

PRIVACY POLICY

Last Update: March 26, 2026

(1) INTRODUCTION AND SCOPE OF THIS PRIVACY POLICY

This privacy policy (“**Privacy Policy**”) describes how **Synthgram Ltd** and its affiliates companies and subsidiaries (collectively, “**Company**”, “**we**” or “**our**”) collect, use and process Personal Data (as defined below), including the needed disclosure and information about the types of Personal Data collected, why we collect your Personal Data and the purposes for which we will use it, how long we will retain it, with whom we share it, what are your applicable rights regarding your Personal Data, and how you can exercise them.

This Privacy Policy applies to our privacy practices regarding the collection, processing, usage and transfer of certain data, including Personal Data (as defined below), from:

- 1) Individuals who access and use our website, available at: <https://www.synthgram.ai/> or other digital assets under our domain, and related interactions with us (respectively “**website**” and “**Visitors**”).
- 2) Representatives of prospects and potential business partners who interact with us (“**Prospects**”).
- 3) Customers (“**Customer**”) and their designate personnel (“**Authorized Users**”) who sign up for and use our cloud-based enterprise AI governance platform (“**Platform**”). Note however that this Privacy Policy does not apply to content that our Customers and their Authorized Users upload and store in the Platform, which is processed by the Company its role as a “processor” and is governed by our agreements with Customers.

“**Visitors**”, “**Customers**” and “**Prospects**” are referred to collectively and individually as “**you**” in this Privacy Policy.

Any Personal Data you provide is made at your free will and consent (where required under applicable data protection laws), and you acknowledge that you are not under any statutory obligation to provide us with Personal Data. However, if you will not provide us with certain Personal Data, we will not be able to fulfill certain purposes, for example, communicate with you regarding any inquiries you submit or provide you with certain Services - all as described under section 4 of this Privacy Policy “**The Data Sets Collected, Purposes of Use and Lawful Basis**” which details the purposes for which each Personal Data set is processed.

(2) PRIVACY POLICY AMENDMENTS

The Company reserves the right to amend this Privacy Policy from time to time, at the Company’s sole discretion. The most recent version of this Privacy Policy will always be posted on our website, and the “Last Update” heading reflects the last date of amendments. We will provide notice to you if these changes are material, and, where required by applicable law, we will obtain your consent. Any amendments to the Privacy Policy will become effective immediately, unless we notify otherwise. We recommend you reviewing this Privacy Policy periodically.

(3) CONTACT INFORMATION AND DATA CONTROLLER INFORMATION

Synthgram Ltd is the “*data controller*” (as such term is defined under applicable privacy and data protection legislation) of the Personal Data collected subject to this Privacy Policy. This means that the Company is responsible for deciding how, and the purposes for which, your Personal Data is processed as well as to enable you to exercise your rights related to your Personal Data processed by the Company.

For any questions you may have related to our processing of your Personal Data and this Privacy Policy, please contact as follows:

By Email: Privacy@synthgram.ai

By Mail: 3 Shaham St., Building Y, Petach Tikva 4951703, Israel

(4) THE DATA SETS COLLECTED, PURPOSES OF USE AND LAWFUL BASIS

Depending on your interaction with us and our website or Platform, we may collect certain information that may be classified as Non-Personal Data, or Personal Data, as follows:

“**Non-Personal Data**” meaning information which is non-identifiable and anonymous. We are not aware of the identity of the individual from whom such Non-Personal Data was collected, and we are not able to link between this information and the individual by using reasonable means. Non-Personal Data may include technical information such as type of operating system and type of browser, type of device, your actions on the website – all when collected on an aggregate basis, or otherwise not combined with any identifiers. We may further process and anonymize data in a manner that the data will be Non-Personal Data.

“**Personal Data**” meaning information that identifies an individual or may with reasonable effort identify an individual.

Below you will find details regarding the types of Personal Data we collect, how and for which purposes we use your Personal Data.

Please note that the actual processing operation per each purpose of use and lawful basis, as we detail below, may differ. Such processing operation usually includes a set of operations made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction, and is based on the same lawful basis as stipulated below. In addition, we may process certain Personal Data, based on our legitimate interests, to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of our website, to enforce our other policies, and to take precautions against legal liability.

(I) Online Identifiers and Usage Data:

Types of Personal Data

When you access and otherwise interact with our website, we may collect your online identifiers, such as Internet Protocol (IP) address, Cookie ID, user agent, and similar online identifiers (collectively “**Online Identifiers**”).

Online Identifiers are further used to generate certain information, for example, IP address can be used to extract your approximate location (e.g., country).

Further, when you access and otherwise interact with our website, Platform or Services, we may further collect information related to such actions or interactions, for example the time and date of the access or interaction, the duration, the URL of the website’s page you have viewed, browser or settings of language preferences, click stream, access logs, duration of use, Services used, session recording, errors or bugs, crash data and analytics, login data, how you interact with the Platform and the Services and similar information. When you access our website we may further use tools which provide us with

information and insights (such as the advertising campaign from which you have reached our website) (collectively “**Usage Data**”).

