

STARTUP NATION CENTRAL PRIVACY POLICY

Last Updated: *December 23, 2024*

This privacy policy (“**Privacy Policy**”) governs how we, Start-Up Nation Central Ltd. (CC) (“**Startup Nation Central**”, “**SNC**”, or “**we**”, “**our**” or “**us**”) use, collect and store information pertaining to you (“**User**”, “**you**”) such as in the following use cases:

- (i) When you visit and make use of our website <https://www.startupnationcentral.org/>, all its Digital Assets (collectively with <https://www.startupnationcentral.org/>, the “**Website(s)**”);
- (ii) Information about Cookies;
- (iii) When you register, use or sign up to Finder;
- (iv) When you contact us or fill in any other form on our Website (including when you request a visit with SNC);
- (v) When you visit and make use of the Finder;
- (vi) When you request introductions through Finder;
- (vii) When you choose to donate to SNC or one of our affiliated non-profit organizations, including while using the Leadership Circle Program;
- (viii) When you interact or post on the Leadership Circle Program; and/or
- (ix) When you register or participate in Health Tech Roadshow Program or other similar programs.

“**Digital Assets**” shall mean the following domains and digital assets:

- a. <https://lp.startupnationcentral.org>,
- b. <https://lp.startupnationcentral.org/leadership-circle-membership/> (“**Leadership Circle Program**”),
- c. <https://finder.startupnationcentral.org/> (“**Finder**”),
- d. <https://lp.startupnationcentral.org/health-tech-first-2024-roadshow/> (“**Health Tech Roadshow Program**”); and
- e. any other of its subdomains, landing pages or websites powered or owned by SNC.

Please note that some of these use cases only apply to certain subdomains or digital assets of our Website.

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. “**Personal Data**” means any information that can be used, alone or together with other data, to uniquely identify any living human being.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory rights, including your rights to a remedy or other means of enforcement.

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This Privacy Policy may be updated from time to time and therefore we ask you to check back periodically for the latest version of the Privacy Policy, as indicated above. If there will be any significant changes made to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED.

Data we collect	Why is the data collected and for what purposes?	Legal basis (GDPR only)	Third parties with whom we share your Personal Data	Period of storage	Consequences of not providing the data
When you visit and make use of Startup Nation Central and its Digital Assets:					
<ul style="list-style-type: none"> • IP address • Referral URLs 	<p>To:</p> <ul style="list-style-type: none"> • create reports on the innovation industry • improve our products, including the usability of our Website 	<p>Legitimate interest (i.e. to provide relevant information to visitors and improve our Website)</p>	<ul style="list-style-type: none"> • Third party applications (such as Google Analytics, Google Ad Manager, Intercom, Fullstory, Marketo). • Hosting companies (such as Google) • SNC's consultants (such as for R&D purposes, digital marketing purposes and SEO purposes). 	<p>For as long as we have a legitimate business need for using the information.</p>	<p>No consequences. However, please note that you may not receive content suggestions.</p>
Cookies - For our cookies practices, please read our cookies notice.					
When you register, use or sign up to Finder:					
<ul style="list-style-type: none"> • First name • Last name • Gender • Email address • Additional email address • Position • Company Name • Phone Number • LinkedIn details • Headline (taken from LinkedIn) • Google Details • Picture (taken from LinkedIn and Google) • Total time on the Finder 	<p>To:</p> <ul style="list-style-type: none"> • Send informational emails (i.e. future informational, event related or other Site related emails from us, which may include events or information from third parties (“Informational Emails”). • Identify potential partners 	<ul style="list-style-type: none"> • Consent (even if you agree to receive Informational Emails, you always have the option to opt-out from receiving such Informational Emails by selecting an unsubscribe link at the bottom of each email that is sent) • Processing is necessary in order to take steps at the 	<ul style="list-style-type: none"> • Third party applications (such as Google Analytics, Intercom, Fullstory, Marketo). • Hosting companies (such as Google) • SNC's consultants (such as for R&D purposes, digital marketing purposes and SEO purposes). • Other users of the Finder Platform. 	<p>Until you withdraw consent (or unsubscribe) or we proactively delete the data.</p>	<p>We cannot sign you up to Finder and use the Finder’s functionalities. We cannot send you, and you cannot receive, Informational Emails. We cannot identify potential partners.</p>

