

## **SERVICES PRIVACY POLICY ("PRIVACY POLICY")**

IMPORTANT: BY USING VISITING VALKYRIE SECURITY LTD.'S ("COMPANY" OR "WE") IDNTITY PRIVILEGE MANAGEMENT PLATFORM ("SERVICES") YOU ("YOU") ACKNOWLEDGE THAT YOU HAVE READ AND UNDERSTAND THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND THAT ALL PERSONAL DATA (DEFINED BELOW) THAT YOU SUBMIT OR THAT IS PROCESSED OR COLLECTED THROUGH OR IN CONNECTION WITH YOUR USE OF THE SERVICES WILL BE PROCESSED BY THE COMPANY AND ITS AFFILIATES IN THE MANNER AND FOR THE PURPOSES DESCRIBED IN THE FOLLOWING PRIVACY POLICY.

Company is a controller of the Personal Data it processes in relation to its customers, vendors, service providers or partners. When Company processes Personal Data on behalf of its customers, Company is a data processor under the GDPR, to the extent applicable. In that case, Company's customers will be a data controller under the GDPR, and will be responsible to obtain the data subject's consent or establish any other applicable lawful basis for processing and to ensure that data subjects can exercise their rights set forth in Section 9 below.

YOU ARE NOT LEGALLY REQUIRED TO PROVIDE US WITH PERSONAL DATA, HOWEVER, USE OF THE SERVICES REQUIRES THAT YOU PROVIDE PERSONAL DATA. IF YOU CHOOSE TO WITHHOLD ANY PERSONAL DATA REQUIRED IN RESPECT THEREOF, IT WILL NOT BE POSSIBLE FOR YOU TO USE THE SERVICES. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS SET FORTH HEREIN PLEASE DO NOT USE THE SERVICES.

**"Personal Data"** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. The Personal Data collected or processed by the Company is detailed herein.

We recognize that privacy is important. This Privacy Policy applies to all of the services, information, tools, features and functionality available on the Services offered by the Company or its subsidiaries or affiliated companies and covers how Personal Data that the Company collects and receives, including in respect of any use of the Services, is treated. If you have any questions about this Privacy Policy, please feel free to contact us at: [support@valkyrie.io](mailto:support@valkyrie.io).

### **1. Information We Collect and How We Use It.**

**Summary: We collect personal data about our customers and their representatives and visitors of our Services. We also collect personal data included in publicly available sources.**

**We use Personal Data to provide and improve our Services, and to meet our contractual, ethical and legal obligations.**

In order to provide and operate our Services and provide services in connection therewith, we collect and process Personal Data, including the following types of information:

*Processing which 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 (GDPR Article 6(1)(b)) OR*

*Processing which is necessary for compliance with a legal obligation to which Company is subject (GDPR Article 6(1)(c)):*

- 1.1. **Your Contact Information.** If you are a customer representative that signed a contract with the Company, we may ask you to provide Personal Data, including full name, professional affiliation, your affiliation contact information including address, work email address and phone number. We use this information to administer the Services, carry out our obligations, verify and carry out financial transactions, contact you for technical and administrative needs related to the Services, replying to queries and troubleshooting, detecting and preventing fraud, soliciting feedback, compliance and audit purposes, prevention of crime and identity theft and more.

*Processing which is necessary for the purposes of the legitimate interests pursued by Company or by a third party (GDPR Article 6(1)(f)) of providing efficient and effective Services to our customers, including:*

- 1.2. **Third Parties.** We sometimes supplement the Personal Data with information that is received from third parties.
- 1.3. **Usage Information.** When you use the Services, we automatically receive and record information from your browser, including without limitation information and statistics about your online/offline status, your IP address, geolocation data (including country and city), device identifiers, internet service provider, connection speed, URL navigations and search history, type of browser, your regional and language settings and software and hardware attributes. Our systems automatically record and store technical information regarding the method and nature of your use of the Services. An IP address is a numeric code that identifies your browser on a network, or in this case, the Internet. Your IP address is also used to gather broad demographic information. The Company uses all of the Personal Data identified in this Section in order to understand the usage trends and preferences of our users, including recent visits to our Services and how you move around different sections of our Services for analytics purposes and in order to make our Services more intuitive.
- 1.4. **User Communications.** When you send emails or other communications to the Company, we retain those communications in order to process your inquiries, respond to your requests and improve our Services. We may send you push notifications to send you news and updates in respect of the Services. We may also send you newsletters and promotional communications, you may opt-out of this service at any time by using the link at the bottom of the communication.
- 1.5. **Aggregate and Analytical Data.** In the effort to produce insights regarding use of the Services in order to improve our services and develop and improve automated processes on our Services, we often conduct research on the information and statistics about online/offline status, IP address, date and time stamps and number of clicks on page, cookie information, device ID, and your settings. This research is compiled and analyzed on an aggregate basis, and we share this aggregate data with Company's affiliates, agents and business partners and also disclose aggregated information in order to describe our services to current and prospective business

