

# Privacy Policy

Last updated: May 24<sup>th</sup>, 2018

This is the privacy policy (the “**Policy**”) of the website [www.top5moneytransfer.com](http://www.top5moneytransfer.com) operated by Seperforma, of 6 Galgalei Haplada St., Herzliya Pituach, Israel (the “**Company**”, “**We**,” “**Us**”, “**Our**”).

The Company is committed to securing your Personal Data and your privacy. According to this commitment We will uphold the following principles:

- To be transparent in respect of the collection and processing of Personal Data about you:

It is important to Us that at all times you will have all of the information required in order for you to make educated decisions about the processing of Personal Data about you. For this purpose, We will make use of various techniques and measures aimed to provide you with relevant information about the processing of Personal Data about you, in the proper manner and timing.

Our complete privacy policy is intended to provide you with the widest understanding of the types of Personal Data collected by Us and the manner in which We process it. It is therefore vital that you will review it at the first possible opportunity and from time to time.

In addition, where We find that you are required to be provided with specific information, We will provide it to you in the appropriate time and place.

We will also be happy to answer any question you have and provide you with any clarification you require, subject to legal limitations. For this purpose, you can approach customer service at: [info@top5moneytransfer.com](mailto:info@top5moneytransfer.com)

- To process Personal Data about you solely for the purposes outlined in the Policy:

The purposes for which We can process Personal Data about you include, inter alia, the provision of Our products and services requested by you, enhancing the user experience in Our products and services, to improve Our products and services, to protect Our rights and interests, to perform business and administrative activity that supports the provision of Our products and services to Our customers and/or to uphold any legal and/or regulatory requirements. The entire list of the purposes for which We use Personal Data about natural persons is listed in section 6 in the Policy.

In addition, We will process Personal Data about you in order to understand your personal needs and preferences and provide you with personally tailored offers. You may request at any time that We will stop sending you personally tailored offers, and We will act according to such a request.

- To invest significant resources in order to respect your rights in connection with Personal Data about you:

We apply significant resources in order to allow you to exercise your rights as a data subject. Therefore, you may approach Us any time you wish to review Personal Data about you, to have us amend it, erase it, cease using it for specific purposes or in general or that We will transfer it to you or to a third party, and We will fulfill your wishes in accordance with the law.

- To secure Personal Data about you:

While We cannot promise absolute protection of the Personal Data about you, We can promise that We use and will continue to use a wide array of means and measures that are aimed ensuring that the Personal Data about you is secured.

## Our Complete Privacy Policy

In order to view the entire document, please press [here](#)

### **1. To What Does This Privacy Policy Apply?**

This Policy describes what kind of Personal Data does the Company collect about natural persons, how does it collect it, use it, share it with third parties, secure it, process it etc.

In this Policy, and reference to “Personal Data” is to any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or in combination with additional information that We have or that We have access to.

In this policy, wherever We refer to the “processing” of Personal Data, We refer to any operation or set of operations which is performed on Personal Data, including the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **2. Data Controller**

The Company:

The Company is the data controller in respect of the Personal Data about you.

### **3. When Do We Collect Personal Data About You?**

We collect Personal Data about you whenever you use Our products and services, use the Website, Our service channels and/or contact Us. In some instances, you will actively provide Us with the Personal Data, and in other instances We will collect the Personal Data about you from examining and analyzing your use of Our products and services and/or Our service channels.

### **4. No Obligation To Provide Personal Data To The Company And Its Implications**

You are not obligated to provide Us with any Personal Data about you. However, in some instances, not providing such Personal Data will prevent Us from providing you with the products or services you request Us to provide you.

By way of example, in order to provide you with certain operational messages, relating to the products and services We provide, or to address your inquiry We will require to receive your email address.

### **5. What Personal Data About You Do We Collect?**

**Personal Data We receive from you:** any Personal Data you provide to Us on your own free will when contacting Us, including via customer support, chat, social networks or in any other manner, including complaints, requests and comments. Our customer support representatives may record and/or document in writing your calls.

**[Personal Data We collect upon each browsing onto our website:** device info, operating system info, browser info, screen resolution, flash version, current and previous webpages browsed, entry and exit page.]

### **6. The Purposes Of The Processing Of Personal Data And Their Legal Basis**

The Company processes your Personal Data for one or more of the purposes outlined in this section and according to the appropriate legal basis.

