

PRIVACY POLICY

[Last Modified: April 19, 2026]

This Privacy Policy (“**Privacy Policy**”) governs the processing and transfer of personal data collected or processed by Glilot Capital Partners (collectively with its subsidiaries and affiliated companies “**Company**”, “**we**”, “**us**” or “**our**”) when we provide our services, through the use of our investor portal (“**investor portal**”), or when you access or use our website available [here](#) (“**you**” or “**your**” and “**website**”), collectively the “**services**”. This Privacy Policy is an integral part of any other agreement between us. Any capitalized terms not defined herein shall have the meanings ascribed to them in the Terms, or under the applicable privacy laws.

This Privacy Policy explains what data we may collect from you, how such data may be used or shared with others, how we safeguard it and how you may exercise your rights related to your Personal Data (as defined below), as required under relevant privacy regulation, including without limitation and where applicable: the EU General Data Protection Regulation (“**GDPR**”), relevant US Privacy Laws (as such terms is defined below), and the Israeli Privacy Protection Law, 1981. In addition, any reference to the GDPR (as defined below) shall also include the UK Data Protection Act, 2018 (UK-GDPR).

This Privacy Policy does not pertain to Personal Data relating to our employees, contractors and other staff as part of their employment or engagement with us.

If you have any questions regarding this Privacy Policy or our data practices, you are welcome to contact us at: privacy@glilotcapital.com.

You are not required by law to provide us with any Personal Data. However, please note that some of our services require the processing of certain Personal Data and without such data we may not be able to provide you with all or part of such services (e.g., without completing the registration process required to create an account within the investor portal, we will not be able to provide you with our services).

1. POLICY AMENDMENTS:

We reserve the right to amend this Policy from time to time, at our sole discretion. The most recent version of the Policy will always be posted on the website. The updated date of the Policy will be reflected in the “Last Modified” heading. Subject to applicable law, any amendments to the Policy will become effective immediately, unless we notify you otherwise. If we materially change the way in which we process your previously collected Personal Data, we will provide you with prior notice, or where legally required, request your consent prior to implementing such changes. **We strongly encourage you to review this Policy periodically to ensure that you understand our most updated privacy practices.**

2. CONTACT INFORMATION AND DATA CONTROLLER INFORMATION:

Glilot Capital Partners is the Data Controller (as such term is defined under the GDPR or equivalent privacy legislation) of your Personal Data collected from you as a user of our services.

You may contact us as follows:

- **By email:** privacy@glilotcapital.com.

- **By Mail:** 6 HaChoshlim St, Herzliya Pituach, Israel.

3. DATA SETS WE COLLECT AND FOR WHAT PURPOSE:

Below you can find information regarding the purposes for which we process your personal data as well as our lawful basis for processing, the definition of “personal” and “non-personal” data, and how it is technically processed.

Non-Personal Data

Non-Personal Data means data that does not identify an individual and cannot reasonably be used to identify an individual, including aggregated or irreversibly anonymized data. Non-Personal Data may include, for example: Aggregated usage statistics (e.g., number of users accessing certain features, average session duration, feature adoption rates), provided that such data does not enable identification of any individual; Technical and device-related information (e.g., device type, operating system, browser type, general system configurations), where such data is not linked to an identifiable individual; De-identified or anonymized analytics data (e.g., traffic patterns, performance metrics, latency and system logs), processed in a manner that prevents re-identification; High-level geographic or demographic insights (e.g., country-level usage distribution), where no individual can be identified; Aggregated business or performance data derived from user activity (e.g., trends, benchmarks, or statistical models), provided such data does not relate to an identifiable person.

Where we process Personal Data to create anonymized or aggregated datasets, we will implement measures designed to prevent re-identification. To the extent such data does not constitute Personal Data under applicable law, we may use it for legitimate business purposes, subject to applicable law.

Personal Data

We may collect and process, in connection with your access to or use of the services, information relating to an identified or identifiable individual (“**Personal Data**”). The categories of Personal Data we process, together with the purposes of processing and the applicable legal bases (where required), are set out in the table below.

