

# Clal Group Privacy Policy

This policy is the privacy policy of the institutional entities within Clal Holdings and the Group's subsidiaries that provide services to those institutional entities[1] (the "Clal Group", the "Group", or "we"). The purpose of this policy is to inform you of the Group's privacy principles; explain what personal information is collected about you (or about others connected to you, such as family members, drivers of an insured vehicle, or your employees); describe how we may use such information; identify the parties with whom we may share it; and explain how you may contact us to obtain further information regarding the information collected, your privacy, and the exercise of your rights, including the right to access information and the right to request correction of inaccurate information.

"Personal Information" is information subject to the Israeli Protection of Privacy Law, 5741–1981 (the "Protection of Privacy Law"), as well as any data relating to an identified individual or that may reasonably lead to the identification of an individual. Each of the institutional entities in the Clal Group collects Personal Information in its own databases. The institutional entities will process such information, other information held by them, and information that may be received by them, as controllers (and jointly where a shared purpose applies), in Israel and abroad, as detailed in this document.

We are required by law to request and retain certain information (for example, a copy of an identification document, insured contact details, or medical information for underwriting purposes), and we require other information in order to provide services or to provide you with improved services. The information you provide is provided voluntarily and with your consent; however, if you do not provide information that we are required to obtain by law or that we need, we may not be able to provide certain services—or any services at all. We may provide separate, specific instructions or notices regarding privacy as part of particular products or services offered by the Group. Such instructions or notices are in addition to the information contained in this Privacy Policy. In the event of a conflict, the specific instructions or notices will prevail.

This Privacy Policy may be updated from time to time, at the Group's discretion, in line with the Group's needs, or due to changes in applicable law or regulation.

## 1. The Group's Privacy Principles

### 1.1 Lawful and Fair Collection and Processing

The Clal Group collects Personal Information in connection with its activities, services, and products, and at times pursuant to legal requirements. This information may be collected from Group customers, prospective customers and interested parties, third parties, public databases, and government databases. Personal Information will be collected and processed by the Clal Group in a lawful and fair manner.

### 1.2 Purpose Limitation

The Clal Group will retain, process, and disclose Personal Information only in connection with its business activities. The purposes for collecting and processing information are described in detail in this policy.

### 1.3 Information Security and Accuracy

The Clal Group takes extensive measures to protect privacy and information security through advanced and stringent security controls consistent with the standards customary in the institutional sector for the protection of Personal Information, in accordance with the regulatory guidance of the Capital Market, Insurance and Savings Authority. The Group protects information privacy in accordance with applicable law, including the Protection of Privacy Law.

The Clal Group also makes efforts to ensure that the Personal Information in its databases is accurate and up to date.

#### **1.4 Rights in Relation to Information**

The Clal Group will enable data subjects to access their information and to request its correction where it is inaccurate, in accordance with the Protection of Privacy Law.

#### **2. Website Use**

Use of the website is subject to the Terms of Access: <https://www.clalbit.co.il/termsofaccess/>

#### **3. Types of Personal Information Collected (or That May Be Collected)**

##### **3.1 Information You Provide to Us, or That Is Collected in the Course of Providing Services or Engaging with You**

**3.1.1 General Information** – including your full name, date of birth, marital status, identification number, citizenship, and your relationship to other individuals (e.g., family members covered under a joint policy).

**3.1.2 Contact Details** – including address, telephone number, and email address.

**3.1.3 Identification Means** – such as official identification numbers (e.g., Israeli ID number, driver's license number, passport number) and copies/photos of such identification documents, and other identifiers such as usernames or social media identifiers.

**3.1.4 Information About Your Appearance and Behavior** – such as sex/gender, age, areas of interest, descriptive data (e.g., height, photograph), demographic and behavioral information (e.g., claims or purchase history).

**3.1.5 Professional Qualifications** – information regarding professional training, education, employment background, membership in professional organizations, licensing, and similar data.

**3.1.6 Information Related to Services We Provide** – including your inquiries to the Company, insurance claims, policies purchased, appraiser assessments of your assets, drawings/plans, documents and medical information, travel abroad information, and any other relevant information connected to a product or service purchased from us.

**3.1.7 Insurance Claims Information** – information related to an insurance claim under an insurance product, collected from you and relevant third parties (e.g., witnesses, medical institutions, involved parties, or other parties connected to claims).

**3.1.8 Fraud-Related Information** – such as information collected through investigations we conduct and checks of publicly available sources (e.g., newspapers, social networks, websites, databases) relating to fraud.

**3.1.9 Financial Information** – such as payment information, credit card details, bank account details, tax information, income, and assets.