partners or investors. This aggregate information does not identify you or your customers or employees personally.

## 2. Cookies.

**Summary: We may use cookies and similar technologies on our Services. You can disable cookies but then your online experience on our Services will be limited.**

In order to collect the data described herein we may use temporary cookies that remain on your browser for a limited period of time. We may also use persistent cookies that remain on your browser until the Company's Services are removed, in order to manage and maintain the Services and record your use of the Services. Cookies by themselves cannot be used to discover the identity of the user. A cookie is a small piece of information which is sent to and stored on your browser. Cookies do not damage your browser. Most browsers allow you to block cookies but you may not be able to use some features on the Services if you block them. You may set most browsers to notify you if you receive a cookie (this enables you to decide if you want to accept it or not). We may also use web beacons via the Services to collect information. Web beacons or "gifs", are electronic images that are used in our Services or in our emails. We may use Web beacons to deliver cookies and count visits.

3. **Links.** Links to other services, sites and applications are provided by the Company as a convenience to our users. The Company is not responsible for the privacy practices or the content of other sites and applications and you visit them at your own risk. This Privacy Policy applies solely to Personal Data collected by us.
4. **Minors.** If any of your data subjects (e.g. employees or customers) are minors under the age of 18, you must obtain parental consent prior to using our Services. The Company will not knowingly contact or engage with children under the age of 16 without said parental consent. If you have reason to believe that a child has provided us with their Personal Data, please contact us at the address given above and we will endeavor to delete that Personal Data from our databases.
5. **Information Sharing.**

**Summary: We may transfer or host your Personal Data to third parties who assist us in providing the Services. We have a contract with those third parties to govern their processing on our behalf. We may also transfer Personal Data to comply with any obligations by which we are bound or to an investor or in connection with a merger or acquisition or similar transaction.**

As part of providing the Services our affiliates, agents, representatives and service providers may have access to your Personal Data. We require these parties to process such information in compliance with this Privacy Policy and subject to security and other appropriate confidentiality safeguards. Where possible, we use commercially reasonable efforts to transfer such Personal Data in encrypted form. The Company may also share Personal Data in the following circumstances: (a) as required for providing the Services; (b) for maintenance and improvement of the Services; (c) if we become involved in a reorganization, merger, consolidation, acquisition, or any form of sale of some or all of our assets, with any type of entity, whether public, private, foreign or local; and/or

(d) to satisfy applicable law or prevention of fraud or harm or to enforce applicable agreements and/or their terms, including investigation of potential violations thereof.

**6. Data Security.** We follow generally accepted industry standards to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of Personal Data. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. We retain your Personal Data only for as long as reasonably necessary for the purposes for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

**7. Data Retention.**

**Summary: We retain Personal Data only for as long as necessary to meet our legal and ethical obligations, which for different types of Personal Data will be different periods.**

7.1. Company will retain Personal Data in accordance with its record retention policy. Personal Data associated with our customers and business partners, will be retained for the duration of our engagement, and a period thereafter in accordance with Company's record retention policy. Company performs periodic reviews of our databases, and have established specific time limits for data retention, based on the criticality of the Personal Data and the purposes of the data processing. We will also retain Personal Data to meet any audit, compliance and business best-practices.

7.2. Personal Data with respect to which Company is the processor will be deleted only on instruction of the controller, except where such data must be retained by us, in our judgment, as above.

