

## SILVERFORT PRIVACY POLICY

Last Updated: May 2022

This privacy policy (“**Privacy Policy**”) governs how we, Silverfort, Inc. and its subsidiaries (“**Silverfort**” “**we**”, “**our**” or “**us**”) use, collect and store information pertaining to you (“**User**”, “**you**”) such as in the following use cases:

- (i) When you browse or visit our website, <https://www.silverfort.com> (“**Website**”)
- (ii) When you make use of, or interact with, our Website
  - a. When you request a demo / schedule a demo
  - b. When you contact us (e.g., to request more information, to make an appointment with us)
  - c. When we process your job application
  - d. When you subscribe to email updates
  - e. When you request to become a partner
  - f. When you log into the partner portal
  - g. When you contact us for support purposes (including, when you access the support platform of Silverfort)
- (iii) When you use Silverfort Authentication platform (“**Platform**”)
  - a. When you sign up for an account, log in and/or purchase our services
  - b. When you create administrators for your use of the Platform
  - c. When your administrator user create users for your use of the Platform
- (iv) When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data
- (v) When we acquire your Personal Data from third-party sources (such as lead-generation companies)
- (vi) When we use the Personal Data of our resellers, distributors, agents and/or finders
- (vii) When you become our customer
- (viii) When you become our supplier
- (ix) When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

The Website and the App are individually and collectively referred to herein as the “**Services**”.

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. “**Personal Data**” or “**Personal Information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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This Privacy Policy can be updated from time to time and therefore we ask you to check back periodically for the latest version of the Privacy Policy, as indicated below. If there will be any significant changes made to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

### **1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED**

<b>Personal Data we collect</b>	<b>Why is the Personal Data collected and for what purposes?</b>	<b>Legal basis (GDPR only, if applicable)</b>	<b>Third parties with whom we share your Personal Data</b>	<b>Consequences of not providing the Personal Data</b>
<b>When you browse or visit our website</b>				
Cookies, analytic tools and log files.  For more information, please see our cookie policy <a href="https://www.silverfort.io/company-2/cookies-policy/">https://www.silverfort.io/company-2/cookies-policy/</a>	Marketing, analytics, analysis, market research, to improve our website	Consent  Legitimate interest (e.g., essential cookies)	For more information, please see our cookie policy <a href="https://www.silverfort.io/company-2/cookies-policy/">https://www.silverfort.io/company-2/cookies-policy/</a>	Cannot collect and store the information; Cannot use or access some parts of the website
<b>When you make use of, or interact with our Website</b>				
<b>When you request a demo/ schedule a demo</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email Address</li> <li>• Job title</li> <li>• Company name</li> <li>• Phone number</li> <li>• Country &amp; State</li> <li>• Message</li> <li>• Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>• To schedule a demo</li> <li>• To send you more information about Silverfort</li> </ul>	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract  Legitimate interest (e.g. to provide a demo)	3rd party platforms, such as for the following purposes: <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> <li>• Salesloft (customer engagement tool)</li> <li>• AWS Redshift (analytic insights)</li> </ul>	Cannot send you more information about Silverfort  Cannot schedule a demo  Cannot respond your query
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email Address</li> </ul>	<ul style="list-style-type: none"> <li>• To send marketing communications.</li> </ul>	Consent	3rd party platforms, such as for the following purposes: <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> </ul>	Cannot send you marketing communications

