

Last Updated: May 2025

In order to ensure transparency and give you more control over your personal information, this privacy policy ("**Privacy Policy**") governs how we, Trustmi Networks Ltd. ("**Trustmi**", "**we**", "**our**" or "**us**") use, collect and store personal information that we collect or receive from or about you ("**you**") in connection with Trustmi.ai ("**Website**") and Trustmi platform ("**Platform**") provided therein (the Website and the platform, all together the "**Services**"). We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal data. **Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory rights, including your rights to a remedy or other means of enforcement.

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Trustmi's mission is to secure our customers ("**Customers**") B2B payments via its Services by verifying that such payment is received by vendors ("**Vendors**").

This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement material changes in the way we use your information, in a manner that is different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means and take any additional steps as required by applicable law.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

• We Process the Following Personal Information:

- a. **Information you provide directly to us.** We collect the following information you provide directly to us, including, without limitation, full name, email address, phone number, company details, job title, the information that you decide to fill in to the Website forms and any other information that you decide to provide us with (for example, when you contact us).
- b. **Information that the Customer (as defined above) provides us with.** We collect the following information when you as a Customer register and make use of our Platform: full name, email address, phone number, company details, job title, log-in details, your usage of the Platform, vendors' details (including point of contact details such as email address, phone number, job title, company address, and company bank details).

- c. **Information that the Vendor (as defined above) provides us with.** When you register as a Vendor in our Platform, we collect the following information: full name, email address, phone number, company details, job title, log-in details, other relevant company information (including, bank account details) to the extent that includes Personal Data, your usage of the Platform.
 - d. **Information from Other Sources.** Trustmi may also obtain information about you from other sources, including publicly – or commercially- available information, and through third-party data platforms, partners and service providers.
 - e. **Automatic Data Collection.** We may automatically collect certain Technologies (as defined below) information through your use of the Services, such as your Internet protocol (IP) address, cookie identifiers and other device identifiers that are automatically assigned to your device, browser type and language, geo-location information, hardware type, operating system, internet service provider and other information about actions taken through the use of the Services.
- **We process information for the following purposes:**
 - a. **To provide you with the Trustmi Services.** Trustmi will use your information to provide the Trustmi Services. Trustmi may use your information (i) to respond to your questions, comments, and other requests for customer support, or information, including information about potential or future services; (ii) to provide you with the Services; (iii) for internal quality control purposes; (iv) to establish a business relationship; (v) to generally administer the Services.
 - b. **To market the Trustmi Services.** Trustmi may use information to market the Services. Such use includes (i) notifying you about offers and services that may be of interest to you, including, to send you marketing communications; (ii) conducting market research; (iii) developing and marketing new products and services; (iv) and to measure interest in the Services; (v) other purposes disclosed at the time you provide information; (vi) as you otherwise consent.
 - c. **Security purposes.** Some of the abovementioned information will be used for detecting, taking steps to prevent and prosecuting fraud or other illegal activity; to identify and repair errors; to conduct audits; and for security purposes. Information may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims.
 - d. **De-identified and aggregated information use.** In certain cases, we may or will anonymize or de-identify your Information and further use it for internal and external purposes, including, without limitation, to analyze and improve Trustmi services (including through the use of artificial intelligence) and for research purposes. We may use this anonymous or de-identified information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them and/or to develop new product features and improve existing offerings).
 - e. **Cookies and similar technologies.** We, as well as third parties that provide content, advertising, or other functionality on the Trustmi Services, may use

cookies, pixel tags, local storage, and other technologies (“**Technologies**”) to automatically collect information through the Trustmi Services. We use Technologies that are essentially small data files placed on your device that allow us to record certain pieces of information whenever you visit or interact with the Trustmi Services. If you would like to opt out of the Technologies we employ on the Trustmi Services, you may do so by blocking, deleting, or disabling them as your browser or device permits.

2. HOW WE PROTECT AND RETAIN YOUR PERSONAL INFORMATION

- Security. We have implemented and maintain reasonable technical, organizational and security measures designed to protect your information. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
 - Retention of your information. Your information will be stored until we delete our records, data retention is enforced and we proactively delete stale data once it reaches the end of its lifecycle, if you send a valid deletion request we as part of your privacy rights we will review the request and act accordingly . Please note that in some circumstances we may store your information for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, and/or (iii) if we reasonably believe there is a prospect of litigation relating to your information or dealings.

