

RANGO Privacy Statement

ABOUT THIS PRIVACY STATEMENT

At RANGO, we take the protection of your personal data seriously. This privacy statement applies to processing of personal data by RANGO cancer case management and mobile app (collectively “RANGO services”).

The RANGO empowers you to play an active role in the journey to fight cancer. We understand that data does not get much more personal than this, and the protection of your personal data is of paramount importance to us. Please take a moment to carefully review this statement.

WHY DOES RANGO PROCESS YOUR PERSONAL DATA?

RANGO collects and processes the personal data of Device & Application Users (“Users”) only for the following purposes:

To provide RANGO services

We process personal data to provide RANGO services and app features, such as to provide you with daily insights about your cancer journey including to-dos, and appointments.

To provide customer service

We process personal data for the purpose of providing customer service and managing our customer communication. If you contact our support with questions regarding your service or app data, we may use the provided information to answer your questions and for solving any issues you may have.

To develop our products and services

We process data regarding your use of the RANGO service to improve our services and features, such as in the RANGO mobile app. When possible, we will do this using only pseudonymized, aggregated, or non-personally identifiable data.

To market our products and services

We process marketing-related data to provide online advertising and RANGO marketing communications. For example, we use cookies on our website in order to create targeted audiences for online

advertisement. You can always opt out of marketing communications, and we will only send you our newsletter if you have requested it.

To enable third party integrations

We process data to provide Users who request that we share their data with certain third parties, such as research partners. This is only done with your express consent.

To comply with statutory obligations

In certain cases, we must process certain data when it is required by applicable laws and regulations. Such statutory obligations are related, for example, to accounting and tax requirements, legal claims, or other legal purposes.

LEGAL BASIS FOR PROCESSING

Data protection law in Europe requires a “lawful basis” for collecting and retaining personal information from residents of the European Economic Area. Our lawful bases for processing your data depends on the particular processing purposes, including:

1. **Contract:** when processing personal data for the purpose of providing RANGO services we process it on the basis of a user contract, which is formed when you create your account and accept of our terms and conditions.
2. **Consent:** we process your health-related data only with your consent. In some cases, you can provide your consent to us for processing your data through your actions, such as by inserting health data into your notes, or by adding health related tags in the RANGO app.
3. **Legitimate Interest:** we process your personal data based on our legitimate interests when we process it for the purposes of marketing our products and services, providing our customer service and improving our products and services. When choosing to use your data on the basis of our legitimate interests, we carefully weigh our own interests against your right to privacy, in compliance with applicable law.
4. **Legal obligation:** RANGO must process certain information to comply with statutory obligations which may vary in each country. For example, such obligations can relate to consumer protection or tax laws.

PROCESSED DATA AND DATA SOURCE

In most cases, RANGO collects personal data directly from you, such as when you register for an account or upload your personal clinical data via the RANGO mobile app. We may also process data that is produced from the information you provide to us.

RANGO processes the following personal data categories about Users:

1. Contact information such as email address or physical address.
2. User information such as gender, height and weight, User ID, and other information you may provide to us about yourself or your account.
3. Device information such as IP address and location data.
4. User activity and context information such as activities, notes and tags.
5. Clinical data such as cancer diagnosis, medications, diagnostic labs and genomic profiles.
6. Measurement data such as heart rate, movement data, and temperature data.
7. Reported symptoms such as mood, pain, cough and nausea.

Please note that some of the personal data we process, including any data concerning your health, is considered special or sensitive personal data. Under applicable law, such data is processed only if you have given your consent for processing. If you access or use any of RANGO's location-based services, such as by enabling GPS-based activity tracking through your app, RANGO may process the approximate or precise location of your device while the service is active. This data may be obtained via your device's service provider network ID, GPS, and/or Wi-Fi data. RANGO does not process such location data without first obtaining your consent. You may disable such location processing at any time using your device's location permission settings.

DATA SHARING AND DISCLOSURES

Personal Data Sharing

RANGO does not sell or rent your personal information, and only shares your personal data with certain trusted service providers so that we can provide you with our services and operate our business. Whenever we share data with third-party service providers, we require that they use your information only for the purposes we have authorized, and for the limited reasons explained in this Privacy Statement. We also require these service providers to protect your personal information to at least the same standards that we do.

Like most companies, RANGO uses service providers for purposes such as:

1. Providing and improving our online service platform;
2. Storing our Users' data;
3. Providing customer services;

4. Managing and organizing our marketing activities. (RANGO only shares website usage data with our advertising network partners for the purposes of analyzing and optimizing our marketing. RANGO does not share the RANGO app data with 3rd party advertisers); and
5. Analyzing information regarding the use of our online service to improve our service quality.
6. We will be recording our conversations with you and making them available to you and to other professionals as necessary. To consent to the conversations being recorded, you will need to click and confirm you are agreeing to that recording.

