



# Privacy Notice for use of “SkyManage” Application

## 1. Introduction

- 1.1. Gilat Satellite Networks Ltd. and its subsidiaries (collectively, the “**Company**”, “**us**”, “**our**”) provides you with this Privacy Notice, as may be amended and/or updated from time to time (the “**Notice**”), to inform you of our practices and procedures regarding the collection, use, share and disclosure of Personal Data that we receive and/or collect from or about you, when you download and/or use our Application.
- 1.2. In this Notice, we will outline what personal data we process; the purpose and legal basis of processing; with whom we share your data; how long we keep your data; your rights related to our processing of your data and how we protect it, and where to address your questions and complains, if any.
- 1.3. In this Notice, the following terms shall have the meaning ascribed next to them:
  - 1.3.1. “**Application**” means Gilat’s mobile computer program called “SkyManage” for installation of Gilat’s SEII-c Vsats (very small aperture terminal).
  - 1.3.2. “**CCPA**” means California Consumer Privacy Act of 2018, as updated and/or amended from time to time, including by the California Privacy Rights Act of 2020 (“**CPRA**”).
  - 1.3.3. “**GDPR**” means General Data Protection Regulation (2016/679), as updated and/or amended from time to time.
  - 1.3.4. “**Personal Data**” means any information that relates to, identifies, or reasonably could be used to identify an individual, directly or indirectly.
  - 1.3.5. “**User**” or “**you**” or “**your**” means an individual who uses the Application as an integral part of the installation services he/she provides to Gilat’s customer(s).

## 2. About the Application

Our Application is a supportive tool for installation of our products at our customers’ site(s). The Application enables you to conduct a site survey following completion of installation, and to share picture(s) of installation with other application if the User chooses to do so (such as e-mail, WhatsApp, etc.).

### 3. Data we process

The Personal Data that we collect in the scope of using the Application is your location on the site where you install our product. We may also collect non-Personal Data such as the site ID, site's name, site's address, and pictures of the sites.

We want to emphasize, that any picture you take and share via the Application are not saved and/or otherwise stored in the Application, but rather locally on your cellular device. We do not store any pictures in the Application.

We do not and will not sell any of your Personal Data and we will not spam you.

### 4. How we process Data

- 4.1. We automatically collect your location in the installation site, from the GPS sensor of your device. This Personal Data is being collected when you use the Application in the installation site.
- 4.2. We also collect non-Personal Data that you positively provide us during the use of the Application, as detailed in section 3 above,

### 5. How we use your Personal Data – Legal Basis

- 5.1. We only use your Personal Data that is necessary for the provision of the services via the Application. We collect your location when you use the Application in the installation site. Your location information is part of the site data required for a site survey. We collect this data since we are obligated to do so according to the agreement(s) we have with our respective customer(s).
- 5.2. For California Requirements, the information about how we may process your Personal Data, include processing for “business purposes”, as defined in the CCPA. You hereby acknowledge that your use of the Application and the provision of any Personal Data associated with those actions, is based on your free will and you are not legally compelled to provide us any Personal Data.
- 5.3. We will only process your Personal Data where we have legal basis to do so. The lawful bases we rely on for processing your Personal Data, are one (or more) of the following:
  - 5.3.1. **Performance of a Contract:** Processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract (according to Article 6(1)(b) to the GDPR);
  - 5.3.2. **Legal obligation:** Processing is necessary for compliance with a legal obligation to which the Company is subject to (according to Article 6(1)(c) to the GDPR);
  - 5.3.3. **Legitimate interests:** Processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party (according to Article 6(1)(d) to the GDPR).

## 6. Transfer of Personal Data outside of your country of residence

For the purpose listed above, we may process, maintain, store, and/or or transfer certain Personal Data to countries outside of your state or country, where the privacy laws may not be as protective as those in your jurisdiction, and you hereby provide your consent to such transfer.

## 7. Sharing your Personal Data

In order to pursue the purposes for processing as listed above, we may share your Personal Data with third parties in the following ways:

- 7.1. We may share your Personal Data with our customers, due to our contractual obligations with such customer(s).
- 7.2. We may disclose your Personal Data internally within our group in case any entity within Gilat's group undergoes any change of control or ownership (including in case of merger, acquisition, etc.).
- 7.3. We may disclose your Personal Data to judicial, government and regulatory authorities, to comply with applicable law, regulations, rules, requests for law enforcement or other legal proceeding; (b) it is required to protect our legitimate business interest; (c) it is required to enforce our agreements.

