

# **PRIVACY POLICY**

*Last updated: January 1, 2026*

Eyeviation Ltd., as data controller, ("**Eyeviation**", "**we**" or "**us**") present this privacy policy, as may be amended from time to time (hereinafter, the "**Privacy Policy**") in order to provide our users ("**User**", "**you**" or "**your**") information about Eyeviation's privacy and data protection practices in relation to Personal Data that is collected, used and/or otherwise processed by Eyeviation through its solution using VCAT™ to monitor and analyze shooting mechanics in real time and provide you with custom tips and routines for better shooting as well as personalized instructions (hereinafter, the "**Solution**").

This Privacy Policy supplements our [Terms and Conditions](#). If you have questions or concerns regarding this Privacy Policy, please contact us at [info@eyeviation.com](mailto:info@eyeviation.com)

**PLEASE SEE OUR FULL PRIVACY POLICY BELOW IN ORDER TO BETTER UNDERSTAND OUR PRACTICES IN DETAIL.**

## **1. Types of Personal Data We Collect and Process**

Definition. When we use the term "Personal Data" in this Privacy Policy, we mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with an identifiable natural person, particular person or consumer.

Data Collection and Processing. When you wish to open an account and use our Solution, we collect and process the following categories of Personal Data: identification Personal Data (i.e., full name, email address, phone number)];, Eye-tracking data (i.e, gaze direction, eye movement patterns and pupil diameter signals) ) and any data concerning the shooting (e.g., type of gun, date and time of shooting and use of the Solution, duration of use of the Solution).

The provision of certain types of Personal Data may be necessary or optional, depending on your requests. Mandatory data will be marked as such at the moment of collection of your Personal Data. If you refuse to provide mandatory Personal Data, Eyeviation may not be able to process your request (e.g., open your account to use the Solution or provide you with personalized instructions).

## **2. Purposes and EU Legal Basis**

We process the Personal Data described in section 1 above for the following purposes:

Purposes	Example of use of Personal Data	Legal Basis <i>(for EEA Users only)</i>
Managing your account	<ul style="list-style-type: none"> <li>● To setup an account</li> <li>● To delete an account</li> </ul>	<b>Necessary for the performance of a contract to which the data subject is party (Terms and Conditions)</b>
To provide the Solution and for performance analysis (not used for unique biometric identification or authentication)	<ul style="list-style-type: none"> <li>● to recognize User using the Solution</li> <li>● to provide User with custom tips and routines for better shooting</li> <li>● to provide User with shooting statistics</li> <li>● to provide User with personalized instructions</li> <li>● to improve User personalized Solution</li> </ul>	<b>Necessary for the performance of a contract to which the data subject is party (Terms and Conditions)</b>
Managing any litigation	<ul style="list-style-type: none"> <li>● to take action against any identified security breach, manage any dispute or litigation</li> <li>● to seek advice from lawyers, auditors, and other professional advisers</li> </ul>	<b>Legitimate interest</b> of Eyeviation in defending our rights and interests
Complying with legal and regulatory obligations	<ul style="list-style-type: none"> <li>● to perform any reporting and notifications obligations we may be subject to, to competent governmental agencies and authorities;</li> <li>● to process your requests to exercise your rights;</li> <li>● to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights</li> </ul>	<b>Legal obligations</b> to which Eyeviation is subject

### 3. With Whom Do We Share Personal Data?

We may share your Personal Data with third parties as detailed below:

<b>Service Providers</b> , including data storage providers, data security services, fraud detection and prevention services, insurers.	We share Personal Data with selected third-party companies we engage to perform services on our behalf. We only provide such service providers with Personal Data so they can perform their required functions on our behalf.
<b>Governmental, Administrative or Judiciary Authorities</b>	We will disclose or allow government and law enforcement officials access to certain Personal Data, exclusively in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur with or without notice to you, if we have a good faith belief that we are legally compelled to do so, or that disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing.
<b>Corporate Transactions</b>	We may share Personal Data in connection with any proposed or actual financing, reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
<b>Lawyers and Interested Parties</b>	We will share Personal Data exclusively in case of the management of possible disputes and other legal matters where appropriate, including with respect to the Solution; to establish, protect, or exercise our legal rights; as required to enforce agreements; to defend against legal claims or demands; to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights.

Under the California Consumer Privacy Act of 2018 (together "**CCPA**"), in the past twelve (12) months, we may have 'sold' or 'disclosed' (as defined by the CCPA) certain types of Personal Data .

Consistent with our obligations under the CCPA, we confirm that during the preceding twelve (12) months, we have not shared (as defined by the CCPA) your Personal Data for cross-contextual behavioral advertising.

#### **4. Cross-Border Data Transfers**

We may store, transfer or otherwise process the Personal Data to various sites worldwide, outside your jurisdiction. Where specific laws or regulations relating to Personal Data transfer apply to us, we will endeavor to ensure that the Personal Data is protected and transferred in a manner consistent with legal requirements.

EEA Transfers. When we transfer Personal Data from within the European Economic Area ("EEA") to countries or international organizations that are based outside the EEA, the transfer takes place based on an adequacy decision by the European Commission, or in the absence of an adequacy decision, other legally permitted safeguards under the General Data Protection Regulation (GDPR), such as standard contractual clauses.

#### **5. Data Retention**

We retain Personal Data for as long as a User is using our Solution. Other circumstances in which we will retain your Personal Data for longer periods of time include: (i) where we are required to do so in accordance with legal and regulatory 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.

