

# **Privacy Policy** Effective as of October 2021

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Customer Name	Customer Name goes here
Supplier Name	Gilat Satellite Networks Ltd.

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# **1** Personal Information We Collect

The Personal Information we collect includes identifiers, professional or employment-related information, commercial information or information on internet activity, and may thus include: name, title, company name, job function, expertise, postal address, telephone number, IP address, or email address, all for the purposes outlined below.

# 2 **Sources of Personal Information**

We may collect Personal Information in the following ways:

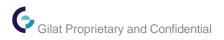
Personal Information you provide us: (i) direct contact, for instance if you email us (or contact us otherwise), we may retain a record of such email communication (including attachments), including your email address, name, content of your email and our response; (ii) visitors of our Website may have Personal Information recorded such as IP addresses, device used or logins in addition to any Personal Information they submit through the website; (iii) job applicants may submit Personal Information for the purpose applying for a job or requesting information; (iv) visitors to our offices may have to register with their name and other identifiers and have the time of their visit recorded.

The provision of data by yourself is either required by law or voluntary to enter into an agreement. Please note that if you do not provide us your Personal Information and the Personal Information is necessary in order to enter a contract or pursue business relations with our supplier or customer, we may not be able to enter into that contract or pursue our contractual relationship.

Personal Information from other sources (i) customers and vendors may provide Personal Information of their representatives in the course of their interaction with Gilat, such as, for example, upon submission of purchase order, or in the course of performance of an agreement or negotiations to enter into an agreement, when communicating with Gilat's team, using our support services, entering a product serial number, or otherwise contacting oursupport team or by providing their contact details in trade shows, seminars and other events; (ii) we may also receive Personal Information about you from other sources like: third-parties that provide services to us, our employees or business partners and publicly available sources (e.g. social or professional networks). This information may be combined with Personal Information obtained directly from you.

# 3 Cookies

"Cookies" are small files containing a string of characters that are sent to your browser and stored to your computer's hard drive while you are viewing a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience with the Website or services. Persistent Cookies can be removed by following your Internet browser help file directions. If you choose to disable Cookies, some areas of the Website or our services may not work properly so that we might not be able to provide you with our content or services at all. How to manage, refuse or delete cookies depends on the specific browser that you use. You can obtain further information by accessing the "Settings" option in your browser. For more information on the cookies used by us, please see our Cookies Policy available at: https://www.gilat.com/cookies-policy.



# 4 How We Use Personal Information

Your Personal Information may be processed by us in the following ways:

**Providing our Products and Services.** We mainly process your Personal Information to approve, manage, administer or effect an agreement between Gilat and the company you represent or work for.

If you represent a vendor, we may use your Personal Information to organize our sourcing activities, issue purchase orders, process payments, perform accounting, audits, manage our contract or review the services or products your company supplies to us. If you represent a customer, we may use your personal information, among other things, for fulfilment of your company's purchase order, processing of payments from your company, organizing and managing our customer relationship activities, accounting, managing our contract and/or reviewing the services or products that we supply to your company.

**Legal compliance.** We may process Personal Information to meet our legal obligations (such as record keeping obligations, reporting duties) and exercise our rights, or to comply with orders or discovery requests, be it from courts, regulatory supervisors or other governmental authority.

**Security of Operations.** We may process Personal Information to manage our risks and operations (e.g. prevent and detect security threats) and to enforce our terms of use, policies and other contractual arrangements and act to ensure the safety and security of the services, systems and applications we provide.

**Website functionality.** We may process Personal Information to monitor and analyze use of the Website in order to ensure the its functionality of the Website, maintain security, allow access to certain parts of the Website, and provide the visitors with more relevant content. For certain support services, a registered user will be provided a unique username and password that enables access to the support system. We may track the activity of registered users in our support services system.

**Marketing and communication.** By providing your Personal Information on our Website or in connection with customer support, service offerings or information that we publish, Gilat assumes you are interested in obtaining more information about our company, our technology and products.

Therefore, Gilat may use your Personal Information for the purpose of (i) providing you with products, services, upgrades and additional offerings; (ii) providing you with information Gilat believes your company would be interested in, such as press release publications, newsletters, product updates, special offers, campaigns, service renewals and additional promotional materials; or (iii) answering your questions and inquiries.

**Managing company events.** We may process Personal Information for events and webinars that you have registered for or attended.

**Office visitors.** We may process Personal Information for registering visitors to our offices and managing access to the premises.