The Company shall not process Personal Data about you unless there is a legal basis for such processing. The legal bases according to which the Company may process Personal Data about you are as follows:

- a. **Your consent that the Company will process Personal Data about you for one or more specific purposes.** By way of example, for the purpose of sending you marketing materials.

Where the legal basis for the processing of the Personal Data about you is consent, you may at any time to withdraw your consent for the purposes for which you provided your consent by sending a notice free of charge to the following email address [info@top5moneytransfer.com](mailto:info@top5moneytransfer.com)

Where you withdraw your consent for the processing of Personal Data about you, We might not be able to provide you with some or all of the products and services you requested or in the form intended to be provided to you, and you will have no claim in respect of that.

- b. **Processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party.** By way of example, for the purpose of improving our products and services, or for the exercise or defense of legal claims.

Whenever the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, the processing is conditional upon such interests not overridden by your interests or fundamental rights and freedoms which require protection of Personal Data about you. At any time, you may approach Us by sending a notice to the following email address [info@top5moneytransfer.com](mailto:info@top5moneytransfer.com) in order to receive information concerning the review performed by Us in order to reach the conclusion that We may process the Personal Data about you on account of such processing being necessary for the purposes of the legitimate interests pursued by the Company or by a third party.

The following list outlines the purposes for which We may process Personal Data about you based on legitimate interested pursued by the Company:

- **In order to respond to your queries, requests and/or complaints, and to provide you with customer support services**

Processing of Personal Data about you is required in order to respond to queries you have concerning products and services of the Company used by you, and in general to provide you with customer support services. In other circumstances, We will need to process Personal Data about you in order to fulfill any self-exclusion (or similar) requests made by you.

- **In order to provide you with tailor made marketing materials and offers.** In order to enhance and improve your user experience and the use of Our products and services, and in order to offer you with additional and new offers, products and services, We process Personal Data about you in order to adjust the materials presented to you according to your preferences, behavior, characteristics and interests. For this purpose, We use Personal Data automated analysis techniques.
- **In order to improve the products and services We offer, as well as to offer new ones.** We may use Personal Data about you in order to improve the products and services We offer, as well for the purpose of offering new ones; such processing will include, inter alia,

an analysis of previous uses by you of Our products and services, any comments and complaints received in respect of Our products and services, as well as any errors and malfunctions.

- **In order to improve the products and services We offer, as well as to offer new ones.** We may use Personal Data about you in order to improve the products and services We offer, as well for the purpose of offering new ones; such processing will include, inter alia, an analysis of previous uses by you of Our products and services, any comments and complaints received in respect of Our products and services, as well as any errors and malfunctions.
- **In order to analyze the effectiveness of any marketing and advertising campaigns and activities of the Company.**
- **In order to perform analysis, including statistical analysis.** We use various analytical measures (including statistical ones) in order to make decisions in various issues, including improving existing products and services and introducing and developing new ones.

## **7. Your Right To Object To The Processing of Personal Data About You Where Such Processing Is Necessary For The Purpose Of The Legitimate Interests Pursued By The Company Or By A Third Party**

Where the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, you have the right to object to such processing for this purpose by sending a notice to the following email address [info@top5moneytransfer.com](mailto:info@top5moneytransfer.com), unless We demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

## **8. Your Right To Object To The Processing of Personal Data About You For Direct Marketing Purposes**

The Company provides its customers with offers that are tailored for them specifically, in order to enhance and improve your user experience and the use of Our products and services, and in order to offer you with additional and new offers, products and services. This is done following the processing of Personal Data about you, in order to adjust the materials presented to you, on the basis of their preferences, behavior, characteristics and interests. For this purpose, We use Personal Data automated analysis techniques that provide Us with analysis and conclusions concerning you in various aspects, including profiling.

By way of example, such analysis and conclusions may be used by Us in order to offer you products and services which We think may be of more interest to you; for instance, on the basis of your country of residence or browsing history etc.

Similar analysis and conclusions are used to the extent that you agreed to receive marketing materials from Us, as such materials are tailored to offer you products and services which We think may be of more interest to you.

