

**Privacy Notice**  
*Last updated: June, 2024*

**What's this Privacy Notice About Anyway?**

Thanks for taking the time to read through this long and (we can admit it) boring document! So, what is this all about? This Privacy Notice is meant to give you information about what personal data we collect about you, how we use it, why we use it, and how you control the data processing.

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1. **The Basics**

1.1. **Who We Are**

1.1.1. Nimrod Vromen Law Offices offers a website in connection with Nimrod's book, *Prompting: Happiness, A Guide to Prompting a Life Worth Living*, through this dedicated website. Our offices are located at Dan 14, Ness Ziona, 7412110, and our registration number is 51-582755-8.

1.1.2. If you have questions about our company or your privacy, or want to exercise your rights, or you just want to say hello, you can contact us at [nimrod@promptinghappiness.com](mailto:nimrod@promptinghappiness.com).

1.1. **Our Role: Controller and Processor.** Certain data protection laws, including the laws in the EU, differentiate between a party that determines why and how personal data is processed (called a "controller") and a party that processes personal data solely on the controller's behalf and according to the controller's instructions (called a "processor"). We are the controller in respect of the processing described in this Privacy Notice.

1.2. **Definitions and Recommendations**

1.2.1. When we refer to "**services**", we mean any services available on the website, including the (third party) AI-powered prompting feature.

1.2.2. When we refer to "**personal data**", we mean information that is defined as personal data under law. This includes information that identifies you directly or indirectly, including unique identifiers like IP addresses or cookie IDs.

1.2.3. When we refer to "**you**", we mean visitors to and registered users of our website.

1.2.4. This Privacy Notice is meant to be read together with our Terms of Service, which you can find at <https://promptinghappiness.com/terms-and-conditions>. In general, we recommend that you routinely review this privacy notice and your preferences on our site.

1.3. A Note on Legal Bases. Certain jurisdictions only allow the processing of personal data where a legal basis has been established. Under the EU's General Data Protection Regulation ("GDPR"), the possible legal bases include (but are not limited): your consent, the processing is necessary to perform a contract with you, the processing is necessary to fulfill our legal obligations, or a company has a legitimate business interest to process your personal data. Where we are a controller, we only collect and process data where we have established a legal basis. Below you can find more details about specific legal bases.

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2. **Personal Data We Collect, How We Use It, and Why.** Below is a description of the types of personal data we collect, how we use it, and the reason why we consider each use lawful. You have no legal obligation to provide us with personal data, but if you don't provide us with certain information, we may not be able to provide you with the associated services.

2.1. **Website Visitors.** If you have just landed on our site, welcome! It's so nice to have you! When you visit our site, we may collect the following types of data about you.

2.1.1. **Contact Form Information** – When you send us a message through the contact form on our site, we collect any data you provide, such as your name, email, and the content of your message.

How We Use this Data: To respond to your message and to provide you with informational newsletters about our products and services.

Legal Basis: We process this personal data based on the performance of a contract with you. Processing your Personal Data to share our informational newsletter with you is based on your consent. You may withdraw your consent at any time by emailing us at [nimrod@promptinghappiness.com](mailto:nimrod@promptinghappiness.com).

2.1.2. **Activity and System Data (Cookies)** – When you visit our site, we automatically collect data about your computer or mobile device, including personal data such as your IP address, device ID, browsing history (e.g. the other sites you've visited before ours), and your activity on our site (e.g. what pages you visited, for how long, and what links you clicked on). For more information about the cookies we use and how to adjust your

preferences, see the [Cookies and Similar Technologies](#) section below.

How We Use this Data: We mainly use this data to generate aggregated analytics data about the use of our site so we can maintain and improve the site and develop new products or services. We also use statistical data to prevent fraud and protect the security of our site. One of the tools we use to collect and analyze this data is "Google Analytics". For more information about how Google collects information and how you can control such use, see: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

Legal Basis: We process this personal data based our legitimate interests to develop and improve our products and services, and to prevent fraud. Additional information regarding [Our Marketing Activities](#) is provided below.

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2.2. **Users.** If you are a user of our site, we collect the following information from and about you.

2.2.1. **Registration Data** – In order to access our site, you must first create an account using a third-party login service (such as Google or Facebook). We also receive personal data about you from that service, such as your name and email address.