3. HOW WE SHARE YOUR PERSONAL INFORMATION

In addition to the recipients described above, we may share your information as follows:

- The information Trustmi gathers is shared with our partners and other third parties. We may also share information with our affiliated companies about you.
 - We use third party service providers to process your information for the purposes outlined above, including, without limitation:
 - With cloud service providers for hosting purposes;
 - With websites and web content creation platforms in order to help us manage our Website;
 - With email providers, marketing, CRM, other similar tool providers;
 - With analytic companies, in order to help us understand and analyze information we collect in accordance with this policy; and
 - To the extent necessary, with regulators, courts, banks or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order, as well as for internal compliance procedures and to

protect the safety, security, and integrity of Trustmi, our Services, customers, employees, property, and the public..

- If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your information to such third party (whether actual or potential) in connection with the foregoing events (including, without limitation, our current or potential investors). In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your information in connection with the foregoing events.
- Where you have otherwise provided your consent to us for sharing or transferring your information.

4. YOUR PRIVACY RIGHTS

- **Rights:** You can exercise your rights by contacting us at privacy@trustmi.ai . Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we need further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than requested, we will address your request to the maximum extent possible, all in accordance with applicable law.
- **Rights:** The following rights (which may be subject to certain exemptions or derogations) may apply to certain individuals depending on their jurisdiction of residence. The rights that may be applicable to you are as follows:
- You have a right to access Personal Data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we rectify any Personal Data we hold that is inaccurate or misleading;
- You have the right to request the erasure/deletion of your Personal Data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your Personal Data, for example for the establishment, exercise or defense of legal claims;
- You have the right to object, to or to request restriction, of the processing;
- You have the right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling, if applicable;

- You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You also have a right to request certain details of the basis on which your Personal Data is transferred outside the European Economic Area, the United Kingdom or Japan, as applicable, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.
- **Marketing emails – opt-out:** You may choose not to receive marketing email of this type by sending a single email with the subject “BLOCK” to support@trsutmi.ai. Please note that the email must come from the email account you wish to block OR if you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails, and we will process your request within a reasonable time after receipt.
- **Additional information regarding transfers of GDPR protected personal data**
 - Internal transfers: Transfers within Trustmi infrastructure will be covered by internal policies and controls as part of our security & privacy controls , for example migrating data as part of a DR procedure.
 - External transfers: When Trustmi engages in transfers of GDPR and/or UK GDPR and where applicable, the Act on the Protection of Personal Information (“APPI”) protected Personal Data outside of the EEA, UK or Japan (for example to third party service providers for the purposes listed above), we generally rely on either: (i) Adequacy Decisions adopted by the European Commission under Article 45 of the GDPR (for example, when our team accesses Personal Data from Israel); (ii) the Standard Contractual Clauses issued by the European Commission or the United Kingdom (as updated from time to time); or (iii) another lawful transfer mechanism provided for under the GDPR or the APPI e.g. Binding Corporate Rules. Trustmi also monitors the circumstances surrounding such transfers to ensure that Personal Data continues to be afforded a level of protection that is essentially equivalent to the one guaranteed by the GDPR, UK GDPR and APPI.

5. USE BY CHILDREN

We do not offer our products or services for use by children **and, therefore, we do not knowingly collect information from, and/or about children** under the age of 18. If you are under the age of 18, do not provide any information to us without the involvement of a parent or a guardian. In the event that we become aware that you

provide information in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at support@trustmi.ai

6. INTERACTION WITH THIRD PARTY PRODUCTS.

We enable you to interact with third party websites, mobile software applications and products or services that are not owned, or controlled, by us (each, a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect information from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

7. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

Our California Do Not Track Notice:

Do Not Track (“**DNT**”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers, but we may allow third parties, such as companies that provide us with analytics tools, to collect personally identifiable information about an individual consumer’s online activities over time and across different web sites when a consumer uses the Services.

8. CONTACT US.

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at privacy@trustmi.ai .