

Scribe Privacy Policy

Last Revised: May 2022

Scribe Security Ltd. (“**Company**”, “**we**”, “**us**” or “**Scribe**”) respects the privacy of the users (“**User**” or “**you**”) of its website at <https://scribesecurity.com/> (the “**Site**”) and/or its software services (the “**Services**”) and is committed to protecting the User's information. We believe that you have a right to know our practices regarding the information we may collect and use when you use our Site and/or Services.

1. Your consent (important, please read carefully!)

BY ENTERING, ACCESSING OR USING THE SITE AND/OR CONSUMING THE SERVICES, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY, INCLUDING TO THE POSSIBLE COLLECTION AND PROCESSING OF YOUR OR YOUR CUSTOMER'S PERSONAL INFORMATION AS SPECIFIED HEREIN. **PLEASE NOTE: IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT ENTER, CONNECT TO, ACCESS OR USE THE SITE IN ANY MANNER AND/OR CEASE FROM CONSUMING THE SERVICES.**

2. Which information we may collect on our Users of the Site?

We may collect two types of data and information from our Users:

- a. The first type of information is non-identifiable and anonymous information (“**Non-personal Information**”). **We are not aware of the identity of the User from whom we have collected the Non-personal Information.** Non-Personal Information is any unconcealed information that does not enable the identification of an individual User, and which is available to us when such User uses our Site. Non-personal Information which is being gathered consists of technical information, behavioral information and aggregated information, and may contain, among other things, the activity of the User on the Site, type of operating system, device type, User's 'click-stream' on the Site, keyboard language, screen resolution, time spent on various screens of the Site, etc. We also use third-party service providers such as Google Analytics to obtain detailed analytics on the User's behavior on the Site.
- b. The second type of information is personally identifiable information (“**Personal Information**”). **This information may identify an individual or may be of a private and/or sensitive nature.**
 - Personal Information consists of any personal details provided consciously and voluntarily by the User when creating an account on the Site and/or when registering to our newsletter and/or when opting-in to receive our marketing information, which information includes: full name, e-mail address, address, phone number, country, name of employer and/or job position.
 - The legal basis for the processing of the Personal Information about you is your consent, you may at any time withdraw your consent for the purposes for which you provided your consent by sending a notice to the following email address: info@scribesecurity.com

For the avoidance of doubt, any Non-personal Information connected or linked to or associated with any Personal Information shall be deemed as Personal Information as long as such connection, linkage or association exists.

We do not collect any Personal Information from you or related to you without your approval, which is obtained, *inter alia*, through your acceptance of this Privacy Policy.

3. How Do We Collect Information on our Users of the Site?

There are two main methods that we use:

- a. **We collect information through your entry, connection, access and/or use of the Site.** In other words, when you are using the Site, we are aware of it and may gather, collect and store the information relating to such usage (such as the Non-personal Information detailed above), either independently or through the help of our authorized third-party service providers as detailed below.
- b. **We collect information which you provide us voluntarily.** For example, we collect Personal Information when you create an account on the Site and/or when you register to our newsletter and/or when you opt-in to receive our marketing information, based on your consent. Where you withdraw your consent for the processing of Personal Information about you, we might not be able to provide you with some or all of the Services (including, but not limited to, the use of the Site)

you requested or in the form intended to be provided to you, and you will have no claim in respect of that.

4. Which information we may collect on our Users of the Services?

- a. Information we may collect upon your registration or installation of our software, as an account holder to the Services: full name, e-mail address, address, phone number, country, name of employer and/or job position, credit card or other means of payment details. By using our Services, you voluntarily and consciously agree to provide us with such categories of information.
- b. Information we may collect upon each time you access the Services and/or during your use of the Services after registration or installation: full name, e-mail address, address, phone number, country, name of employer and/or job position.
- c. Any information you provide to us on your own free will when contacting us, including via customer support, chat, social networks or in any other manner, including complaints, requests and comments. You voluntarily and consciously agree to provide us with such information. Our customer support representatives may record and/or document in writing your calls.

