligocapital.com.

Last updated date: April 2023