Job Applicants. We process Personal Information about you when you voluntarily upload your CV and/or documents containing Personal Information to our Website or send them by e-mail, when you enter Personal Information directly into our online form or by contacting us by phone, e-mail, or otherwise. In addition, we may receive Personal Information about you from recruitment agencies or when conducting any assessment tests, as well as from previous employers. Your Personal Information will be stored on our information management system. We mainly process and use your Personal Information in connection with your job application, for evaluating your suitability for relevant positions, contacting and communicating with you and your references (which you provide us), and retaining your information for future employment opportunities, if applicable.



#### 5

#### Legal Basis for Use of Your Personal Information (If GDPR governs your Personal Information)

We generally process Personal Information about you:

- It is necessary for purpose of entering into a contract or carry out a contract with you or the entity you represent;
- It is necessary for purpose of complying with our legal obligations and exercising our rights;
- Where it is in our legitimate business interests, such as:
  - Allowing us to effectively and efficiently manage and administer the operation of our business;
  - Improving and developing our products and services; o ensuring safety of our operations and the provision of services and goods;
  - o Preventing fraud or criminal acts and in support of information security;
  - Maintaining functional website, adaptation to users, ease of use and promoting relevant content;
  - Advertising and marketing our services by maintaining contact with customers, vendors and potential customers and vendors (In cases of direct marketing where legitimate interest cannot be relied upon by law, and only in such cases, will we rely on consent as the legal basis);
  - Organizing company events that promote our services and products or that provide information on areas related to our business operations;

It is hereby clarified that the legal basis detailed above is the legal basis for actions to process Personal Information, carried out by us as in accordance with EU General Data Protection Regulation. If the processing of Personal Information about you is subject to other legal systems that require a legal basis for processing this Personal Information, then such legal basis may differ according to those laws.

# 6 Disclosure of Your Information

We do not sell, rent or lease your Personal Information. We may share and/or otherwise transfer Personal Information to third parties, as follows:

- Affiliates: We may work through our affiliates to fulfill the purposes listed above and therefore share Personal Information to the extent required to fulfill that purpose.
- Service providers: We may share your Personal Information with service providers, such as authorized suppliers and business partners, to provide some of our products or services. These third parties may have access to your Personal Information when needed to provide services we have contracted for, such as product delivery, hosting and cloud, data analysis, IT services, recruitment, auditing, payment processing, support or customer service. We use a wide variety of software and tools at Gilat and we process Personal Information using these tools as a regular course of business, and the third party suppliers supporting these tools may have access to your Personal Information. Our contracts with suppliers and vendors include provisions to protect your information in line with legal requirements.
- Corporate transaction: Gilat group of companies may be required to disclose your Personal Information as part of a corporate reorganization, restructuring or merger and acquisition activities, to the extent required to consummate such activities.
- Legal processes: We may have a duty to disclose or share your Personal Information with a competent law enforcement body, regulatory or government agency, court or other third party in order to comply with any legal obligation, or to enforce our terms of sale and other

agreements; or to protect the rights, property, or safety of Gilat, our customers or others, such as, for example, fraud protection and credit risk reduction.

 Professional advisors: We may also share your Personal Information with our auditors, advisors, legal representatives and similar agents in connection with advisory services they provide us for legitimate business purposes.

# 7 Security

Personal Information is stored on our internal systems, some of which are provided and/or supported by third party providers. We have implemented safeguards that aim to protect this information. Where we have given you (or where you have chosen) a password which enables you to access our services, we encourage you to choose a strong password and to keep this password confidential. No technology for the storage or transmission of data can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you have reason to believe that your password to your account has been compromised), please immediately notify us by contacting us at the email address shown below.

#### 8 Your Rights With Respect to Your Personal Information

You may have the following rights in relation to your Personal Information and, in most cases, you can exercise them free of charge. Your rights may differ depending on your jurisdiction.

- The right to obtain information regarding the processing of your Personal Information and access to the Personal Information which we hold about you;
- The right to request that we rectify your Personal Information if it is inaccurate or incomplete;
   the right to request that we erase your Personal Information in certain circumstances.
   Please note that there may be circumstances where you ask us to erase your Personal Information but we are legally entitled to retain it;
- The right to request that we restrict our processing of your Personal Information in certain circumstances. Again, there may be circumstances where you ask us to restrict our processing of your Personal Information but we are legally entitled to refuse that request;
- The right under certain circumstances to request that certain personal information be provided in machine readable format, and exported to another controller where technically feasible.
- If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection.
- In the cases where we may have collected your Personal Information with your consent, you can withdraw your consent at any time; Please note, however, that we may still be entitled to process your Personal Information if we have another legitimate reason for doing so. For example, we may need to retain Personal Information to comply with a legal obligation;
- You have the right to opt-out of marketing communications we send you at any time. You
  can exercise this right by clicking on the "unsubscribe" in the e-mails we send you or
  generally from mailing lists by contacting us through the details in the "Contact Us" section at
  the end of this Privacy Policy.