Where Personal Data about you is processed for direct marketing purposes, you shall have the right to object at any time to such processing for this purpose, including profiling to the extent that it is related to such direct marketing, by sending a notice to the following email address [info@top5moneytransfer.com](mailto:info@top5moneytransfer.com), in which case We shall cease to process Personal Data about you for such direct marketing purposes.

In addition, you may withdraw your consent from receiving marketing materials at any time, by sending an email free of charge with the title “unsubscribe” to the following email address: [info@top5moneytransfer.com](mailto:info@top5moneytransfer.com). Please note that you may be requested to choose from which means of communication (one, some or all) you wish to unsubscribe.

It is hereby clarified that unsubscribing will not cause the deletion of your contact details, but to cease receiving marketing materials – unless you re-request to receive them, subject to any legal obligation of Ours.

## **9. Transfer Of Personal Data To Third Parties**

The Company shares Personal Data with companies within the group of companies of which the Company is a part, for the purpose of supporting the activities of the Company and the offering of the Company’s products and services.

The Company may also share Personal Data about you with third parties that provide Us with the following services:

- a. Storage and hosting providers, including cloud computing services.
- b. IP address information.
- c. Analysis of user experience.
- d. Support.
- e. Marketing.
- f. Dispatch of materials, including marketing materials, via various means of communications, such as emails, SMS, regular (snail) mail, push notifications and other electronic messages.
- g. CRM data management.
- h. Call enters.
- i. Digital signing.

- j. Accounting and legal services.
- k. Research, analytical, technical and diagnostic services.

The Company may share Personal Data about you with governmental, local, official, regulatory, licensing and gambling authorities, as well as where such disclosure is required to protect Our and third parties' interests, rights and assets, including initiation or exercise or defense of legal claims.

In addition, We may disclose Personal Data about you to potential purchasers or investors of, or lenders to, the Company and/or any company within the group of companies of which the Company is a part, or in the event of any similar transaction (including the sale of assets of the Company and/or of any company within the group of companies of which the Company is a part), and/or in connection with any merger, reorganization, consolidation or bankruptcy of the Company and/or any company within the group of companies of which the Company is a part.

## **10. Your Rights in respect of The Personal Data About you**

You are entitled to the following rights in respect of the Personal Data about you. The exercise of such rights will be via sending an email requesting to exercise your right to the following email address [info@top5moneytransfer.com](mailto:info@top5moneytransfer.com)

### **Right of access**

You have the right to receive from the Company confirmation as to whether or not Personal Data about you is being processed, and, where that is the case, access to the Personal Data and the following information: (1) the purposes of the processing; (2) the categories of Personal Data concerned; (3) the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries outside the EEA or international organisations; (4) where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period; (5) the existence of the right to request from the Company rectification or erasure of Personal Data or restriction of processing of Personal Data about you or to object to such processing; (6) the right to lodge a complaint with a supervisory authority; (7) where the Personal Data is not collected from you, any available information as to its source; (8) the existence of profiling; and (9) where personal data is transferred to a third country outside the EEA or to an international organisation, the appropriate safeguards relating to the transfer.

The Company shall provide a copy of the Personal Data undergoing processing and may charge a reasonable fee for any further copies requested by you. Where you make the request by electronic means, and unless otherwise requested by you, the information shall be provided in a commonly used electronic form.

The right to obtain a copy of the Personal Data shall not adversely affect the rights and freedoms of others, and therefore if the request will harm the rights and freedoms of others, the Company may not fulfill your request or do so in a limited manner.

### **Right to rectification**

You have the right to obtain from the Company the rectification of inaccurate Personal Data about you. Taking into account the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

### **Right to erasure**

You have the right to obtain from the Company the erasure of Personal Data about you where one of the following grounds applies: (a) the Personal Data is no longer necessary in relation to the purpose for which it was collected or otherwise processed; (b) you withdraw your consent on which the processing is based and there is no other legal ground for the processing; (c) you object at any time, on grounds relating to your particular situation, to processing of Personal Data about you which is based on the legitimate interests pursued by Us or by a third party, and there are no overriding legitimate grounds for the processing; (d) you object to the processing of Personal Data about you for direct marketing purposes; (e) the Personal Data has been unlawfully processed; (f) the Personal Data about you has to be erased for compliance with a legal obligation in European Union or Member State law to which the Company is subject.

This right is not applicable to the extent that the processing is necessary: (a) for compliance with a legal obligation which requires processing by European Union or Member State law to which the Company is subject; or (b) for the establishment, exercise or defense of legal claims.

