



Privacy Policy – “Segasec”

Date: June 10th, 2018

The Company respects the privacy of its users. In order to improve the protection of the Users, the Company publishes this privacy policy (the "**Privacy Policy**") regarding how the Company collects Your information from Your use of the Website.

The processing and collection of personal data is governed by the Israeli law and by the General Data Protection Regulation (the "**GDPR**"), and whenever you'll provide the Company such information, the Company will only use your information in line with all applicable data protection laws, including the GDPR. At all times You are in control of Your information, and You can withdraw Your consent to provide Your information to the Company.

The data controller of the Website is Segasec Labs Ltd, Israeli Company No. 515665214 (the "**Company**") which is the entity which decides how Your personal information is processed and for what purposes as detailed in the Privacy Policy.

1. General and Information the Operator Collects

During Your use of the Website, the Company will not collect any of Your personal information unless you will fill in your details via the "contact us" which include only your email address, name and phone number.

Regarding non-personal information, Subject to Your consent the Operator will use web-analytics technology which will be used to collect information about how You use and navigate the Website so that the Operator will be able to add new features and improve of the Website. This information is anonymous and cannot be used to identify you personally. Please note that at any time You have the right to withdraw Your consent and object from this.

2. Your Rights Regarding Your Personal Information

2.1. Under the GDPR and subject to different exemptions, you have the following rights:

- To access Your personal data and receive a copy of Your personal data upon Your request;
- To rectify, erase or restrict Your information upon Your request (right to be forgotten);
- To object to the processing of Your information;
- To request that the Company will provide the You with Your personal information and, if possible, to transmit Your data directly to another data controller (right to data portability).
- To withdraw Your consent to processing and collecting your information at any time.

- 2.2. No fees are required for exercising any of the above rights. However, and subject to the GDPR, the Company may charge You a reasonable fee including administration fees if Your request is repetitive or excessive or demands the Company to bear excessive and/or expensive efforts.
- 2.3. To exercise your rights, please contact the Company's Data Protection Officer at the following contact details:

Tal Hershkovitz

Hapelech st 7 Tel Aviv – Yafo, Israel.

gdpr@segasec.com

3. **Database and Use of Information**

- 3.1. All collected information as stated above is stored in the Company's database. With accordance to Your consent, the Company warrants to use such information for the following purposes:

- Contacting you regarding your interest in the Company's services;
- Any other purpose detailed in any agreements that You may enter to with the Company.

- 3.2. Your information is collected and used because the Company has a legitimate business interest for Your personal data to be used for the above purposes. You have the right to object to this by contacting the Company via email: gdpr@segasec.com. Please note that if you object, this may affect the Company's ability to provide You the Company's services.

- 3.3. Please note that some of the information You will be requested to provide is necessary for providing You the Services. Therefore, your refusal to provide some information may result in You not receiving the Services since the Company will not be practically able to provide you the Services.

- 3.4. The Company may receive Your information from third parties which the Company cooperates with (e.g. business partners, professional advisors, service providers, etc.) and the Company may receive Your information from them.

4. **Transferring Information to Third Parties**

5. Subject to Your consent, the Company will transfer and/or share Your information in the following events and circumstances and, when applicable, will give you reasonable notice upon doing so:

- When You have permitted the Company to transfer and/or share Your information;
- When You violate any agreement with the Company or act illegally;
- To enforce the Privacy Policy;



- In response to a subpoena or similar investigative demand, a court order, or a request for cooperation from law enforcement or other government agency;
- To establish or exercise the Company's legal rights;
- To defend against legal claims; or as otherwise required by law. In such cases, the Company may raise or waive any legal objection or right available to the Company, in the Company's sole discretion;
- When the Company believes disclosure is appropriate in connection with efforts to investigate, prevent, report or take other action regarding illegal activity, suspected fraud or other wrongdoing;
- To protect and defend the rights, property or safety of the Company, its Users, employees or others;
- In connection with a substantial corporate transaction, such as the sale of the Company's business, a divestiture, merger, consolidation, or asset sale, or in the event of liquidation.

6. **Retaining Your Information**

- 6.1. The Company will only retain Your personal information for as long as necessary to fulfil the purposes it was collected for including, but not only, for the purposes of complying with legal, accounting, or reporting requirements. The retention period is determined based on the amount, nature, and sensitivity of Your personal information, the potential risk of harm from unauthorized use or disclosure of Your information, the purposes for which the Company processes Your information and whether such purposes can be achieved through other means with accordance to any applicable law.
- 6.2. Your personal information will be retained for a period of 3 years from the date of providing Your consent to collect Your information, thereafter all of Your information is removed from the Company's systems.

7. **Data Security**

- 7.1. The Company takes appropriate security measures for data security purposes to help prevent unauthorized persons from gaining access to Your personal information. However, no system can be completely secure. Therefore, the Company does not warrant that its services will be totally immune to any breaches of security and/or unauthorized access, including access to the data stored in the Website, although the Company will contact You upon a breach of Your data security with accordance to any applicable law.
- 7.2. The Company inspects, from time to time, the data security of the Website and performs modifications and upgrades accordingly in order to keep the Website's security. Nonetheless, the Company will not be liable for any direct or indirect damage caused to You due to exposure of Your information by an unauthorized access to the Company's database and/or due to any negligence or act not controlled by the Company.



8. **Changes to This Privacy Policy**

The Company may occasionally update this Privacy Policy. The Company will notify You by sending an email to the email address You most recently provided the Company and/or by prominently posting notice of the changes and will state at the heading of the Privacy Policy the date of change.