ORCA SECURITY PRIVACY POLICY

Last Updated: June 5, 2019

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

(i) When you browse or visit our website, https://orca.security ("**Website**");
(ii) When you make use of, or interact with, our Website
   a. When you request a demo
   b. When you download our e-book
   c. When you subscribe to our blog
   d. When you contact us (e.g. customer support, help, submit a request, submitting through the "click to leave a comment" button)
(iii) When you interact with us on our social media profiles (e.g., Facebook, LinkedIn, Twitter)

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. "**Personal Data**" means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals.

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This Privacy Policy can be updated from time to time and therefore we ask you to check back periodically for the latest version of the Privacy Policy, as indicated below. If there will be any significant changes made 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 Website or by other means.

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

Data we collect	**Why is the data collected and for what purposes?**	**Legal basis (GDPR only)**	**Third parties with whom we share your data**	**Consequences of not providing the data**

Cookies, analytic tools and log files	To improve the website's services, to analyze the use of the website and campaigns	Consent Legitimate interest (e.g. essential cookies)		Cannot improve website's services or analyze the use of the website and campaigns Cannot use or access some parts of the Website
When you make use of, or interact with, our Website				
When you request a demo				
• Full name • Company name • Email address • Password • Phone number • Job title • Any other data that you decide to supply/provide us	• To provide a demo	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. Legitimate interest (e.g., to provide a demo)	3rd party platforms such as for the following purposes: *Hubspot-CRM*	Cannot provide a free trial
	• To send marketing communications	Consent		Cannot send marketing communications
When you download our e-book				
• Full name • Company name • Email address • Password • Phone number • Job title • Any other data that you decide to supply/provide us	To download the e-book	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. Legitimate interest (e.g., to enable data subject to download the ebook)	3rd party platforms such as for the following purposes: *Hubspot - CRM*	Cannot download the e-book

	• To send marketing communications	Consent		Cannot send marketing communications
When you subscribe to our blog				
• Email address	• To add you to our blog mailing list	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. Legitimate interest (e.g., to enable data subject sign up to receive blog posts)	3rd party platforms such as for the following purposes: *Hubspot - CRM*	Cannot add you to our mailing list
	• To send marketing communications	Consent		Cannot send you marketing communications
***When you contact us (e.g. customer support, help, submit a request, submitting through the* "click to leave a comment" *button*)**				
• Full name • Email address • Company name • Phone number • Message • Any other data that you decide to supply/provide us	• To process and answer questions • To provide support (e.g., to solve problems, bugs or issues) • To customize your experience	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 Legitimate interest (e.g. respond to a query sent by you)	3rd party platforms such as for the following purposes: *Hubspot CRM*	Cannot assist you and respond your query
	• To send you marketing communications	Consent		Cannot send you marketing communications

When you interact with us on our social media profiles (e.g., Facebook, Twitter, LinkedIn)				
• Full name • Company name • Email address • Phone number • Any other data that you decide to supply/provide us	• To reply and/or respond to your request or question • To establish a first business connection/discussion • To send you marketing communications	Consent Legitimate interest (e.g. send you more information about Orca Security)	*3rd party platforms such as for the following purposes:* *Hubspot CRM*	Cannot reply or respond to your request Cannot establish a business connection Cannot send you marketing communications

Finally, please note that some of the abovementioned Personal Data will be used for fraud detection and prevention, and for security purposes.

2. PERIOD OF STORAGE OF COLLECTED INFORMATION

2.1. Personal Data. Your Personal Data (as described above) will be stored until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we will retain it for a longer or shorter period in accordance with data retention laws. We have an internal data retention policy to ensure that we do not retain your Personal Data perpetually.

2.2. Cookies. This depends on the cookie in question. Some cookies (e.g. essential cookies) cannot be disabled. You may also control and delete these cookies through your browser settings.

3. HOW WE PROTECT AND STORE YOUR INFORMATION

3.1. Security. We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the information will not be exposed 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.