**3.1.10 Credit Data** – such as credit data from the Credit Data Register and credit bureaus, in accordance with the Credit Data Law, 5776–2016 and the Supervisor's directives regarding credit data sharing; information under the Financial Information Services Law, 5782–2021; enforcement proceedings, bankruptcies, judgments, court orders, and settlements.

**3.1.11 Group Authentication Information** – such as information used to access the Clal Group's platforms, passwords, answers to identification questions, and biometric information (subject to the customer's consent).

**3.1.12 Audio/Video Recordings and Chat Records** – such as information collected from recorded telephone calls and chats with Clal Group representatives and service centers.

**3.1.13 Communication Preferences, Feedback, and Surveys** – preferences regarding marketing communications and advertisements, promotions, survey responses, complaints, and customer experience.

**3.1.14 Medical Information** – for example, your physical and mental health status (past and present), medical opinions, treatments, diagnoses, test results, information from medical institutions (including medical records), disability, medications, and health-related habits such as smoking, alcohol consumption, and drug use.

**3.1.15 Information About Service Providers and Insurance Agents Working with the Group** – such as identification and contact details; business/professional information

(licenses, training, certifications, permits); financial information required for payments and reconciliation; performance and activity data; information on regulatory compliance; and economic information including assets.

**3.1.16 Other Sensitive Information** – criminal activity and/or criminal history (e.g., fraud-related); in exceptional cases we may process particularly sensitive information where relevant to medical treatment.

### **3.2 Information Provided to Us by Third Parties**

**3.2.1** Information from third parties such as insurance agents, medical institutions, other insurers, government entities, and various suppliers involved in service provision, underwriting, and claims handling.

**3.2.2 Data Enrichment / Data Quality** – for example, where you changed your address, phone number, email address, or other contact details but have not yet updated the Clal Group. Such information may be used to provide and improve services and to contact you as required by law and regulation. We will not purchase information solely for advertising purposes unless the third party explicitly collected the information for such purpose and in accordance with law.

### **3.3 Information Collected from the Device Used to Contact the Group Online or Consume Group Services**

**3.3.1** Such as mobile device number, device type, operating system, browser, IMEI or other serial number, MAC address, IP address, location data, domain name and access point, login times, and other digital identifiers; as well as user activity data (e.g., time spent on a site/page/screen, actions performed, browsing patterns), collected through dedicated tools and through our use of cookies, including data saved during entry even if an action was not completed. More information on cookies appears in Section 10.

**3.3.2** Information received by third parties from automated systems (e.g., in-vehicle tracking systems), including continuous real-time location information. Vehicle location information is retained by those third parties only subject to your consent.

### **3.4 Information Already Held in Our Databases**

**3.4.1** Any information collected from services or products you received in the past from the Clal Group—including policies purchased, claims history and related information, and contact details.

### **3.5 Information About Third Parties**

**3.5.1** Information about witnesses; guarantors; family members; third-party claimants; and parties involved in claims.

### **3.6 Derived Information**

**3.6.1 Consumption or behavioral patterns** – including areas, services, or products of interest; descriptive/appearance data; consumption or behavior data (used, for example, to generate predictions or assumptions regarding your interests in order to provide tailored services).

**3.6.2** Information about your health status, significant life events, capabilities and mental resilience—allowing us, among other things, to identify whether additional support and/or service adjustments may be required.

**3.6.3** Fraud and related insights—such as information derived from checks and/or investigations we perform.

### **3.7 Information About Others**

If you provide us with information about another person (e.g., employees, family members, parties involved in claims, drivers of an insured vehicle, or other parties), you must inform them that you are providing their details and obtain their consent for the use of their information in accordance with this Privacy Policy.

### **3.8 Accuracy and Completeness**

You must provide the Clal Group with complete, accurate, and correct information. Without derogating from any other provisions in an agreement, policy, or other Clal Group document,

providing false information is prohibited, constitutes a breach of law, and may affect your products or services with the Clal Group.

#### **4. How We Use Personal Information and Our Processing Purposes**

4.1 Contacting you and others.

4.2 Providing products and services by Group companies—including ensuring we have the information required to offer and provide products and services, verifying identity, offering optimal payment terms based on your data; identification, operations, actuarial processes, underwriting, service provision, payments, changes (as requested or required), claims assessment, reliable risk assessment, and dispute resolution.

4.3 Payments (collection processes, claims settlement)—including transferring insurance benefits to you when due.

4.4 Assessing and making decisions regarding underwriting and insurance events—including verification of insured rights; deciding whether to accept a claim; decisions on coverage or credit; pursuing recovery from you or third parties; and determining the terms under which products/services are provided.

4.5 Working with third parties—e.g., engagement and ongoing dealings with agents and service providers.

4.6 Detecting and preventing fraud—including checks/investigations of fraud and money laundering, hostile actor detection, prohibited uses of platforms, and legal violations.