5. How Do We Collect Information on our Users of the Services?

- d. We collect information about you whenever you use our Services (including, but not limited to, our software). In some instances, you will actively provide us with such information, and in other instances, we will collect the information about you from examining and analyzing your use of our Services (including, but not limited to, our software).
- e. We may collect or obtain certain types of data from our clients and/or users of the Services. Such Users may upload, transmit, import, post or process anonymized data about their end-users, personnel and/or customers ("**User's Data**") in the course of providing our Service. During a User's use of our Services, it may provide us with its and/or its User's Data such as full name, e-mail address, address, phone number, country, name of employer, job position, credit card or other means of payment details (if required or applicable) and other relevant data. You are not obligated to provide us with any **User's Data**. However, in some instances, not providing such data will prevent us from providing you with the Services, prevent the use of the software and/or cause the malfunctioning of our Services.
- f. User shall remain solely responsible and liable for the User's Data, including without limitation for our use of and reliance upon such User's Data, and expressly release us from any and all liability arising from any such activities. This information is used by us to provide Services, support, mailings, sales and marketing actions, billing (if required or applicable) and to meet our contractual obligations with the relevant User and/or third parties. In addition, we will only have access to information related to the User's end-users, personnel and/or customers after it has been pseudonymized by the User, unless otherwise required and authorized by such end-users', personnel's and/or customers' explicit consent, or by the law and/or legal authority.

6. What are the Purposes of the Collection of Information?

Non-personal Information is collected in order to:

- Use it for statistical, analytical and research purposes and for customization, development and improvement of our Site and/or Services.
- Enhance the User's experience while using the Site and/or Services.

Personal Information is collected in order to:

- Respond to your inquiry.
- Provide the Users with materials, updates about Scribe's activities and news regarding the topics that may be of interest to you, etc.
- For billing and payment purposes for the use of the Services.

7. Processing of Personal Information

We rely on the User's consent to process Personal Information and/or on its representations and statements that such User has obtained all the required consents from its end-users, personnel and/or customers. On other occasions, we may process User's Data when it needs to do this to fulfill a contractual obligation with you as a User of our Services or where it is required to do so by law. We may also process User's Data when it is in our or our providers' legitimate interests to do so and when these interests are not overridden by the individual's data protection rights (which may vary based on an individual's jurisdiction).

User acknowledges and agrees that the data which will be provided to us may contain Personal Information, as defined by the applicable laws which govern the use of data relating to identified or identifiable natural persons residing in the EU and/or the state of California in the United States, including the laws of the European Union ("EU") Data Protection Act 1998, the EU General Data Protection Regulation ("GDPR"), and the California Consumer Protection Act effective as of January 1, 2020, as each of these laws are amended or replaced from time to time, and any other foreign or domestic laws to the extent that they are applicable to the personally identifiable or personal data you upload, transmit, post or process while using the Service ("**Data Protection Laws and Regulations**").

User hereby grants us a non-exclusive right and license to receive, retrieve, access, use, reproduce, display, copy, transmit, process and store (collectively, "**Process**") the Personal Information in order to provide the Services. User retains ownership of its and/or its end-users', personnel's and/or customers' Personal Information. We may redact, anonymize, and/or aggregate the data with content and data from our other providers for purposes including, without limitation, product and service development and commercialization and quality improvement initiatives. We will redact or anonymize data in such a way as to not divulge any Personal Information.

User represents and warrants that by providing us with any Personal Information: (i) it have lawfully obtained any personally identifying information or Personal data pursuant to any and all applicable and relevant Data Protection Laws and Regulations; (ii) it have appropriately disclosed to end-users, personnel and/or customers how personally identifiable information or personal data will be used, processed, stored and/or shared pursuant to any and all applicable and relevant Data Protection Laws and Regulations; (iii) it is responsible for honoring any requests from end-users, personnel and/or customers relating to the collection, use and storage of personally identifiable information or personal data as required by any and all relevant Data Protection Laws and Regulations; (iv) it owns or have acquired the right to all of the intellectual property rights subsisting in the data, and have the right to provide us the license granted herein to the User's Data; and (ii) the User's Data does not infringe or violate any patents, copyrights, trademarks or other intellectual property, proprietary or privacy rights of any third party.

