

**A P M**  
**P R I V A C Y   N O T I C E**

*Recently Updated: July 2018*

We at APM & Co. (“**APM**” or “**us**”) are committed to your right to privacy. In order to fully understand your rights, you should carefully read this Privacy Notice (“**Privacy Notice**”), as well as our Terms and Conditions (“**Terms**”). Any capitalized terms not defined herein shall have the meaning ascribed to such terms in the Terms.

This Privacy Notice governs the collection, processing and transfer of Personal Data in connection with our Website, available at: <http://www.apm-law.com/> (“**Website**”), to each person (the “**user**” or “**you**”) accessing or using the Website.

**PLEASE READ THIS NOTICE CAREFULLY, AND MAKE SURE YOU UNDERSTAND AND AGREE WITH THE PROVISIONS HEREIN PRIOR TO BROWSING THE WEBSITE, OR PROVIDING US WITH ANY PERSONAL DATA.**

This Privacy Notice shall not be construed in any manner to derogate from the Terms or any other agreement or understanding between APM and you.

Please note, that the Website may contain links to other sites, products or services offered by third parties, which are not governed by this Privacy Notice. This Privacy Notice does not apply to the practices of entities which are not controlled by APM.

**THE HIGHLIGHTS:**

- **You are not required by law to provide us with any Personal Data. Sharing Personal Data with us is entirely voluntary.**
- **Our Website is intended for users over the age of 18. Minors under such age are not permitted to use the Website. If you are under such age you should cease to use the Website immediately.**
- **You may be entitled under applicable law to request to review, amend, erase or restrict the processing of your Personal Data.**
- **We do not sell, trade, or rent users' Personal Data to third parties.**
- **If you have any questions or requests regarding the processing of your Personal Data, or would otherwise like to contact us in connection with this Privacy Notice, please send us an email to: [apm\\_website@apm-law.com](mailto:apm_website@apm-law.com)**

***1. What is Personal Data, and what data is collected about me when browsing the Website?***

“**Personal Data**”, means any information which identifies or can be used to identify a natural person, including, but not limited to, first and last name, phone number, email address, IP address, billing information, etc.

**Non-Personal Data**

We collect non-Personal Data regarding users concerning their use of the Website, such as the scope, frequency, latency, pages accessed, what and when a user views or interacts with content and materials displayed through our Website, device identifiers, and other technical information regarding the device used to access the Website, such as model, operating system, etc.

#### Personal Data

- 1.1. When you interact with our Website, we may collect online identifiers such as your Internet protocol (IP) address.
- 1.2. If you choose to use the “Contact Us” feature on our Website, you will be requested to provide certain Personal Data, such as full name, phone, e-mail address, etc.
- 1.3. If you choose to subscribe to receive our legal updates and invitations to conferences and seminars, you will be requested to provide certain Personal Data, such as name, phone, e-mail address, etc.

### **2. *What will APM do with my data?***

- 2.1. Non-Personal Data. Non-Personal Data is used mainly for click stream analysis in order to constantly improve and maintain our Website and content, including among others, in order to measure and understand the level of engagement in the Website, for general business analytics and in order to provide a more personalized experience and tailored content, for ensuring the technical functioning of our network, to help prevent fraudulent use of the Website and for developing new services and features.
- 2.2. Personal Data. Personal Data is used only for the following limited purposes:
  - 2.2.1. To address your inquiry or send you the materials you have signed up to receive.
  - 2.2.2. To resolve any disputes, communicate with you regarding service and support issues.
  - 2.2.3. To prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts and any other misuse of the Website and to enforce our Terms and Conditions.
  - 2.2.4. To protect the security or integrity of our databases and the Website, and to take precautions against legal liability.
  - 2.2.5. To improve the Website, and to develop new features, products and services.

### **3. *Does APM use cookies?***

Yes, we use data files such as cookies, pixel tags, “Flash cookies,” or other local storage files provided by your browser or associated applications (“**Cookies**”). We use these technologies in order to customize our content, and for advertising purposes; measure promotional effectiveness; prevent fraud and for operational purposes.

We use both session and persistent Cookies. Session Cookies expire and no longer have any effect when you log out of your Account or close your browser. Persistent Cookies remain on your device until you erase them or they expire.

Our advertising partners may also place persistent cookies on your device when you visit our Website or our advertisers’ websites in order to help us recognize you and serve relevant advertisements to you when you visit their website or online service or websites in their networks. You may at any time program your browser to block

cookies, but please be aware that such blocking may prevent us from providing some or all of the features of the Website to you. These cookies help us track how visitors use the Website.

