Protecting your personal data is very important to us.

1. Introduction

DermaDetect is committed to protecting your online privacy. We feel it is important for you to know how we handle the information we receive from you via our website www.dermadetect.com (Website) and application (App). You can visit our Website without revealing any personal information. However, you are required to provide an email address to create an account in the App, to receive any newsletter or obtain personalized information and services.

2. Amendments

We reserve the right to change or modify this Privacy Policy. We will notify you prior to your access to the Services. Your use of the services will be subject to the most current version of this Privacy Policy published on our Website and App at the time of your use. You should check this page occasionally, to ensure you are content with any changes to this policy.

3. Personal data we may collect

We may collect, store and use the following kinds of personal information:

- Information that you may provide (if you choose so) when you register and complete your profile in the App, including your name, email address, gender, location and skin characteristic, etc.
- Information relating to the results of the analysis.
- Information contained in or relating to any communication that you send to us or send through our Website or the App.
- Your payment information (in case you use our paid services).
- Information about the device you use to access our App or Website. The type of information we collect can, for example, include the type of your device, the software you use, location, device language, your IP address, hardware, operating system, internet browser, application settings and version, as well as data about when and how you used our service, including interaction with the elements on it and which pages you visited in the App or on the Website.
- Data you provide in the App including the answers to the questionnaire regarding your skin profile, condition and the pictures you take.

Before you disclose to us the personal information of another person, you must obtain that person’s consent to both the disclosure and the processing of that personal information in accordance with this policy.
Our service can only be used when you have reached the age of eighteen (18) years or when you are older. In case of younger than of eighteen (18) years – our service can only be used by the legal guardian in accordance with the Israeli law.

Our service is exclusively meant for your personal use. If you want to assist others, please do so by encouraging them to download their own version of DermaDetect. This will ensure that any health-related messages will be delivered to the right person.

4. What we do with the data

Personal information submitted to us through our Website or App will be used for the purposes specified in this policy or on the relevant pages of the Website.

We may use your personal information to:

- Manage our Website, App and business;
- Enable your use of the services available in our App;
- Supply to you services as detailed in the App;
- Send you non-commercial communications, including our newsletter (you can inform us at any time if you no longer require the newsletter);
- Send you email notifications relating to the results of the analysis. We may send you an e-mail wherein we provide you with information and ask you to provide us with information about possible follow-up actions;
- Send you marketing communications relating to our business and the businesses of carefully-selected third parties, which we think may be of interest to you, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
- Conduct research activities (see section 7);
- Provide third parties with statistical information (anonymously) about our users (however, those third parties will not be able to identify any individual user from that information);
- Handle feedback, enquiries and complaints made by or about you relating to the Website or the App.

If you submit personal information for publication on our Website, we will publish and otherwise use that information in accordance with the license you grant to us.

We will not, without your expressed consent, supply your personal information to any third party for the purpose of their or any other third party’s direct marketing.

5. Social media

On our Website, we have share and like buttons to enable you to share our content with your network. We provide you with the opportunity to use your Facebook to login to our Services and
we also have a Facebook plugin which provides us with information which allows us to improve our services.

6. Health tools information

In order to use the health tools in our App you may need to provide personal information. This information may include your answers to questions about your health status. We use this information to calculate risks.

7. Research

By uploading your images in the App, you explicitly consent to the images being processed for the purposes of the provision of the Services and to be used anonymously for the purposes of research and testing of the Services software. As such, your images may be reviewed by our employees or third-party consultants engaged by us.

All third-party service providers of DermaDetect are subject to similar privacy obligations as are contained in these Terms.

You grant us a transferable, sub-licensable, royalty-free, worldwide, perpetual license to use anonymously any of the images and data that you upload to the Website and/or App for the purposes of medical, clinical and commercial research.

If you are participating in a certain research study, we may also collect sensitive data from you, anonymously, in the meaning of health information. We will limit the collection of sensitive information to the minimum amount required to perform our services.

