

Privacy Policy

Last Revised: November August 1, 2025

Belongtail Ltd. (“**Belongtail**”, “**Company**” “**we**” or “**us**”) respect the privacy of the users of our website at: <https://www.smartclinica.com/> (the “**Site**”), our social network (the “**Network**”), and our mobile application (the “**App**” and together with the Network and the Site – the “**Service**”), and are committed to protect the personal information that users share with us in connection with the use of the Service.

This Privacy Policy (the “**Privacy Policy**”) is intended to describe our practices regarding the information we may collect from you (the “**User**” or “**You**”) when you use the Service (or any part thereof), the manners in which we may use such information, and the options and rights available to you and allowing you to access and participate in the applicable Professional User’s dedicated generated chat (the “**Chat**”) customized, managed and operated by the applicable **Professional User**. Each Chat is managed by its own operators, which have entered into an agreement with Belongtail (“**Operator**”). Please note that each Network may each have its own respective terms of service and privacy policy which will govern your use of the particular Chat.

Please read this Privacy Policy carefully before accessing and using the Service. Your use of the Service is also subject to the App’s Terms available at and is incorporated herein by reference. Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Service available at <https://www.smartclinica.com/terms-of-service-eng> (the “**TOS**”), which this Privacy Policy is incorporated thereto by reference.

The Data Controller is Belongtail Ltd., Belongtail is an Israeli company which located in Bnei Atarot, Israel.

1. Legal Basis for collection and Use of Personal Information

We collect, process and use your information for the purposes described in this Privacy Policy, based at least on one of the following legal grounds:

- **With your consent:** We ask for your agreement to process your information for specific purposes and you have the right to withdraw your consent at any time. For example, we ask for your consent to provide you with personalized content and ads through the use of cookies;
- **When Performing this Agreement:** We collect and process your Personal Information and Healthcare Sensitive Information in order to provide you with the Service, following your acceptance of this Privacy Policy; to maintain and improve our Services; to develop new services and features for our Users; and to personalize the Services in order for you to get a better user experience. We will also allow the applicable Professional User related to each User to access and view the Personal Information, Non-personal Information and Healthcare Sensitive Information, and in some instances, update it.
- **Legitimate interests:** We process your information for our legitimate interests while applying appropriate safeguards that protect your privacy. This means that we process your information for things like detecting, preventing, or otherwise addressing fraud, abuse, security, usability, functionality or technical issues with our services, protecting against harm to the rights, property or safety of our properties, or our users, or the public as required or permitted by law; Enforcing legal claims, including investigation of potential violations of this Privacy Policy; in order to comply and/or fulfil our obligation under applicable laws, regulation, guidelines, industry standards and contractual requirements, legal process, subpoena or governmental request, as well as our TOS.
- The Patient agrees that the information will be shared with the Physician and/or Clinic they have selected, as well as with other relevant parties approved by the Patient, for the purpose of providing the Service.

IMPORTANT:

PLEASE NOTE: YOU ARE NOT OBLIGATED TO PROVIDE US WITH ANY PERSONAL OR HEALTHCARE SENSITIVE INFORMATION. HOWEVER, IF YOU CHOOSE NOT TO PROVIDE US WITH THE REQUIRED INFORMATION, WE MAY NOT BE ABLE TO PROVIDE YOU WITH THE SERVICES. YOU HEREBY ACKNOWLEDGE AND AGREE THAT YOU ARE PROVIDING US WITH SUCH INFORMATION AT YOUR OWN FREE WILL, FOR THE PURPOSES DESCRIBED IN SECTION 4 BELOW, AND THAT WE MAY RETAIN SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND ANY APPLICABLE LAWS AND REGULATIONS.

COMPANY IS NOT RESPONSIBLE FOR THE USE THAT THE PATIENT, PHYSICIAN, CLINIC, OR ANY OTHER PARTY MAY MAKE OF THE INFORMATION UPLOADED, ONCE THE INFORMATION HAS BEEN TRANSFERRED TO THEM THROUGH THE SYSTEM. THE RESPONSIBILITY FOR MAINTAINING THE CONFIDENTIALITY OF THE INFORMATION AND ITS USE RESTS ENTIRELY WITH THE RECIPIENT OF THE INFORMATION.

