

STUDENT DORMITORIES PRIVACY POLICY

[Last Modified: March , 2025]

This Privacy Policy (“**Privacy Policy**”) governs the processing and transfer of personal data collected or processed by Shikun & Binui Group, including Shikun & Binui Ltd., Shikun & Binui Real Estate Ltd. and Solel Boneh Ltd. (collectively, “**Company**”, “**Shikun & Binui Group**”, “**we**”, “**us**” or “**our**”), through its websites used for the operation of student dormitories, including, among others, Einstein Dormitories and Broshim Dormitories (the “**website**” and “**Dormitories**”) for students of each applicable university or academy institution (the “**University**”). This Privacy Policy is an integral part of the website Terms of Use and/or any other agreement or consent between you and the Company.

This Privacy Policy details how the Company collects and uses Personal Data of Dormitory residents (the “**Users**”, “**Residents**”, “**you**,” or “**your**”) who access the website and/or use the services provided by the Company (the “**Services**”), including submitting service requests via the resident support system available on the website (the “**Resident Support System**”).

The collection and processing of Personal Data are conducted in accordance with the provisions of the relevant privacy regulation, including the Israeli Privacy Protection Law, 1981 (“**IPPL**”) as further detailed below.

Subject to applicable law, the information collected under this Privacy Policy may be shared with other Companies within the Shikun & Binui Group as necessary for their operations and the provision of Services. Additionally, the information may be transferred to the Dormitories' operating company for the purpose of providing services to the Residents.

Please be aware that the website may contain links to third-party websites and services that are not governed by this Privacy Policy. We recommend reviewing their privacy policies before providing any Personal Data.

Your privacy is important to us. Please read this Privacy Policy carefully and ensure that you accept its terms. **If you do not agree to this Privacy Policy, you are not permitted to use the website and/or the Services for any purpose.**

1. **GENERAL:**

You are not required by law to provide us with any Personal Data. However, please note that some of our Services and other website's features require the processing of certain Personal Data and without such data we may not be able to provide you with all or part of such Services.

Our website is intended for users aged 18 and above. Minors under this age are not permitted to use the website. If you are under 18 and/or lack legal capacity, you must not use the website or provide us with any information.

Our business activities do not involve the sale of user information to third parties. We share Personal Data with third parties only as part of providing services to our users or under the limited circumstances detailed below.

2. **DATA SETS WE COLLECT AND FOR WHAT PURPOSE:**

Below you can find information regarding the purposes for which we process your Personal Data as well as our lawful basis for processing, the definition of “personal” and “non-personal” data, and how it is technically processed.

Non-Personal Data

During your interaction with the website, we may collect aggregated, non-personal non-identifiable information (“**Non-Personal Data**”). We are not aware of the identity of the user from which the Non-Personal Data is collected. We collect Non-Personal Data regarding your use of the website, such as the scope, frequency, latency, pages accessed and viewed, time and date stamp, interactions with content and materials displayed through our website, language preference, and other technical information regarding the device used to access the website, for example type of device, type of browser, operating system, IP address, etc.

We may sometimes process and anonymize or aggregate Personal Data and identifiable information in a manner that shall create a new set of data that will be Non-Personal Data. Such a new data set can no longer be associated with any identified natural person. Non-Personal Data may be used by us without limitation and for any purpose.

If we combine Personal Data with Non-Personal Data, the combined information will be treated as Personal Data or for as long as it remains combined.

Personal Data

We may also collect from you, directly or indirectly, during your access or interaction with the website and Services, individually identifiable information, namely information that identifies an individual or may, with reasonable effort, be used to identify an individual (“**Personal Data**”). The types of Personal Data that we collect as well as the purpose for processing and the lawfulness are specified in the table below.