How We Use this Data: We use your registration information to allow you to access to our site, save your preferences, protect the security of our site, prevent fraud, and address any issues that arise.

Legal Basis: When we process your registration data to provide you with our services, we do so to perform a contract with you, in this case our Terms of Service. When we process your registration data to maintain our site, including to prevent fraud, protect the security of and/or address issues with our site, we do so on the basis of our legitimate interest to maintain our assets.

2.2.2. **Payment Data** – If you make a purchase through the site, we receive information related to such purchase, such as the last four (4) digits of your credit card number.

How We Use this Data: To process your payment and to prevent fraud.

Legal Basis: We process your payment data to perform a contract with you, specifically our Terms of Service. When we process your payment data to prevent fraud, we do so based on our legitimate interest to protect ourselves and our customers.

2.2.3. **Materials You Upload** – We collect any personal data that may be included in any materials (such as Prompts) that you may upload to the site.

How We Use this Data: To provide you with our services and to improve our

services.

Legal Basis: When we process the materials you provide to provide you with our services we do so to perform our contract with you, specifically, the Terms of Service. When we process the materials you provide to improve our services, we do so based on our legitimate interest to grow and improve our business and services

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**2.2.4. Activity and System Data (Cookies)** – We collect data about your device and your activity, as described more fully above in section 2.1.2, when you use our site.

**2.3 Visitors to Our Social Media Pages** – When you engage with our social media outlets (including Facebook, Instagram and LinkedIn), such as when you post on our page, like, share or re-tweet our posts, answer surveys, or similar activities, we collect the personal data you provide, such as the content of your post and the information available to us through your profile or account. The social media companies we use may also provide us with aggregate and analytical information about activity relating to us.

How we use this data: We may use this information to engage with you or respond to your posts and comments and to analyze the effectiveness of our social media efforts and to improve how we manage them, and for marketing purposes.

Legal Basis: When we process your personal data to engage with you or respond to your posts and comments and to, we do so on the basis of our legitimate interest to engage with and serve our audiences in an effective manner. When we process your personal data to improve our social media outlets or for marketing purposes, we do so based on our legitimate interest to effectively market our products and services, improve our services, and develop new ones.

3. **Our Marketing Activities.** As described above, we may use personal data we collect for advertising and marketing purposes. We try to limit the marketing material we send to a reasonable and proportionate level. Below we describe how you can control the marketing material you receive from us.

3.1. **Email Marketing and Services Communications**

3.1.1. We use your contact details to send you informational newsletters about our products and services if you have provided your consent. You may withdraw your consent at any time by emailing us at [nimrod@promptinghappiness.com](mailto:nimrod@promptinghappiness.com).

3.1.2. You can stop the delivery of all marketing emails by following the "unsubscribe" link in any messages we send you. Alternatively, you can contact us at [nimrod@promptinghappiness.com](mailto:nimrod@promptinghappiness.com) to request to unsubscribe.

3.1.3. Note that if you are a registered user, we may need to contact you about administrative or service-related issues as part of the services we provide to

you. This is not marketing communication and you will continue to receive these messages even if you opt-out of marketing emails.

3.1.4. Social Media Platforms. We may also use social media plugins, such as the Facebook and Google plugins, which will allow social media platforms to link personal data collected through our site with personal data in your social media profile. This combined data may be used to serve you with advertising or customized content on the applicable social media platform. We recommend that you routinely review the privacy notices and preference settings that are available to you on social media platforms you use.

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4. Sharing the Personal Data We Collect. We share your personal data as follows:

4.1. Service Providers. Below is a list of the types of service providers we use, the service each provides, and the types of data shared with each. All service providers have agreed to confidentiality restrictions and have undertaken to use your personal data solely as we direct.

Type of Service	Description	Personal Data Shared
Cloud Computing	We use service providers that offer cloud computing services. They offer us space on their servers for us to store our files and programs, including your personal data.	All personal data that we collect from you is stored on third party servers.
Email Marketing	We use an independent vendor to send out marketing emails on our behalf.	your name and email address.
Payment Processors	When you make a payment through our services, the transaction is processed by an independent vendor.	the details of your credit card number.
Analytics Providers	We use a service provider to assist us with analytics services.	Data collected automatically through our site, including IP addresses and cookie information.
Third Party AI Tools	We use third party AI tools to provide you with our services, such as providing output based on your Prompt.	All personal data you provide when sharing your Prompt.

