

Privacy Policy – “Guardio”

Effective From: 24/05/2018

This privacy policy (the "**Privacy Policy**") is an integral part of the terms of use, and both documents should be read together.

The processing and collection of personal data are governed by the Israeli law and by the General Data Protection Regulation (the "**GDPR**"), and whenever you'll provide the Operator such information, the Operator 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 Operator.

The data controller of the Product is "Guardio Security" (the "**Operator**") which is the entity that decides how Your personal information is processed and for what purposes as detailed in the Privacy Policy.

1. General

During Your use of the Product, the following information about You will be collected:

- Anonymized browsing behavior needed for the operation of the product including sites and URLs visited during product's operation.
- In order to maintain account information we collect Country, IP, Installation time. E-mail, name, and last name (as provided by the user). 4 digits of credit card, credit card type for paying customers

2. Your Rights Regarding Your Personal Information

1.1. 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 Operator will provide You with Your personal information and, if possible, transmit Your data directly to another data controller (right to data portability).
- To withdraw Your consent to processing and the processing at any time;

1.2. No fees are required for exercising any of the above rights. However and subject to the GDPR, the Operator may charge You a reasonable fee including administration fees if Your

request is repetitive or excessive or demands the Operator to bear excessive and/or expensive efforts.

1.3. To exercise your rights, please contact the Operator's Data Protection Officer at the following contact details: my.privacy@guard.io.

3. **Database and Use of Information**

2.1. All collected information as stated above is stored in the Operator's database. In accordance with Your consent, the Operator warrants to use such information for the following purposes:

- Enabling convenient and efficient use;
- Improve and enrich existing services and content;
- Modify and/or remove existing services and content;
- Perform research and provide statistical information to third parties (in such case, the provided information will not identify You);
- Enforce the Operator's Terms;
- Collecting subscription fees;
- Notifying You of websites and/or services that may be malicious by sending Warnings;
- Performing services including blocking of malicious websites;
- Providing additional services to You for example personalized reports and personalized security features;
- Any other purpose detailed in the Terms and this Privacy Policy.

2.2. Your information is collected and used because the Operator has a legitimate business interest for Your personal data to be used for the above purposes. This enables the Operator to send You relevant and personalized content designed to improve Your use of the Product. You have the right to object to this by contacting the Operator via email: my.privacy@guard.io. Please note that if you object, this may affect the Operator's ability to send personalized content to You.

2.3. 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 Operator will not be practically able to provide you the Services.

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

4. **Storing Information and Mailings**

4.1. User details provided by You will be bound to the Privacy Policy, and subject to Your consent which may be withdrawn at any time You hereby agree that such information will be stored in the Operator's databases for the following purposes:

4.1.1. Marketing, advertising, sales promotion, and addressing the User by any available media (including in writing, by phone, electronic form, and any other form);

4.1.2. Encouraging loyalty, research and analyzing of statistics, conducting surveys and any other use regarding registration to the Website and/or Your subscription to the Product;

4.1.3. Internal uses including investigating complaints and/or reviews;

4.1.4. Operational marketing and statistical purposes including processing information and mailings for such purpose;

4.1.5. Providing additional services to You.

5. **Transferring Information to Third Parties**

Subject to Your consent, the Operator may 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 Operator to transfer and/or share Your information, and in such case, the Operator will always ensure that Your information will remain protected and secure when being transferred;
- When You violate the Terms of the Product or act illegally;
- To enforce the Terms or 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 Operator's legal rights;
- To defend against legal claims; or as otherwise required by law. In such cases, the Operator may raise or waive any legal objection or right available to the Operator, in the Operator's sole discretion;

- When the Operator 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 Operator, its Users, employees, or others;
- To collect any unpaid fees including via collection agencies and attorneys;
- In connection with a substantial corporate transaction, such as the sale of the Operator's business, a divestiture, merger, consolidation, or asset sale, or in the event of liquidation.

6. **Third-Parties**

- 2.5. There are a number of places on the Website where You may click on a link to access other websites that do not operate under this Privacy Policy and are not related to the Operator including, but not only, links leading to third-party Websites. These links may independently solicit and collect information, including personal information, from You and, in some instances, provide the Operator with information about Your activities on those links.
- 2.6. Every third party such as detailed above may have its own privacy policy describing its use of personal information, and such policy will regulate the use, handling, and disclosure of such personal information of the User. Should You require additional information regarding any privacy policy of third parties, The Operator recommends that You visit these third-party websites and read their privacy policies. It is clarified that such third parties unless explicitly mentioned otherwise, are neither controlled nor owned by the Operator
- 2.7. Your information will be handled and used by the Operator's trusted third parties including the following recipients in order to deliver services provided by the Operator:
- Providers, partners, and sub-contractors on behalf of the Operator;
 - Analytics, marketing, performance monitors & search engine providers that may assist the Operator in improving the optimization and performance of the Product and/or Website.