8. The purposes of processing the Personal Information

We process your Personal Information for one or more of the purposes outlined in this section and according to the appropriate legal basis. We shall not process Personal Information unless there is a legal basis for such processing. The legal bases according to which we may process Personal Information are as follows:

- a. Your consent that we will process Personal Information about you for one or more specific purposes. By way of example, for providing the Services or for the purpose of sending marketing materials to you .
- b. Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract. By way of example, in order to allow you to install and use our software and/or to use the Services and/or Site as per our Terms of Use or License Agreement.
- c. Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party. By way of example, for the purpose of improving our Site and/or Services (including, but not limited to, our software), or for the exercise or defense of legal claims. Such processing is conditional upon such interests not overridden by your interests or fundamental rights and freedoms which require protection of Personal Information about you.

Notwithstanding the aforementioned, it should be emphasized that except for the purposes of registration and/or payments related to the use of the Services, the Company and its Services do not require any Personal Information, as such information is not being used and/or processed as part of the provision of the Services. Correspondingly, except for registration and/or payment purposes, as a user of our Services, you are requested not to transfer or pass to the Company any information that could use or recognize as personally identifiable

information. In any case of voluntary delivery of Personal Information and/or personally identifiable information made by you as a user of the Services, you hereby declare and undertake that you have obtained all the necessary consents from your employees, users, clients and/or any other data subjects to use such information and/or transfer such information to third parties (including the Company), as required by the Data Protection Laws and Regulations. In addition, in any case of transfer of such information, you must ensure that the information is provided after undergoing the process of anonymization, while omitting or shushing any personally identifiable information.

9. Sharing Information with Third Parties

Scribe will not share any Personal Information it collects with any third party, other than in the circumstances as follows: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental and/or regulatory authorities requests; (b) to enforce this Privacy Policy, including investigation of potential violations thereof; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; (e) to protect the rights, property, or personal safety of the Company, its Users or the general public; (f) by virtue of undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of Company, so long as such acquirer maintains the same privacy terms hereunder; or (g) pursuant to your explicit consent prior to the disclosure. Note, that we collect, hold and/or manage your Personal Information through Scribe's authorized third parties' vendors of certain products or services (such as hosting cloud services and client relations management services/systems) (including, as applicable, their affiliates) solely and limited to providing us with such requested services, and not for any other purposes. Such vendors may be located in a country that does not have the same data protection laws as your jurisdiction.

For the avoidance of doubt, Scribe may transfer and disclose Non-personal Information to third parties at its sole discretion, including without limitation, for statistical, analytical and research purposes.

Personal Information about you may be transferred to a third country (i.e., jurisdictions outside the EEA) or to international organizations. In such circumstances, we shall take any reasonable efforts to safeguards aimed to ensure the protection of Personal Information about you and provide that enforceable data subject rights and effective legal remedies for data subjects are available .

These safeguards and protection will be available if any of the following are met:

- a. The transfer is to a third country or an international organization which the EU Commission decided that they provide an adequate level of protection to the Personal Data that is transferred to them pursuant to Article 45(3) of the GDPR;
- b. The transfer is according to a legally binding and enforceable instrument between public authorities or bodies pursuant to Article 46(2)(a) of the GDPR; or
- c. The transfer is in accordance with standard data protection clauses adopted by the EU Commission pursuant to Article 46(2)(c) of the GDPR; the clauses adopted by the EU Commission can be viewed at: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en.

You may request to be provided with details concerning the safeguards employed by us to protect the Personal Information about you which is transferred to a third country or an international organization, by sending an email to the following address: info@scribesecurity.com

10. Third Party Service Providers

While using the Site and/or providing our Services we may be using third party service providers, who may collect, store and/or process the information detailed herein. Scribe uses commercially reasonable efforts to engage with third parties that post a privacy policy governing their collection, processing and use of non-personal and personal information. Such software may include without limitation:

- **Google Analytics:** We may utilize Google Analytics, a web analysis service provided by Google, to better understand your use of our Services and/or Site. Google Analytics collects information such as how often users visit the Site, what pages they visit and what other sites they used prior to visiting. Google uses the data collected to track and examine the use of the Site, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the Site to

contextualize and personalize the ads of its own advertising network. Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). Google also offers an opt-out mechanism for the web available [here](#); and

Please read such third-party service providers' terms of use and privacy policies to understand their privacy practices.