If you have any questions about data retention, please contact us by email at: [info@eyeaviation.com](mailto:info@eyeaviation.com)

#### **6. Data Security**

We endeavor to maintain appropriate technical and organizational measures compliant with industry standards to protect Personal Data in particular, against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. However, although we make every effort to protect the Personal Data which you provide to us or we generate, we cannot completely ensure the security of any Personal Data you transmit to us or guarantee that this Personal Data will not be accessed, disclosed, altered, or destroyed.

If you have found a vulnerability or would like to report a security incident, you may send an email to: [info@eyeaviation.com](mailto:info@eyeaviation.com)

#### **7. Your Rights Regarding your Personal Data**

General Provisions. Please note that under certain circumstances and depending on your jurisdiction, you are entitled to specific rights regarding your Personal Data (subject to some exceptions). In most cases, you can exercise such rights free of charge. When you ask us to exercise any of your rights under this Privacy Policy and the applicable privacy and data protection laws, we may need to ask you to provide us

with certain credentials to make sure that you are who you claim you are, to avoid disclosure to you of Personal Data which is related to others that you are not authorized to receive, and to ask you questions to better understand the nature and scope of Personal Data that you request to access. Applicable privacy and data protection laws in your jurisdiction may provide you with different or additional rights related to the Personal Data we collect from you, which may also apply.

Please note that you can deliver your request by contacting us at [info@eyevasion.com](mailto:info@eyevasion.com) and mailing address: Eyevasion Ltd. 11 Tuval St, Ramat Gan, 5252226, Israel.

EEA Users. If you are based in the EEA, you have the following rights:

- a. **to access** your Personal Data in order to obtain clear, transparent and understandable information on how we process your Personal Data and on your rights, as well as a copy of your Personal Data.
- b. **to rectify** your Personal Data in case your Personal Data is obsolete, inaccurate or incomplete.
- c. **to object** the processing of your Personal Data when the processing is based on Eyevasion's legitimate interest. We will no longer process your Personal Data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, such as the respect of a legal obligation (e.g., legal obligation involving the retention of documents), or for the establishment, exercise or defense of legal claims.
- d. in certain circumstances under GDPR, you have the right **to restrict** the processing of some of your Personal Data during a limited period of time;
- e. **to withdraw** your consent when it has been obtained and processing is based on consent. in certain circumstances under GDPR, you have the right **to request data portability**, meaning that you can receive the Personal Data originally provided by you in a structured and commonly used format or that you can request the transfer of the Personal Data you provided to another data controller.
- f. in certain circumstances under GDPR, you have the right **to delete** your Personal Data (also known as the right to be forgotten);
- g. if applicable, not to be subject to a decision based solely on **automated processing**, including profiling, if such profiling produces a legal effect concerning you or similarly significantly affects you and if automated processing is used;
- h. **to lodge a complaint with your national data protection authority.** If you have a complaint about how we use your Personal Data, we will always prefer you to contact us first. If you are unsure which data protection authority to contact, please contact us at [info@eyevasion.com](mailto:info@eyevasion.com)

California Users. If you are a California User who resides in California, you have the following rights under the CCPA:

- a. **to know** what Personal Data we have collected, the categories of Personal Data, the categories of sources from which the Personal Data is collected, the business or commercial purpose for collecting, selling, or sharing Personal Data, the categories of third parties to whom we disclose Personal Data, and **the specific pieces of Personal Data** we have collected about you.
- b. **to delete** your Personal Data that we collect or maintain, subject to certain exceptions.

- c. **to correct** your inaccurate Personal Data that we maintain about you.
- d. to the extent applicable, you have the right **to opt-out of the “sharing” of your Personal Data for “cross-contextual behavioral advertising,”** often referred to as “interest-based advertising” or “targeted advertising”.
- e. to the extent applicable, you have the right **to opt-out of the sale** of your Personal Data to third parties;
- f. under certain circumstances, you have the right **to limit the use or disclosure of Sensitive Personal Information (SPI)**, unless SPI is strictly necessary to provide the Solution.
- g. **to not receive discriminatory treatment** if and when you exercise your rights regarding your Personal Data under the CCPA.

Only you may make a request related to your Personal Data. If you are a California resident a request can be made by a person registered with the California Secretary of State that you authorize to act on your behalf, in such event you must provide us with signed documentation that you have authorized an agent to act on your behalf.

## 8. Children

The Solution is not intended for use by minors (an individual that is under the age defined by applicable law, which concerning the EEA is under the age of 18, and with respect to the US, under the age of 13). If we nevertheless receive Personal Data from an individual who indicates that he or she is, or whom we otherwise have reason to believe is, under the age of 18, we will endeavor to delete such Personal Data from our systems.

## 9. Changes to this Privacy Policy

This Privacy Policy may change from time to time. Each version of this Privacy Policy will be identified by its effective date, which you can find at the top of this Privacy Policy. The new or updated privacy policy will be effective from the date mentioned at the top page of the new privacy policy.

We strongly encourage you to review this Privacy Policy periodically to ensure that you understand our most updated privacy practices.

## 10. Contact Information and Data Controller Details

If you have any questions about this Privacy Policy, or in the event that you wish to exercise certain rights you are eligible for with respect to your Personal Data, please contact us as follows:

*By email:* [info@eyevasion.com](mailto:info@eyevasion.com)

*By Mail:*

Eyevasion Ltd.

11 Tuval St, Ramat Gan, 5252226, Israel