### **Right of restriction of processing**

You have the right to obtain from the Company restriction of processing of Personal Data about you where one of the following applies: (a) the accuracy of the Personal Data is contested by you, for a period enabling the Company to verify the accuracy of the Personal Data about you; (b) the processing is unlawful and you oppose the erasure of the Personal Data about you and request the restriction of its use instead; (c) the Company no longer needs the Personal Data about you for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; (d) where the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, unless We demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims; (e) where Personal Data about you is processed for direct marketing purposes, including profiling the extent that it is related to such direct marketing.

Where processing of Personal Data about you has been restricted following your request, such Personal Data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State.

### **Right to data portability**



You have the right to receive the Personal Data about you, which you have provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit such Personal Data to another controller, where: (a) the processing is based on your consent or on a contract to which you are a party; and (b) the processing is carried out by automated means.

In exercising your right to data portability, you have the right to have the Personal Data about you transmitted directly from the Company to another controller, where technically feasible. The exercise of your right to data portability is without prejudice to your and the Company's rights under your right to erasure. In addition, the right to data portability shall not adversely affect the rights and freedoms of others.

### **Right to object**

You have the right to object, on grounds relating to your particular situation, at any time to processing of Personal Data about you which is based on the legitimate interests pursued by the Company or by a third party, including profiling based on such legitimate interests. We shall no longer process the Personal Data about you unless We demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

You have the right to object at any time to the processing of Personal Data about you for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing.

### **Right to withdraw consent**

You may withdraw your consent provided to Us for the purpose of processing Personal Data about you at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

### **Right to lodge a complaint with a supervisory authority**

You have the right to lodge a complaint with a supervisory authority which is established by a Member State in order to protect the fundamental rights and freedoms of natural persons in relation to processing of personal data within the European Union.

Your rights in respect of Personal Data about you as outlined in this section 10 may be restricted by European Union or Member State law to which the Company is subject to.

We shall provide you with the information requested according to your rights outlined in this section 10 without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

The information requested according to your rights outlined in this section 10 shall be provided free of charge. Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, We may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or (b) refuse to act on the request.

The Company may require you to provide additional information necessary to confirm your identity in order to fulfill your request according to your rights outlined in this section 11, where We have reasonable doubts concerning the identity of the natural person making the request.

## **11. Cookies**

When you visit or access the Website or the Application, a cookie file (which is a small text file) is installed on the device via which you visit or access the Website or Application. The cookies allow Us to collect information about you and your behavior, in order to improve your user experience, to remember your preferences and settings, to customize and offer you with products and services that may interest you. Cookies are also used collect statistics about your usage of Our products and services and perform analytics.

We use cookies to track Your browsing history on our Website, your exit page and your activity on our partners websites.

The cookies you consent to, are also used to collect data which we then profile into audiences so that we can deliver targeted advertising tailored to your interests and limit the number of times you see an advertisement. We also insert cookies in emails and newsletters to improve our content and advertising.

Lastly, we use cookies to compile anonymous, aggregated statistics that allow us to understand how people use our Website and to help us improve their structure and content and also help us measure the effectiveness of advertising campaigns.

### **Control of cookies**

You can control or delete cookies by use of your browser settings.

The procedures for changing your settings and cookies differ from browser to browser. If necessary, use the help function on your browser.

### **What cookies do we use?**

The cookies used on the Website may be generally categorized as follows:

- **Necessary Cookies.**

These cookies are essential to make the Website work correctly, they enable you to move around our websites and use our features. Examples include identifying your browser and adjusting the look of the website. These cookies do not identify you as an individual. If you do not accept these cookies, it may affect the performance of the website, or parts of it.

- **Performance Cookies.**

These cookies collect information about how you use our Website, for instance which pages you go to most often, the time spent on the Website, and any issues encountered, such as error messages. These cookies are also used to let affiliates know if you came to them from our Website and if your visit resulted in the use or purchase of a product or service from them, including details of the product or service purchased. This helps us improve the performance of the Website.

These cookies do not identify you as an individual. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

- **Functionality Cookies.**

These cookies allow the Website to remember the choices you make (such as language or the region you are in) to provide a more personalized online experience. These cookies may also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. Similarly, they may be used to keep track of what featured products or videos have been viewed to avoid repetition, and to enable you to play games and engage with social tools, such as blogs, chatrooms and forums.