Purposes of Processing

We collect and use Online Identifiers and Usage Data for the following purposes:

- To operate and enable the proper functionality of our website, the Platform and the Services, including to secure our website and Platform and prevent fraud or other malicious conducts, to detect errors, for debugging and to resolve such technical issues.
- For internal analytic purposes and to enhance and improve our website, Platform and Services and its content, as well as the way we offer it. For example, we use Online Identifiers and Usage Data to understand how users use our website or the most viewed content and pages.
- To advertise and promote our website and services. This includes to serve ads on third party’s platforms across the web, as well as targeted ads (further depending on your browser and cookies setting and preferences) and to measure effectiveness of, and improve, our ads and marketing campaigns, for example, to track conversions (how many users reached our website or contacted us), build targeted audience and remarket our website and services.
- Analyze the use of our Platform, improve and enhance the Platform.
- Develop future Platform features.
- Detect fraud, abuse and malicious use of the Platform and Services.
- Enforce our policies and agreements regarding the use of our Platform and to have internal records to evidence the Services provided or used, in the event we find needed subject to any potential, actual or threatened claim or dispute with us, and to comply with applicable laws or security standards.

(II) Contact Information, Contact Communications and Customer Support:

Types of Personal Data

If you contact us, through means we make available through our website or other means (such as sending us an email or calling us), you will be requested to provide us with your contact information, which depending on the interaction with us may include your name, telephone number, business email address, your organization, etc. (“**Contact Information**”).

When we communicate with you, by means of communication such as email correspondence, phone call etc., we will further process and store the communications with you, and may also process data related to these communications, such as, interactions with email correspondence (including access time and date), etc. (collectively “**Contact Communications Data**”).

Purposes of Processing

We collect and use Contact Information and Contact Communications Data for the following purposes:

- To respond to your inquiry or request, for example, as applicable, to set up meetings, send you with information you have requested, provide you the requested support, etc.
- To contact you or send you marketing material related to our services in which you have shown your interest, such as promotional offers, new products, special opportunities etc. (“**Direct Marketing**”), or otherwise, subject to applicable laws, to contact you and explore potential business opportunities and offer you information regarding our services that we think will be of interest to you or your organization.
- To enhance and improve our marketing efforts.
- To keep internal records of our communications, where we believe it is required, for example, to comply with our obligations under applicable laws or have internal records demonstrating our

compliance, in order to provide you with any further assistance, or in the event of any potential, threatened or actual claim or dispute.

(III) Customer and Authorized Users' Account Information:

Types of Personal Data

Customers register and create an account and submit Personal Data such as name, email, title, role, and other similar contact information, further, the Customer can add Authorized Users from which we will collect Contact Information as well.

You may also log in through a social network account (such as Google). If you do so, the relevant provider may share certain Personal Data with us (for example, information from your public profile and identifiers associated with your account), depending on the permissions you grant and your privacy settings with that provider.

Purposes of Processing

We collect and use Account Information for the following purposes:

- Create and designate an account, authentication and validate access, enable log-in, access and use of the Platform and the Services.
- Identification and validation.
- Send you related information, including confirmations, invoices, technical notices, updates, security alerts, training and support and administrative messages.
- Direct Marketing.

(5) HOW PERSONAL DATA IS COLLECTED

Depending on the nature of your interaction with the website and with us, we may collect Personal Data:

- **By using automated means** – we may use cookies or similar technologies to gather some information automatically when you interact with our website, Platform and Services. For additional information regarding our use of cookies and the choices you can make, please see Section 6 of this Privacy Policy “*Our Use of Cookies and Tracking Technologies*”
- **When provided by you voluntarily** – we will collect Personal Data if and when you provide us with such information, for example when you contact us through the means made available on the website, register as a Customer etc.

(6) OUR USE COOKIES AND TRACKING TECHNOLOGIES

We use “cookies” (or similar tracking technologies such as tags and pixels) on our website and Platform. The use of cookies is a standard industry-wide practice. Cookies and similar technologies are a small piece of information, text or code that a website assigns and stores on your browser while you access a website. Cookies can be used for various purposes, including for operation and security purposes, to improve website functionality and remember preferences, for statistical purposes, as well as for advertising purposes.

The information generally collected and stored by cookies includes Online Identifiers and Usage Data (as defined in **Section 4** of this Privacy Policy “*The Data Sets Collected, Purposes of Use and Lawful Basis*”).

Most browsers will allow you to block acceptance of cookies or erase cookies by adjusting the privacy and security settings of your web browser. Please refer to the support page of your browser to learn more.

Please note that once you choose to opt out or disable cookies, some features of our website may not operate properly.