#### **4. *How Can I Control My Personal Data?***

- 4.1. **Reviewing and amending your Personal Data.** You may send us a request in connection with reviewing your Personal Data to: [apm\\_website@apm-law.com](mailto:apm_website@apm-law.com)
- 4.2. In the event any Personal Data is incorrect or outdated, you may update and correct such data by providing us with appropriate notification or correcting the data directly on the Website, as applicable to you.
- 4.3. **Right of erasure and restriction.** You may also be entitled request the erasure or the restriction of your Personal Data, and we will comply with such requests, to the extent required under applicable law.
- 4.4. **Portability of Personal Data.** To the extent relevant to you, you may be entitled to request the portability of your Personal Data, and we will comply with such requests, to the extent required under applicable law.
- 4.5. **Retention of Data.** We reserve the right to retain any Personal Data for as long as reasonably necessary in order to: (i) fulfill the purposes described herein; (ii) in the defense or assertion of legal claims and liability; (iii) for the analysis and development of the Website; and (iv) to comply with applicable law. Non-Personal Data and statistical anonymized data may be retained by us without limitation.

#### **5. *Will APM Share My Personal Data With Others?***

- 5.1. Non-Personal Data, aggregate and statistical or otherwise anonymized data may be shared without limitation with third parties at our discretion. This information does not contain Personal Data and is used to develop content and services.
- 5.2. We share Personal Data only under the following limited circumstances:
  - 5.2.1. With trusted partners and third parties service providers who assist us in operating the Website and conducting our business, such as fraud prevention, marketing and technology services.
  - 5.2.2. For personalizing your experience of the Website, including by way of targeted advertising.
  - 5.2.3. As necessary to help detect and prevent potentially illegal acts and fraud, and to guide decisions about products, services and communications.
  - 5.2.4. To comply with a legal requirement, for the administration of justice, to protect your vital interests or the vital interests of others, to protect the security or integrity of our databases or the Website, or to take precautions against legal liability.
  - 5.2.5. Other third parties with your consent or direction to do so.

#### **6. *What is the lawful basis under which APM processes Personal Data?***

- 6.1. Certain processing activities are based on our legitimate interests such as collection of IP address for operation purposes and in the event you contact us.

6.2. There may be certain processing activities based on your consent, for example, if you subscribe to receive our updates. In connection with such activities, you may withdraw your consent, by sending us an email to: [apm\\_website@apm-law.com](mailto:apm_website@apm-law.com).

6.3. Please note that in the event you withdraw your consent to the processing of Personal Data, we may not be able to provide you with some or all of the services.

**7. *Will APM transfer my Personal Data internationally?***

Some of our processing activities are made in Israel and some outside the State of Israel, such as the EU or US.

**Note to EEA Residents:** The European Commission has decided that the State of Israel ensures an adequate level of privacy and data protection, therefore, in accordance with the GDPR, the transfer of Personal Data from the EU to Israel is lawful and does not require any specific authorization. Any other transfer of Personal Data originating from the EU to a third country (other than Israel) shall be made in accordance with applicable law, including by providing adequate protections, or otherwise implementing appropriate safeguards to ensure the protection of our users' rights.

**8. *Will I receive promotional materials from APM?***

APM may send you offers that may be of special interest to you via email. You may unsubscribe from receiving such communications at any time, by sending us a notification to: [apm\\_website@apm-law.com](mailto:apm_website@apm-law.com), or following the instructions for unsubscribing included in such communications.

**9. *Individuals under 18***

The Website is a general audience website, which is not directed to persons under 18 years old. If a parent or guardian becomes aware that his/her child has provided us with Personal Data without their consent, he/she should contact us immediately. We do not knowingly collect or solicit Personal Data from people under 18 years old. If we become aware that a person under 18 years old has provided us with Personal Data, we will delete such data from our databases.

**10. *Questions or concerns regarding privacy***

If you have any questions or concerns regarding privacy issues, please send us a detailed message to [apm\\_website@apm-law.com](mailto:apm_website@apm-law.com) and we will make every effort to resolve your concerns without delay.

APM may, at any time and from time to time, modify this Privacy Notice. Modifications to this Privacy Notice will be posted on the Website, and shall be effective as of the date in which they are posted on the Website.

You are also entitled to file a complaint with the appropriate supervisory authority in connection with concerns you may have with regards to your privacy and Personal Data.