Please note that we may retain certain Personal Information as deemed required by us in accordance with applicable laws, or for legitimate business reasons (such as exercise or defense of legal claims), for the duration as required under applicable laws.

If you believe we are using your Personal Information in a way that is inconsistent with this Privacy Policy or for more information about your rights, contact us through the details in the "Contact Us" section at the end of this Privacy Policy.

If you wish to exercise any of your rights, you may contact us with your request at info@gilat.com. We will respond to your request in accordance with applicable law.

Help us Keep Accurate Information. Please help keep your records accurate by contacting your defined contact person in Gilat with any changes or corrections to your information. If the Gilat contact person is not available, you may update your information at info@gilat.com.

Please refrain from providing Gilat any Personal Information where such information is not relevant and required within the scope of the engagement between your company and Gilat.

**Links to Third-party Websites.** This Privacy policy does not address, and we are not responsible for the policies and practices of third parties. Our Website may contain links to third-party websites. Gilat is not responsible for the privacy practices of such websites. Please read the terms and conditions and privacy policy of each such third party that you choose to use or interact with.

# 9

# Cross-Border Transfer of Personal Information

As a global organization, Gilat may transfer your Personal Information to any of Gilat's affiliates worldwide, or to its business partners or other third parties in Israel or worldwide, including through cloud-based service providers worldwide, for the purposes of processing or storage of the Personal Information pursuant to this Policy, or any of the other recipients listed above under "Disclosure of Your Information", including if these are cross-border.

Where the GDPR applies and we transfer Personal Information to another country outside the EEA, we will transfer it in a manner consistent with legal requirements of the GDPR. This means that we will either transfer the data to a country that has received an adequacy decision by the European Commission (such as Israel), and where required use the standard contractual clauses or one of the other mechanisms compliant by the GDPR. You can obtain more details of the protection given to your Personal Information when it is transferred outside the EEA (including a copy of the relevant safeguards) by contacting us as described the section titled "Contact Us" at the bottom of this Privacy Policy.

If you are located in a jurisdiction where transfer of your Personal Information to another jurisdiction requires your consent, then by using the Website you provide us your express consent to such transfer or the storage, processing or maintenance of the Personal Information in other jurisdictions.

#### **10** Retention of Your Personal Information

We retain Personal Information for the period necessary to comply with legal obligations (e.g. to comply with mandatory record retention or legal hold requirements), as agreed in an individual consent (if applicable) or based on our legitimate interest, to resolve disputes, and to otherwise fulfill the purposes, rights and obligations outlined in this Privacy Policy. Retention periods can vary based on the type of Personal Information and how it is used, and our retention periods are based on criteria that include legally mandated retention periods, pending or potential litigation, our intellectual property or ownership rights, contract requirements, operational directives or needs, and historical archiving. When Personal Information is removed from our systems, it will be deleted, destroyed or anonymized using customary security protocols. We may store aggregated Non-Personal Information without time limit.

# 11 Children

The Website is not intended for minors under the age of 18 years and we do not intend to collect Personal Information from anyone we know to be under 18 years. If we have reason to believe that we hold personal data of a person under that age in our databases, we will take steps to delete that personal data.

#### **12 Governing Law**

This Privacy Policy shall be governed by and construed in accordance with the laws of the State of Israel, excluding its choice of law principals. Disputes arising in connection with this Privacy Policy shall be subject to the exclusive jurisdiction of the competent courts in Tel Aviv-Jaffa, Israel.

# 13 Amendment of Policy

Gilat reserves the right to amend the terms of this Policy from time to time, by posting the revised terms on the Website. The new privacy policy will be effective from the date mentioned at the top page of the new policy. If we make a material change, we may provide you with notice prior to the change taking effect, such as by posting a conspicuous notice on our website or by contacting you directly, or where required under applicable law and feasible, seek your consent to these changes

#### 14 Contact Us

You may contact Gilat with any questions regarding our Privacy Policy at info@gilat.com. Copyright © 2021, Gilat Satellite Networks Ltd. All rights reserved