The table below details the processing of Personal Data, the purpose, lawful basis, and processing operations:

DATA SET	PURPOSE AND OPERATIONS
<p><u>Contact Information:</u></p> <p>If you voluntarily contact us, e.g., through a “contact us” form in our website, you may be required to provide us with certain Personal Data such as your name, email address, and any additional information you decide to share with us.</p> <p>Additionally, you may choose to provide our customer support representatives with additional information at your discretion.</p>	<p>We will use this information to respond to your inquiry and provide you with the requested details.</p>
<p><u>Newsletter, promotional materials, and Direct Mailing:</u></p> <p>In the event you sign up to receive our newsletter or other promotional materials or direct mailing from the Company and the entire Shikun & Binui Group, you will be requested to provide your contact details, such as email address.</p> <p>Additionally, subject to applicable law, promotional materials may be sent to existing users and/or users</p>	<p>We will use the information you provide to include you in our mailing list and send you the materials you have signed up to receive. Additionally, we may collect and document information about your interaction with our promotional materials.</p> <p>If you wish to unsubscribe from our marketing mailing list, you may do so by contacting us directly at info@shikunbinui.com and/or through the opt-out</p>

<p>who have engaged the Company regarding its services.</p>	<p>options provided by the Company (for example, an “unsubscribe” link included in marketing emails).</p> <p>Please note that even if you request to be removed from our marketing mailing lists, we may still send you operational and other non-marketing messages.</p>
<p><u>Online Identifiers:</u></p> <p>When you interact with the website and Services, we may collect online identifiers such as your Internet Protocol (IP) address and other technical identifiers, as detailed above. This data may be collected directly by us or through service providers acting on our behalf.</p>	<p>We use online identifiers to operate and manage the website, analyze trends and traffic patterns, segment and improve the website, its content, and user experience. Additionally, we may use this data for website security purposes, including detecting and preventing viruses, unauthorized uses of the website, fraud, or any other violations of the Terms or applicable law.</p>
<p><u>Surveillance Footage from Dormitory Security Cameras</u></p> <p>The footage will be collected and stored in designated systems accessible only to relevant personnel within the Company and/or the University.</p>	<p>The purpose of using the footage is to ensure dormitory security, protect the safety of the Residents, provide information to the Israel Police upon request and in accordance with applicable law, and safeguard the legitimate and legal interests of the Company and/or the University.</p>
<p><u>Information Collected During Dormitory Resident Registration</u></p> <p>Residents whose eligibility for the dormitories and has been approved by the University will be required, as part of the registration process, to provide the Company with the following information: full name, ID number, faculty affiliation, details of the higher education institution, degree type, permanent address, landline phone number, mobile phone number, work phone number, email address, parents' names and their phone numbers, as well as their precise dormitory address. Additionally, as part of the security deposit payment and the establishment of a standing order, Residents will be required to provide their bank account details.</p> <p>The registration process for the dormitories is not necessarily conducted via the website, however, certain parts of the registration process and/or the creation of a Resident profile on the website and/or any additional collection of information about the Resident may be carried out through the website. Furthermore, the website is used to display and manage Resident information collected from various sources, including registration forms and similar sources.</p>	<p>The Company will use this information for the purpose of providing the Resident with a dormitory apartment as outlined in the agreement, for monitoring and security purposes, for notifications in case of emergency, and for collecting payments from the Resident.</p>

<p><u>Information Collected When Using the Resident Support System</u></p> <p>The website includes a Resident Support System, which allows Residents to submit various service requests related to maintenance and administration. When submitting a request through the Resident Support System, Residents will be required to provide their full name, phone number, and precise dormitory location (building, floor, and apartment), as well as the type of request, which may include: maintenance issues, administrative inquiries, departure requests, accommodation-related requests, and visitor-related requests.</p> <p>Additionally, Residents may include details about their request, upload images and documents, and opt to receive notifications via SMS.</p>	<p>The Company will use the information collected through the Resident Support System to process and respond to service requests in accordance with the Resident's inquiry.</p>
--	---

3. **HOW WE COLLECT YOUR INFORMATION:**

Depending on the nature of your interaction with us, we may collect the above detailed information from you, as follows:

- **Automatically** – we may use cookies (as elaborated in the section below) or similar tracking technologies (such as pixels, tags, agent, etc.) to gather some information automatically.
- **Provided by you or about you voluntarily** – we will collect information if and when you choose to provide us with the information, such as contact us form or registering for the Dormitories.
- **Provided from third parties** – where permitted under applicable law and provided with your consent for cookie usage, we may enrich the Personal Data collected about you with data provided by third parties.