<ul style="list-style-type: none"> • Average session length • Average events per session • Location (City, State/Region, Country, IP address) • Device type • Browser • Operating System • Referral URLs • User journey • Any other data you decide to provide 		<p>request of the data subject prior to entering into a contract.</p> <ul style="list-style-type: none"> • Legitimate interest (such as identifying potential partners or contacting you after you have shown interest in a company or a field) 			
<p>When you fill in forms on our Website (including Global Partnerships, Contact Us form and requests for visits with SNC):</p>					
<ul style="list-style-type: none"> • First name • Last name • Email address and contact details • Organization name • Job title • Country • Information related to your company or institution • Any other data you decide to provide in the context of your query 	<p>To:</p> <ul style="list-style-type: none"> • Respond to your question or query • Organize a visit to the extent appropriate • B2B marketing purposes 	<p>Legitimate interest (e.g. to respond to your query/request) • Regarding B2B marketing, we rely on Recital 47 of the GDPR and legitimate interest. In this situation, we offer an unsubscribe capability.</p>	<ul style="list-style-type: none"> • Third party applications (such as Google Analytics, Google Ad Manager, Intercom, Fullstory, Marketo). • Hosting companies (such as Google) • SNC's consultants (such as for R&D purposes, digital marketing purposes and SEO purposes). 	<p>Depending on the context, we keep it until you request your data to be deleted or we proactively delete the data.</p>	<p>We cannot respond to your query or request.</p> <p>We cannot consider you for a visit with SNC.</p> <p>We cannot send you marketing communications.</p>
<p>When you visit and make use of the Finder:</p>					
<ul style="list-style-type: none"> • IP address • Referral URLs 	<p>To:</p> <p>create reports on the innovation industry, improve our products,</p>	<p>Legitimate interest (i.e. to provide relevant information to visitors and improve our Website).</p>	<ul style="list-style-type: none"> • Third party applications (such as Google Analytics, Google Ad Manager, 	<p>For as long as we have a legitimate business need for using the information.</p>	<p>No consequences. However, please note that you may not receive content suggestions.</p>

	including the usability of our Website.		Intercom, Fullstory, Marketo). <ul style="list-style-type: none"> • Hosting companies (such as Google) • SNC's consultants (such as for R&D purposes, digital marketing purposes and SEO purposes). 		
When you request an introduction through Finder:					
<ul style="list-style-type: none"> • Full Name • Email address • Contact details • Message • Attachments • Information you provide in connection with the introduction request • If you are sending information about third parties you represent and warrant that you have all required consents and the right to send the information. 	To make introductions to companies that you have approved	<ul style="list-style-type: none"> • Legitimate interest (e.g. to process your request) 	<ul style="list-style-type: none"> • Hosting companies (such as Google) • Companies that you have approved 	Depending on the context, we keep it until you request your data to be deleted or we proactively delete the data.	Cannot process your introduction request
When you choose to donate to SNC or one of our affiliated non-profit organizations, including while using the Leadership Circle Program:					
<ul style="list-style-type: none"> • Full name • Email address • Title/position • Country/Region • Address • Phone Number • Details about your donations and any relevant information you share with us in order to donate (Credit card 	<ul style="list-style-type: none"> • To process your donation. • To keep track of donations, create statistics and research regarding donors and donations. • To perform security checks, address 	<ul style="list-style-type: none"> • Consent or your active choice to provide such data. • Performance of a contract (to process your donation as requested). • Legitimate interest (e.g., to detect fraud 	<ul style="list-style-type: none"> • Third party applications (such as Anedot, Tranzila, Visa). • Hosting companies (such as Google). • SNC's consultants (such as for R&D purposes, digital 	Depending on the context, we keep it until you request your data to be deleted or we proactively delete the data.	<ul style="list-style-type: none"> • Cannot verify, check, or process your donation. • Cannot keep track of donations, run statistics, or conduct research regarding donors and donations.

<p>details will be securely processed by third-party payment vendors, and we will not keep them).</p> <ul style="list-style-type: none"> Any other data you decide to provide in the context of your donation. <p>In case of donation by organization, the following will be also collected:</p> <ul style="list-style-type: none"> organization name; type of organization; and organization address. 	<p>regulatory issues, for recordkeeping and for legal defense).</p>	<p>and maintain records).</p>	<p>marketing purposes and SEO purposes).</p>		<ul style="list-style-type: none"> Cannot meet our security, regulatory, or legal obligations.
<p>When you sign up, interact, or post on the Leadership Circle Program:</p>					
<ul style="list-style-type: none"> Full name Title/position Email address LinkedIn profile and other information related to your Bio Investment Experience Company Details (name, job title/position, number of employees, industry and location) Any other data you decide to provide us in connection with the Leadership Circle Program. 	<ul style="list-style-type: none"> To facilitate interactions with the platform including allowing you to publish posts, and enable others to see and interact with your content. 	<ul style="list-style-type: none"> Consent or your active choice to provide such data (you have the option to withdraw your consent at any time). Legitimate interest (e.g., to detect fraud and maintain records). 	<ul style="list-style-type: none"> Other members of the Leadership Circle Program. Third party applications (such as Hive and []). Hosting companies (such as Google). SNC's consultants (such as for R&D purposes, digital marketing purposes and SEO purposes). 	<p>Until you request your data to be deleted or we proactively delete the data</p>	<p>We cannot sign you up to, or let you use, the Leadership Circle Program and its functionalities.</p>
<p>When you register or participate in Health Tech Roadshow Program and/or other similar programs:</p>					
<ul style="list-style-type: none"> Full name Company name Position Email address Phone number 	<ul style="list-style-type: none"> To allow you to register for the Health Tech Roadshow Program or other similar programs and contact you. 	<ul style="list-style-type: none"> Consent or your active choice to provide such data. 	<ul style="list-style-type: none"> Third party applications (such as Tranzila and Visa). 	<p>Depending on the context, we keep it until you request your data to be deleted or we</p>	<ul style="list-style-type: none"> Cannot verify, check, or process your registration and participation in the Health Tech Roadshow

