

SERAPHIC PRIVACY POLICY

Last Updated: June 2022

This privacy policy (“**Privacy Policy**”) governs how we, Seraphic Algorithms Ltd. (together, “**Seraphic**”, “**we**”, “**our**” or “**us**”) use, collect, and store Personal Data we collect or receive from or about you (“**you**”) such as in the following use cases:

- i. When you make or interact with our website, <https://www.seraphicsecurity.com/> (“**Website**”)
 - a. When you contact us
 - b. When you book a demo
- ii. When you make use of, or interact with, our platform (the “**Platform**”)
- iii. When you attend a marketing event, give us your business card or otherwise and provide us with your Personal Data for marketing purposes
- iv. When we use the Personal Data of our service providers and customers (e.g. contact details)
- v. When you interact with us on our social media profiles (e.g., Twitter, Facebook, LinkedIn)

Please read this Privacy Policy carefully, so you can understand our practices and your rights in relation to personal data. “**Personal Data**” or “**Personal Information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being and any information deemed as Personally Identifiable Information by privacy laws. **Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

Table of contents:

1. What information we collect, why we collect it, and how it is used
2. How we protect and retain your Personal Data
3. How we share your Personal Data
4. Additional information regarding transfers of Personal Data
5. Your privacy rights. How to delete your account
6. Use by children
7. Interaction with third party products
8. Log files
9. Cookies and analytic tools
10. Specific provisions applicable under California privacy law
11. Contact us

This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Platform or by other means.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Specific Personal Data we collect	Why is the Personal Data collected and for what purposes?	Legal basis (GDPR only, if applicable)	Consequences of not providing the Personal Data
<i>When you make or interact with our Website</i>			
<i>When you contact us</i>			
<ul style="list-style-type: none"> • Full name • Email address • Phone number • Company • Job title • State • Country • Any other information that you decide to provide us with 	<ul style="list-style-type: none"> • To receive and respond to your request(s) • To send marketing communications 	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract Legitimate interest (e.g. provide support and answer your questions) Consent (for marketing)	Cannot receive and respond to your request(s) Cannot send you marketing communications
<i>When you book a demo</i>			
<ul style="list-style-type: none"> • Full name • Email address • Phone number • Company • Job title • State • Country • Any other information that you decide to provide us with 	<ul style="list-style-type: none"> • To receive and respond to your request(s) • To send marketing communications 	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract Legitimate interest (e.g. provide support and answer your questions) Consent (for marketing)	Cannot receive and respond to your request(s) Cannot send you marketing communications
<i>When you make use of, or interact with, our Platform</i>			
<i>When you create an account and when you log in</i>			

<ul style="list-style-type: none"> • Full Name • Email address • Phone number (optional for authentication purposes) • Any other information that you decide to provide us with 	<ul style="list-style-type: none"> • To be able to create an account and get access to our Platform • To be able to log in to the Platform • To authenticate you 	<p>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to create your account)</p>	<p>Cannot create an account and get access to our Platform</p> <p>Cannot log in to the Platform</p>
<ul style="list-style-type: none"> • Full name • Email address 	<ul style="list-style-type: none"> • To send you marketing communications (e.g., to send you new features or updates) 	<p>Consent</p> <p>Legitimate interest (e.g. to send you updates regarding our products)</p>	<p>Cannot send you marketing communications</p>
<p><i>When you attend a marketing event and provide us with your Personal Data and/or you give us your business card</i></p>			
<ul style="list-style-type: none"> • Full name • Email Address • Company name • Job title • Phone number • Any other data you decide to provide us with 	<ul style="list-style-type: none"> • To establish a first business connection/discussion • To send you marketing communications 	<p>Consent</p> <p>Legitimate interest (e.g. to establish a business connection)</p>	<p>Cannot establish a first business connection/discussion</p> <p>Cannot send you marketing communications</p>
<p><i>When we use the Personal Data of our service providers and customers (e.g. contact details)</i></p>			
<ul style="list-style-type: none"> • Full name • Company name • Email address • Phone number • Any other data you decide to provide us with 	<ul style="list-style-type: none"> • To contact you • To perform the applicable agreement 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.).</p> <p>Legitimate interest (e.g., to contact you)</p>	<p>Cannot contact you</p> <p>Cannot perform the applicable agreement</p>
<p><i>When you interact with us on our social media profiles (e.g., Twitter, LinkedIn)</i></p>			
<ul style="list-style-type: none"> • Full name • Company name • Email address • Phone number • Any other data that you decide to provide us and/or publicly available on your social media account 	<ul style="list-style-type: none"> • To reply to your request or question 	<p>Consent</p> <p>Legitimate interest (e.g. send you more information about Seraphic)</p>	<p>Cannot reply and/or respond to your request or question</p>