2. Which information we may collect on our Users?

We may collect three types of data and information from our Users:

- (i) Personal Information**, which is individually identifiable information, that identifies an individual or may with reasonable effort identify an individual, either alone or in combination with other information, or may be of private or sensitive nature (“**Personal Information**”);
- (ii) Non-personal Information**, which is non-identifying and non-identifiable information, without particular reference to the identity of the User from which such information was collected (“**Non-personal Information**”); and
- (iii) Healthcare Information**, is any medical information, including diagnosis, treatment, prescription, device, therapy, test, result, counseling, laboratory and any other information related to services or supplies related to your health. Provision of healthcare information is purely voluntary and is not needed for the use of this Services (“**Healthcare Sensitive Information**” and together with Personal Information and Non-personal Information, the “**Information**”).

For the avoidance of doubt, any Non-personal Information and/or Healthcare Sensitive Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

Information which is being gathered in connection with the Service may consist of the following:

- If a User is invited to the Service by the Operator or anyone else on its behalf (via the App or Site), then we may receive certain information, including Personal Information and/or Healthcare Information, from the Operator.
- If a User registers to the Service (via the App or Site), such User will be required to select a relevant disease and disease subtype, phone number and add a nickname. Thereafter, User may voluntarily provide but is under no obligation to provide, additional information (such as: gender, date of birth, picture, e-mail address, and other details about medical status, including additional Information).
- Moreover, in order to use the Service, the User may voluntarily provide additional Personal Information, such as the User’s address, geo-location, family member names who are also Users, User’s mobile phone address book and contacts (to share the App and invite User’s friends to the Network), information collected from other Users regarding their Personal Information, Non-personal Information and Healthcare Sensitive Information through using the Service (or parts thereof including via the chat, comments, posts, or sharing of

such), and other information which User may voluntarily provide while registering to and using the Service or while logged-in to his/her Account.

- You may also choose to provide Healthcare Sensitive Information such as blood and other test results, biopsy results, Radiology images, therapist summaries, medical history, medical institutions visited, doctor appointments, specific diets you are on, medications and other supplements and vitamins you consume, etc., and/or other Healthcare Sensitive Information as part of your use of the Services and the information shared in the applicable Chat.
- As the User enters and/or uses the Service, he/she may automatically provide us with his/her IP address or other persistent user and/or mobile device token, advertising ID (if applicable to user who is watching or otherwise disclosed to a campaign, advertising content etc). (as applicable), which is used mainly for enhancing the User's experience and for geolocation, personalization and security purposes, as further detailed below.
- The User of the Service may also automatically provide us with certain technical Non-personal Information and aggregated usage information, such as the User's device type, operating system, browser type and version, screen resolution, browser and keyboard language, the User's 'click-stream' and activities on the Service, the period of time the User visited the Service and related time stamps, etc.

Please note that to use the Service, you must at least provide such information that is clearly marked as "Required" (such as: user type, phone number, nickname, etc.), while any other information may be withheld or provided by you voluntarily and at your discretion, however it may help us improve the accuracy and reliability of our Service, and your overall experience from using the Service. Specific services, such as Paid Services, may require additional Personal Information fields to enable the operation and/or the provision of such Services to You, and if you elect to provide such additional Personal Information you may be prevented from consuming or receiving such services; You hereby agree and acknowledge that any Personal Information or Healthcare Sensitive Information is provided at your own free will and pursuant to these privacy practices.

We will not collect any Personal Information and Healthcare Sensitive Information, from you or related to you without your approval, which is obtained, inter alia, through your active acceptance of the TOS and this Privacy Policy and your active interaction with the Services.

3. How do we collect Information on our Users?

We use the following methods of collection:

- a. We collect Non-personal Information through your use of the Service.** In other words, we may be aware of your use of the Service, and may gather, collect and record the information relating to such usage, either independently or through the help of third-party services as detailed below. We may also collect Non-personal Information through the processing, analysis and anonymization of Personal Information and/or Healthcare Sensitive Information provided by you.

