

CCPA PRIVACY NOTICE

[Last Updated: May 19, 2026]

(1) INTRODUCTION, SCOPE & APPLICABILITY

This CCPA Privacy Notice applies to California residents (“**consumers**” or “**you**”), and is an integral part of Optival LTD [Privacy Policy](#), designed to supplement the Privacy Policy and provide you with the specific information Optival LTD (“**Company**”, “**we**”, “**us**” or “**our**”), are required to disclose under the California Consumer Privacy Act of 2018 as amended and revised by the California Privacy Rights Act of 2020 (collectively “**CCPA**”) as the “*business*” when we are collecting and using “*personal information*” about you, in connection with your use of our Services (all terms as defined under our [Privacy Policy](#)).

Among other, under this CCPA Privacy Notice we will detail the categories of “*personal information*” we collect, with whom we share it for a “*business purpose*”, your rights related to your “*personal information*” under the CCPA and the choices you can make.

Definitions used under this CCPA Privacy Notice shall have the same meaning as assigned to them under the CCPA, or as defined in our Privacy Policy, as applicable. When we refer to “Personal Data” under our Privacy Policy, it shall also mean “*personal information*” as defined under the CCPA.

If you wish to learn more about your California privacy rights, you may visit <https://oag.ca.gov/privacy/consumer-privacy-resources>.

(2) A COMPREHENSIVE DESCRIPTION OF THE INFORMATION PRACTICES

(I) Categories of Personal Information We Collect

We collect “*personal information*” which is defined under the CCPA as any information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device, all as detailed in the table below.

Personal Information does not include: Publicly available information that is lawfully made available from government records, that a consumer has otherwise made available to the public; De-identified or aggregated consumer information; Information excluded from the CCPA’s scope, such as: Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and the Driver’s Privacy Protection Act of 1994.

Below we detail the categories of personal information that we collect (and have collected within the last 12 months) as a “business”. For additional details, please see Section 4 of our [Privacy Policy](#) “The Information We Collect & Purpose of Collection”.

Category	Example	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes: online identifiers, Internet protocol address, unique identifiers, real name, email address.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes: name, email address, address, telephone number.
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	No.

D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	No.
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	No.
G. Geolocation data.	Physical location, approximate location derived from IP address or movements.	No.
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No.
I. Professional or employment-related information.	Current or past job history or performance evaluations.	No.
J. Non-public education information (per the Family Educational Rights and Privacy Act (20	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes,	No.

U.S.C. Section 1232g, 34 C.F.R. Part 99)).	student financial information, or student disciplinary records.	
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No.
L. Sensitive personal information.	Government-issued identifying numbers, financial account details, genetic data, precise geolocation, race or ethnicity, religious or philosophical beliefs, union membership, mail, email, text messages, biometric data, health data, and sexual orientation or sex life.	No.

(II) Categories of Sources of Personal Information

- **Information you provide us directly** - for example, when you correspond with us or from forms you complete.
- **Information we receive automatically** – for example, we will collect your Online Identifiers and Usage Data including analytics data (or use third-party measurement and marketing tools) automatically.

(III) Use of Personal Information

We may use the personal information collected as identified above, for the following purposes:

- To fulfill or meet the reason you provided the personal information, for example, provide the Services, respond to a query, etc.
- To provide the Services.
- To market and promote our Services.
- To analyze your use of our Services.
- To respond to law enforcement.
- Any other purpose detailed in Section 4 of our [Privacy Policy](#) *“The Information We Collect & Purpose of Collection”*.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice or where required under the CCPA, obtain your consent.

(IV) Disclosures of Personal Information for a Business Purpose

We may disclose your personal information to our affiliated companies, a contractor or service provider for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except for performing the contract. We further restrict the contractor and service provider from selling or sharing your personal information.

Below we detail the categories of personal information we disclose (and have disclosed within the last 12 months) for a business purpose (as defined under the CCPA), the categories of personal information shared (corresponding with the table above) and the categories of recipients.

Business Purpose (as defined under CCPA)	Category (corresponding with the table above)	Category of Recipient
Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes.	Category A Category B	Subsidiaries, operational partner, security and fraud prevention providers, operating systems.
Debugging to identify and repair errors that impair existing intended functionality.	Category A	Analytic providers, operational partner, security and fraud prevention providers, operating systems.
Performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider	Category A Category B	Payment processors, subsidiaries, affiliated companies, operating systems, CRM, ERP, customer support, cloud computing and storage vendors, etc.
Undertaking internal research for technological development and demonstration.	Category A Category B	Developers, operating systems, cloud and hosting providers, SaaS platforms for task management and development, customer support and optimization tools.

Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned or controlled by the business.	Category A	Developers, operating systems, cloud and hosting providers, SaaS platforms for task management and development, customer support and optimization tools.
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(V) Sale or Share of Personal Information

We do not “sell” information as most people would commonly understand that term, we do not, and will not, disclose your personal information in direct exchange for money or some other form of payment.

For retargeting and analytic purposes, when we promote our Services, we use third-party tools that market our Services online, measure these marketing efforts, identify individuals that are interested in our Services, etc. This is done by placing cookies, pixel or other tracking technology on our website and sharing with these vendors the online identifiers and online behavior information, including for cross-context behavioral advertising. The CCPA defines these actions as “sharing” or “selling”.