Finally, please note that some of the abovementioned Personal Data will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your Personal Data and further use it for internal and external purposes, including, without limitation, to improve the services and for research purposes. “Anonymous Information” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

2. HOW WE PROTECT AND RETAIN YOUR INFORMATION

1. **Security.** We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
2. **Retention of your Personal Data.** Your Personal Data will be stored until we delete the record and we proactively delete it or you send a valid deletion request. Please note that in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings. We have an internal data retention policy to ensure that we do not retain your Personal Data perpetually.

3. HOW WE SHARE YOUR PERSONAL DATA

1. In addition to the recipients described above, we may share your Personal Data as follows:
 - i. With our service providers;
 - i. With cloud service providers for hosting purposes;

- ii. With email providers, marketing, CRM and other similar tool providers; and
 - iii. With analytic companies, in order to help us understand and analyze information we collect in accordance with this policy.
2. With our business partners with whom we jointly offer products or services. We may also share Personal Data with our affiliated companies.
 3. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
 4. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your Personal Data to such third party (whether actual or potential) in connection with the foregoing events;
 5. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your Personal Data in connection with the foregoing events, including, in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company; and/or
 6. Where you have provided your consent to us sharing or transferring your Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

1. Storage: We store the Personal Data on our CRM and marketing platforms with servers located in the US or in the EU.
2. External transfers: Where we transfer your Personal Data outside of EU/EEA (for example to third parties who provide us with services), we will generally obtain contractual commitments from them to protect your Personal Data. When Seraphic engages in such transfers of personal information, it relies on i) Adequacy Decisions as adopted by European Commission on the basis of Article 45 of Regulation (EU) 2016/679 (GDPR) (for example, when we access from Israel), or ii) Standard Contractual Clauses issued by the European Commission. Seraphic also continually monitors the circumstances surrounding such transfers in order to ensure that these maintain, in practice, a level of protection that is essentially equivalent to the one guaranteed by the GDPR.

5. YOUR PRIVACY RIGHTS. HOW TO DELETE YOUR ACCOUNT

1. Rights: The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):
 - You have a right to access Personal Data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
 - You have the right to request that we rectify any Personal Data we hold that is inaccurate or misleading;
 - You have the right to request the erasure/deletion of your Personal Data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your Personal Data, for example for the establishment, exercise or defense of legal claims;
 - You have the right to object, to or to request restriction, of the processing;
 - You have the right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
 - You have the right to object to profiling;
 - You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
 - You also have a right to request certain details of the basis on which your Personal Data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
 - You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.
2. You can exercise your rights by contacting us at privacy@seraphicsecurity.com. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. To protect your privacy, we may take steps to verify your identity before fulfilling your request. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

Deleting your account: Should you ever decide to delete your account, you may do so by emailing privacy@seraphicsecurity.com. If you terminate your account, any association between your account and Personal Data we store will no longer be accessible through your account. However, given the nature of sharing on certain services, any public activity on your account prior to deletion will remain stored on our servers and will remain accessible to the public.

6. USE BY CHILDREN

We do not offer our products or services for use by children and, therefore, we do not knowingly collect Personal Data from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any Personal Data to us without involvement of a parent or a guardian. For the purposes of the GDPR, we do not intend to offer information society services directly to children. In the event that we become aware that you provide Personal Data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@seraphicsecurity.com.

7. INTERACTION WITH THIRD PARTY PRODUCTS

We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

7. LOG FILES

We use log files. We use such information to analyze trends, administer the Platform, track users’ movement around the Platform, and gather demographic information.

9. COOKIES AND ANALYTIC TOOLS

- **Cookies**. Our Website may utilize “cookies”, anonymous identifiers and other tracking technologies in order to for us to provide our services and present you with information that is customized for you. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Website. Certain cookies and other technologies may serve to recall Personal Data, such as an IP address, previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

- **Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with Personal Information we collect. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

10. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

1. **California Privacy Rights:** California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@seraphicsecurity.com. Please note that we are only required to respond to one request per customer each year.
2. **Deletion Of Content From California Residents:** If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or Personal Information you have publicly posted. To remove, please send an email to privacy@seraphicsecurity.com. Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

10. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at privacy@seraphicsecurity.com.
