



Privacy Policy

Effective Date: December 15, 2025

Last Updated: December 15, 2025

1. Introduction

This Privacy Policy describes how we collect, use, disclose, and otherwise process personal information in connection with our website, products, and services (collectively, the "Service"). This policy applies to all visitors, users, and other individuals who access our Service.

We are committed to protecting your privacy and ensuring you have a positive experience on our website and when using our services. This Privacy Policy explains our data collection practices, your privacy rights, and how to contact us with questions.

2. Applicability

This Privacy Policy applies to:

- All personal information we collect from California residents
- Both online and offline data collection practices
- All third parties who process personal information on our behalf

2.1. Applicable Law and Jurisdiction

This Privacy Policy, and any dispute or claim relating to it (including its validity, interpretation, performance or non-performance) shall be governed exclusively by the laws of the State of Israel. Any action arising out of or relating to this Privacy Policy shall be brought only in the competent courts of Israel, and you irrevocably submit to the exclusive jurisdiction of those courts.

3. Personal Information We Collect

We may collect the following categories of personal information from California residents:

3.1. Information You Provide Directly

- **Contact Information:** Dr. Noga Gulst, noga@nogago.co.il 15/5 Bnei Binyamin St. Natanya, Israel, +972-54-4224382
- **Professional Information:** Owner, Noga Business Consultant, MEI, PhD

3.2. Information Collected Automatically

- **Device Information:** Device type, operating system, browser type, IP address, device identifiers

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- **Usage Information:** Pages visited, time spent on pages, links clicked, referring URL
- **Cookies and Tracking Technologies:** Data collected through cookies, pixels, web beacons, and similar technologies
- **Location Information:** General geographic location based on IP address (we do not collect precise geolocation without explicit consent)
- **Online Activity:** Interaction with our website and services

3.3. Information from Third Parties

- **Service Providers:** Information from analytics providers, hosting providers, and payment processors
- **Business Partners:** Information from referral sources and marketing partners
- **Publicly Available Sources:** Information from public databases and social media (where applicable)

3.4. Sensitive Personal Information

We do NOT intentionally collect the following sensitive personal information, but if inadvertently provided, we handle it with appropriate safeguards:

- Social Security numbers or other government identifiers
- Financial account information or credit card numbers (processed securely by third-party payment processors)
- Precise geolocation data (unless explicitly authorized)
- Genetic, biometric, or health information
- Information revealing racial or ethnic origin, religious beliefs, or union membership

4. Purposes for Data Collection

We collect and use personal information for the following purposes:

- **Providing Services:** Delivering products and services you request
- **Account Management:** Creating and maintaining your user account
- **Communication:** Responding to inquiries, sending service updates, and providing customer support
- **Marketing and Advertising:** Sending promotional materials, newsletters, and targeted advertisements (with your consent where required)
- **Analytics and Improvement:** Understanding how users interact with our Service to improve functionality and user experience
- **Legal Compliance:** Fulfilling legal obligations and protecting our legal rights
- **Fraud Prevention:** Detecting, preventing, and addressing fraudulent activity and security breaches

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- **Recruitment:** Processing employment applications (if applicable)
- **Aggregated Analytics:** Creating anonymized and aggregated data for research and statistical purposes
- **Business Operations:** General business administration, accounting, and recordkeeping

5. Data Retention

We retain personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required by law. Retention periods vary depending on the context of the processing and our legal obligations.

Specific retention practices:

- Contact information is retained for the duration of your relationship with us plus a reasonable period for legal claims
- Transactional data is retained for accounting and tax purposes (typically 7 years)
- Cookies and tracking data are retained according to the cookie policy specifications
- Marketing data is retained until you opt out
- Account information is deleted upon request or within 45 days of account termination (unless retention is legally required)

6. Sharing of Personal Information

We may share personal information with the following categories of recipients:

6.1. Service Providers

We share information with third-party service providers who perform services on our behalf, including:

- Hosting and cloud computing providers
- Payment processors and financial institutions
- Email marketing service providers
- Analytics and tracking tool providers
- Customer relationship management (CRM) platforms
- Legal, accounting, and consulting professionals



6.2. Business Partners

We may share information with business partners for joint marketing initiatives or service delivery (only with your consent where required by law).

6.3. Law Enforcement and Legal Obligations

We may disclose personal information when required by law, court order, or to protect our legal rights, including:

- Responding to valid legal process (subpoena, warrant, court order)
- Enforcing our terms of service and other agreements
- Protecting the safety, rights, and property of our company, users, or the public
- Detecting, preventing, or addressing fraud, security, or technical issues

6.4. Business Transfers

If our business is acquired, merged, or undergoes a change of control, personal information may be transferred as part of that transaction. We will provide notice before such a transfer occurs.

6.5. Aggregated and De-identified Data

We may share aggregated, anonymized, and de-identified data that cannot reasonably be linked to you without restriction.

6.6. Data Not Sold or Shared for Advertising

We do NOT sell or share your personal information for advertising purposes. We do not exchange personal information for monetary consideration.

7. Your California Consumer Privacy Rights

Under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), California residents have the following rights regarding their personal information:

7.1. Right to Know

You have the right to request that we disclose:

- The specific personal information we have collected about you
- The categories of personal information collected
- The sources of the information
- The purposes for collecting the information.
- The categories of third parties with whom we share the information

How to submit a request: Complete the request form on our website, email [contact email], or call [phone number].

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7.2. Right to Delete

You have the right to request deletion of personal information we have collected from you, with certain exceptions. We will delete the requested information within 45 days of verification.