4.7 Service improvement and user-experience analysis and optimization across Group channels.

4.8 Handling inquiries—enabling handling of current and future inquiries/complaints, internal training and monitoring, and improving inquiry-handling processes. In some cases, we are required to transfer details of your complaint, including Personal Information, to relevant authorities.

4.9 Business operations—audits, quality control, training, business analyses, accounting, product management, and management of Group services and products.

4.10 Marketing and advertising—including targeted/personalized advertising and direct marketing on Group platforms and on non-Group websites, regarding Group products/services and those of commercial partners. Additional information appears in Section 8.

4.11 Research and measurement—market segmentation, activity measurement, campaign planning, promotion, customer and satisfaction surveys; business risk management including arranging and maintaining insurance and reinsurance.

4.12 Compliance with law/regulation and public-interest activities—cooperation and disclosure to regulators, authorities (including law enforcement), court orders, and management of legal disputes, as required.

4.13 Fulfilling legal obligations.

4.14 Acquisition, sale, and transfer of Group business (in whole or in part).

4.15 Legitimate business interests and legal rights, and their protection.

4.16 Handling data-subject requests; archiving; ensuring accuracy; anonymization/aggregation; and deletion.

#### **5. With Whom We Share Personal Information**

In accordance with the processing purposes above, we may share Personal Information with Clal Group companies and with third parties in Israel or abroad (including countries such as the United States, where privacy laws may provide a lower level of protection than Israeli law), including:

5.1 Insurance agents, pension license holders, financial advisors, and business partners.

5.2 Employers—where legally required in connection with an employee's pension products and/or insurance for employees and family members provided on a group basis.

5.3 Other insurers, as part of providing products and services and subject to law.

5.4 Insurers and reinsurers outside Israel (directly or via insurance agents) providing reinsurance services.

5.5 Third parties providing services to you (including services arising from products purchased from the Group, such as vehicle service providers, medical service providers) or who are authorized by you or otherwise receive your consent.

5.6 Third parties providing services to us (or to third-party insurers relevant to your product/claim), including service providers, claims administrators, experts, and in special cases private investigators.

5.7 Legal advisors, appraisers, accountants, auditors, financial institutions, service providers on our or your behalf, or representatives of third-party claimants.

5.8 Research and measurement service providers used to develop products and measure marketing effectiveness.

5.9 Third parties supporting data accuracy (e.g., identifying deceased customers, updating changed contact details, credit-card companies for updated card data).

5.10 Law-enforcement and fraud-prevention entities; parties operating fraud-detection databases; parties assisting investigations of suspected fraud; enforcement of this policy or other policies/terms (including internal/external investigations).

5.11 Relevant regulators.

5.12 Authorities including law enforcement (e.g., Israel Police) and courts.

5.13 Credit bureaus, the pension clearinghouse, and entities entitled to receive information under the Financial Information Services Law, 5782-2021.

5.14 Service providers supporting IT systems and cybersecurity, security, underwriting, claims operations, credit-card clearing, and payments.

5.15 Medical experts for underwriting and claims handling.

5.16 Survey companies.

5.17 Marketing and direct-communication providers, including ad networks, social networks, and online platforms.

5.18 Subject to law, disclosures in the context of sale/transfer of business (in whole/part), including negotiations, reorganizations, mergers, joint ventures, and similar transactions—subject to lawful use restrictions.

5.19 Where required or permitted by law; pursuant to orders from courts, governmental or regulatory authorities, or other competent authorities.

5.20 Aggregated and anonymized information that does not reasonably enable identification.

## **6. Profiling, Advanced Analytics Tools, and Automated Decision-Making Using AI**

6.1 The Clal Group may use automated processes, including those based on artificial intelligence and machine learning, to make decisions. These processes will be based on information held by us in accordance with this Privacy Policy, and may be used for the following purposes:

6.1.1 Forecasting events for risk assessment (including the likelihood of an insured event or insurance claim), operations and pricing (including likelihood of purchase), product/service popularity and audiences, claims settlement, and fraud detection.

6.1.2 Determining insurance policy terms and other decisions at the quotation stage and throughout the policy lifecycle.

6.1.3 Better understanding customers and prospective customers, including what content/products/services may be useful or of interest.

6.1.4 Improving internal processes, including enhancing service to third parties.

6.1.5 Marketing, advertising, and direct marketing.

6.2 Use of these tools is conducted in accordance with law, including the Protection of Privacy Law.

6.3 Often, analytics/profiling will not be used to make direct individualized decisions about a specific customer, but rather by combining your Personal Information with information about additional customers and/or information received from third parties, to generate aggregated insights for the purposes above. Where feasible, we use aggregated and/or pseudonymized information.