For the avoidance of doubt, certain categories of data may be subject to specific regulatory regimes and therefore fall outside the scope of certain privacy laws (for example, under applicable U.S. privacy laws, de-identified or aggregated information, or information regulated by sector-specific legislation such as HIPAA, FCRA, GLBA, COPPA, FERPA or similar laws). Such information will be treated in accordance with applicable law.

The table below further describes the processing activities, including the categories of Personal Data processed, the purposes of processing, and, where applicable, the relevant legal basis.

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS PER GDPR
Contact and Customer Support Information: If you voluntarily contact us in order to receive our support, you may be required to provide us with certain Personal Data such as your	We will use this data to respond to your inquiry. The correspondence with you may be processed and stored by us to improve our internal operations, as well as in the	We process such Contact Information subject to our legitimate interest. If you are a customer of our services

<p>name, email address, and any additional information you decide to share with us.</p>	<p>event we reasonably determine it is needed for future assistance or to handle any dispute you might have with us.</p> <p>We may retain and manage such information using external services and platforms such as CRM systems.</p>	<p>approaching us with respect to your usage of the services, the data will be processed per the contract between us.</p>
<p><u>Investor Account Basic Information:</u></p> <p>Any user of the services provided within the investor portal must have an account. The information provided during the registration process may include your name, email, username and password.</p>	<p>We will process this information to verify your identity and grant you access to our services. As part of that we may use your email or phone number as part of a Multi-Factor-Authentication process.</p> <p>We may also use this information in order to provide you with account management, to provide the services as well as to send you needed information related to provide you with our services and which related to our business engagement (e.g., send you a welcome message, notify you regarding any updates to our services, etc.) and additional occasional communications and updates related to the services. Such messages may be delivered to you through email or SMS in accordance with applicable law.</p> <p>Further, we may send you promotional and marketing emails, to the extent we are allowed to do so under applicable law (“Direct Marketing” as detailed hereunder).</p> <p>We may also process your user’s account information by using “cookies”.</p>	<p>Our lawful basis for processing such data, analyzing it, and granting you access to the requested service is the contract between us.</p> <p>We may further analyze and process your login data for security purposes, upon our legitimate interests.</p> <p>In some cases, and where required under applicable law, using your data for promotional purposes will be subject to your consent. In such instances, you may always withdraw your consent at any time by contacting us or unsubscribe from any marketing list through the designated feature included in such message.</p>
<p><u>Financial Information</u></p>	<p>We will collect this information directly from you or from tax and</p>	<p>We process such financial information</p>

<p>As a user of our services, we will collect and process certain financial information, such as financial statements, tax reports, capital account reporting, and notices, or other information or documentation related thereto.</p>	<p>anti-money laundry forms, or similar forms.</p> <p>We may share this information with third party processors, such as banks and third parties (e.g., administrator that assist us in onboarding investors, managing their documents and providing payments).</p>	<p>subject to your consent and performance of our contract.</p> <p>Sometimes, certain data is Processed under our legal obligations, such as AML/KYC obligations.</p>
<p>Online Identifiers and Advertising and Targeting data</p> <p>When you interact with the website and services, we may collect online identifiers such as your Internet Protocol address (IP), Cookie-ID, etc., and other information that relates to your activity through the website, such as pages viewed, click stream data, login time and date stamp, etc. This data might be collected directly by us or through our use of third parties' cookies and advertisement platforms.</p> <p>Similarly, we may collect Ad calls, which is a code shared with advertisers, include zip code, advertiser ID, the webpage that you came from, the IP address, and approximate location which assists the advertiser to determine which ads to place. The ad-call will also include your preference regarding interest-based advertising as further explained herein.</p> <p>Please see more in the Cookies section below.</p>	<p>Collection of device identifiers is needed for the following purposes:</p> <p>(i) Internal statistics and analysis, for which device identifiers might be combined with usage data, for example, to analyze how many visitors have accessed certain content and from which country (where the country is extracted from the IP address) in order to enhance and improve our website and its content.</p> <p>(iii) Marketing and advertising purposes. Our partners will process this data to manage and deliver advertisements and content more effectively and personally, including contextual, behavioral, and interests-based advertising based on your activity, preferences or other data available to us or to our business partners and advertisers, including for re-targeting purposes.</p>	<p>Our lawful basis for processing this data for technical and security purposes is based upon our legitimate interest.</p> <p>If we process your Personal Data for analytics and advertising purposes and to the extent required under applicable laws (e.g., if we use third party cookies), we will obtain your consent for such processing. In any such case, you may withdraw consent or change your preferences at any time by using the cookie settings tool available on our website.</p>
<p>Direct Marketing:</p> <p>As a user, we will send you materials and marketing content, including events invitations, through the email</p>	<p>We will use this information to keep you updated with offers and content such as updates, new capabilities and features,</p>	<p>We process such data subject to our legitimate interest. You can opt-out at any time through the</p>