We will only collect sensitive information with your prior consent and only if it is directly related to, or reasonably necessary for the research we conduct.

8. Disclosing personal information

We may disclose your personal information to certain employees, officers, health professionals, authorized service providers, agents or subcontractors insofar as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information to any related entity (such as subsidiaries, holding companies, etc.) insofar as reasonably necessary for the purposes set out in this policy or to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling/providing.

We may disclose your personal information:

- To the extent that we are required to do so by law;
- In connection with any ongoing or prospective legal proceedings;
- In order to establish, exercise or defend our legal rights, including providing information to others for the purposes of fraud prevention and reducing credit risk;
• To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

In exception to what is provided in this policy, we will not provide your personal information to third parties.

9. Cross border data transfers

a. As we provide you with a unique service, all paid services are non-refundable. If you believe that there has been an error in billing or you are entitled to a refund, please contact us at www.dermadetect.com.

b. Credits that you have purchased or received in your wallet are not exchangeable for money.

10. Data Privacy

All data you provide is stored on a secure cloud server used by DermaDetect. As a result, your personal information may be transferred to, and stored at, a destination outside your country. By submitting your personal information, you agree to the transfer of your personal information to the cloud server.

Personal information may also be processed by staff or by other third party service providers operating outside your country who work for us. We take such steps as are necessary in the circumstances to ensure that any overseas third party service providers treat your data securely and in accordance with applicable laws.

11. Financial transactions

The financial in-app-purchase transactions for a subscription are handled through the Apple App Store or the Google Play Store (depending on your device). These transactions are subject to the privacy police of Apple and Google Play.

The financial transactions for the services related to the communication with a health professional are handled through our payment services provider. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our App, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

12. Retaining personal information

DermaDetect will destroy or de-identify your personal information as soon as reasonably practicable once it is no longer required for that purpose.

Notwithstanding the other provisions of this Section, we will retain (electronic) documents containing personal information:

• to the extent that we are required to do so by law;
• if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and

• in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

13. Data Protection

All data that you enter on the App and/or the Website is encrypted with secure server software (SSL). The encryption means that your data is protected while it is being transferred over the Internet to our servers.

DermaDetect does not guarantee that personal information transmitted to the Server (including without limitation information in your Account), will not be disclosed to third parties. While our aim is to keep your personal information confidential by security measures, third parties may unlawfully intercept transmissions or private communications, or access data within the Server.

14. Your rights – Access to your information

We will, upon your request, and subject to applicable privacy laws, provide you with access to your personal information that is held by us.

We request that you provide us with appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport plus an original copy of a utility bill showing your current address).

In your request for access we also request that you identify, as clearly as possible, the type(s) of information you wish to have access to.

We will deal with your request to provide access to your personal information within 30 days and if you agree we may charge you our reasonable costs incurred in supplying you with access to this information.

You may instruct us at any time not to process your personal information for marketing purposes and we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

Your rights entitle you to cancel, delete or block any of your data that is processed in breach of applicable laws.

You may oppose against the processing of personal information concerning you, even if they are relevant to the purpose of the collection.

15. Third Party Websites

Our Website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

16. How we use cookies
“Cookies” are small pieces of information that some websites store on your computer’s hard drive when you visit them. Like many other websites, our Website uses cookies to provide us with information relating to the sources of our site traffic. Collecting this information, however, does not allow us to personally identify you. Most web browsers automatically accept cookies but allow you to modify security settings so that you can approve or reject cookies on a case-by-case basis. Our site requires that both cookies and JavaScript be enabled. If you reject cookies from our site, some parts of the site may not work properly for you.

17. Our details

This Website and the App is owned and operated by DermaDetect Ltd. Our registered address is at 8/7 Gibeon St. Jerusalem 9452108 Israel. You can contact us by writing to the address given above, by using our Website contact form or the feedback form in the App.