Exceptions to deletion: We may retain information if necessary to:

- Complete the transaction for which information was collected
- Provide goods or services you requested
- Detect and prevent fraud or security incidents
- Comply with legal obligations
- Enable internal uses compatible with your reasonable expectations

7.3. Right to Correct

You have the right to request that we correct inaccurate personal information, considering the nature of the information and the purposes of processing.

How to submit a correction request: Contact us using the information in Section 10 below.

7.4. Right to Opt Out of Sale or Sharing

We do not sell your personal information. However, certain data sharing practices may constitute "sharing" under California law. You may request to opt out of such sharing by:

- Clicking the "Do Not Sell or Share My Personal Information" link on our website homepage
- Submitting a request through our contact us form
- Emailing noga@nogago.co.il
- Calling +972-54-4224382

We will honor opt-out requests within 45 days.

7.5. Right to Limit Use of Sensitive Personal Information

If we collect sensitive personal information, you have the right to limit our use of that information to purposes necessary to provide the Services or as otherwise permitted by law.

How to submit: Use the request methods listed in Section 7.1 above.

7.6. Right to Non-Discrimination

We will not discriminate against you for exercising your privacy rights. Specifically, we will not:

- Deny goods or services
- Charge different prices or rates
- Provide different quality of service

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- Suggest that you receive different treatment

8. Automated Decision-Making Technology (ADMT)

We do not use automated decision-making technology that has a material impact on you.

9. Children's Privacy

Our Service is not directed to children under the age of 13, and we do not knowingly collect personal information from children under 13. If we become aware that we have collected personal information from a child under 13, we will delete such information promptly.

For children between 13 and 17 (minor California residents), we provide additional privacy protections, including enhanced opt-out capabilities for any "sale" or "sharing" of their personal information.

10. Cookies and Tracking Technologies

We use cookies, pixels, web beacons, and similar tracking technologies to:

- Remember your preferences
- Track your usage patterns
- Deliver personalized content
- Prevent fraud.
- Conduct analytics

10.1. Types of Cookies

- **Essential Cookies:** Required for website functionality
- **Analytics Cookies:** Help us understand website usage
- **Marketing Cookies:** Used for targeted advertising and marketing purposes
- **Third-Party Cookies:** Placed by third-party service providers

10.2. Do Not Track Signals

Some browsers include a "Do Not Track" feature. Currently, there is no industry standard for recognizing Do Not Track signals. We do not respond to Do Not Track browser signals, but we provide multiple ways for users to opt out of tracking and marketing communications as described in this Privacy Policy.



10.3. Managing Cookies

You may control cookie preferences through:

- Browser settings
- Cookie preference center on our website
- Opting out of specific tracking technologies through the opt-out mechanisms described herein

11. Third-Party Links and Services

Our website may contain links to third-party websites and services that are not operated by us. This Privacy Policy does not apply to third-party websites, and we are not responsible for their privacy practices. We encourage you to review the privacy policies of any third-party websites before providing personal information.

Our Services may include links to or integration with third-party services, websites or applications. This Privacy Policy does not govern the privacy practices of third parties. We are not responsible for the content, privacy practices or policies of any third-party site or service.

12. International Data Transfers

If we transfer personal information internationally, we ensure that appropriate safeguards are in place, including:

- Standard contractual clauses
- Privacy Shield certifications (where applicable)
- Your explicit consent

13. Amendments to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. We will notify you of material changes by updating the "Last Updated" date at the top of this policy and, if required by law, by providing additional notice.

Your continued use of our Service following the posting of revised Privacy Policy means you accept the changes.

13.1. Limitation and Liability

To the fullest extent permitted by law, we disclaim any liability for indirect, incidental, special or consequential damage arising from or relating to the use of the Services or reliance on this Privacy Policy.



13.2. Severability

If any provision of this Privacy Policy is held invalid, illegal, or unenforceable under applicable law, the remaining provisions shall continue in full force and effect. The invalid provision shall be interpreted or replaced as closely as possible to reflect the original intent of the parties under the applicable law.

14. Compliance with Local and International Norms

While we may draw on practices common in international privacy policies (including but not limited to Policies designed for compliance with jurisdictions such as California, U.S.), our practice is intended to comply with applicable Israeli privacy and data-protection law, including, where applicable, the Israeli Privacy Protection Act (1981-תשל"א-חוק הגנת הפרטיות or any successor legislation, including but not limited to, Israeli Ordinances), and any other local relevant regulatory requirements.

15. Contact Us

If you have questions about this Privacy Policy or wish to exercise your privacy rights, please contact us:

By Email: noga@nogago.co.il

By Mail:

Noga Business Consultant
15q5 Bnei Binyamin St.
Netanya, 4201968
Israel

By Phone: +972-54-4224382

Response Time: We will respond to verifiable consumer requests within 45 days of receipt. If we require additional time, we will notify you and explain the reason for the delay.

15.1. Verification Process

To protect your privacy, we will verify your identity before processing your request. Verification may include:

- Requesting information that matches information we have on file
- Requesting a signed declaration under penalty of perjury
- Using third-party verification services

You may authorize another person (an authorized agent) to make requests on your behalf. We will require proof of authorization.

16. Accessibility

This Privacy Policy is available in English. If you require this Privacy Policy in an alternative format or language, please contact us using the information in Section 15 above.

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End of Privacy Policy

This Privacy Policy is current as of December 1, 2025, and complies with the California Consumer Privacy Act (CCPA), California Privacy Rights Act (CPRA), California Online Privacy Act (CalOPPA), and other applicable California privacy laws.

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