4.2. Change of Ownership. If we are looking to sell our company, liquidate assets, or merge with another, we may share your personal data with other interested parties as part of negotiations toward that transaction. In such case, or where we do sell our company, your personal data shall continue to be subject to the provisions of this Privacy Notice.

4.3. Law Enforcement Related Disclosure. We may share your personal data with

government agencies or other relevant parties, such as a law office or independent auditor: (i) if we believe that such disclosure is appropriate to protect our rights, property or safety (including the enforcement of the Terms and this Privacy Notice) or those of a third party; (ii) if required by law or court order; or (iii) as is necessary to comply with any legal and/or regulatory obligations, such as audit requirements.

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5. **International Transfers**. Some of our service providers are located in countries other than your own. When we transfer your personal data internationally, we will do so safely and securely and in accordance with applicable law.

5.1. If you are located in the EU, when we share your personal data with third parties based outside of the European Economic Area ("**EEA**"), we will ensure that they sign on agreements that require them to comply with applicable law, keep your data secure at similar levels to the level described in this Privacy Notice, and make sure that your data protection rights are protected. We will also implement the following safeguards:

5.1.1. When we transfer your personal data to Israel, we rely on the decision by the European Commission that says that those countries are considered to provide an adequate level of data protection.

5.1.2. Where we transfer your personal data to other countries, we (i) take additional security measures to protect the data and (ii) use specific contracts approved by the European Commission, known as the Standard Contractual Clauses, to give your personal data the same protection it has in the EEA.

5.1.3. Please contact us at [nimrod@promptinghappiness.com](mailto:nimrod@promptinghappiness.com) if you would like further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

6. **Security**. The security of your personal data is our highest priority. We work hard to make sure that your personal data will be held securely and that it will not be shared or lost accidentally. However, it is impossible to guarantee absolute security. The security of your data also depends on the security of the devices you use and the way in which you protect your user IDs and passwords. The measures we take include:

6.1. **Technical Measures**. The electronic safeguards we employ to protect your personal data include secure servers, firewalls, and antivirus protections. We encrypt data in transit using secure protocols.

6.2. **Access Control**. We limit access to your personal data only to authorized personnel who have a need to know. We review these permissions regularly and revoke an employee's access immediately after his/her termination.

6.3. **Internal Policies**. We maintain and regularly review and update our privacy related and information security policies.

6.4. **Personnel**. We require employees to sign non-disclosure agreements according to

applicable law and industry customary practice.

- 6.5. Database Backup. Our databases are backed up and verified regularly. Backups are encrypted and stored within the production environment to preserve their confidentiality and integrity.

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7. **Your Rights - How to Control Our Use of Your Personal Data**. Depending on which laws apply, you have certain legal rights over your data. Below is some general information about rights that may apply to you but we recommend checking the law or consulting with a lawyer to understand what applies in your specific case. To exercise your rights, please contact us at [nimrod@promptinghappiness.com](mailto:nimrod@promptinghappiness.com). We may ask for reasonable evidence to verify your identity before we can comply with any request.

- 7.1. Right of Access. You may have a right to know what personal data we collect about you. We may charge you with a fee to provide you with this information, if permitted by law. If we are unable to provide you with all the information you request, we will do our best to explain why. See [Article 15](#) of the GDPR for more details, if your personal data is subject to GDPR.

- 7.2. Right to Correct Personal Data. You may request that we update, complete, correct or delete inaccurate, incomplete, or outdated Personal Data. See [Article 16](#) of the GDPR for more details, if your personal data is subject to GDPR.

- 7.3. Deletion of Personal Data ("Right to Be Forgotten"). If you are located in the EU, you may have the right to request that we delete your personal data. Note that we cannot restore information once it has been deleted. Even after you ask us to delete your personal data, we may be allowed to keep certain data for specific purposes under applicable law. See [Article 17](#) of the GDPR for more details, if your personal data is subject to GDPR.

- 7.4. Right to Restrict Processing. If you are located in the EU, you may have the right to ask us to stop processing your personal data. See [Article 18](#) of the GDPR for more details, if your personal data is subject to GDPR.