3.2. Retention of your Personal Data. In addition to the retention periods mentioned in Section 1 above, 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.

4. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described in Section 1, we may share your information as follows:

- To the extent necessary, with regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;

- If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the minimum extent required) disclose information to a potential or actual third party purchaser of our business or assets. 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 or assign Personal Data in connection with the foregoing events.

- Where you have provided your consent to us sharing the Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality); and

- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

  If you want to receive the list of recipients of your Personal Data, please make your request by contacting us to info@orca.security.

5. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

Storage: AWS – North Virginia - US– *subject to the Privacy Shield of AWS).*

Access from Israel: Access from Israel is covered by the European Commission's Adequacy Decision regarding Israel. You can read more here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

External transfers: Where we transfer your Personal Data outside of EU/EEA, for example to third parties who help provide our products and services, we will obtain contractual commitments from them to protect your Personal Data. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of Personal Data transferred from within the EU to the United States.

Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

6. YOUR 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 information 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 it is inaccurate or misleading;
- You have the right to request the erasure of the Personal Data that relates to you. Please note that there may be circumstances in which we are required to retain your data, for example for the establishment, exercise or defense of legal claims;
- The right to object, to or to request restriction, of the processing. However, there may be circumstances in which we are legally entitled to refuse your request;
- 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 a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority;
- The right to withdraw your consent. 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.
- You also have a right to request details of the basis on which your Personal Data is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality.

You can exercise your rights by contacting us at info@orca.security. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly 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 your identity and for security purposes, before disclosing the Personal Data requested to you. 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 initial requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

7. USE BY CHILDREN

We do not offer our products or services for use by children. If you are under 18, you shall not use the Website, or provide any information to the Website without involvement of a parent or a guardian. We do not knowingly collect information from, and/or about children.

8. PUBLIC INFORMATION ABOUT YOUR ACTIVITY ON THE SERVICES

Some of your activity on and through the Services is public by default. This will include, but not limited to, content you have posted publicly on the Website or otherwise through the Services.

Registered users can have some of this information associated with their Accounts. Unregistered users will not have this association, but information concerning their use of the Services (such as what pages they have visited) can be tracked anonymously through the use of cookies and stored by us.

Please also remember that if you choose to provide Personal Data using certain public features of the Services, then that information is governed by the privacy settings of those particular features and can be publicly available. Individuals reading such information may use or disclose it to other individuals or entities without our control and without your knowledge, and search engines may index that information. We therefore urge you to think carefully about including any specific information you may deem private in content that you create or information that you submit through the Services.

9. LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS

The Website enables you to interact with or contain links to your Third Party Account and other third party websites, mobile software applications and 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 policy of each Third Party Service that you choose to use or interact with.

10. LOG FILES

We make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We use such information to analyze trends, administer the Website, track users' movement around the Website, and gather demographic information.

11. COOKIES AND OTHER TRACKING TECHNOLOGIES

Our Website utilizes "cookies", anonymous identifiers and other tracking technologies in order to for us to provide our Website 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.

12. ANALYTIC TOOLS

- **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 personally identifiable information. 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 http://www.google.com/analytics/terms/us.html/, 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/.

- **Firebase Analytics**. We also use a similar tool called "**Google Analytics for Firebase**". By enabling this tool, we enable the collection of data about App Users, including via identifiers for mobile devices (including Android Advertising ID and Advertising Identifier for iOS), cookies and similar technologies. We use the information we get from Google Analytics for Firebase to maintain and improve our App(s). We do not facilitate the merging of personally-identifiable information with non-personally identifiable information unless we have robust notice of, and your prior affirmative (i.e., opt-in) consent to, that merger. Finally, please note that Google Analytics for Firebase's terms (available at https://firebase.google.com/terms/) shall also apply.

