

# Privacy Policy

**Last updated: September 2025**

## General

At H.C.S. Capital Ltd. (the "Company"), which operates the website <http://www.hcs-capital.com> (the "Website"), we respect your privacy and are committed to protecting the personal data collected during your use of the Website ("Personal Data").

This Privacy Policy is intended to clearly and transparently explain what information is collected when using the Website, how we use it, how we protect it, and what your rights are in relation to it.

By using the Website, you agree to this Privacy Policy. If you do not agree with any part of this Policy, you should refrain from using the Website.

## Personal Data Collection

The Website does not include any technical means for users to submit personal Data proactively and does not include registration forms, contact forms, or service ordering mechanisms.

During your use of the Website and related services, the following types of information may be collected (collectively: "Data" or "Information"), depending on your interaction with the Website:

1.

**Automatically Collected Technical Information:** Your use of the Website may be logged by our systems, including pages viewed, the time and duration of your visits, interactions with content (clicks, hovers, etc.), reading times of messages on the site, and data collected via cookies (see more below).

2.

**Information About Your Browsing Device:** When accessing the Website, the Company (or parties acting on its behalf) collects and stores data relating to your device and connection, such as IP address, originating server, device identifier, browser type, and similar information.

3.

**Information from Third Parties:** If you choose to contact the Company independently via the email address listed on the Website, you may voluntarily provide personal information such as your email address; however, this information is not collected through the Website itself.

You are not legally obligated to provide the data listed above. However, such data may be required for the Company to efficiently and properly provide its services. Failure to provide certain information may prevent the Company from offering you its full range of services. For any questions, please contact us using the details provided below.

You are responsible for ensuring that any personal information you provide is accurate and up to date. Inaccurate data may impact the services and responses you receive from us and our ability to contact you.

### **Use of Personal Data**

The collected information will be used for the following purposes, in accordance with this Privacy Policy and applicable law:

- To provide you with services and content available on the Website;
- Statistical analysis of Website usage;
- Monitoring Website performance and usage patterns to improve user experience, site functionality, and content relevance;
- Gathering information regarding user activity on the Website to improve our offerings and develop new services;
- Conducting audits and investigations to prevent misuse;
- Storing information in Company databases in accordance with applicable law;
- Sending notifications related to violations of the Website's terms of use; and/or
- Promoting the Website across various media channels.

### **Disclosure of Information to Third Parties**

The Company is committed to maintaining the confidentiality of your information and does not trade or sell personal information. We do not share your personal data with third parties except in the following circumstances:

- To third parties providing services supporting our operations, such as IT and storage providers, customer relationship management systems, statistical and analytics providers, and professional consultants (e.g., accountants and attorneys);
- For the purpose of enforcing our terms of use or resolving disputes or legal proceedings between you and the Company or its representatives;
- As required by legal, regulatory, or judicial authorities;
- To protect the rights, property, or safety of the Company, its clients, suppliers, or third parties, and to prevent harm or suspected illegal activity;
- In any case where the Company transfers or assigns its business (in whole or in part), including during mergers, acquisitions, or liquidation;
- With your explicit consent or as per your instruction.

### **Cookies and Tracking Technologies**

The Website uses cookies and similar tracking technologies, including third-party cookies (e.g., Google Analytics), to improve your browsing experience, analyze usage patterns, gather statistical data, and deliver personalized content. Cookies are small text files stored on your device when you visit the site. They allow the Website to

remember your actions and preferences over time, eliminating the need to re-enter information on future visits.

You may manage your cookie preferences by adjusting your browser settings or using consent management tools provided on the Website. Please note that blocking certain cookies may impair your browsing experience and limit site functionality.

### **Data Security**

The security of your personal data is important to us. The Company implements accepted technological and organizational measures to protect the confidentiality and security of your data. However, no system is completely immune to unauthorized access, and we cannot guarantee absolute protection.

Users should be aware that internet browsing involves inherent risks such as identity theft (phishing), exposure of unencrypted data, malware infections, and eavesdropping on network communications.

Beware of phishing emails – these are fraudulent messages that may appear to come from us and ask you to click on a link that imitates our official website and enter your personal details for reasons such as security verification or system upgrades. These links can be used unlawfully to obtain access to your accounts.

Note: The Company will never ask users to update personal information via email. Do not respond to such requests.

### **Links to Other Websites**

The Website may include links to external websites ("**Links**") that are not operated by us ("**Third-Party Websites**") and that may have different privacy practices. While we aim to link only to reliable and trustworthy sites, we are not responsible for the privacy policies, security systems, or data handling practices of such third-party websites. We recommend reviewing their privacy policies and terms of use.

### **User Rights**

Pursuant to the Israeli Privacy Protection Law, 1981 (including Amendment No. 13), Data subjects have the right to:

- Access their Personal Data collected and stored by the Company (where such data exists);
- Request the correction or deletion of such Personal Data if it is incorrect, incomplete, or outdated.

To exercise these rights, you may contact the Company in writing at: [info@hcs-capital.com](mailto:info@hcs-capital.com)

### **Changes to This Privacy Policy**

The Company reserves the right to modify this Privacy Policy at any time, without prior notice, and at its sole discretion. Any such updates will be reflected in the "Last updated" date at the top of this document. We recommend reviewing this Policy

periodically for any changes. We will continue to provide notice of material changes as required by law.

**Contact Us**

For any questions or requests related to the Website or this Privacy Policy, please contact us at: [info@hcs-capital.com](mailto:info@hcs-capital.com)