4. **COOKIES:**

When you access or use the website, we use “cookies” or similar tracking technologies, which store certain information on your device (i.e., locally stored). The use of cookies is a standard industry-wide practice. A “cookie” is a small piece of information that a website assigns and stores on your computer while you are viewing a website. Cookies are used by us for various purposes, including allowing you to navigate between pages efficiently, as well as for statistical purposes, analytic purposes and advertising.

There are several types of cookies, including without limitation:

- ***Essential, Functionality, Operation & Security Cookies.*** These cookies are essential for enabling visitor movement around the website, for the website to function properly, and for security purposes (i.e., used to authenticate visitors, prevent fraudulent use, and protect visitor data from unauthorized parties). This category of cookies either cannot be disabled, or if disabled, certain features of the website may not work.
- ***Analytic, Measurement & Performance Cookies.*** These cookies are used to collect information about how visitors use our website, in order to improve our website, content, and the way we offer them, as well as assess the performance of the content and marketing campaigns. These cookies enable us, for example, to assess the number of visitors who have viewed a certain

page as well as their country of origin. It enables our website to remember information that changes the way it behaves or looks, such as your preferred language.

- **Preference, Targeting & Advertising Cookies.** These cookies are used to advertise across the internet and to display relevant ads tailored to visitors based on the parts of the website they have visited (e.g., the cookie will indicate you have visited a certain webpage and will show you ads relating to that webpage).

The Company may also use third-party tracking tools provided by service providers.

You can stop the collection of data through cookies (except for cookies necessary for website operation and security) by adjusting your browser settings. Note that blocking or deleting cookies may limit access to some website features or affect your browsing experience.

For more information, you may refer to:

Browser Type	Disabling Data Collection via Cookies
Chrome	https://support.google.com/chrome/answer/95647?hl=en;
Firefox	https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences;
Opera	https://help.opera.com/en/latest/security-and-privacy/;
Internet Explorer	https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies;
Safari	https://support.apple.com/en-il/guide/safari/manage-cookies-and-website-data-sfri11471/mac;
Edge	https://support.microsoft.com/en-us/help/4027947/windows-delete-cookies

5. **DATA SHARING:**

We share your data with third parties, including our partners or service providers that help us operate and make the most of the website. You can find here information about the categories of such third-party recipients.

Categories of Recipients	Additional Information
Shikun & Binui Group	We may share Personal Data with Companies within the Shikun & Binui Group and transfer information between them as required for their operations and the provision of Services.
Dormitories' Operating Company	We may share Personal Data with the Dormitories' operating company for the purpose of providing services to the Residents.
The University	<p>We may disclose certain Personal Data to the University, as the entity that owns the Dormitories and operates them under its authorization. The disclosed information may include data collected about the Resident, including any inquiries made to the Company, any complaints and/or requests, as well as periodic and/or specific reports regarding the Resident and their stay in the Dormitories, etc.</p> <p>Additionally, images of the Dormitories' common areas may be accessible to the University and its representatives, and in certain cases, to security authorities such as the Israel Police, in accordance with their instructions and applicable law.</p>

Categories of Recipients	Additional Information
Our Service Providers	<p>We share your Personal Data with our trusted service providers and business partners that perform business operations for us on our behalf (as data processors) and pursuant to our instructions. This includes, without limitation, the following categories of service providers:</p> <ul style="list-style-type: none"> ● Advertising and marketing service providers, who help us with advertising measurements, email marketing, etc.; ● Data storage providers, with whom we entrust the hosting and storage of our data; ● General IT and SaaS providers – providing us with IT systems for the management of our daily conduct; ● Data analytics and data management providers, who help us improve, personalize and enhance our operation. ● Data security partners, who help us detect and prevent potentially illegal acts, violations of our policies, fraud and/or data security breaches and ensure compliance with legal obligations.
Legal and Law Enforcement	<p>We may disclose certain Personal Data to law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other visitor to legal liability, and solely to the extent necessary to comply with such purpose. Additionally, we may disclose Personal Data if required by law, regulation, legal process, or court order, or if we believe in good faith that such disclosure is necessary to prevent fraud, security threats, physical harm, or other violations of the law. In the event of a legal dispute between you and the Company, or if necessary to protect our rights, interests, or enforce our Terms, we may disclose Personal Data as required for the resolution of the dispute.</p>
Corporate Transactions	<p>In the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation, or asset sale) we will share the Personal Data we store with our acquiring Company.</p> <p>In any such case, we will oblige the acquiring Company to assume the rights and obligations as described in our Privacy Policy.</p>