information you provided during your registration.	and to send supporting documentation.	"unsubscribe" link within the email or by contacting us directly. However certain operational content will still be sent.
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Please note that the actual processing operation for each purpose of use and lawful basis detailed in the table above 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. The transfer of Personal Data to third-party countries, as further detailed in the Data Transfer Section below, is based on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of the services and to enforce the Terms, as well as to protect the security or integrity of our databases, services, and the website, and to take precautions against legal liability. Such processing is based on our legitimate interests.

4. HOW WE COLLECT YOUR INFORMATION:

Depending on the nature of your interaction with us, we may collect the above detailed information from you, as follows:

- ***Automatically*** – we may use cookies (as elaborated in the section below) or similar tracking technologies (such as pixels, tags, agent, etc.) to gather some information automatically, or automatically through the use of our services.
- ***Provided by you or about you voluntarily*** – we will collect information if and when you choose to provide us with the information, when you register to our services, etc.
- ***Provided from third parties*** – where permitted under applicable law and provided with your consent for cookie usage, we may enrich the Personal Data collected about you with data provided by third parties.

5. COOKIES

When you access or use our services, we may use “cookies” or similar tracking technologies, which store certain information on your device (i.e., locally stored). The use of cookies is standard industry-wide practice. A “cookie” is a small piece of information that a website assigns and stores on your computer while you are viewing a website. Cookies are used by us for various purposes, including allowing you to navigate between pages efficiently, as well as for statistical purposes, analytic purposes and advertising. You can find more information about our use of cookies here: www.allaboutcookies.org.

There are several types of cookies, including without limitation:

- ***Essential, Functionality, Operation & Security Cookies.*** These cookies are essential for enabling visitor movement around the website, for the website to function properly, and for security purposes (i.e., used to authenticate visitors, prevent fraudulent use, and protect visitor data from unauthorized parties). This category of cookies either cannot be disabled, or if disabled, certain features of the website may not work.

- **Analytic, Measurement & Performance Cookies.** *These cookies are used to collect information about how visitors use our website, in order to improve our website, content, and the way we offer them, as well as assess the performance of the content and marketing campaigns. These cookies enable us, for example, to assess the number of visitors who have viewed a certain page as well as their country of origin. It enables our website to remember information that changes the way it behaves or looks, such as your preferred language.*
- **Preference, Targeting & Advertising Cookies.** *These cookies are used to advertise across the internet and to display relevant ads tailored to visitors based on the parts of the website they have visited (e.g., the cookie will indicate you have visited a certain webpage and will show you ads relating to that webpage).*

You may find more information about the cookies we use as well as opt-out from cookies or change your preferences at any time by using the cookies setting tool available on the footer of our website.

Where we use third-party advertising cookies, such third-party may independently collect, through the use of such tracking technologies, some or all types of Personal Data detailed above, as well as additional data sets, including to combine such information with other information they have independently collected relating to your online activities across their network of websites, for the purpose of enhanced targeting functionality and delivering personalized ads, as well as providing aggregated analytics related to the performance of our advertising campaign you interacted with. These third parties collect and use this information under their own privacy policies, and we are not responsible for their privacy practices.

Although we do not sell your personal information for profit, we do engage in targeted advertising on the website, this type of advertising activity may be considered a “sale” of Personal Data under certain US Privacy Laws and may also be referred to as “targeted advertising”. Please note that even if you opt-out you may still see personalized ads based on information other companies and ad networks have collected about you, if you have not opted out of sharing with them.