<b>When you contact us (e.g., to request more information, to make an appointment with us)</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email Address</li> <li>• Job title</li> <li>• Company name</li> <li>• Phone number</li> <li>• Country &amp; State</li> <li>• Information regarding how we can help you</li> <li>• Message</li> <li>• Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>• To process and answer questions</li> <li>• To provide support (e.g., to solve problems, bugs or issues)</li> <li>• To customize your experience</li> </ul>	<p>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to respond to your request)</p>	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> <li>• Salesloft (customer engagement tool)</li> </ul>	<p>Cannot assist you and respond your query</p> <p>Cannot provide support</p> <p>Cannot customize your experience</p>
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email Address</li> </ul>	To send marketing communications.	Consent	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> </ul>	Cannot send marketing communications
<b>When we have audio calls</b>				
Call recordings	Internal call analytics and internal educational purposes	Depending on the context, consent or legitimate interest	3 <sup>rd</sup> party platform - Gong (Customer call recordings and analytics)	Cannot perform internal call analytics and limited internal education
<b>When we process your job application</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Phone number</li> <li>• Resume/CV</li> <li>• LinkedIn profile</li> <li>• Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>• To process your job application</li> <li>• To assess the candidate</li> </ul> <p><b>Note:</b> For the avoidance of doubt, this use case shall apply to the CVs submitted by the Website or by any other methods (e.g., HR and recruitment agencies)</p>	<p>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to assess a candidate)</p>	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Comeet (job applicant tracking system)</li> <li>• Box.com (storage)</li> <li>• Microsoft O365 (email service)</li> </ul>	<p>Cannot process your job application</p> <p>Cannot assess your suitability as a candidate</p>
<b>When you subscribe to email updates</b>				
<ul style="list-style-type: none"> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you more information about Silverfort and marketing communications</li> </ul>	<p>Consent</p> <p>Legitimate interest (e.g. to send you marketing communications about Silverfort)</p>	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> </ul>	Cannot send you marketing communications
<b>When you request to become a partner</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Job title</li> <li>• Company name</li> <li>• Email address</li> <li>• Phone number</li> <li>• Country</li> <li>• Message</li> <li>• Any other information that you choose to share with us</li> </ul>	<ul style="list-style-type: none"> <li>• To assess you as a partner</li> <li>• To analyze your profile</li> <li>• To contact you with information about becoming a Silverfort partner</li> </ul>	<p>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to assess a partner)</p>	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> <li>• Salesloft (customer engagement tool)</li> <li>• Docusign (digital signing tool)</li> </ul>	<p>Cannot assess you as a partner</p> <p>Cannot analyze your profile</p> <p>Cannot send you more information about becoming a partner</p>
<b>When you log into the partner portal</b>				
<ul style="list-style-type: none"> <li>• User</li> <li>• Password</li> </ul>	<ul style="list-style-type: none"> <li>• To log in into the partner's portal</li> <li>• To access partner knowledge base</li> <li>• To register deals with Silverfort</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Legitimate interest (e.g. to log in into the portal).</p>	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• ZenDesk (technical support and knowledge base)</li> <li>• Salesloft (customer engagement tool)</li> </ul>	Cannot log in into the portal
<b>When you contact us for support purposes (including, when you access the support platform of Silverfort)</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Phone number</li> <li>• User and Password</li> <li>• Message/support problem</li> <li>• Any other information that you choose to share with us</li> </ul>	<ul style="list-style-type: none"> <li>• To access the support platform</li> <li>• To open support tickets</li> <li>• To access knowledge base and documentation</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Legitimate interest (e.g. to log in into the portal).</p>	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• ZenDesk (technical support and knowledge base)</li> <li>• When you call to the support center, we use Voicenetation (call center services for support)</li> <li>• Slack (internal communications)</li> <li>• Everafter AI Ltd.</li> </ul>	<p>Cannot access the support platform</p> <p>Cannot open support tickets</p> <p>Cannot access knowledge base and documentation</p>