We collect Personal Information and Healthcare Sensitive Information which you provide us voluntarily.

For example, we collect Personal Information in the course of your use of the Service, including when you register and open an Account on the Network or the Site or the App by completing the registration form, when you provide us additional information during your use of the Service (e.g., when you interact with our AI Smart Clinic Service or AI Health Mentor Service or when you subscribe to our Paid Services under our Paid Services Terms available <https://www.smartclinicai.com/paid-service-terms-eng> or when you contact us directly.

We store the Non-personal Information and Personal Information and Healthcare Sensitive Information either independently or with the help of our authorized third-party service providers as detailed below.

4. What are the Purposes of the Collection of Information?

We collect the above mention information, using advanced techniques (including via our AI Health Mentor Service and AI Smart Clinic Service), in order to provide and operate the Service, to operate and conduct payments to our Paid Services which you elected to subscribe to, and to give our Users information to use as applicable to the specific Belongtail features they use; to study the Information, to direct and advise the applicable and relevant Professional User for personalized services and information in order to manage their clinic in more efficient way. i.e., we will share each User's Information with its relevant Professional User (who is his/her healthcare provider), to allow them manage, control and optimize the provision of the Services and the Professional User's services to the User; to use on an aggregated, statistical basis to discover patterns and anomalies; to enable us to further develop, customize and improve the Service based on Users' common preferences, uses, attributes and anonymized data; to enable us to provide our Users with a better user experience, with more relevant and accurate information, services, third party services, features and functionalities, statistical and research purposes, and to deliver advertising and other commercial or sponsored content from Belongtail's authorized partners which may be valuable to our Users, etc. Please note that the Operator may also collect information from you separately and according to their needs as a healthcare provider.

We may share aggregated data (such as statistics about common metastasizes) and anonymized User's Information with third parties for research purposes or providing the Services and to discover patterns and anomalies regarding such things as complications and treatment issues or to help to develop better treatments and potentially manage complications or for other purposes. If required by any applicable laws, FDA regulations or other obligations, we may share information about adverse events or product problems provided voluntarily by Users. We will not share any identifying information regarding any particular User without such User prior consent.

5. Where Do We Store Personal Information?

Information regarding the Users will be maintained, processed and stored by Belongtail and our authorized affiliates and service providers in the USA and in Israel, and as necessary, in secured cloud storage, provided by our third party service provider.

While the data protection laws in the above jurisdictions may be different than the laws of your residence or location, please know that Belongtail, its affiliates and service providers that store or process your Personal Information and Healthcare Sensitive Information on Belongtail's behalf are each committed to keep it protected and secured, pursuant to this Privacy Policy and industry standards, regardless of any lesser legal requirements that may apply in their jurisdiction.

You hereby accept the place of storage and the transfer of information as described above.

For more information regarding this compliance, you can visit the following links:

- <https://aws.amazon.com/privacy/>
- <https://cloud.google.com/privacy>

6. Sharing Information with Third Parties

Belongtail will not share any Personal Information or Healthcare Sensitive Information it collects with any third party, except in the following cases: (a) to provide and/or operate the Services, at your request and choice, including certain features you elect to use that enable communications between Users and Professional Users, enabling the sharing of Users' Information with the applicable Professional User (who is his/her healthcare provider and Operator) via Chat and communication between Users and Belongtail third party authorized partners; (b) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (c) to enforce this Privacy Policy and/or the TOS, including investigation of potential violations thereof; (d) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to respond to User's support requests; (e) to respond to claims that any content available on the Service violates the rights of third-parties; (f) to respond to claims that contact information (e.g. name, e-mail address, etc.) of

a third-party has been posted or transmitted without their consent or as a form of harassment; (g) to protect the rights, property, or personal safety of Belongtail, any of its Users, or the general public; (h) when Belongtail is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of its assets; (i) to collect, hold use and/or manage your Personal Information and/or Healthcare Sensitive Information through Belongtail's authorized third party service providers, as reasonable for business purposes (including for purposes of providing and promoting the Services) which may be located outside of Israel, including but not limited to, USA (for example: data storage on Amazon Cloud Services or Google Cloud) as described below; (j) to provide advertising and other commercial or sponsored content from Belong's authorized partners which may be valuable to you or (k) pursuant to your explicit approval prior to the disclosure, including without limitation before the entrance to each and every Chat, via a dedicated notice or other specific disclosure.

