## **Privacy Policy**

Last modified: Dec 15, 2020

SwordEye and SwordSec ("Swordsec," "Swordeye," "we," "our," or "us"), recognizes that your privacy is very important and we take it seriously. SwordEye provides cyber security solutions and other services to users ("User," "Users," "you," or "your") and Enterprise Users ("Enterprise User", "Enterprise Users") around the world. Your use of our website (the "Site") and the services made available on the Site ("Services") is subject to these Privacy Rules, "Terms & Conditions" (these "Terms") for individual users and SwordEye Data Processing Agreement for corporate users.

This Privacy Policy (the "Privacy Policy") describes how SwordSec Inc. collect, use, and share information in connection with your use of our websites (including swordeye.io and any subdomains of this site unless expressly excluded by their own terms and conditions), Application, services, and other web based applications (collectively, the "Services").

This Privacy Policy does not apply to information and data processed by our customers when using our Services. A customer's processing of any information using our Services is specific to their implementation and governed by the customer's own privacy policy and the written data agreements between SwordEye and the customer.

If you have any questions about this Privacy Policy or SwordEye's data collection, use, and disclosure practices, please contact us at info@swordsec.com

#### 1. Information we collect

We collect and receive information from you and your devices in the following cases:

Through your visit to our web sites and using our Applications, Giving your contact details physically (mostly in an event, bilateral meetings or other similar physical organizations) Using our services (dashboard, API, plugins)

### 1.1 Information collected when you visit our web sites

We use cookies on our Sites to improve user experience and enhance our services. Therefore when you visit our web sites, our servers may automatically log the standard data provided by your web browser. It may include your Internet Protocol (IP) address, OS platform, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, your clicks, your scrolls and other details.

We may also collect contact and/or professional data about you in person, through means like online forms and/or communications, and through our websites. For example, you may provide your name, surname and contact information, as well as professional information to us when you sign up to learn more about SwordEye's products and services, download content, register for an event, and visit our offices.

## 1.2 Information collected physically

During our physical marketing efforts and business activities, you may provide us your contact and professional details especially in business card format or orally. If you attend an event, we may also receive contact and professional details about you by filling in a form or by providing us a business card or other method where you share Personal Data with us, as well as pictures and videos taken that can be shared on social media to express Enterprise activities. Typically, contact data includes your name and contact methods, such as telephone number, email address, and mailing address, and professional data includes details such as the organization you are affiliated with, your job title, and industry.

# 1.3 Information collected when you use our services

Information collected by our systems will be detailed in the following subsections:

#### 1.3.1 Web Dashboard Part

For Enterprise Users that have contracts with us, we provide a web-based management console for cyber security solutions of their employees and/or customers. In this console, employee or customer data is provided to the system by the Enterprise . In such cases, the data controller is the Enterprise and we are in the data processor role. So, the responsibility to meet the data privacy and other related legal requirements with the end user or employee is primarily on the Enterprise .

As a Enterprise User of our Site, Application and services your data controller may keep and process your personal data under the following sections of management console:

#### 1.3.2 API Services

Since our backend services run through API services, the data mentioned in the previous systems should be transferred using these API's.

## 1.3.3 Plugins

We sometimes provide some plugins in order to interact with third party systems. In the settings page of these plugins, the system may store users' email addresses, API Keys, some other relevant configuration data.

### 2. How we collect information

We collect information by fair and lawful means, with your knowledge and consent. We also let you know why we're collecting it and how it will be used. You are free to refuse our request for this information, with the understanding that we may be unable to provide you with some of your desired services without it. Use of information

We use your data in order to increase the security of your authentication processes and prevent any malicious cyber attack against your identities.

We may use a combination of identifying and non-identifying information to understand who our visitors are, how they use our services, and how we may improve their experience of our Services in the future. We do not disclose the specifics of this information publicly, but may share aggregated and anonymised versions of this information, for example, in website and customer usage trend reports.

We may use your personal details to contact you with updates about our Services, along with promotional content that we believe may be of interest to you. If you wish to opt out of receiving promotional content, you can follow the "unsubscribe" instructions provided alongside any promotional correspondence from us.

### 3. Data processing and storage

We only transfer data within jurisdictions subject to data protection laws that reflect our commitment to protecting the privacy of our users.

We only retain personal information for as long as necessary to provide a service, or to improve our services in future. While we retain this data, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification. That said, we advise that no method of electronic transmission or storage is 100% secure, and cannot guarantee absolute data security.

If you request your personal information be deleted, or where your personal information becomes no longer relevant to our operations, we will erase it from our system within a reasonable timeframe.

#### 4. Cookies

We use "cookies" to collect information about you and your activity across our site. A cookie is a small piece of data that our website stores on your computer, and accesses each time you visit, so we can understand how you use our site. This helps us serve you content based on preferences you have specified.

## 5. Third-party access to information

We use third-party services for:

Analytics tracking
Advertising and promotion
Content marketing
Email marketing
Payment processing (Paddle.net)
Hosting

These services may access our data solely for the purpose of performing specific tasks on our behalf. We do not share any personally identifying information with them without your explicit consent. We do not give them permission to disclose or use any of our data for any other purpose.

We may, from time to time, allow limited access to our data by external consultants and agencies for the purpose of analysis and service improvement. This access is only permitted for as long as necessary to perform a specific function. We only work with external agencies whose privacy policies align with ours.

We will refuse government and law enforcement requests for data if we believe a request is too broad or unrelated to its stated purpose. However, we may cooperate if we believe the requested information is necessary and appropriate to comply with legal process, to protect our own rights and property, to protect the safety of the public and any person, to prevent a crime, or to prevent what we reasonably believe to be illegal, legally actionable, or unethical activity.

We do not otherwise share or supply personal information to third parties. We do not sell or rent your personal information to marketers or third parties.

## 6. Children's privacy

SwordEye does not knowingly collect information from children under the age of 13, and children under 13 are prohibited from using our Services. If you learn that a child has provided us with personal information in violation of this Privacy Policy, you can alert us at info@swordsec.com

## 7. Limits of our policy

This privacy policy only covers SwordEye's own collecting and handling of data. We only work with partners, affiliates and third-party providers whose privacy policies align with ours, however we cannot accept responsibility or liability for their respective privacy practices.

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices.

# 8. Changes to this policy

This Privacy Policy may be modified from time to time, so please review it frequently. Changes to this Privacy Policy will be posted on our websites. If we materially change the ways in which we use or share personal information previously collected from you through our Services, we will notify you through our Services, by email, or other communication channels.

### 9. Your rights and responsibilities

As our user, you have the right to be informed about how your data is collected and used. You are entitled to know what data we collect about you, and how it is processed. You are entitled to correct and update any personal information about you, and to request this information be deleted. You may amend or remove your account information at any time, using the links in our web sites.

You are entitled to restrict or object to our use of your data, while retaining the right to use your personal information for your own purposes. You have the right to opt out of data about you being used in decisions based solely on automated processing.

#### 10. Contact us

If you have any questions or concerns about this Privacy Policy, please feel free to email us at info@swordsec.com

SwordSec Inc. is the data controller of your personal information in individual services but data processor in the Enterprise services.