

End Users Platform Privacy Policy

Your privacy is important to us. This privacy policy (the "**Privacy Policy**") explains what personal information T.I.B.A Research and Development (1986) Ltd, its affiliates, and licensors ("**TIBA**", "**we**", "**us**" and "**our**") collects through SPARK's web and mobile Platform ("**Platform**") from its users ("**users**", "**you**"), and how the data is processed, used and transferred.

All capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the [Terms of Use](#) ("**Terms**"). If you do not agree with this Privacy Policy, do not use our Services or provide TIBA with your Personal Information (as defined below).

Information Collection

The use of the Platform involves the collection and processing of two types of information. The first type is information from which you can be personally identified may be collected (hereinafter: "**Personal Information**"). The second type is aggregated, non-identifiable, non-personal information, which may be made available or gathered via the user's use of the Services ("**Non-Personal Information**").

We collect the following types of Personal Information:

Contact Details: We may collect your contact details, including your full name and email address and correspondence with us, when you wish to contact us for support, for the management of your Account or for providing us feedbacks about the Platform.

Account Information: We may collect your full name, email address, phone number, postal code, car license plate(s) (if multiple vehicles are associated with your Account) when you register for the Services, or other identified information used to enter or exit the Parking Facilities. Further, following your registration and ongoing use of the Platform, we may collect information related to your use of the Platform, including the Parking Facility you enter, your location, and the dates and times of your entrances and exits to and from the Parking Facilities.

Payment Information: In order to make a transaction through the Platform (such as booking a parking, pay for a parking, etc.), you will be required to share your payment information, which will be processed by our third-party payment processors. We do not keep any payment information; however, we process your commercial transaction data such as records of purchases and prices, address, phone number and email address. Any transactions that are processed by our third-party payment providers, will be governed by their policies.

Unique Device Identification: We may collect your unique device identification, in order to identify your mobile device, authorize the use of the Platform and filter the relevant information for us.

Usage Data: We want to inform you that whenever you use our Platform, we collect information on your mobile device. Such information is defined as "**Usage Data**". Usage Data may include information such as: device name, operating system version, the configuration of the Platform when utilizing our Platform, the time and date of your use of the Platform and other relevant statistics.

Use of Information

We use the Personal Information we collect from you for a range of different business purposes according to different legal bases of processing. TIBA may use or process your Personal Information for the following purposes:

To Provide the Services through the use of the Platform

We collect your Personal Information such as your full name, email address, phone number, postal code, car license plate, entrance and exit dates to and from the parking facilities and payment information for the provision of the Platform and Services. This enables us:

- To allow you to use our Service.
- To operate and maintain your Account, and provide you with access to and use of the Platform;
- Provide you with customer and technical support;

- To contact you when we believe it is necessary.

To improve and develop the Platform and the Services

- We conduct surveys and research, test features in development, and analyze the information we have to evaluate and improve our Platform, develop new features, and conduct audits and troubleshooting activities;

To maintain a safe and secure environment

We may collect your Personal Information to:

- Detect and prevent fraud, abuse, security and incidents;
- Verify and authenticate your identity and prevent unauthorized or illegal activity;
- Enhance the safety and security of our Platform and Services;
- Conduct security investigations and risk assessments;
- Prevent or take action against activities that are, or may be, in breach of our Terms or applicable law;

To provide personalize content (including for advertising and marketing purposes)

Subject to your consent, we will provide you with relevant marketing materials. We may collect your Personal Information:

- To improve your experience on the Platform by providing personalized content, cross-Parking Facilities services, access-control services, recommendations, and features;
- To customize the content and measure performance of any email, push notification, SMS text messages, or in-app message we may send you in relation to the Services.

Disclosure of Information

We may disclose certain trusted third-party companies and individuals to help us provide, analyze, and improve the Platform, and for the purposes described in this Privacy Policy.

In particular, the Platform is powered by TIBA, however is operated by the Parking Facilities Providers or other Providers providing access-control services. Therefore, in order to provide our Services, we will share your Personal Information with the Parking Facilities Providers. Please note that the Providers who facilitate your use of the Services, may have access to your Personal Information only for purposes of providing you with the parking solution and services you requested.

We may also disclose Personal Information as part of a corporate transaction such as a merger or sale of assets. When we transfer Personal Information, we use a variety of legal mechanisms, including contracts, to help ensure your rights and protections travel with your data. We will transfer Personal Information within assuring appropriate and suitable safeguards.

In addition, we may share your Personal Information with others, without your explicit consent, for the following purposes and to the extent necessary in TIBA's sole discretion:

- When it is necessary to facilitate the functionality of the Platform and to provide you with the Services, or to protect our customers;
- If TIBA reasonably believes that you have breached the agreements you obtain with TIBA, or abused your rights to use the Platform, or performed any act or omission that TIBA reasonably believes to be violating any applicable law, rules, or regulations. TIBA may share your information in these cases, with law enforcement agencies and other competent authorities and with any third party as may be required to handle any result of your wrongdoing;
- If disclosure is necessary in order to comply with applicable law or respond to a valid legal process, including such process which is conducted by law enforcement or other government agencies.
- In any case of dispute, or legal proceeding of any kind between you and TIBA, or between you and other users with respect to, or in relation with the Services;

- In any case where TIBA reasonably believes that sharing information is necessary to prevent imminent harm, physical damage or damage to property;
- If TIBA organizes the operation of the Platform within a different framework, or through another legal structure or entity, or if TIBA enters bankruptcy, or if TIBA and/or any of its business is acquired by, or merged into or with another entity;
- To enable our partners target the audience they want to reach and to provide you with potentially interesting offers.