For IBA opt out options on desktop and mobile websites, please visit:

- Digital Advertising Alliance (US) <https://www.aboutads.info/choices/>
- Digital Advertising Alliance (Canada) <https://youradchoices.ca/en/tools>
- Digital Advertising Alliance (EU) <https://www.youronlinechoices.com/>
- Network Advertising Initiative <https://optout.networkadvertising.org/?c=1>

We also honor browser-based opt-out signals, such as the Global Privacy Control (GPC) and Universal Opt-Out Mechanisms (UOOM), by automatically disabling non-essential cookies when such signals are detected.

6. DATA SHARING:

We share your data with third parties, including our partners or service providers that help us operate and make the most of the website. You can find here information about the categories of such third-party recipients.

Categories of Recipients	Additional Information
Our Affiliated Companies	We may share Personal Data with our affiliated companies and subsidiaries in order to provide joint services, for example, marketing, improving our services, etc.
Our Service Providers	<p>We share your Personal Data with our trusted service providers and business partners that perform business operations for us on our behalf (as data processors) and pursuant to our instructions.</p> <p>This includes the following categories of service providers:</p> <p>Advertising and marketing service providers, who help us with advertising measurements, email marketing, etc.;</p> <p>Data storage providers, with whom we entrust the hosting and storage of our data;</p> <p>Consent Manager (CMP), an external service that provides us with the ability to allow website visitors to control and manage their cookies preferences and consent;</p> <p>General IT and SaaS providers – providing us with IT systems for the management of our daily conduct;</p> <p>Data analytics and data management providers, who help us improve, personalize and enhance our operation.</p> <p>Data security partners, who help us detect and prevent potentially illegal acts, violations of our policies, fraud and/or data security breaches and ensure compliance with legal obligations.</p>
Legal and Law Enforcement	We may disclose certain Personal Data to law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other visitor to legal liability, and solely to the extent necessary to comply with such purpose.
Corporate Transactions	<p>In the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation, or asset sale) we will share the Personal Data we store with our acquiring company.</p> <p>In any such case, we will oblige the acquiring company to assume the rights and obligations as described in our Privacy Policy.</p>

When we share information with service providers, we ensure they only have access to such information that is strictly necessary for us to operate the services. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only while ensuring compliance with all applicable data protection regulations (however, such service

providers may use certain data for their own benefit subject to separate terms agreed upon with you or per your consent, as well as in the case of using merely Non-Personal Data).

7. DATA RETENTION:

In general, we retain the Personal Data we collect for as long as it remains necessary for the purposes set forth above, all under the applicable regulation, or until you express your preference to optout, where applicable.

The circumstances in which we will retain your Personal Data include: (i) where we are required to do so in accordance with legal requirements, or (ii) for us to have an accurate record of your interaction with us in the event of any inquiries or contact requests, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data. Please note that except as required by applicable law, we will not be obliged to retain your data for a particular period, and we may delete it for any reason and at any time, without providing you with prior notice of our intention to do so.

8. SECURITY MEASURES:

We take great care in implementing physical, technical, and administrative security measures for the website and services, that we believe comply with applicable regulation and industry standards to prevent your information from being accessed without the proper authorization, improperly used or disclosed, unlawfully destructed, or accidentally lost.

If you feel that your privacy was not dealt with properly or was dealt with in a way that was in breach of our Privacy Policy or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data, please contact us at our email.

9. INTERNATIONAL DATA TRANSFER:

Due to our global business operation, we may store or process your Personal Data in several territories, including, for example in Israel, the UK, EU, US or in other countries (whether directly or indirectly through the use of our vendors). Thus, your Personal Data may be transferred to and processed in countries other than the country from which you accessed our websites or otherwise the country of your jurisdiction. We will take appropriate measures to ensure that your Personal Data receives an adequate level of data protection upon its transfer in accordance with applicable law.

Further, when Personal Data collected within the EU is transferred outside the EU (and not to a recipient in a country that the European Commission has decided provides adequate protection) it shall be transferred under the provisions of the standard contractual clauses approved by the European Union. If you would like to understand more about these arrangements and your rights in connection therewith, please contact us at our email.