- **Mixpanel**. We collect personally identifiable information such as your email address and your user activity through the use of Mixpanel. Mixpanel's ability to use and share information is governed by the Mixpanel Terms of Use, available at https://mixpanel.com/terms/, and the Mixpanel Privacy Policy, available at https://mixpanel.com/privacy/. You can opt-out of Mixpanel's services by clicking on the following link: https://mixpanel.com/optout/. If you get a new computer, install a new browser, erase or otherwise alter your browser's cookie file (including upgrading certain browsers) You may also clear the Mixpanel opt-out cookie.

- **AppsFlyer**. We use a tool called "AppsFlyer", a mobile attribution & marketing analytics platform, to understand the use of our Service. AppsFlyer is exposed to the following data: (i) unique identifiers and technical data, such as IP address, User agent, IDFA (Identifier For Advertisers) or Android ID (in Android devices); (ii) technical data regarding your operating system, device attributes and settings, applications, advertising opt-out signals, Google Advertiser ID, in-app events, device motion parameters and carrier. The use of this data allows us to analyze our campaigns and performance, as well as your habits and characteristics. For example, the data AppsFlyer receives includes downloads, impressions, clicks and installations of their mobile applications, mobile device use and data regarding in-app events. AppsFlyer's terms of use (available at https://www.appsflyer.com/terms-of-use/) and privacy policy (available at https://www.appsflyer.com/privacy-policy/) also apply to the use of AppsFlyer.

- **AppSee and other third party technologies**. We use Appsee https://www.appsee.com/legal/terms and other third parties to collect and analyze data from our Services.

- **Hotjar**. The Website uses Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our Website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy at https://www.hotjar.com/legal/policies/privacy. You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our Website and Hotjar's use of tracking cookies on other websites on this link https://www.hotjar.com/legal/compliance/opt-out.

- **Facebook Pixels and SDKs**. We use Facebook pixels or SDKs, which are tools that provide help to website owners and publishers, developers, advertisers, business partners (and their customers) and others integrate, use and exchange information with Facebook, as such the collection and use of information for ad targeting. Please note that third parties, including Facebook, use cookies, web beacons, and other storage technologies to collect or receive information from your websites and elsewhere on the internet and use that information to provide measurement services and target ads. Facebook's ability to use and share information is governed by the Facebook Tools Terms, available at: https://www.facebook.com/legal/technology_terms/. You can prevent your data from being used by

Facebook Pixels and SDKs by exercising your choice through these mechanisms: http://www.aboutads.info/ choices or http://www.youronlinechoices.eu/.

- **Google Signals**. The Website uses a tool called "**Google Signals**" to collect information about use of the Website. When we activate Google Signals, some existing Google Analytics features are updated to also include aggregated data from Google users who have turned on "Ads Personalization" (Ads Personalization available at https://support.google.com/ads/answer/2662856/). Audiences that we create in Google Analytics and publish to Google Ads and other Google Marketing Platform advertising products can serve ads in cross device-eligible remarketing campaigns to Google users who have turned on Ads Personalization. Google Analytics collects additional information about users who have turned on Ads Personalization, base across device types and on aggregated data from users who have turned on Ads Personalization. The data is user based rather than session based. The Cross Device reports include only aggregated data. No data for individual users is ever exposed. You can modify your interests, choose whether your Personal Data is used to make ads more relevant to you, and turn on or off certain advertising services in the Ads Personalization link above.
- **Facebook Custom Audience**
- **Lookalike Audience**

We reserve the right to use other analytic tools.

13. 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 Data to third parties for their direct marketing purposes. To make such a request, please send an email to info@orca.security. Please note that we are only required to respond to one request per customer each year.

14. OUR CALIFORNIA DO NOT TRACK NOTICE

We do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer's online activities over time and across third-party websites or online services. We allow third parties, such as companies that provide us with analytics tools, to collect personally identifiable information about an individual consumer's online activities over time and across different websites when a consumer uses the Services.

15. 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 info@orca.security

Data controller: Orca Security Ltd.