11. Links to Third Party Websites

Certain links provided herein permit our Users to leave the Site, and enter non-Scribe sites or services (which may include but shall not be limited to Facebook, Twitter, LinkedIn and GitHub). Scribe is not responsible or liable for such linked sites and services' privacy practices and/or any other practices. Your access to, use of and reliance upon any such sites, services and content and your dealings with such third parties are at your sole risk and expense. Those linked sites and services are provided solely as a convenience to you. Most of such linked sites and services provide legal documents, including terms of use and privacy policy, governing the use thereof. It is always advisable to read such documents carefully before using those sites and services, *inter alia*, in order to know what kind of information they are collecting.

12. Tracking And Cookies

When you visit or access the Site, a cookie file (which is a small text file) is installed on the device via which you visit or access the Site. The cookies allow us to collect information about you and your behavior, in order to improve your user experience, to remember your preferences and settings, to customize and offer you products and services that may interest you. Cookies are also used to collect statistics about your usage of the Site and perform analytics. Cookies, by themselves, do not tell us your Personal Information, unless you choose to provide this information to us (by, for example, registering for one of our Services). However, once you choose to furnish the Site with your Personal Information, this information may be linked to the data stored in the cookie.

We use the following categories of cookies for the Site:

- Essential Cookies. These cookies are necessary for the operation of the Site and, for example, enable a User to log-in and enjoy member benefits (if applicable).
- Functional Cookies. We use Functional Cookies to save your settings on the Site - settings such as your currency preference when using the Site. We also use Functional Cookies to store data so that you can easily find it the next time you visit the Site.
- Session Cookies. These cookies are stored only temporarily during a browsing session and are deleted from your device when you close the browser. We use Session Cookies to support the functionality of the Sites and to understand your use of the Sites, for example, which pages you visit, which links you use and how long you stay on each page.
- Persistent Cookies. These cookies are not deleted when you close your browser but are saved on your device for a fixed period or until you delete them. Each time you visit the Sites, the server that set the cookie will recognize the Persistent Cookie saved on your device. We and others use Persistent Cookies to store your preferences, so that they are available for your next visit, for example, if you already logged into our Sites, these cookies will skip the log-in when you visit our Sites again.
- Performance Cookies. Performance Cookies allow us to understand how members use our Services, by collecting information on how often users use a particular feature of the Services. These aggregated statistics are used internally to improve our Services in a way that makes the Services interesting to as users members as possible. Performance Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services' content for those who engage with our advertising.

- **Targeting and advertising Cookies.** These cookies are used to collect information from you to help us to improve our products and/or Services, as well as serve you with targeted advertisements that we believe will be relevant to you. We use targeting cookies on our Sites for various marketing initiatives and campaigns. We also may use some Analytics Cookies (see below) and other technologies to facilitate advertising.
- **Analytics Cookies.** These cookies collect information about your use of the Sites, and enable us to improve the way it works. These Analytics Cookies give us aggregated information that we use to monitor Site performance, count page visits, spot technical errors, see how users reach the Sites, and measure the effectiveness of advertising and targeted ads.

Different web browsers provide varying degrees of control over your browser's cookies, session storage and local storage. You can change your browser settings, or if necessary, change to a different browser, to automatically prevent cookies from being stored. If you are concerned about online tracking you can also change your settings to send a "[Do-Not-Track](#)" signal to request the Site not to use cookies or other mechanisms to track you, or you can install a browser extension, such as [Disconnect](#), to block third-party tracking cookies on our Site. However, please note that certain features of the Site may not work if you delete or disable cookies.

13. Minors

The Site is intended for Users over the age of thirteen (13). Therefore, Scribe does not intend and does not knowingly collect directly Personal Information from children under the age of thirteen (13) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of thirteen (13) are not using the Site.

14. Newsletters & Marketing Materials

You hereby agree that we may use your contact details you provided us with for the purpose of providing you with materials related to our current and/or future activities, products and/or Services. You may withdraw your consent by sending a written notice to Scribe e-mail address that appears in the Site or alternatively follow the instructions for removing yourself from the mailing list which are available in the message transmitted to you.