The categories of personal information disclosed to such third parties under this practice considered “sell” or “share” includes Category A; Category D; Category F and Category G.

(VI) Children Under Age 16

Our Services are not intended for use by children and we do not knowingly collect or maintain information about anyone under the age of 16. Please contact us at: Legal@optival.com if you have reason to believe that a child has shared any information with us.

(VII) Data Retention

In general, we retain the personal information we collect for as long as it remains necessary for the purposes set forth above, all under the applicable regulation, or until you express your preference to opt out or request to delete your personal information, where applicable.

The retention periods are determined according to the criteria described under Section 8 “Data Retention” of our [Privacy Policy](#).

(3) EXPLANATION OF YOUR RIGHTS UNDER THE CCPA AND HOW TO EXERCISE THEM

(I) Your Rights Under the CCPA

If you are a California resident, you may exercise certain privacy rights related to your personal information. You may exercise these rights free of charge except as otherwise permitted under applicable law, all as described herein.

Your Rights	Details
The right to know what personal information the business has collected.	The right to know what personal information the business has collected about the consumer, including the categories of personal information, the categories of sources from which the personal

	information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about the consumer.
Deletion rights.	The right to delete personal information that the business has collected from the consumer, subject to certain exceptions.
Correct inaccurate information	The right to correct inaccurate personal information that a business maintains about a consumer.
Opt-out of selling or sharing for cross-contextual behavioral advertising	You have the right to opt-out of the “selling” or “sharing” of your personal information for “cross-contextual behavioral advertising,” often referred to as “interest-based advertising” or “targeted advertising.”
Limit the use or disclosure of sensitive personal information	Under certain circumstances, If the business uses or discloses sensitive personal information, the right to limit the use or disclosure by the business.
Opt-out of the use of automated decision making	In certain circumstances, you have the right to opt-out of the use of automated decision making in relation to your personal information.
Non-discrimination	The right not to receive discriminatory treatment by the business for the exercise of privacy rights conferred by the CCPA, including the right not to be retaliated against for the exercise of their CCPA rights, denying a consumer services, charging different prices or rates for services, providing you a different level or quality of services, etc. We may, however, charge different prices or rates, or provide a different level or quality of services, if that difference is reasonably related to the value provided to us by your Personal Information.
Data portability	You may request to receive a copy of your personal information, including specific pieces of personal information, including, where applicable, to obtain a copy of the personal Information you provided to us in a portable format.

To learn more about your California privacy rights, please visit <https://oag.ca.gov/privacy/privacy-laws>.

(II) How Can You Exercise Your Rights?

You may exercise your rights laws by contacting our privacy team at: Legal@Optival.com .

Note, certain rights can be exercised by you independently without using the **Request to Exercise Privacy Rights Form**. For example, depending on your interaction with us:

- You can opt-out from receiving emails from us by clicking the “unsubscribe” link or other opt-out alternatives we make available, as detailed in the marketing communication we sent you or otherwise through the communication preferences settings we make available within your account.

- Opt-out from selling or sharing can be executed at any time, by using the cookie settings tool or the “Do Not Sell or Share my Personal Information” button all available through our website.
- Install privacy-controls in the browser's settings to automatically signal the opt-out preference to all websites you visit (like the “[Global Privacy Control](#)”). We honor the Global Privacy Control, where applicable, subject to your jurisdiction, as a valid request to opt-out of the sharing of information linked to your browser.

(III) Authorized Agents

“Authorized Agents” on behalf of consumers may submit opt-out requests on a consumer’s behalf. We will accept requests from qualified third parties on behalf of other consumers, subject to the following verification procedures:

- When a consumer uses an authorized agent to submit a request to know or a request to delete, a business may require that the consumer do the following: (a) provide the authorized agent signed permission to do so or power of attorney; (b) verify their own identity directly with the business; (c) directly confirm with the business that they provided the authorized agent permission to submit the request.
- We may deny a request from an authorized agent that does not submit proof that they have been authorized by the consumer to act on their behalf.

(4) NOTICE OF FINANCIAL INCENTIVE

We do not offer financial incentives to consumers for providing personal information.

(5) CONTACT US

By email: Legal@Optival.com

By mail: Simtat Eliyahu 3, Givatayim, Israel 5322317

(6) UPDATES

As required under the CCPA, we will **update** the CCPA Notice **every 12 months, if needed**. The last revision date will be reflected in the “Last Amended” heading at the top of this CCPA Notice.

(7) OTHER CALIFORNIA OBLIGATIONS

Direct Marketing Requests: California Civil Code Section 1798.83 permits you, if you are a California resident, to request certain information regarding disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please review [Section \(3\)\(II\)](#) above.

Do Not Track Settings: Cal. Bus. And Prof. Code Section 22575 also requires us to notify you how we deal with the “Do Not Track” settings in your browser. As of the effective date listed above, there is no commonly accepted response for Do Not Track signals initiated by browsers. Therefore, we so not

respond to the Do Not Track settings. Do Not Track is a privacy preference you can set in your web browser to indicate that you do not want certain information about your web page visits tracked and collected across websites. For more details, including how to turn on Do Not Track, visit: www.donottrack.us.