RANGO stores personal data primarily within the geographic region where it is collected. In cases where personal data is processed outside of the area in which it was collected, we always ensure your personal data is protected with appropriate safeguards in accordance with applicable privacy laws. We also use industry standard data protection measures to safeguard all international transfers of personal data through data protection agreements with our service providers.

Personal Data Disclosures

We also reserve the right to disclose personal information under certain specific circumstances, including:

1. When we have your express consent to do so;
2. When it is reasonably necessary for our legitimate interests in conducting our business, such as in the event of a merger, acquisition, or sale;
3. To protect RANGO's legal rights and property; and
4. To comply with the law or law enforcement.

Otherwise, your personal information is never shared with any individual or other organization.

SAFEGUARDING YOUR DATA

RANGO uses technical and organizational safeguards to keep your data safe and secure. Where appropriate, these safeguards include measures such as anonymization or pseudonymization of personal data, strict access control, and the use of encryption to protect the data we process.

We also ensure that our staff receives adequate training to ensure personal data is processed only in accordance with our internal policies, consistent with our obligations under applicable law. We also limit access to your sensitive personal data to personnel that have specifically been granted such access.

Online services that we provide, such as the RANGO website and RANGO mobile app, protect your personal data in-transit using encryption and other security measures. We also regularly test our service, systems, and other assets for possible security vulnerabilities.

We update the RANGO mobile app regularly. We recommend that you make sure that you always have the latest app version installed in order to maximize protection of your data.

DATA RETENTION

The retention period for your personal data generally depends on the duration of your RANGO account lifecycle. Your personal data will be deleted when it is no longer needed for the purpose it was originally collected, unless we have a legal obligation to retain data for a longer period of time. For example, your data regarding your symptoms is stored only so long as your RANGO account is active.

RANGO also has legal obligations to retain certain personal data for a specific period of time, such as for tax purposes. These required retention periods may include, for example, accounting and tax requirements, legal claims, or for any other legal purposes. Please note that obligatory retention periods for personal data vary based on the relevant law.

If you wish, you may request deletion of your RANGO account by contacting info@Rango.com

USE OF COOKIES

We use cookies and various other technologies to collect and store analytics and other information when customers use our site, as well as for personalization and advertising purposes. The cookies we use include both first party and third party cookies.

Cookies are small text files sent and saved on your device that allows us to identify visitors of our websites and facilitate the use of our site and to create aggregate information of our visitors. This helps us to improve our service and better serve our customers, and will not harm your device or files. We use cookies to tailor our site and the information we provide in accordance with the individual interests of our customers. Cookies are also used for tracking your browsing habits and for targeting and optimizing advertising, both on our site as well as on other sites you may visit. We also use cookies for integrating our social media accounts on our website.

YOUR RIGHTS AS A DATA SUBJECT

Whenever RANGO processes your data, you have certain rights that enable you to control how your personal data is being processed. This section provides you with information about each of those rights.

If you wish to exercise your rights as a data subject, please contact info@Rango.com with your request to do so.

Right to access data

You have the right to know what personal data is processed about you. You may contact us to request access to the personal data we have collected about you, and we will confirm whether we are processing your data, and provide you with information about the personal data we have collected and processed about you.

Please note that by using the RANGO mobile app, you can easily access the clinical data, reported symptoms and measurements data that we process about you.

Right to erasure

You have the right to request the deletion of your personal data in certain circumstances. We will comply with such requests unless we have a valid legal basis or legal obligation to preserve the data.

Right to rectification (of inaccurate data)

You have the right to request correction of any incorrect or incomplete personal data we have stored about you.

Please note that you can correct and update some of your basic information via the RANGO mobile app.

Right to data portability

You have the right to request receipt of the personal data you have provided to us in a structured and commonly used format. The right to data portability only applies when we process your personal data for certain reasons, such as by contract or by your consent.

Right to object to processing

You have the right to object to the processing of your personal data under certain circumstances. In the event that we do not have legitimate grounds to continue processing such personal data, we will no longer process your personal data after we have received and verified your objection. You also have the right to object processing of your personal data for direct marketing purposes at any time.

Right to restrict processing

You have the right to request that we restrict processing of your personal data under certain circumstances. For example, if you contest the accuracy of your data, you can make a restriction request that we do not process your data until RANGO has verified the accuracy of your data.

Right to withdraw consent

If we have requested your consent in order to process your personal data, you have the right to withdraw your consent for such processing at any time. It should be noted, however, that withdrawing your consent may lead to issues or restrictions on your ability to fully utilize RANGO services.

Please note that you can always unsubscribe from receiving our newsletter and other marketing emails by using the 'Unsubscribe'-link provided in the emails you receive from us.