15. Your rights in respect of the Personal Information

You are entitled to the following rights in respect of the Personal Information about you. The exercise of such rights will be via sending an email requesting to exercise your right to the following email address: info@scribesecurity.com

- a. **Right of access.** You have the right to receive from us confirmation as to whether or not Personal Information about you is being processed, and, where that is the case, access to the Personal Information and the following information: (1) the purposes of the processing; (2) the categories of Personal Information concerned; (3) the recipients or categories of recipients to whom the Personal Information have been or will be disclosed; (4) where possible, the envisaged period for which the Personal Information will be stored, or, if not possible, the criteria used to determine that period; (5) the existence of the right to request or restriction of processing of Personal Information about you or to object to such processing; (6) the right to lodge a complaint with a supervisory authority; (7) where the Personal Information is not collected from you, any available information as to its source; and (8) where Personal Information is transferred to a third country outside the EEA or to an international organization, the appropriate safeguards relating to the transfer. We shall provide a copy of the Personal Information undergoing processing and may charge a reasonable fee for any further copies requested by you. Where you make the request by electronic means, and unless otherwise requested by you, the information shall be provided in a commonly used electronic form.
- b. **Right to rectification.** You have the right to obtain from us the rectification of inaccurate Personal Information about you. Taking into account the purposes of the processing, you have the right to have incomplete Personal Information about you completed, including by means of providing a supplementary statement.

- c. Right to erasure. You have the right to obtain from us the erasure of Personal Information about you where one of the following grounds applies: (a) the Personal Information is no longer necessary in relation to the purpose for which it was collected or otherwise processed; (b) you withdraw your consent on which the processing is based and there is no other legal ground for the processing; (c) you object, at any time, on grounds relating to your particular situation, to processing of the Personal Information which is based on the legitimate interests pursued by us or by a third party, and there are no overriding legitimate grounds for the processing; (d) you object to the processing of the Personal Information for direct marketing purposes; (e) the Personal Information has been unlawfully processed; (f) the Personal Information has to be erased for compliance with a legal obligation in European Union or Member State law to which we are subject. This right is not applicable to the extent that the processing is necessary for the establishment, exercise or defense of legal claims.
- d. Right of restriction of the processing. You have the right to obtain from us restriction of processing of Personal Information about you where one of the following applies: (a) the accuracy of the Personal Information is contested by you, for a period enabling us to verify the accuracy of the Personal Information; (b) the processing is unlawful and you oppose the erasure of the Personal Information and request the restriction of its use instead; (c) we no longer need the Personal Information for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; (d) where the processing of the Personal Information is necessary for the purpose of the legitimate interests pursued by us or by a third party, unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.
- e. Right to data portability. You have the right to receive the Personal Information about you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit such Personal Information to another controller, where: (a) the processing is based on your consent or on a contract to which you are a party; and (b) the processing is carried out by automated means. In exercising your right to data portability, you have the right to have the Personal Information about you transmitted directly from the Company to another controller, where technically feasible.
- f. Right to object. You have the right to object, at any time, on grounds relating to your particular situation, to the processing of Personal Information about you which is based on the legitimate interests pursued by us or by a third party, including profiling based on such legitimate interests; in such case, we shall no longer process the Personal Information about you unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.
- g. Right to withdraw consent. You may withdraw your consent provided to us for the purpose of processing Personal Information about you, at any time, without affecting the lawfulness of processing based on your consent before its withdrawal. Please note that in the event you withdraw your consent, we may not be able to provide you with some of our Services.

16. Security

We take reasonable measures to maintain the security and integrity of our Site and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures. The Personal Information is hosted on the AWS servers which provide advanced strict security standards (both physical and logical). In addition, we implement reasonable administrative, organizational and technical safeguards and security measures to protect Personal Information from unauthorized access, disclosure, destruction or alteration, accidental loss, misuse or damage. Please note, however, that there are inherent risks in the transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur. SCRIBE SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA.

17. Changes to the Privacy Policy

The terms of this Privacy Policy will govern the use of the Site and any information collected therein. Scribe retains the right to change this policy at any time, so please re-visit this page frequently to check for any changes. In case of any material change, we will make reasonable efforts to post a clear notice on the Site or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such material changes will take effect seven (7) days after such notice was provided on our Site or sent to you via e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" and your continued use of the Platform on or after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Privacy Policy should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by the law and without any prior notice.

18. Got any Questions?

If you have any questions (or comments) concerning this Privacy Policy, you are most welcome to send us an email to the following address: *info@scribesecurity.com* and we will make an effort to reply within a reasonable timeframe.