<ul style="list-style-type: none"> • Country • Travel information collected during the Health Tech Roadshow Program or other similar programs, including but not limited to flight ticket details, hotel accommodations, passport photos, and visa information. • Details about your payment (credit card details will be securely processed by third-party payment vendors, and we will not keep them). • Any other relevant information you share with us. 	<ul style="list-style-type: none"> • To process your payment. • To participate in the Health Tech Roadshow Program or other similar programs and assist in arrangements as necessary. 	<ul style="list-style-type: none"> • Performance of a contract. • Legitimate interest (e.g., to detect fraud and maintain records). 	<ul style="list-style-type: none"> • Hosting companies (such as Google). • SNC's consultants (such as for R&D purposes, digital marketing purposes and SEO purposes). • SNC's partners and subcontractors operate in order to perform the Health Tech Roadshow Program or other similar programs such as the Israel Economic Mission to the East Coast, Matter, and the Science Center. 	<p>proactively delete the data.</p>	<p>Program or other similar programs and payment.</p> <ul style="list-style-type: none"> • Cannot meet our security, regulatory, or legal obligations.
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2. HOW WE PROTECT AND STORE YOUR INFORMATION.

- Security. We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the information will not be exposed as a result of unauthorized penetration to our servers. Nevertheless, we make commercially reasonable efforts to make the collection and security of such information consistent with this Privacy Policy and all applicable laws and regulations. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- Retention of your Personal Data. In addition to the retention periods mentioned in Section 1 above, in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

3. HOW WE SHARE YOUR PERSONAL INFORMATION.

In addition to the recipients described in Section 1, we may share your information as follows:

- To the extent necessary, with regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the minimum extent required) disclose information to a potential or actual third party purchaser or transferee, of our business or assets. In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Data in connection with the foregoing events;
- Where you have provided your consent to us sharing the Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality); and
- With related parties, as necessary to advance the mission of SNC.

4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL INFORMATION.

- We store the personal data with the following storing companies: Google Cloud Platform UK and Google Analytics.
- In order to run our business and provide our Website and Services to you, we transfer personal data to certain countries around the world, including to our affiliates and service providers, many of whom are located outside of your jurisdiction. Therefore, your personal data may be processed in countries with privacy laws that are different from privacy laws in your country. Whenever we make such transfers, we will use commercially reasonable efforts to implement an appropriate level of protection to your personal data by implementing at least one of the following safeguards:
- making sure the destination country has been deemed to provide an adequate level of protection for personal data; and/or
- by executing data onward transfer instruments such as data processing and protection agreements.

- With respect to the access from Israel, please note that Israel was declared as a country offering adequate level of data protection by the European Commission. Please read more here: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en,
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011D0061>;
- Where we transfer your Personal Data outside of the EU/EEA, for example to third parties who help provide our products and services, we will obtain contractual commitments from them to protect your Personal Data. Some of these assurances are well recognized certification schemes like the EU - US Privacy Framework for the protection of Personal Data transferred from within the EU to the United States. See - <https://www.dataprivacyframework.gov/>.

5. INTERACTION WITH THIRD PARTY PRODUCTS.

We enable you to interact with third party websites, mobile software applications and products or services that are not owned, or controlled, by us (each, a "**Third Party Service**"). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect information from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service. You can typically access these privacy policies through the privacy policy links provided on the Third Party Service's website or application.

