

Privacy Policy

Revision History			
Version	Created by	Date	Change Log
1.0	Guy Alfassi	30/09/21	1 st version
1.1	Tamar Asseraf	23/11/21	2 ND version
1.2	Yoav Horman	13/02/22	Approved by Management
1.3	Meitar	01/05/2022	

1. Purpose and Scope

- 1.1 This privacy policy ("Privacy Policy") governs how we, Unbiased Security Inc. (together, "Unbiased Security" "we", "our" or "us") use, collect and store Personal Data we collect or receive from or about you ("User", "you") when you use our services.
- 1.2 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.
- 1.3 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.

2. What Information We Collect, Why We Collect It, And How It Is Used

Container	Data we collect	Why is the data collected and for what purposes?	Legal basis (GDPR only)	Third parties with whom we share your data
Emails	- Email address - Name - Recipient email address - Text within email – can contain anything	- To provide the service - To analyze, support and improve our service.	- Processing is necessary for the performance of the service we are contracted to perform for the individual's organization. - Legitimate interest	GCP (for cloud storage and processing)
Web pages elements	- Site used - Images and other elements included in the HTML body	- To provide the service - To analyze, support and improve our service.	- Processing is necessary for the performance of the service we are contracted to perform for the individual's organization. - Legitimate interest	GCP (for cloud storage and processing)

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UI Analytics	• IP address • Usage analytics (browsing history)	• To provide the service • To analyze, support and improve our service.	• Processing is necessary for the performance of the service we are contracted to perform for the individual's organization. • Legitimate interest	GCP (for cloud storage and processing)
Client Logs	• IP address • Cookie	• To provide the service • To analyze, support and improve our service.	• Processing is necessary for the performance of the service we are contracted to perform for the individual's organization. • Legitimate interest	GCP (for cloud storage and processing)
Management Data	• Name • Email address • Position • Company name • Device used • Network Information	• To provide the service • To analyze, support and improve our service.	• Processing is necessary for the performance of the service we are contracted to perform for the individual's organization. • Legitimate interest • legal obligation	GCP (for cloud storage and processing)
Contact data	• Name • Email address • Position	• To answer your query • To respond to your requests • To provide support and customer service	• Consent	GCP (for cloud storage and processing)

	• Company name	• To establish a business connection		
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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: Your Personal Data will be stored until we delete the record and we proactively delete it or you send a valid deletion request, 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 2, we may share your information as follows:

4.1 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.

4.2 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.

If you want to receive the list of recipients of your Personal Data, please make your request by contacting us to privacy@unbiasedsecurity.com

5. TRANSFERS OF PERSONAL DATA

- 5.1 Personal data is stored in a GCP data center in Frankfurt, Germany. Data protection is subject to the privacy protection mechanisms of GCP.
- 5.2 We mainly store and process your data in the EEA/EU territory, and we also process data in a limited way in Israel, which according to article 45 of GDPR, offers an adequate level of data protection.

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):

- 6.1 You have the right to request that we rectify any Personal Data we hold that it is inaccurate or misleading
- 6.2 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
- 6.3 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
- 6.4 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

- 6.5 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
- 6.6 You have the right to object to profiling
- 6.7 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
- 6.8 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 can exercise your rights by contacting us at privacy@unbiasedsecurity.com. Subject to legal and other permissible considerations, we will make every reasonable effort to honour 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 initially 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 should not use the service, or provide any information to the service 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 SERVICE

We do not make any information regarding your use of the service or activity throughout it, public.

9. COOKIES

Our service utilizes “cookies” in order to for us to provide our service. A “cookie” is a small text file that may be used, for example, to identify a user in our service. 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.

10. ANALYTIC TOOLS

We use GCP analytic tools (e.g. Elastic Search) to collect information about use of the service. We use the information we get from these tools to maintain and improve the service.

11. 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@unbiasedsecurity.com