For avoidance of doubt, Belongtail may transfer and disclose to third parties or otherwise use Non-personal Information at its own discretion.

7. With respect to the Personal Data collected via the AI Smart Clinic Service.

- (i) With respect to any Information and/or data that is customized to the applicable Professional User, and your participation in the applicable Professional User's generated "assistant", the Operator, and not Belongtail, is deemed as a data controller for purposes of compliance with the requirements of applicable data protection laws in the country in which you use the Service ("**Privacy Laws**"). Belongtail is a mere processor of your Data on behalf of your Operator. Notwithstanding the foregoing, with respect to certain categories of data, both Belongtail and your Operator may be deemed as independent data controllers with regard to your Information, and in such case, Belongtail and your Operator shall apportion data protection compliance responsibilities between one another for purposes of compliance with applicable Privacy Laws.
- (ii) Your use of the Service will result in sharing your Personal Information and/or Healthcare Sensitive Information with your Operator and Belongtail, and other third parties as set forth in this Privacy Policy, and any applicable notice and/or disclosure may be applicable to each Chat. While we take steps to safeguard your information, we have no control over how the applicable Professional Users may use the Information you share while using the Service. Collecting your information and sharing it with others is inherent in the Service.

8. Review, Modification or Deletion of Personal Information

Belongtail will maintain your Personal Information and Healthcare Sensitive Information as long as you are using our Services. If for any reason you wish to review, modify, update, revise and/or delete your Personal Information or Healthcare Sensitive Information stored with us and identifies you, you may contact us do so on the Service by editing your information on your Account, or by deleting your Account from the Service, in which case we will delete any such Personal Information and/or Healthcare Sensitive Information pursuant to any applicable privacy laws. Note that we may retain your Personal Information for a minimum period required to provide the Services. We will also retain your Information as necessary to comply with our legal obligations, to resolve disputes, to prevent fraud and abuse, to enforce our agreements and/or protect our legitimate interests, all in accordance with applicable laws or until the User requests to opt-out of such collection. We may at our sole discretion, delete or amend information from our systems, without providing any notice to you, once we deem it is no longer necessary for our purposes.

Where we no longer need to process your Personal Information for the purposes set out in this Privacy Policy, or following your request to delete your Personal Information, we will delete your Personal Information and/or Healthcare Sensitive Information from our systems and/or depersonalize your information. Please note that Belongtail may also depersonalize (and un-identifiable) your Service activity history and information for the purpose of enhancing and improving our Services.

If you would like, we can provide you all your Personal Information and/or Healthcare Sensitive Information which you provided to us in a structured, commonly used and machine-readable format. To do so, see our contact information below.

9. Minors

To use the Service, you must be over the age of eighteen (18). Belongtail does not knowingly collect Personal Information from children under the age of eighteen (18), unless such Personal Information was provided by the User's family member who is over the age of eighteen (18) and has all of the required consents, approvals, and rights to upload Personal Information on the minor's behalf. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of eighteen (18) are not using the Service. In the event that it comes to our knowledge that a person under the age of eighteen (18) is using the Service, we reserve the right to prohibit and block such User from accessing the Service.

10. Cookies & Local Storage

A cookie is a small data file that a website saves on your computer or mobile device when you visit the website. Cookies are widely used for record-keeping purposes in order to make website work, or work more efficiently, as well as to provide information to the owners of the website.

Like many Websites and applications, when you access or use the Service, we may use industry-wide technologies such as "cookies" or similar technologies, which stores certain information on your computer ("**Local Storage**") and which will allow us to enable automatic activation of certain features and make your Service experience much more convenient and effortless. It is easy to prohibit the Local Storage, erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored, by instructing your browser or device and changing its options. However, if you block or erase cookies your online experience may be limited.