RANGO strives to address your privacy concerns. If you have contacted RANGO about your issue and are still unhappy with our response, subject to applicable law, you may contact your local supervisory authority regarding your issue. However, we urge you to first contact us at info@Rango.com so that we can more quickly resolve your issue before escalating the issue.

Please read RANGO's CCPA Privacy Notice if you are a resident of the state of California to read more about your rights under California law.

CCPA NOTICE FOR CALIFORNIA CONSUMERS

This notice supplements the information contained in this Privacy Statement of RANGO and its subsidiaries (collectively “we”, “us” or “our”) and applies solely to all visitors, Users, and others who reside in the State of California (“customers” or “you”), and who access RANGO's website or the services provided by RANGO. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”), and any terms defined in the CCPA have the same meaning when used in this notice.

COLLECTION, USE AND SHARING OF INFORMATION

Where a customer interacts with RANGO's products and/or services, RANGO collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“Personal Information”). Personal Information does not include de-identified or aggregate information; publicly-available information that is lawfully made available from federal, state, or local government records; and information covered by certain sector-specific privacy laws.

Information about the categories of Personal Information we collect, the purposes for which your Personal Information is processed, and any sharing of your Personal Information can be found from relevant sections of this privacy statement above:

Sharing of personal data

In the preceding twelve (12) months, we have not sold Personal Information to third parties, including data aggregators.

Disclosure of Personal Information in the Preceding 12 Months

In the 12 months preceding the date of this Privacy Policy, RANGO has shared Personal Information with the following categories of third parties and has disclosed the following categories of Personal Information for a business purpose, for commercial purpose, to comply law, in the context of a transaction, or for other business reasons:

Personal Information	Third Parties

Identifiers	We may disclose IP address, device ID, or online identifier to service providers, advertising networks, internet service providers, and/or data analytics providers. We may disclose name, email address, date of birth, phone number, and address if you provided it to us via form on the website or during an incomplete or failed registration to Service providers.
Commercial information	Service providers
Internet or other electronic network activity information	Service providers, advertising networks, internet service providers, and/or data analytics providers.

See [Section 4](#) for additional detail.

CALIFORNIA CONSUMER RIGHTS

If you are a California resident, and in accordance with §999.308 of the CCPA Regulations, you have the right to:

- (1) Request to know and access the Personal Information we collect, use, disclose, and sell;
- (2) Request deletion of Personal Information;
- (3) Opt-out of the sale of Personal Information; and
- (4) Not receive discriminatory treatment by RANGO for the exercise of the privacy rights conferred by the CCPA.

(1) Requests to Know and Access

You have the right to request that we disclose to you the following information:

- (a) Categories of Personal Information that RANGO has collected about you, disclosed about you for a business purpose, or sold; Categories of sources from which the Personal Information is collected;
- (b) Categories of third parties with whom RANGO shares or to whom RANGO sells Personal Information;
- (c) The business or commercial purpose for collecting and selling Personal Information; and
- (d) Specific pieces of Personal Information that RANGO has collected about you.

Instructions for submitting a verifiable request are provided below.

You may only make a request for access twice within a 12-month period.

(2) Requests to Delete

You have the right to request that we delete Personal Information about you that we have collected, subject to certain exceptions.

Instructions for submitting a verifiable request are provided below.

(3) Opt out of the Sale of Personal Information

You have the right to opt-out of the sale of your Personal Information.

RANGO does not sell your Personal Information.

(1) Right to Nondiscrimination

You have the right to be free from discriminatory treatment for exercising the privacy rights conferred by the CCPA, including not being: denied goods or services; charged different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; provided a different level or quality of goods or services; or suggested that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

How to Exercise Your Rights

If you are a California resident, you can request disclosure, access to, and/or deletion of your personal as described above by submitting a verifiable consumer request to us by sending an e-mail to info@Rango.com, including the following information along with your request: your full name, company name (if applicable), address, e-mail address and a phone number. We may request that you provide additional information if necessary to confirm your identity. This is for security purposes, and is required by law in some cases.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You have the right to make a free request up to two times in any 12-month period. We will respond to all validated requests within 45 days of receiving your request, unless we request an extension. In the event that we reasonably require an extension in order to respond to your request, we will notify you of any such extension within the initial 45-day period.

CONTACT INFORMATION

RANGO

Address: Menachem Begin 11, Ramat Gan 6291917 Israel

Data Protection Officer: info@Rango.com

CHANGES TO THIS PRIVACY NOTICE

This Privacy Statement is effective as of December 30, 2021. We reserve the right to update this Policy from time to time at our sole discretion, but if we do, we will let you know about any material changes either by notifying you on the website or by sending you an email or push notification. If you keep using RANGO services after a change, your continued use means that you accept any such changes.