



Way2Vat

Privacy Notice

Recently Updated: June 2018

Way2Vat Ltd. and its subsidiaries (together, “**Way2Vat**” or “**us**”) are committed to your right to privacy.

This Privacy Notice (“**Privacy Notice**”), is an integral part of our Terms of Use, which can be found at: [Terms of Use](#) , and governs the use, processing and transfer of Personal Data collected via Way2Vat's website (“**Website**”) and/or the Services (as defined below) available through the Website or otherwise provided by Way2Vat, to each person (the “**User**” or “**you**”), accessing or using the Website and/or the Services.

If you choose to use the Services, or otherwise provide data to us, you explicitly agree to the use of such data in accordance with this Privacy Notice. You may not use the Services or the Website or submit any data through them if you do not agree to any of the terms hereunder.

Please note, that the Website and/or Services may contain links to other websites, products or services offered by third parties, which are not governed by this Privacy Notice. This Privacy Notice does not apply to the practices of entities which are not controlled by Way2Vat.

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 use the Services. If you are under such age you should cease to use the Services immediately.**
- **You may be entitled under applicable law to request to review, amend, erase or restrict the processing of your Personal Data. 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.**
- **We do not sell, trade, or rent Users' Personal Data to third parties. We only share Personal Data with third parties in connection with the provision of the Services to Users and their Employers, or other limited circumstances as specified herein.**
- **If you have any questions or requests regarding the processing of your Personal Data, or would otherwise like to contact us in connection with this Privacy Notice, please send us an email to: info@way2vat.com.**

1. What is Personal Data, and what data is collected about me by Way2Vat?

“**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.

Non-Personal Data

We collect non-Personal Data regarding Users concerning their use of the Website and Services, such as the scope, frequency, latency, pages accessed, what and when a User views or interacts with content and



materials displayed through our Services, device identifiers, and other technical information regarding the device used to access the Services, such as model, operating system, etc.

Personal Data

- 1.1. We collect Personal Data you submit to us via the Website, for example when filling a form on our website, requesting a Demo, etc.
- 1.2. We log users Internet protocol (IP) address. Way2Vat also collects certain data regarding your use of the Website, such as the frequency and the extent of your use.
- 1.3. If you contact us on various customer support issues of other matters, we may also collect data associated with these communications.
- 1.4. We do not knowingly collect or process any Personal Data included in Special Categories of Personal Data (as defined in the GDPR). In the event you become aware that such data has been posted to the Website or collected by us, please inform us immediately.

2. What will Way2Vat do with my data?

- 2.1. Non-Personal Data. Non-Personal Data is used mainly for click stream analysis in order to constantly improve and maintain our Website and 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 and features.
- 2.2. Personal Data. Personal Data is used only for the following limited purposes:
 - 2.3. To provide our Services to Users, including contacting you when you fill a form on our Website.
 - 2.4. To prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts and any other misuse of the Website or the Service and to enforce our Terms of Use.
 - 2.5. To protect the security or integrity of our databases and the Services, and to take precautions against legal liability.
 - 2.6. To improve the Services, and to develop new features, products and services.
 - 2.7. To improve your experience on the Website and customize our Services to your interests, including by way of targeted advertising.
 - 2.8. For the purposes of our legitimate interests, to the extent not overridden by the rights and freedoms of natural persons, as permitted under applicable law.
 - 2.9. To provide updates with respect to material changes to this Privacy Notice or our Terms of Use.

3. Does Way2Vat use cookies?

Yes, we use cookies (small text files stored in a user's device) and other similar technologies to gather non-Personal Data. You may at any time program your device to block cookies, but please be aware that such blocking may prevent us from providing some or all of the Services to you. These technologies help us track how Users use the App. These cookies provide us only with aggregate data, which is used to assist us in improving your experience of using the Services through the App.

4. How Can I Control My Personal Data?

- 4.1. Reviewing and amending your Personal Data. If you are a User, you may review the information included in your Account on the App, or send us a request in connection with reviewing your Personal Data to: info@way2vat.com . In the event any Personal Data is incorrect or outdated, you may update and correct such data by providing us with appropriate notification or correcting the data directly on the App, as applicable to you.
- 4.2. 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.
- 4.3. Portability of Personal Data. To the extent relevant to you and to the Services, you may be entitled to request the portability of your Personal Data, and we will comply with such requests, to the extent required under applicable law.
- 4.4. Retention of 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 analysis and development of the Services; and (iv) to comply with applicable law. Non-Personal Data and statistical anonymized data may be retained by us without limitation.

5. Will Way2Vat Share My Personal Data With Others?

WE DO NOT SELL OR RENT ANY OF YOUR PERSONAL DATA TO NON-AFFILIATED THIRD PARTIES FOR THEIR MARKETING PURPOSES.

- 5.1. Non-Personal Data, aggregate and statistical or otherwise anonymized data may be shared without limitation with third parties at our discretion. This information does not contain Personal Data and is used to develop content and services for our Users and clients.
 - 5.2. We share Personal Data only under the following limited circumstances:
 - 5.3. With trusted partners and third parties who assist us in operating the Services and conducting our business, such as fraud prevention, marketing, account maintenance and technology services.
 - 5.4. For personalizing your experience of the Services.
 - 5.5. As necessary to help detect and prevent potentially illegal acts and fraud, and to guide decisions about products, services and communications.
 - 5.6. With our affiliates and connected companies, such as subsidiaries, sister-companies and parent companies.
 - 5.7. 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, to take precautions against legal liability, or in the event of a corporate sale, merger, reorganization, dissolution or similar event.
 - 5.8. Other third parties with your consent or direction to do so.
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6. What is the lawful basis under which Way2Vat processes Personal Data?

- 6.1. Certain processing activities conducted by us are based on the necessity of such activities for the performance of our Services and the contract between us and our Users.
- 6.2. Other processing activities are based on the grounds that they are necessary for the purposes of our legitimate interests or the legitimate interests of a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of natural persons which require protection of Personal Data.
- 6.3. There may be certain processing activities based on your consent. In connection with such activities, you may rescind your consent, by sending us an email to: info@way2vat.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 or your Employer with some or all of the Services.

7. Will Way2Vat transfer my Personal Data internationally?

Our databases are currently located in Israel . Some of our processing activities are made in Israel and in other countries due to the nature of the Services (e.g. uploading information and receipts of Expenses to the Website during your stay in foreign countries). The European Commission has decided 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 from the EU to Israel is lawful and does not require any specific authorization.

Any other transfer of Personal Data originating from the EU 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' rights.

By using our Services, you agree to such transfer of Personal Data.

8. Will I receive promotional materials from Way2Vat?

If you provide us with your email, or otherwise consent to receive marketing materials, we may send you with information on new products, features, activities, services and periodic announcements or newsletters which may interest you. By accepting this Notice, or otherwise indicating your consent to such materials, you hereby provide us with your explicit, written consent to receive marketing communications. You may at any time choose to opt-out and to not receive these communications, by contacting us at [**info@way2vat.com**](mailto:info@way2vat.com).

9. Persons under 16

Our Website is a general audience App, which is not directed to persons under 16 years old. If a parent or guardian becomes aware that his/her child has provided us with Personal Data without their consent, he/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.



11. Questions or concerns regarding privacy

If you have any questions or concerns regarding privacy issues, please send us a detailed message to: info@way2vat.com and we will make every effort to resolve your concerns without delay.

Way2Vat may, at any time and from time to time, modify this Privacy Notice. Modifications to this Privacy Notice will be posted on the App, and shall be effective as of the date in which they are posted on the App.

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.