## 8. Your rights

- 8.1. Under certain circumstances, you may have rights concerning your Personal Data, which may vary - depending on your jurisdiction. If you wish to exercise any of the rights that are applicable to you in your jurisdiction, please send us a written request to the email below and we will act in accordance with the applicable laws.
- 8.2. However, please note that if your Personal Data is required for us for legitimate business reasons, or if we are under legal obligation to save this information for a certain period, we shall retain the Personal Information for the period of time required by applicable laws.
- 8.3. **California Requirements.** US Candidates may have, among others, the following rights (dependent on US state of residence):
  - 8.3.1. The right to know the Personal Data we collect about you, and how we use it;
  - 8.3.2. The rights to access and receive a copy of your Personal Data we have collected in the prior 12 months;
  - 8.3.3. The right to delete Personal Data collected from you (with some exceptions);
  - 8.3.4. The right to opt-out of the sale or sharing of your personal data. Please note, that We DO NOT SELL or SHARE your Personal Data, as the terms "sell" and "share" are defined under the CCPA;
  - 8.3.5. The right to non-discrimination for exercising your rights under this Notice;
  - 8.3.6. The right to correct inaccurate Personal Data that we have about you;

- 8.3.7. The right to limit the use and disclosure of sensitive Personal Data collected about you. Please note that we do not use, collect or disclose sensitive Personal Data;
- 8.3.8. The right to opt-out of targeted advertising. Please note that we do not process Personal Data in this manner;
- 8.3.9. The right to receive a copy of your Personal Data in a portable and readily usable format;
- 8.3.10. The right not to be subject to discrimination for the exercise your rights;
- 8.3.11. The right to designate someone as your authorized agent, to submit requests and act on your behalf (all, subject to receipt your written permission).

**8.4. If you are a data subject in the EU/EEA/UK, you have the following rights:**

- 8.4.1. The right to access your Personal Data that we collect;
- 8.4.2. The right to rectify, complete or delete (on legitimate grounds) your Personal Data;
- 8.4.3. The right to restrict processing of your Personal Data (on legitimate grounds);
- 8.4.4. The right to object processing of your Personal Data, in certain situations;
- 8.4.5. The right to withdraw your consent to the processing of your Personal Data;
- 8.4.6. The right to transfer your Personal Data to other controller (when applicable);
- 8.4.7. The right not be subject to automated decision making; please note that we do not process Personal Data in this manner.
- 8.4.8. The right to file a complain with the applicable supervisory authority.

**8.5. Israeli requirements.** Where processing is subject to the Israeli privacy laws and regulations, you have the rights to review, access, correct, withdraw consent, and ask for deletion from databases that are being used for direct mailing services.

## **9. For how long personal data is retained**

We retain your Personal Data as long as you are using the Application and provide our customer a service via the Applications. If you cease to use the Application to provide installation services to our customers, we may continue to retain your Personal Data for the period required by our legal and regulatory obligations and/or for accounting purposes.

Please note that except as required by applicable law, we will not retain your information for any period, and we will delete it for any reason and at any time, with or without notice to you. Unless otherwise restricted by applicable law, non-Personal Data that is collected via the Application (such as technical information about the installation and/or our products) may be retained indefinitely.

## **10. Security**

We implement physical, electronic, and procedural measures to protect our Application and our systems, and any Personal Data resides in it. We restrict access to Personal Data only to personnel who need to know that information to for the purposes listed above. However,

since these measures are not absolute, and we cannot guarantee the full security of any information transmitted to us.

You are solely responsible for maintaining the confidentiality of your Personal Data and for restricting access to your mobile device. You will be responsible for all activities coming from your user or from your mobile device. You are solely responsible for adequate protection and backup of your Personal Data. If you cease to provide the services via the Application and/or if you transfer your mobile device to someone else, it is your obligation to uninstall the Application from your mobile device. When you remove the Application from your device, all information in it will be deleted.

## **11. Our policy towards Children**

The service via the Application is intended for a general, adult audience. We do not knowingly collect Personal Data from minors aged 18 or younger. If a parent and/or legal guardian becomes aware that his or her child has provided us with Personal Data, please contact us at [gilatapps@gilat.com](mailto:gilatapps@gilat.com) and such information will be deleted.

## **12. Changes to our privacy notice**

We may update the Notice from time to time. Any changes we may make to the Notice will be posted on this page.

## **13. Contact Details**

For any questions, concerns of complaint you may have regarding our Notice, and in any event you wish to exercise any of your rights, please contact us at: [gilatapps@gilat.com](mailto:gilatapps@gilat.com).

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