

**ASTRIX SECURITY LTD.  
APPLICATION PRIVACY POLICY**

*Last Updated: August 4, 2022*

This privacy policy (“**Privacy Policy**”) governs how we, **ASTRIX SECURITY LTD.** (together, “**Astrix**” “**we**”, “**our**” or “**us**”) use, collect and store Personal Data we collect or receive from or about you when you make use of, or interact with, Astrix's software application (“**App**” and “**you**”, respectively).

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.

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 App or by other means.

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

### **Specific Personal Data we collect**

When you create an account in the App, and when you login to gain access to your account in the App, we collect first name, surname, email address and usernames that are used for the purpose of authentication and verifying user authorization.

We collect the following information when you make use of the App: (a) we collect information about your use of the App, including data collected through the use of cookies and other technologies; and (b) any other information you provide, grants us access to as part of your use of the App or any other information that we may have access to from third parties via your use of the App.

When you register, login or make use the App on behalf of an entity or organization (“**Organization**”), we also collect: (a) a list of all your Organization's users, including, first names, surnames and email addresses of such users (“**Organization Users**”); and (b) a list of all software applications installed by your Organization Users on behalf of your Organization.

### **Why is the Personal Data collected and for what purposes?**

Depending on which features of the App you use, we collect different kinds of information (including Personal Information) about or from you. This Personal Information is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests, as well as for compliance with regulatory obligations to which we are subject. We also use Personal Data to optimize the results produced by the App and to improve our services. In addition, we collect Personal Data to answer your questions and to provide support and in some cases, to add you to our mailing list and to send you newsletters and other marketing communications. If this information will not be provided, you may not be able to use our App (such as opening an account), or certain features of our App. In certain

instances, we may obtain your consent to the collection of your Personal Information, as appropriate (in which case, you can revoke your consent at any time by approaching us).

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

- 2.1. 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.
- 2.2. Retention of your Personal Data. We retain your Personal Data as follows: (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.

## 3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your Personal Data as follows:

- 3.1. With our business partners with whom we jointly offer products or services. We may also share Personal Data with our affiliated companies. We may also share Personal Data with our affiliated companies about you. They may combine this Personal Data with other details they hold about you. Unless they provide you with their own privacy policy, they may use your Personal Data for the purposes explained in this Privacy Policy. We are part of the Astrix group, which is a global organization. For the purposes explained in this Privacy Policy, we may transfer your Personal Data to Astrix group companies (including service providers operating on their behalf) and other third parties in countries which do not have the same level of data protection laws as those in the country where you are located. Astrix uses several legal mechanisms, including EU Standard Contractual Clauses, to help ensure that your rights and protections are respected by all companies of the Company Name group. We use efforts to ensure that each Astrix group company will comply with the key data protection principles of fair handling of Personal Data and ensuring adequate level of protection of Personal Data.
- 3.2. 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;
- 3.3. 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;

- 3.4. 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
- 3.5. 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. YOUR PRIVACY RIGHTS. HOW TO DELETE YOUR ACCOUNT**

- 4.1. You can exercise your rights by contacting us at [privacy@astrix.security](mailto:privacy@astrix.security).
- 4.2. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you.
- 4.3. 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.
- 4.4. 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. 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.
- 4.5. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.
- 4.6. Deleting your account: Should you ever decide to delete your account, you may do so by emailing [privacy@astrix.security](mailto:privacy@astrix.security). If you terminate your account, any association between your account and Personal Data we store will no longer be accessible through your account.

#### **5. 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). 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@astrix.security](mailto:privacy@astrix.security).

#### **6. LOG FILES**

We use log files. We use such information to analyze trends and administer the App.

#### **7. ANALYTIC TOOLS**

We reserve the right to use and add new analytic tools.

#### **8. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW**

- 8.1 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@astrix.security](mailto:privacy@astrix.security). Please note that we are only required to respond to one request per customer each year.

**8.2 Our California Do Not Track Notice:** We do not track consumers over time and across third party websites and therefore do not respond to Do Not Track signals. We do not allow third parties to collect personally identifiable information about an individual consumer's online activities over time and across different web sites when a consumer uses the Services.

## 9. 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@astrix.security](mailto:privacy@astrix.security).