In addition, some of the third parties used for cookies management on our website may store and process data globally, including in the US (e.g., Google Analytics servers). When granting consent for such cookies, you hereby acknowledge and approve such cross-border transfer, in accordance with such third party's privacy practices.

10. YOUR RIGHTS

Data protection and privacy laws may grant you certain rights with regards to your Personal Data, all according to your jurisdiction. The rights may include one or all of the following: (i) request to amend your Personal Data we store accessing; (ii) review and access your Personal Data that we hold; (iii) request to delete your Personal Data that we hold (as long as

we do not have a legitimate reason for retaining the data); (iv) restrict or object to the process your Personal Data; (v) exercise your right of data portability (vi) contact to a supervisory authority in your jurisdiction and file a complaint; and (vii) withdraw your consent (to the extent applicable). **We will not discriminate against you for exercising any of your privacy rights.**

To exercise your rights set out above, you may fill out the the Data Subject Request Form (“DSR”) available **here** and send it to our email at: privacy@glilotcapital.com. You may also complete the DSR form if you do not want us to share your Personal Data with unaffiliated or non-agent third parties for promotional purposes.

We do not control third parties' method of collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (“NAI”) on the NAI's website at <https://optout.networkadvertising.org/?c=1>.

When you contact us and request to exercise your rights regarding your Personal Data, we will require certain information from you in order to verify your identity and locate your data and that the process of locating and deleting the data may take reasonable time and effort, as required or permitted under applicable law. Data privacy and related laws in your jurisdiction may provide you with different or additional rights related to the data we collect from you, which may also apply.

In certain circumstances, and subject to applicable U.S. Privacy Laws, you may permit an authorized agent to submit requests on your behalf. For more information, please refer to our DSR form.

You have the right to lodge a complaint with the EU Member State supervisory authority if you are not satisfied with the way in which we handled the complaint.

Specific U.S. Jurisdictional Privacy Rights

Residents of the following states may have the privacy rights set out above: Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia.

Nevada provides its residents with a limited right to opt-out of certain Personal Data sales. Residents who wish to exercise this sale opt-out rights may do so by following this Section.

You should check the laws of your state of residence to determine whether these rights apply to you. The exact scope of these rights may vary by state. Data privacy laws are constantly evolving, and the list of states herewith data privacy laws may not be all-inclusive.

Responding to US Data Rights Requests:

For U.S. residents exercising data privacy rights, we endeavor to confirm receipt of all requests within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact us through our email at: privacy@glilotcapital.com. to ensure we received your request.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt, or as otherwise required by U.S. Privacy Laws. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

The information in our response will cover the 12-month period preceding our receipt of your request. If we cannot comply with your request or any portion of your request, our response will explain the reasons we cannot comply.

If you have an account with us, we may deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or your authority to make the request and confirm that the Personal Information relates to you.

We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. You do not need to create an account with us to exercise your privacy rights.

Appeals:

If we decline to take action on your request, we will inform you within 45 days (Colorado residents) or 60 days (all other U.S. jurisdictions) of receipt. Our response will include a justification for the decision and an explanation about your right to lodge an appeal. If you wish to do so, please send your appeal request with a summary of the request and decision you want to appeal to: privacy@glilotcapital.com.

If you are not happy with our response, depending on your jurisdiction, you may have the right to lodge a complaint against us with the relevant State's Attorney General: If you do not have your Attorney General's contact information, please contact us at privacy@glilotcapital.com, and we will endeavor to provide the relevant information to you.

11. THIRD PARTY WEBSITES:

Our Privacy Policy only addresses the use and disclosure of Personal Data we collect from you. To the extent that you disclose your Personal Data to other parties via the website (e.g., by clicking on a link to any other website or location), different rules may apply to their use or disclosure of the Personal Data you disclose to them, and this Privacy Policy does not apply to any such third-party products and services. You agree that we shall have no liability whatsoever with respect to such third-party sites and your usage of them.

12. ELIGIBILITY AND CHILDREN PRIVACY:

Our services are not directed nor intended for use by children, and we do not knowingly process, sell or share children's information. We will discard any information that we receive from a user who is considered a "child" immediately upon our discovery that such a user shared information with us. Please contact us at: privacy@glilotcapital.com, if you have reason to believe that a child has shared any information with us.