(7) DISCLOSURE OF PERSONAL DATA

We may disclose your Personal Data to third parties, including our affiliated companies, partners or service providers that help us manage our website, the Platform, business operations and marketing campaigns. The categories of such third-party recipients or otherwise events in which we may share Personal Data are as follows:

- **Our Service Providers** - we share Personal Data with our service providers to perform the requested functions and services on our behalf, for example, cloud providers, analytic tools, security tools, communication management providers, professional advisors, etc. These providers are prohibited from using the Personal Data we share with them for any purpose other than providing us with the requested services and we only share with them the types of Personal Data that are needed for the provision of the applicable services they provide us with.
- **Marketing Partners** – we may share Personal Data with marketing partners we engage with or use their tools and services to market and promote our website, including for targeted advertising campaigns, for example, social media operators. The Personal Data shared may include Online Identifiers and Usage Data, (as defined in **Section 4** of this Privacy Policy “*The Data Sets Collected, Purposes of Use and Lawful Basis*”). These marketing partners may combine your Personal Data with other data they collect independently from your visits and interactions on other websites where their tools are used or that they otherwise operate.
- **Our Affiliated Companies and Sharing in the Event of Corporate Transactions** - we share Personal Data, internally within our company group to fulfil certain purposes for which Personal Data is collected and retained, and may further share Personal Data in the event of a corporate transaction (for example, sale of our assets or substantial part of our business, merger, consolidation, etc.). The types of Personal Data that will be shared can be any data processed by us, as needed. Our affiliated companies or acquiring company will assume the rights and obligations as described herein.
- **Sharing with Law Enforcement or Governmental Authorities & to Enforce our Rights or for Security and Fraud Prevention** - we may disclose certain Personal Data to law enforcement, governmental agencies, or authorized third parties, to comply with applicable laws or in response to a verified request or order. We may further share Personal Data to defend our rights, enforce our agreements or policies, to investigate or prevent potential violations thereof or any alleged illegal activity or any other activity that may expose us, you, or other users to legal liability, however Personal Data will be shared solely to the extent required.

For the avoidance of doubt, we may transfer, disclose, or otherwise use Non-Personal Data, including information linked to anonymous random identifiers or aggregated in a non-identifiable way, at our sole discretion.

(8) YOUR RIGHTS RELATED TO YOUR PERSONAL DATA

Depending on your relationship with us, your jurisdiction and the data protection laws that apply to you, you have the right to control and request certain limitations or rights to be executed.

The principal rights that may apply to your Personal Data (subject to your jurisdiction and additional conditions) may include:

- **Right to Be Informed** – you have the right to be provided with information regarding our privacy practices, including the Personal Data we collect and how we use it – as we detailed under this Privacy Policy. If you have any additional questions, you can contact us as set forth under this Privacy Policy.

- **Right to Access/Inspect Your Personal Data** – you have the right to ask us to confirm whether or not we collect and use your Personal Data and which Personal Data we specifically hold about you, and to ask for a copy of your Personal Data or otherwise access it.
- **Right to Correction/Rectification** – you have the right to ask us to correct inaccuracies or update your Personal Data we hold or request deletion for inaccurate Personal Data, considering and subject to the nature and purposes of the processing.
- **Right to Deletion/“To Be Forgotten”** – you may have the right to request the deletion of certain Personal Data we process, if specific conditions are satisfied, subject to applicable law.
- **Right to Withdraw Consent** – when we collect and process your Personal Data based on your consent, you have the right to withdraw such consent at any time.
- **Right to Opt-Out** – you have the right to opt-out from receiving our marketing communications, if applicable, by unsubscribing through the message received.

You may submit a request to exercise most of your privacy rights under applicable privacy laws by contacting us at Privacy@synthgram.ai. We will respond and fulfill your request within the timeframe required under applicable laws.

When you submit a request, we will take steps to verify your identity and your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for denial and how to remedy any deficiencies, where applicable.

(9) PERSONAL DATA RETENTION

We retain the Personal Data for as long as it is needed for the purposes for which it was collected, in accordance with applicable laws, or, where applicable, until a user expresses a preference to opt-out or delete its Personal Data. There are other circumstances in which we will retain your Personal Data for longer periods, as follows: we are required to retain the Personal Data in accordance with legal, regulatory, tax, or accounting requirements; where we determine we need to retain records of your dealings with us in the event of any complaints or in the event we reasonably believe there is a prospect of litigation relating to your Personal Data.

Without derogating from the above, except where we are required to retain Personal Data under applicable law, we may at our sole discretion, delete or amend any data, without notice, once we deem it is no longer needed.

(10) SECURITY

We have implemented physical, technical, and organizational security measures that comply with applicable laws and industry standards intended to protect Personal Data from unauthorized access, alteration, disclosure or destruction.

Note however that security incidents cannot always be prevented, and we will not be held responsible for unauthorized or unintended access beyond our control, and we make no warranty, express, implied, or otherwise, that we will always be able to prevent such unauthorized access or use.

Please contact us at if you become aware of any attempt to gain unauthorized access to your Personal Data.

(11) CROSS-BORDER DATA TRANSFER

We may transfer, store or process your Personal Data in countries outside the country from which you accessed our website or Platform. We will take appropriate measures in accordance with applicable laws to ensure that your Personal Data receives an adequate level of data protection upon its transfer.

(12) CHILDREN

Our website, Platform and Services are not intended for use by children, and we do not knowingly collect or maintain information about children. Please contact us at Privacy@synthgram.ai, if you have reason to believe that a child has shared any information with us.