- 7.5. Right to Data Portability. If you are located in the EU, you may have the right to request that we provide you with a copy of the personal data you provided to us in a structured, commonly-used, and machine-readable format. See [Article 20](#) of the GDPR for more details, if your personal data is subject to GDPR.

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- 7.6. Right to Object. If you are located in the EU, you may have the right object to certain processing activities. See [Article 21](#) of the GDPR for more details, if your personal data is subject to GDPR.

- 7.7. Withdrawal of Consent. If we are processing your data based on your consent, you are always free to withdraw your consent, however, this won't affect processing we have done from before you withdrew your consent.

- 7.8. Right to Lodge a Complaint with Your Local Data Protection Authority. If you are located in the EU, you have the right to submit a complaint to the relevant data protection authority if you have any concerns about how we are processing your personal data, though we ask that as a courtesy you please attempt to resolve any issues with us first.

## 8. Data Retention.

- 8.1. Now that we've collected your data, how long do we keep it? We retain your personal data as long as necessary to fulfill each of the purposes we described above. Once we're done with your data, we delete it.
- 8.2. When deciding how long to store personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized access, the purposes for which the personal data was collected, as well as applicable legal requirements. Please note that we may delete information from our systems without notifying you first. Retention by any of our service providers or subcontractors may vary in accordance with each business's retention policy.
- 8.3. In some circumstances, we may store your personal data even after we're finished using it if required to do so by law (e.g. to fulfill tax or audit requirements), or to keep accurate records of our interactions in case there is a prospect of litigation relating to your personal data. In such cases, we will maintain the same security measures as described above.
- 8.4. Please contact us at [nimrod@promptinghappiness.com](mailto:nimrod@promptinghappiness.com) if you would like details about the retention periods for each type of personal data we process.

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## 9. Cookies and Similar Technologies.

- 9.1. What are Cookies? Sounds tasty, right? Unfortunately, these cookies are a lot less exciting. A cookie is a small piece of text that is sent to your browser by a website you visit. This piece of text acts as a sort of tag, letting the website know that it's you (really, your device) that's visiting. There are other technologies that act similarly, like web beacons, pixel tags, and Device IDs for apps, but for simplicity's sake we'll refer to them all as "cookies" and hope that the tech guys forgive us.
- 9.2. Websites can place their own cookies (called "first-party cookies") but can also place cookies from other sites (called "third-party cookies"). If your browser holds both first and third-party cookies for a given website, both the website and the third party are notified when you visit the site. We may place both first and third-party cookies on our site.
- 9.3. How We Use Cookies. While the specific names and types of cookies we use may change from time to time, they generally fall into one of the categories listed below. We will not place any cookies on your browser that are not strictly necessary unless you have first consented to receive them.

Cookie Type	Function
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Necessary	These cookies allow the site to work correctly. They enable your access to the site, move around, and access different services, features, and tools. These cookies cannot be disabled.
Functionality	These cookies remember your settings, preferences, and other choices you make (like placing an item in a shopping cart) in order to help personalize and streamline your experience.
Security	These cookies help us identify and prevent security risks. They may be used to store your session information to prevent others from changing your password without your login information.
Performance /Analytics	These cookies collect analytical information to help us understand how you use our site, for example whether you have viewed messages, clicked on links, and how long you spent on each page. This helps us improve our site to better suit your needs.

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9.4. **How to Adjust Your Preferences.** Most web browsers are initially configured to accept cookies, but you can change the settings so your browser refuses all cookies or certain types of cookies. In addition, you are free to delete any existing cookies at any time. Please note that some features of the services may not function properly when cookies are disabled or removed. For example, if you delete cookies that store your account information or preferences, you will be required to input these each time you visit.

10. **Third-Party Services.** You may have access to third-party services through our services. Please note that all use of third-party services is at your own risk and subject to such third party's terms and privacy policies. We do not take any responsibility for the performance of other services.

11. **Children.** We do not knowingly collect personal data from children under the age of eighteen (18). In the event that you become aware that an individual under the age of eighteen (18) has registered without parental permission, please advise us immediately.

12. **Changes to the Privacy Notice.** We may update this Privacy Notice from time to time to keep it up to date with legal requirements and the way we operate our business. We will place any updates on this webpage. Please come back to this page every now and then to make sure you are familiar with the latest version.

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