6. ANALYTIC TOOLS/COOKIES.

- **Google Analytics.** The Website uses a tool called "**Google Analytics**" to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with information we collect. Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- **Fullstory.** If you are a visitor of our Website, Fullstory collects information on your use of the Website, such as pages visited, links clicked, non-sensitive text entered, and mouse movements, as well as information more commonly collected such as the referring URL, browser, operating system, and Internet Protocol address. Fullstory uses publicly available sources to approximate your geographic region and Internet Service Provider based on your IP address. The purpose in collecting your usage data is to better understand how you use our Website. Fullstory's privacy policy is available here: <https://www.fullstory.com/legal/privacy-policy/>
- **Facebook Pixels and SDKs.** We use Facebook pixels or SDKs, which are tools that provide help to website owners and publishers, developers, advertisers, business partners (and their customers) and others integrate, use and exchange information with Facebook, as such the collection and use of information for ad targeting. Please note that third parties, including Facebook, use cookies, web beacons, and other storage technologies to collect or receive information from our websites and elsewhere on the internet and use that information to provide measurement services and target ads. Facebook's ability to use and share information is governed by the Facebook Tools Terms, available at: https://www.facebook.com/legal/technology_terms/. You can prevent your data from being used by

Facebook Pixels and SDKs by exercising your choice through these mechanisms: <http://www.aboutads.info/choices> or <http://www.youonlinechoices.eu/>.

- **Google Signals.** The Website uses a tool called “**Google Signals**” to collect information about use of the Website. When we activate Google Signals, some existing Google Analytics features are updated to also include aggregated data from Google users who have turned on “Ads Personalization” (Ads Personalization available at <https://support.google.com/ads/answer/2662856/>). Audiences that we create in Google Analytics and publish to Google Ads and other Google Marketing Platform advertising products can serve ads in cross device-eligible remarketing campaigns to Google users who have turned on Ads Personalization. Google Analytics collects additional information about users who have turned on Ads Personalization, base across device types and on aggregated data from users who have turned on Ads Personalization. The data is user based rather than session based. The Cross Device reports include only aggregated data. No data for individual users is ever exposed. You can modify your interests, choose whether your personal data is used to make ads more relevant to you, and turn on or off certain advertising services in the Ads Personalization link above.
- **Google API.** Our website and platform uses Google API in order to interact with users’ search results for marketing campaigns. For further details please see the Google API terms of service at <https://developers.google.com/terms> and the Google privacy policy at <https://policies.google.com/privacy>
- **YouTube API.** Our website and platform uses YouTube API in order to interact with users’ search results for marketing campaigns. For further details please see the YouTube API terms of service at <https://developers.google.com/youtube/terms/api-services-terms-of-service> and the Google privacy policy at <https://policies.google.com/privacy>
- Through our Services we allow third party advertising partners to set technologies and other tracking tools to collect information regarding your activities and your device (e.g., your IP address, mobile identifiers, page(s) visited, location, time of day). We also combine and share such information and other information (such as demographic information and past purchase history) with third party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising”. We may allow access to other data collected by the services to share information that may be useful, relevant, valuable or otherwise of interest to you.
- We reserve the right to remove or add new analytic tools, cookies, pixels and other tracking technologies.
- A full detail of Google’s use of Personal Data can be found on Google’s Business Data Responsibility Site – <https://business.safety.google/privacy/>.

7. YOUR RIGHTS.

The following rights (which may be subject to certain exemptions or derogations), shall apply to individuals who are protected by the GDPR (as applicable):

- You have a right to access information held about you. Your right of access is normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we amend any Personal Data we hold that it is inaccurate or misleading;
- You have the right to request the erasure of the Personal Data that relates to you. Please note that there may be circumstances in which we are required to retain your data, for example for the establishment, exercise or defense of legal claims;
- The right to object to or to request restriction of the processing. However, there may be circumstances in which we are legally entitled to refuse your request;

- The right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority;
- The right to withdraw your consent. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations;
- You also have a right to request details of the basis on which your Personal Data is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality;
- The personal information we collect is not used for automated decision-making and profiling, except for automated processes in the context of marketing. As stated above, you can opt out of direct marketing by Startup Nation Central by contacting Startup Nation Central directly or by following the instructions through the unsubscribe options in our email messages.
- You can exercise your rights by contacting us at hello@sncentral.org (for the main Startup Nation Central page and other Digital Assets), eden.eini@sncentral.org (for the Health Tech Roadshow Program), or at finder@sncentral.org (for the Finder page). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Data requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.
- In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

8. USE BY CHILDREN.

We do not offer our products or services for use by children. We do not knowingly collect information from, and/or about children.

9. CONTACT US.

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at hello@sncentral.org (for the main Startup Nation Central page and other Digital Assets), at eden.eini@sncentral.org (for the Health Tech Roadshow Program) or at finder@sncentral.org (for the Finder page).