We may also use certain third-party cookies. These are a different kind of cookies, stored on your computer by third parties, including the Operator, rather than by us. This kind of cookie is read-only each time you visit the Service, and also when you visit certain websites or applications that use similar cookies. Third-party cookies usually store only a Non-personal Information, such as the web pages you have visited, the duration of your browsing, etc. For more information regarding those third-party read section 13.

11. Direct Marketing

You hereby agree that we may use your contact details for the purpose of informing you regarding our products and services (which may interest you, and to send to you other marketing material, including news, updates and relevant medical data) as part of the Services (including via the App and/or the Site), and/or transmitted to the e-mail address or phone number you have provided or by displaying you this information on the Application to you.

You may withdraw your consent via sending a written notice to Belongtail by email to the following address: info@belong.life.

Please note that Belongtail may also contact you with important information regarding our Services. For example, we may notify you (through any of the means available to us) of changes or updates to our Services, payment issues, service maintenance, etc. You will not be able to opt-out of receive such service messages.

12. Security

We take a great care in implementing and maintaining the security of the Service, and our Users' Personal Information and Healthcare Sensitive Information. The Personal Information and Healthcare Sensitive Information, or parts thereof, is hosted on AWS Amazon and Google Cloud servers, which provide advanced security features. Belongtail employs industry standard procedures and policies to ensure the safety of its Users' Personal Information and/or Healthcare Sensitive Information, and prevent unauthorized use of any such information, including encryption, Secure Socket Layer (SSL) and Transport Layer Security (TLS). However, we do not and cannot guarantee that unauthorized access will never occur.

We recommend using the strongest password combination available on your mobile device to protect unauthorized access to your mobile device.

13. Domestic and International Transfer of Your Information / Third Party Software/Service

Belongtail has partnered with a number of selected service providers, whose services and solutions complement, facilitate and enhance our own. These include hosting, database and server co-location services (such as AWS), data and cyber security services (such as Cloudflare, Logz.io), Payment Processors (such as Apple Pay, Google Pay), data analytics services (such as Facebook Analytics, Google Analytics, Firebase), App analytics tools including session replay records for application usability and functionality monitoring and analysis (such as: Crashlytics, Zohodesk), as well as our and/or our business partners' campaign analytics tools for measuring and analysis of marketing campaigns (whether ours or our authorized business partners) displayed via the App (such as Crossix/Iqvia/Comscore/Publicis/Double-verify/Nielsen), services for measuring our Services attribution and effectivity of our publication and marketing efforts (such as: Appsflyer), e-mail, push notifications and SMS distribution and monitoring services (such as Pushwoosh, Mailchimp, Twilio), online advertising platforms (such as Google AdWords, Facebook Ads, Yahoo Ads, Outbrain, Taboola), users' surveys (such as: Survey Monkey), services for translations (such as: Google translate) implementation of and use of large language models (such as: OpenAI), tokenization for personalized services and research capabilities (such as Datavant), verification of contact information (such as Whitepages), gamification services (such as: Dot Marketing, Dot.vu) and our business, legal and financial advisors (collectively, "**Third Party Services**"). Such Third Party Services may receive or otherwise have access to our Users' personal information controlled, collected and/or processed by us under this Privacy Policy, depending on each of their particular roles and purposes in facilitating and enhancing our Services and business, and may only use it for such purposes. When we act as the controller of the information collected from its Users in connection with the use of the Services, use reasonable effort to review the personal information processing practicing done by Third Party Services on our behalf, and to the extent required under applicable law we are responsible for such processing to the extent that it is not outside of our reasonable control. By providing such information, you expressly consent to such transfer and use, including transfers outside of the jurisdiction in which the information was provided.

Where Belongtail transfers Personal Information and/or Healthcare Sensitive Information which is subject to limitations or conditions on the international transfer of such data under the laws applicable to such transfer, Belongtail shall do so in accordance with applicable law.

If you are located in the EU please see also section 16.