The information these cookies collect may include personal data that you have disclosed. If you do not accept these cookies, it may affect the performance and functionality of the website and may restrict access to content on the website.

- **Targeting or Advertising Cookies.** These cookies are used to deliver content that is more relevant to you and your interests. They are also used to deliver targeted advertising or limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns on various websites. They remember that you have visited the Website and this information is shared with other parties, including advertisers and our agencies.

While many types of these cookies track consumers via their Device ID or IP address, we do not use such and only collect statistical data. However, therefore they may collect Personal Data.

- **Third-Party Cookies.** We use a number of partners that may also set cookies on your device on our behalf when the Website to allow them to deliver tailored advertising within their domains, for example Google Analytics. The third party cookies used by Us do not collect personal information.

### **Duration of the cookie we use**

In terms of duration, we may use two different types of cookies on our websites:

- Session Cookies. These cookies are temporary cookies that remain on your device until you leave the Website; or
- Persistent Cookies. These cookies remain on your device for much longer or until you manually delete them (how long the cookie remains on your device will depend on the duration or “lifetime” of the specific cookie, as well as your browser settings).

## **12. Retention Of Personal Data About You**

The Company shall retain Personal Data about you for as long as is required to fulfill the purposes of the processing of the Personal Data as outlined in this Policy, or for a longer period as required according to the legislation, regulation, policies and orders that apply to Us.

In order to ensure that Personal Data about you is not retained for longer than is required, We periodically review Personal Data retained by Us in order to examine whether any Personal Data can be erased.

## **13. Transfers Of Personal Data To A Third Country Or An International Organization**

Personal Data about you may be transferred to a third country (i.e., jurisdictions outside the EU Member States, Iceland, Norway and Liechtenstein) or to international organizations. In such circumstances, the Company shall take appropriate safeguards aimed to ensure the protection of Personal Data about you and provide that enforceable data subject rights and effective legal remedies for data subjects are available.

These safeguards and protection will be available if any of the following are met:

- a. The transfer is to a third country or an international organization which the EU Commission decided that they provide an adequate level of protection to the Personal Data that is transferred to them pursuant to Article 45(3) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("GDPR");
- b. The transfer is according to legally binding and enforceable instrument between public authorities or bodies pursuant to Article 46(2)(a) of the GDPR; or
- c. The transfer is in accordance with standard data protection clauses adopted by the EU Commission pursuant to Article 46(2)(c) of the GDPR; the clauses adopted by the EU Commission can be viewed at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)

You may request the Company to be provided with details concerning the safeguards employed by it to protect the Personal Data about you which is transferred to a third country or an international organization, by sending an email to the following address: [info@top5moneytransfer.com](mailto:info@top5moneytransfer.com)

#### **14. Protection Of Personal Data About You**

We implement appropriate technical and organizational measures to ensure an appropriate level of security to Personal Data taking into account the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

We may be required, due to legal or other obligations outside Our control, to transfer Personal Data about you to third parties, such as public authorities. In such circumstances, We have limited control over the level of protection provided to the Personal Data about you by such third parties.

Any transfer of Personal Data via the internet cannot be fully secured. Therefore, the Company cannot ensure the protection of Personal Data about you when transferred via the internet to the Website and Application operated by the Company.

#### **15. Links To Websites of Third Parties**

The Website may provide links to websites of third parties. The Company does not control such websites and applications, nor the collection and/or processing of Personal Data about you by such websites and We are not responsible for such websites, nor to their privacy and data protection policies and activities. This Policy does not apply to any actions taken via such websites.

Wherever you access such third parties' websites, We recommend that you carefully review their privacy policies prior to using such websites and/or applications and prior to disclosing any Personal Data by you.

#### **16. Changes To This Policy**

We may amend, from time to time, the terms of this Policy. Whenever We amend this Policy, We will notify such amendments by publishing the updated Policy on the Website. In addition, when We make significant amendments of this Policy, We will strive to inform you about such amendments via means of communication which We believe are reasonably appropriate to inform you of such amendments and by publishing a notice about such amendments on the Website. Unless stated otherwise, all amendments will enter into force upon publishing the updated Policy on the Website.