7. **Retaining Your Information**

- 7.1. The Operator will only retain Your personal information for as long as necessary to fulfill 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

Operator processes Your information, and whether such purposes can be achieved through other means with accordance to any applicable law.

- 7.2. Your personal information will be retained for a period of 1 year from the date of providing Your consent to collect Your information, thereafter all of Your information is removed from the Operator's systems.
- 7.3. Your details for marketing communications will be retained for a period of 2 years from the date of your last interaction with the marketing communication (i.e. opening an email or clicking on a link within the email) at which point all of your personal details will be removed from the Operator's systems unless You will address the Operator and request that You no longer wish to receive marketing messages from the Operator.
- 7.4. If You report any fault regarding Your information, Your details will be retained for a period of 2 years where it will be archived by the Operator's relevant staff.

8. **Your Choices About Collection and Use of Your Information and Mailings**

- 8.1. You can choose not to provide the Operator with certain information, but that may result in You being unable to use the Products since such information is necessary in order to enable You to subscribe to the Service.
- 8.2. Upon registration to the Service and upon agreeing to receive Mailings, the Operator may, with accordance to any applicable law, send You Mailings which include email messages and/or newsletters about service updates, improvements, special offers, or special content. The Operator may send You other types of transactional and relationship email communications, such as service announcements, administrative notices, and surveys. If the Operator has already provided Your information to a third party before You have changed Your preferences or updated Your information, You may have to change Your preferences directly with that third party.
- 8.3. It is clarified that at any stage You will have the ability to opt-out of receiving the Mailings by contacting the Operator and/or by clicking on a link available on the Mailings sent to You by the Operator.

9. **Use of Cookies**

- 9.1. Upon Your consent, the Operator uses various technologies to collect information from Your device and about Your activities while using the Website and/or Product in order to improve and personalize Your online experience of the Website and/or Product including by means of storing cookies to Your device. Please note that some of the cookies the Operator uses are necessary for using the Website and some cookies are used to provide features of third parties.
- 9.2. The Operator uses the following cookies on the Website and/or Product:

- Necessary Cookies are essential for providing the services of the Operator. These cookies do not record any of Your identifiable personal information and the Operator does not need Your consent to place these cookies on Your device. Please note that without these cookies, The Operator will not be able to provide You some of the services offered by the Operator.
- Performance cookies are used to collect anonymous information about Your use of the Websites in order to help the Operator to improve the Websites and, for example, the effectiveness of the advertisements available on the Website, including by means of recording and tracking webpages You've accessed, length of Your visit, Your interaction with a webpage (e.g. mouse clicks, scrolling). In some cases, the Operator uses trusted third parties to collect such information which may include recording Your use of the Websites, although it is clarified that such third parties use any of Your information solely for the above purpose. By using the Website You agree that the Operator can place such cookies on Your device. Please note that at any time You have the right to withdraw Your consent and object from being recorded on the Website.
- Functionality cookies are used to remember Your settings to enhance Your visit to the Website (e.g. text size, language, time zone, or other preferences). The information these cookies collect is anonymous and does not enable the Operator to track Your browsing activity on the Website. By using the Website You agree that the Operator can place such cookies on Your device. Please note that at any time You have the right to withdraw Your consent and object from being remembered by the Website.
- Targeting and advertising cookies which are used by the Operator's trusted third parties to display advertisements that are relevant to You and measure the effectiveness of such advertisements. Information contained in these cookies is anonymous and doesn't contain Your personal information. Please note that at any time You have the right to withdraw Your consent and object from being profiled by the Website.
- Web analytics cookies are 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 Your experience of the Website. This information is anonymous and cannot be used to identify you personally.

9.3. Please note that if You choose to disable some or all of the above cookies, the Operator cannot guarantee the proper performance and use of the Website and/or Product and some features may not function properly.

9.4. During your use of the Website and/or Product, third-party websites may store cookies on Your device, e.g. when some content of the website is embedded from third-party websites.

Please note that the Operator has no control over these cookies and You should check such a third-party's cookie policy.

10. **Data Security**

- 10.1. The Operator 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 Operator 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 Product, although the Operator will contact You upon a breach of Your data security with accordance to any applicable law.
- 10.2. The Operator inspects, from time to time, the data security of the Product and performs modifications and upgrades accordingly in order to keep the Product's security. Nonetheless, the Operator will not be liable for any direct or indirect damage caused to You due to exposure of Your information by unauthorized access to the Operator's database and/or due to any negligence or act not controlled by the Operator.

11. **Changes to This Privacy Policy**

The Operator may occasionally update this Privacy Policy. Upon major changes, the Operator will notify You by sending an email to the email address You most recently provided the Operator and/or by prominently posting notice of the changes and will state at the heading of the Privacy Policy the date of the change. The Operator reserves its rights, at its sole discretion, to amend the Privacy Policy at any time. You are responsible to check any updates of the Privacy Policy by entering the Privacy Policy from time to time. Your continuation of using the Product will be considered as consent to any amended Privacy Policy.