14. Third Party Websites

While using the Service you may encounter links to third party websites and/or services and/or products. Please be advised that such third party websites and/or services and/or products are independent from Belongtail, and may use cookies and other web-tracking technologies to collect Non-Personal and/or Personal Information about you. We assume no responsibility or liability whatsoever with regard to privacy matters or any other legal matter with respect to such third party websites and/or services and/or products. We encourage you to carefully read the privacy policies and the terms of use of such third party websites and/or services, as their terms, not ours, will apply to any of your interactions with such third parties. Belongtail has no control over the use of any information you provide by these third party services.

15. Changes to the Privacy Policy

Belongtail reserves the right to change this Privacy Policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this Privacy Policy on the Service and/or we will send you an e-mail regarding such changes to the e-mail address that is registered with your Account. Such substantial changes will take effect seven (7) days after such notice was provided on any of the above mentioned methods. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date, and your continued use of the Service after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes.

16. Compliance with USA Privacy Regulations

Belongtail is not a Covered Entity or Business Associate of any Covered Entity. According, any Healthcare Information you provide voluntarily is not protected by the Health Insurance Portability and Accountability Act of 1996, and regulations promulgated there-under, including the Standards for Security and Privacy of Individually Identifiable Health Information at 45 Code of Federal Regulations Parts 160 through 164 (“**Privacy and Security Regulations**”), as amended from time to time, in addition to the Health Information Technology for Economic and Clinical Health Act, enacted as part of the American Recovery and Reinvestment Act of 2009, Public Law 111-005. Moreover, this social networking application is not a Medical Device, and thereby is not regulated by the Federal Food, Drug & Cosmetic Act.

17. Compliance with European Privacy Regulation

Belongtail is compliant with the European General Data Protection Regulation (GDPR) and therefore maintain your rights according to the GDPR. If you consider that your rights under the GDPR are infringed, you can contact us as describe below. You also have the right to lodge a complaint with a supervisory authority.

We shall not use and process your Personal and/or Sensitive Information in order to target advertisement to you, without your explicit consent. However, as mentioned above we customized our services to you according to the collected information. It means that by indicating your type of disease and providing certain HealthcareSensitive Information and Personal Information, we offer you to participate in groups which are relevant to you and you are able to join additional groups and/or Communities according to your interests and get from time to time a relevant query that you may voluntarily answer. In those groups you may see advertisements which relate to your Personal and/or Sensitive Information.

If you are located in the EU, you have a right to request further information regarding the data transfer mechanisms used by us with respect to data transfers to third countries and to international organizations.

In case that your data will be stored outside the EU, we will apply strict safeguards which may include the following:

- Transferring your personal information to countries approved by the European Commission as having adequate data protection laws, such as Israel;
- Entering into standard contracts that have been approved by the European Commission and which provide an adequate level of high quality protection, with the recipients of your Personal Information;
- Transferring your Personal Information to organizations that are Privacy Shield Scheme certified, as approved by the European Commission.
- You have the right to access and correct your Personal Information. To exercise these rights, please use the settings within the App, Site or Network, as applicable, or contact us at info@belong.life. To enable us to process your request, please provide sufficient details to verify your identity and clarify the nature of your request. Where we are unable to comply with your request, we will explain the reasons and inform you of your rights, including the right to lodge a complaint with a supervisory authority, if applicable in your jurisdiction.

For more information regarding to your rights according to the GDPR you can visit this link: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

18. Contact us

If you have any questions (or comments) concerning this Privacy Policy or if you would like to submit a request of any kind, you are welcome to send us an email at info@belong.life or contact our Data Protection Officer at dpo@belong.life. We may ask you to provide us certain personal information in order for us to identify you.

By contacting us, you represent that you are free to do so and that you will not knowingly provide Belongtail with information that infringes upon third parties' rights, including any intellectual property rights. You further acknowledge that notwithstanding anything herein to the contrary, any and all rights, including intellectual property rights in such information provided, shall belong exclusively to Belongtail, and Belongtail may use or refrain from using any such information at its sole discretion.