Your Rights

Under some circumstances you may be afforded with the following rights:

1. Request information about the collection of Personal Information by us;
2. Request access to applicable Personal Information.
3. Request the rectification of the Personal Information we obtain about you, if such is required.
4. Request the erasure of applicable Personal Information under certain circumstances.
5. You may be entitled to limit the purposes for which we process your Personal Information if some conditions are satisfied.
6. Under certain circumstances you may have the right to get a copy of your Personal Information in a portable format and, to the extent technically feasible, readily usable format that allows you to transmit the Personal Information to another entity without hindrance.

If you wish to file a request regarding any of the above, you may contact us at: info@tibaparking.com.

Notice to California Residents

This section is designated for California residents and is provided under the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (“**California Privacy Laws**”). It explains your privacy rights, provides “notice at collection”, and provides certain mandated disclosures about how we handle your Personal Information. This section uses certain terms that have the meanings given to them by the California Privacy Laws, unless otherwise specified. Please note that some of the disclosure obligations required under the California Privacy Laws are satisfied within other sections of this Privacy Policy.

The California Privacy Laws permit some users to request to exercise certain rights. If these rights are applicable to you, you are afforded with the following rights:

a. Right of access

You can request TIBA for certain information about our practices with respect to your Personal Information. In particular, you can request to receive information on the following:

- The categories and specific pieces of your Personal Information that we have collected.
- The categories of sources from which we collected your Personal Information.
- The business or commercial purposes for which we collected or share your Personal Information.
- The categories of third parties with which we shared your Personal Information.

b. We do not Sale your Personal Information

You can be rest assured that we do not sell your Personal Information.

c. Sensitive Personal Information

We do not share sensitive Personal Information for cross-context behavioral advertising and we do not sell sensitive Personal Information.

d. Exercising your California Law Rights

Please note that we will be required to verify your identity and request before an action is taken to exercise your rights. As a part of this process, government identification may be required. Moreover, you may designate an authorized agent to make a request on your behalf. We make our best efforts to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide, will only cover the 12 months period preceding your verifiable request's receipt. If, for some reason, we cannot reply within such time frame, our response will include an explanation for our inability to comply. If you wish to exercise your California Privacy Laws rights, please contact us at: info@tibaparking.com.

e. Right of No Retaliation Following Opt-Out or Exercise of your Rights

If you choose to exercise your rights, we will not charge you different prices or provide different quality of our Services, unless those differences are related to your provision of your Personal Information. We will not discriminate against you for exercising any of your rights and unless permitted by the California Privacy Laws, we will not:

1. Deny you goods or services.
2. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
3. Provide you with a different level or quality of goods or services.
4. Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

CAN SPAM Act

The CAN-SPAM Act is a Federal US law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out strict penalties for violations.

To be in accordance with CANSPAM, TIBA agrees to the following:

- Not use false or misleading subjects or email addresses.
- Identify the commercial message sent to you as an advertisement when required.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

If you would like to unsubscribe from receiving future emails, you can unsubscribe at any time at the bottom of every email.

Cookies

We may use “cookies” and/or other technologies or files (collectively, “**cookies**”) to identify how users make use of the Platform. This aggregated tracking information may be used to help us improve and enhance the Platform’s experience for all of our users. In addition, cookies are used for adjusting the Platform to your personal preferences. Cookies contain information such as the pages you visited, the length of time you stayed on the Platform, the location from which you accessed the Platform and more. If you would prefer not to have cookies stored on your device, you may modify your browser settings to reject most cookies, or manually remove cookies that have been placed on your device. However, by rejecting the cookies, you may be unable to fully access the offerings on the Platform. To find out more about cookies, visit www.allaboutcookies.org.

Data Retention

How long we will hold your Personal Information for will vary and will be determined by the following criteria:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Information.

Security

TIBA considers information security to be a top priority, and is committed to protecting the security of your Personal Information. TIBA implements systems, applications and procedures to secure Personal Information, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing. When we transmit highly confidential data over the Internet, we protect it through the use of encryption. However, these measures are unable to provide absolute assurance. Therefore, although TIBA takes great efforts to protect your personal information, TIBA cannot guarantee and you cannot reasonably expect that TIBA's databases will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

Links to Other Sites

This Platform may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or platforms.

Contact Us /Abuse Reports

If you have a privacy concern, complaint, or a question or believe that your privacy has been compromised by any person, in the course of using the Services, or any other requests, responses, questions and complaints, then please contact us via "Contact Us" in our Platform, or via our Email address below:

info@tibaparking.com

Changes to this Privacy Policy

We may change this Privacy Policy from time to time, when necessary to reflect customer feedback and changes in our Platform. When we post changes to this policy, we will revise the "last modified" date at the bottom of the Privacy Policy. If we make a change to this Privacy Policy that we believe materially reduces your rights, we will provide a notice prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. We may provide notice of changes in other circumstances as well. By continuing to use the Site after those changes become effective, you agree to be bound by the revised Privacy Policy.

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