

## **Data Protection and Security Policy**

*Last updated: April 19, 2025*

At **AICO Real Estate**, we are committed to safeguarding the confidentiality, integrity, and availability of the personal data we collect and process in the course of our operations. This policy outlines the principles, practices, and responsibilities adopted by the company to ensure the protection of personal data in accordance with applicable Israeli laws, including the **Protection of Privacy Law, 5741-1981**, and, where applicable, the **EU General Data Protection Regulation (GDPR)**.

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### **1. Purpose and Scope**

This policy applies to all personal data collected and processed by **AICO Real Estate** through our website ([www.aico.realestate](http://www.aico.realestate)), business communications, and client engagements. It applies to:

- All employees, contractors, and third-party service providers
  - All processing activities involving personal data, regardless of format (electronic, paper, etc.)
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### **2. Data Collection and Processing Principles**

We adhere to the following principles when processing personal data:

- **Lawfulness, fairness, and transparency:** Data is collected and processed based on a lawful basis, with clear communication to data subjects.
- **Purpose limitation:** Data is collected for specified, explicit, and legitimate purposes.
- **Data minimization:** Only data that is necessary for the intended purpose is collected.
- **Accuracy:** Reasonable steps are taken to ensure data is accurate and up to date.
- **Storage limitation:** Data is retained only for as long as necessary.
- **Integrity and confidentiality:** Appropriate security measures are implemented to protect data.
- **Accountability:** We take responsibility for our data handling and are prepared to demonstrate compliance.

### **3. Types of Data We Process**

Depending on the interaction, we may collect and process the following categories of personal data:

- Identity information (e.g., name, ID number)
- Contact details (e.g., email address, phone number)
- Communication records (e.g., emails, forms, inquiries)
- Website usage data (e.g., IP address, device/browser type)

We do not collect or process sensitive personal data unless legally required and with the necessary safeguards in place.

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### **4. Data Security Measures**

We implement a variety of organizational and technical security measures to protect personal data, including:

- Secure servers and firewalls
- Access control and role-based permissions
- Data encryption where applicable
- Regular security audits and system updates
- Employee awareness and training programs
- Backup and disaster recovery procedures

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### **5. Third-Party Access and Data Sharing**

We may share personal data with trusted third parties only under the following conditions:

- The third party provides services that support our operations (e.g., IT, hosting, marketing tools)
- A written data processing agreement is in place to ensure compliance with this policy
- The third party has demonstrated adequate data protection safeguards

We never sell personal data.

## 6. International Data Transfers

Where personal data is transferred outside of Israel, we ensure adequate safeguards are in place to protect that data, such as:

- Standard contractual clauses (SCCs)
  - Transfers to countries with recognized adequate data protection levels
  - Binding corporate rules, where applicable
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## 7. Data Subject Rights

Data subjects have the following rights under Israeli law and, where applicable, GDPR:

- Right to access and obtain a copy of their personal data
- Right to request correction or deletion
- Right to restrict or object to processing
- Right to data portability (where applicable)
- Right to lodge a complaint with the Israeli Privacy Protection Authority or another supervisory authority

Requests to exercise these rights may be sent to:

✉ **[contact@aico.realestate](mailto:contact@aico.realestate)**

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## 8. Breach Notification

In the event of a data breach that poses a risk to individuals' rights and freedoms, we will:

- Notify the relevant supervisory authority as required by law
  - Inform affected data subjects without undue delay
  - Take immediate action to contain and mitigate the breach
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## **9. Policy Review and Updates**

This policy is reviewed annually or upon significant changes in applicable laws, technology, or business processes. The updated version will be made available on [www.aico.realestate](http://www.aico.realestate) with the date of revision.

If you have any questions about this policy or our data protection practices, please contact us at:

✉ **contact@aico.realestate**