7.3. Personal Data that is no longer retained will be anonymized or deleted. Non-personal, non-identifiable, metadata and statistical information concerning the use of our Services are retained by Company indefinitely. Some Personal Data may also be retained on our third-party service providers' servers until deleted in accordance with their privacy policy and their retention policy.

**8. Data Integrity.** The Company processes Personal Data only for the purposes for which it was collected and in accordance with this Privacy Policy or any applicable service agreements. We review our data collection, storage and processing practices to ensure that we only collect, store and process the Personal Data needed to provide or improve our Services. We take reasonable steps to ensure that the Personal Data we process is accurate, complete, and current, but we depend on our users to update or correct their Personal Data whenever necessary. Nothing in this Privacy Policy is interpreted as an obligation to store information, and we may, at our own discretion, delete or avoid from recording and storing any and all information.

**9. Rights of Data Subjects.**

9.1. **Right of Access and Rectification.** Data subjects have the right to know what Personal Data we collect about them and to ensure that such data is accurate and relevant for the purposes for which we collected it. Where we are controller, we allow data subjects the option to access and obtain a copy of their Personal Data and to rectify such Personal Data if it is not accurate,

complete or updated. However we may first ask data subjects to provide us certain credentials to permit us to identify their Personal Data.

9.2. **Right to Delete Personal Data or Restrict Processing.** Data subjects have the right to delete their Personal Data or restrict its processing. We may postpone or deny such requests if the Personal Data is in current use for the purposes for which it was collected or for other legitimate purposes such as compliance with legal obligations.

9.3. **Right to Withdraw Consent.** Data subjects have the right to withdraw their consent to the processing of their Personal Data. Exercising this right will not affect the lawfulness of processing the Personal Data based on consent obtained before its withdrawal.

9.4. **Right of Data Portability.** Where technically feasible, data subjects have the right to ask to transfer their Personal Data in accordance with their right to data portability, if required pursuant to applicable law.

Where we are controller of your Personal Data, data subjects may exercise the above rights by sending a request to [support@valkyrie.io](mailto:support@valkyrie.io).

9.5. **Right to Lodge Complaint.** Data subjects also have the right to lodge a complaint with a data protection supervisory authority regarding the processing of their Personal Data.

Note that we may have to undertake a process to identify a data subject exercising their rights, and we will keep details of such rights exercised for our compliance and audit requirements. Personal Data may be either deleted or retained in an aggregated manner without being linked to any identifiers or Personal Data, depending on technical commercial capability. Such information may continue to be used by Company.

When data is provided by a data subject's employer or organization, or through a controller, such data subject rights will have to be effected through that customer or controller.

**10. Enforcement.** The Company regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Privacy Policy or our treatment of Personal Data by contacting us as provided above. When we receive formal written complaints, it is the Company's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of Personal Data that cannot be resolved between the Company and an individual.

**11. Changes to This Privacy Policy.** The Company may update this Privacy Policy. We will notify you about significant changes in the way we treat Personal Data by placing a prominent notice on the Services. We encourage you to periodically review this Privacy Policy for the latest information about our privacy practices. Our customers and business partners will be notified of such changes and are responsible to inform their data subjects.

## **12. Legal Justification and Consent To Processing.**

12.1. By providing any Personal Data to us pursuant to this Privacy Policy, all users, including, without limitation, users in the United States, Israel and member states of the European Union, acknowledge and fully understand this Privacy Policy and the collection and

processing of such Personal Data abroad. The server on which the Services are hosted and/or through which the Services are processed may be outside the country from which you access the Services and may be outside your country of residence. Some of the uses and disclosures mentioned in this Privacy Policy involve the transfer of your Personal Data to various countries around the world that may have different levels of privacy protection than your country and will be transferred outside of the European Economic Area. If there is a transfer of your Personal Data outside the EEA we will, in the absence of an EC Adequacy decision relevant to the destination country or to the transfer, seek to rely on appropriate safeguards such as entering into appropriate EC approved standard contractual clauses (see [http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm)). By submitting your Personal Data through the Services, you consent, acknowledge, and agree that we will collect, use, transfer, and disclose your Personal Data as described in this Privacy Policy.

### **13. Marketing emails**

- 13.1. Email marketing content released by Valkyrie shall include an unsubscribe option in the email body.

Last Date Updated: May 27, 2024.