When we share information with service providers, we ensure they only have access to such information that is strictly necessary for us to operate the website. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only while ensuring compliance with all applicable data protection regulations (however, such service providers may use certain data for their own benefit subject to separate terms agreed upon with you or per your consent, as well as in the case of using merely non-personal data).

6. **DATA RETENTION:**

In general, we retain the Personal Data we collect for as long as it remains necessary for the purposes set forth above, all under the applicable regulation.

The circumstances in which we will retain your Personal Information include: (i) where we are required to do so in accordance with legal requirements, or (ii) for us to have an accurate record of your interaction with us in the event of any inquiries or contact requests, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data. Please note that except as required by applicable law, we will not be obligated to retain your data for a particular period, and we may delete it for any reason and at any time, without providing you with prior notice of our intention to do so. Statistical, aggregative and non-Personal data may be retained and used by us without any limitation, even if derived from Personal Data.

7. SECURITY MEASURES:

We take great care in implementing physical, technical, and administrative security measures for the website and Services, that we believe comply with applicable regulation and industry standards to prevent your information from being accessed without the proper authorization, improperly used or disclosed, unlawfully destructed, or accidentally lost.

If you feel that your privacy was not dealt with properly or was dealt with in a way that was in breach of our Privacy Policy or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data, please contact us at our email.

Please note that these systems and procedures do not provide absolute security, and we do not guarantee that our systems will be completely immune to unauthorized access to the information stored within them.

8. DATA TRANSFER:

We may store or process your Personal Data both in Israel and in other countries worldwide. By accessing the website, you acknowledge that your information may be transferred, stored, and processed on our servers outside of Israel. Any such transfer will be carried out in accordance with applicable law.

9. YOUR RIGHTS:

You have the right to review the Personal Data we hold about you by submitting a written request to info@shikunbinui.com. If you identify any inaccuracies or outdated information, you may request its correction or deletion.

Furthermore, if we process your Personal Data for direct mailing purposes based on your classification within a specific demographic group, as defined under the IPPL, you have the right to request in writing that such information be deleted from our databases.

Please note that we may retain certain information necessary for the management of our business operations, including records of commercial and other transactions you have conducted in connection with our business activities, as permitted or required by applicable law. However, such information will no longer be used for direct mailing purposes.

When submitting a request for access, correction, or deletion of your Personal Data, we may require you to provide certain identifying details to verify your identity before processing your request.

10. DIRECT MAILING:

As detailed above, subject to applicable law and obtaining your consent where required, the Company may send you marketing messages and communications from time to time.

If you no longer wish to receive such communications, you may withdraw your consent at any time by using the unsubscribe link included in the communication or by sending an email to info@shikunbinui.com.

Please note that even if you request to be removed from our marketing mailing lists, we may still send you operational and other non-marketing messages.

11. GOVERNING LAW:

This Privacy Policy shall be exclusively governed by, interpreted and construed in accordance with the laws of the State of Israel. The competent court in Tel Aviv, Israel shall have sole and exclusive jurisdiction regarding any dispute or claim arising out of or in connection with this Agreement.

12. PRIVACY POLICY AMENDMENTS:

We reserve the right to amend this Privacy Policy from time to time, at our sole discretion. The most recent version of the Privacy Policy will always be posted on the website. The updated date of the Privacy Policy will be reflected in the “Last Modified” heading. Any amendments to the Privacy Policy will become effective immediately, unless we notify you otherwise. If we materially change the way in which we process your previously collected Personal Data, we will provide you with prior notice, or where legally required, request your consent prior to implementing such changes. **We strongly encourage you to review this Privacy Policy periodically to ensure that you understand our most updated privacy practices.**

13. CONTACT US:

If you have any questions regarding this Privacy Policy or our data practices, you are welcome to contact us at: info@shikunbinui.com.