## **7. Your Rights**

In accordance with the Protection of Privacy Law, you may request access to your Personal Information held in the Clal Group's databases. You may access your Personal Information at any time via your personal area on the website, using a code sent to the mobile phone number recorded in the Group's systems.

You may also contact the Group's customer service center and submit an access request by completing an online access request form (click the link to fill out the form), and receive the information after completing an appropriate identification process.

If your information is inaccurate or incomplete, you may request correction by completing an online correction request form (click the link to fill out the form). The Company will review your request and, where required, implement the necessary changes.

## 8. Direct Marketing

Information held by the Clal Group may be used for direct marketing (including creation of a marketing profile to tailor advertisements and other outreach based on personal profiling).

To stop such profiling, you may notify us at any time via the Company website at:

<https://www.clalbit.co.il/portfolio/changedetails> and remove yourself from the mailing list.

## 9. Marketing Messages

The Clal Group may send you marketing messages via email, SMS, and other instant messaging platforms, after receiving specific consent, which may be provided by you on various occasions through the Group's platforms or after you purchase a Group product or service.

If you do not wish to receive such marketing communications, you may notify us at any time via the Company website at:

<https://www.clalbit.co.il/portfolio/changedetails>

or through the method by which the message was sent, and remove yourself from the mailing list.

The Clal Group may send messages that it is required or permitted by law to send even without consent.

## 10. Cookies and Other Data Collection Tools

The Clal Group may use cookies and other technologies such as pixels and web beacons, Device IDs, Google Tag Manager, tags, and similar tools that collect information about you on the Group's website and applications (the "Platforms") (including when you browse without logging in as a customer), for the purpose of proper operation, measurement and monitoring of user activity, analytics, verification, personalization, product matching, personalized ads on the Group's website/apps or other websites, ease of use, and information security. For example, these tools may help measure the effectiveness of online marketing campaigns and support personalized marketing.

Cookies are text files (or code strings) created when accessing the Group's digital assets, subject to the use of the Platforms and to the extent your device settings permit, and they collect relevant information such as time spent on a site/page/screen, browsing patterns, and actions performed, including use of your IP address, domain name and access point, device location, login times, and other digital identifiers. Some cookies expire when the site/app is closed, while others may remain stored on your device. You may prevent the creation of cookies by changing your browser/device settings; however, disabling certain cookies may limit your ability to use certain services and features. As part of cookie use, we may receive information about your actions on the digital assets in addition to device-related information described in Section 3.3.

The Clal Group also uses third-party collection technologies, advertising platforms, and social networks such as Google, Facebook, YouTube, Taboola, AppsFlyer, Firebase, and analytics services (e.g., Google Analytics) and personalized advertising tools of platforms such as Google and Facebook. These platforms may also use cookies or similar collection methods to collect information from the Group's site/app and from other locations on the internet, for

their measurement and personalized advertising purposes, in accordance with their privacy policies or other applicable documents.

Advertising platforms and social networks may combine Personal Information they hold with Personal Information provided by us to create custom audiences—audiences we believe may be interested in our online advertising. These platforms may also create “lookalike audiences” of people with similar characteristics to those audiences, while they browse the internet and/or use social networks.

For additional information on cookies, please refer to:

<https://www.google.com/policies/privacy> ; [www.facebook.com/policies/cookies](https://www.facebook.com/policies/cookies) ;  
<https://www.taboola.com/policies/cookie-policy>

To opt out of these tools or similar tools, or to delete cookies accumulated on your device, you may do so manually through your browser/device settings, or by using free automated tools such as:

<http://www.aboutads.info/choices> or <https://youradchoices.com/control>

You may also manage Google-related preferences via:

<https://tools.google.com/dlpage/gaoptout> and <https://adssettings.google.com>

We also recommend reviewing Google's privacy policy at: [www.google.com/policies/privacy](https://www.google.com/policies/privacy)

## 11. Security Cameras

Closed-circuit security cameras are installed at Clal Group sites to protect the security of visitors and the sites themselves. Information recorded by security cameras is retained for the minimum period required to achieve the purposes described above, in accordance with the Clal Group's policy. Where necessary, you may contact the Group's Head of Security and Safety Department for additional information.

## 12. Data Protection Officer

The Clal Group's Data Protection Officer is Mr. Nir Rubin. You may contact him with questions regarding this Privacy Policy at: [privacy@clal-ins.co.il](mailto:privacy@clal-ins.co.il)

### Policy Update

Privacy Policy last updated: **03 August 2025**

[1] Clal Insurance Company Ltd., Clal Insurance Credit Ltd., Clal Pension & Provident Funds Ltd., Clalbit Systems Ltd., **KANAF Clal Finance Management Ltd.**