

Privacy Policy - Sion Medical

Last updated: September 2025

Responsibility, Name, and Contact Details

- **Company name:** Sion Medical Ltd.
Address: 3 Eshel St., Sapir Industrial Park, Sderot, Israel
Privacy representative / Data Protection Officer (if any): Adv. Itay Troim.
Email for privacy inquiries: itay@sn-medical.com
Phone: 054-3009377.

Legal Applicability - Amendment No. 13 to the Privacy Protection Law

- **Relevant law:** The Israeli Privacy Protection Law, 1981, as amended (Amendment No. 13), 2024, which entered into force on August 14, 2025.
Key changes in the amendment include: expanded definitions of personal data and sensitive personal data; the requirement to obtain informed consent for the purposes of collection, processing and use of data; the purpose-limitation principle; duties of notice and transparency; expanded enforcement powers and administrative fines.

Main Types of Personal Data and Definitions

- **Personal Data** – Any information relating to an identified person or a person who can be identified, directly or indirectly, including medical information, biometric details, personality data, location data, professional assessments, and more.
Sensitive Personal Data – Medical information, information relating to privacy, sexual orientation, criminal record, genetic data, religious beliefs, etc.
Processing – Any action performed on data, such as collection, storage, analysis, alteration, transfer, deletion, etc.
“Database” – An array of personal data organized in a manner enabling access or processing according to certain criteria; statutory obligations apply under the law and regulations.

Data Collection

- **A. Data provided by the customer**
 - Contact details (name, email address, phone, etc.)
 - Details used for services provided by the company, for example deliveries to the customer and sending invoices.
- **B. Technical and automatic data**
 - IP address; browser type; operating system; browsing patterns on the website; visit times.
 - Use of Cookies & similar technologies for diagnostics, performance improvement, usage analysis, personalization/
- **C. Third-party data**
 - **Advertising measurement and analytics** – We use Google Ads via Google Tag Manager to measure purchases attributed to campaigns. Upon completion of a purchase, a conversion event is sent to Google that includes aggregate data (for example, number of purchases, amount and currency), without personally identifiable information. Processing is intended for statistics and improvement of advertising activity and is performed subject to consent for cookie management.

Legal Basis for Processing the Data

- Where processing activities are not necessary for operating the website—especially when using sensitive personal data—informed consent will be requested from the user. The data will be processed only for purposes specified in advance, lawful and fair. The company will not process the data for purposes other than those compatible with the original purpose without your knowledge and consent.

Notice and Transparency

- At the time of collection, or before it, the company will:
- Provide clear information to the data subject regarding the purposes of collecting and using personal data.
- Notify that the controller of the database is Sion Medical Ltd.
- Specify whether the data will be transferred to third parties, or if third-party services are used.
- Clarify users' rights (access, rectification, deletion, etc.) and what occurs if they refuse to provide the data.

Data Retention and Time Limit

- Personal data will not be retained beyond the period required for the purpose for which it was collected, unless there are legal obligations to retain it for a defined period. After the data is no longer relevant – it will be deleted, masked, or anonymized.

Information Security

- Use of appropriate technological and organizational measures to prevent unauthorized access, changes, or disclosure of data.
Maintaining records of security actions, regular tests, and procedures for responding to security events and data breaches.

Use of Artificial Intelligence

- We use artificial intelligence tools to analyze data. The company declares that such data analysis is performed without personal information of website users and without training the artificial intelligence.
Inquiries received via the website are processed by company staff, manually, and answered by a human representative.

Rights of Data Subjects (Customers)

- Access to the data retained about you and understanding which items are stored and who holds them.
- Rectification of inaccurate, incomplete, or outdated data.
- Deletion of data if there is no longer a legal need for it or if your privacy has been unlawfully infringed.
- Restriction of processing in certain cases.
- The right to withdraw consent you have given for non-essential purposes at any time.
- The right to receive a copy of the database definition document and, if appointed, the details of the Data Protection Officer.

Security Incidents and Reporting

- Any incident of unauthorized access, leakage, or other harm to personal data will be examined immediately.
In cases where required – notification will be provided to the Israeli Privacy Protection Authority and to data subjects, in accordance with the law and regulations.

Changes to this Policy

- This policy may change due to legislative amendments, regulations, Authority guidelines, or changes in the company's operations.
Material changes will be published on the website in a prominent place, and an update will be provided to data subjects where relevant.