<b>When you use Silverfort Platform</b>				
<b>When you sign up for an account, log in and/or purchase our services</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Business email address</li> <li>• Password</li> <li>• Usage pattern (logs from the use of the Platform)</li> <li>• IP address</li> <li>• Any other information that the user may keep as part of the log-in process, to the extent that it includes Personal Data.</li> </ul>	<ul style="list-style-type: none"> <li>• To provide access to our Platform To create an account</li> <li>• To make the Platform features available to you</li> <li>• To fulfill your requests for products and/or services and for related activities (e.g., product and service, account management, support and to provide other services related to your relationship with)</li> <li>• To perform/execute the agreement</li> <li>• To grant you access to the services (our Platform)</li> <li>• To improve and customize user experience</li> </ul>	<p>Performance of a contract to which the data subject is party.</p> <p>Legitimate interest (e.g. to provide you with Silverfort's services).</p>	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Google Firebase (for mobile app operation)</li> <li>• Microsoft Azure (cloud)</li> <li>• Docusign (digital signing tool)</li> <li>• Skytap (demo test environment)</li> <li>• Snowflake, Inc.</li> </ul>	<p>Cannot provide access to our Platform</p> <p>Cannot create an account</p> <p>Cannot make the Platform features available to you</p> <p>Cannot fulfill your requests for products and/or services and for related activities (e.g., product and service, account management, support and to provide other services related to your relationship with)</p> <p>Cannot perform/execute the agreement</p> <p>Cannot grant you access to the services (our Platform)</p> <p>Cannot improve and customize user experience</p>
<b>When you create administrators for your use of the Platform</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Business email address</li> <li>• Password</li> <li>• Usage pattern (logs from the use of the Platform)</li> <li>• IP address</li> <li>• Any other information that the user may keep as part of the log-in process, to the extent that it includes Personal Data</li> </ul>	<ul style="list-style-type: none"> <li>• To create administrator users for your use of the Platform</li> <li>• To perform/execute the agreement</li> <li>• To grant you and your admin users access to the services (our Platform)</li> <li>• To manage your everyday business needs (e.g., administration)</li> </ul>	<p>Performance of a contract to which the data subject is party.</p> <p>Legitimate interest (e.g. to provide you with Silverfort's services).</p>	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Google Firebase (for mobile app operation)</li> <li>• Microsoft Azure (cloud)</li> </ul>	<p>Cannot create administrator users for your use of the Platform</p> <p>Cannot perform/execute the agreement</p> <p>Cannot grant you and your admin users access to the services (our Platform)</p> <p>Cannot manage your everyday business needs (e.g., administration)</p>
<b>When your administrator user create users for your use of the Platform</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Business email address</li> <li>• Password</li> <li>• Usage pattern (logs from the use of the Platform)</li> <li>• IP address</li> <li>• Any other information that the user may keep as part of the log-in process, to the extent that it includes Personal Data</li> </ul>	<ul style="list-style-type: none"> <li>• To create regular users for the use of the Platform</li> <li>• To perform/execute the agreement</li> <li>• To grant you access to the services (our Platform)</li> <li>• To manage your everyday business needs (e.g., administration)</li> </ul>	<p>Performance of a contract to which the data subject is party.</p> <p>Legitimate interest (e.g. to provide you with Silverfort's services).</p>	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Google Firebase (for mobile app operation)</li> <li>• Microsoft Azure (cloud)</li> </ul>	<p>Cannot create regular users for the use of the Platform</p> <p>Cannot perform/execute the agreement</p> <p>Cannot grant you access to the services (our Platform)</p> <p>Cannot manage your everyday business needs (e.g., administration)</p>
<b>When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data</b>				
<ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> <li>• Email address</li> <li>• Company name</li> <li>• Contact information</li> <li>• Any other data you decide to supply</li> </ul>	<ul style="list-style-type: none"> <li>• To establish a business connection</li> </ul>	<p>Depending on the context, consent or legitimate interest (e.g. send you more information about SilverFort in certain B2B situations)</p>	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> </ul>	<p>Cannot stay in touch with you</p> <p>Cannot deliver content</p>
<ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To send marketing communications</li> </ul>	<p>Consent</p>	<ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> </ul>	<p>Cannot send you marketing communications</p>
<b>When we acquire your Personal Data from third-party sources (such as lead-generation companies)</b>				
<ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> <li>• Email address</li> <li>• Company name</li> <li>• Contact information</li> </ul>	<ul style="list-style-type: none"> <li>• To establish a business connection</li> <li>• To send marketing communications</li> </ul>	<p>Depending on the context, legitimate interest (B2B marketing), pre-contractual discussions or consent</p>	<p>3<sup>rd</sup> party platforms, such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> <li>• Salesloft (customer engagement tool)</li> </ul>	<p>Cannot stay in touch with you</p> <p>Cannot deliver content</p>
<b>When we use the Personal Data of our resellers, distributors, agents and/or finders</b>				
<ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> <li>• Email address</li> <li>• Company name</li> <li>• Contact information</li> <li>• Any other data you decide to supply</li> </ul>	<ul style="list-style-type: none"> <li>• To provide our services</li> <li>• To perform the applicable agreement</li> <li>• To communicate with our resellers, distributors, agents and/or finders</li> <li>• To send you more information about Silverfort</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Legitimate interest (e.g. contract –related communications)</p>	<ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• ZenDesk (technical support and knowledge base)</li> <li>• Microsoft O365 (email service)</li> <li>• Docusign (digital signing tool)</li> </ul>	<p>Cannot provide our services</p> <p>Cannot perform the agreement</p> <p>Cannot communicate with you</p>

<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To send marketing communications.</li> </ul>	Consent	3 <sup>rd</sup> party platforms, such as for the following purposes: <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> </ul>	Cannot send marketing communications
<b>When you become our customer</b>				
<ul style="list-style-type: none"> <li>• Name</li> <li>• Last name</li> <li>• Email address</li> <li>• Job title</li> <li>• Company name</li> <li>• Phone number</li> <li>• Contact information</li> <li>• Any other data you decide to supply in the context of the contract</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of the applicable contract</li> <li>• Contract-related communications</li> <li>• Sending updates</li> </ul>	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract  Legitimate interest (e.g. sending updates about SilverFort)	3 <sup>rd</sup> party platforms, such as for the following purposes: <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Azure (cloud)</li> <li>• AWS (cloud)</li> <li>• Logz.io (product analytics)</li> <li>• ZenDesk (technical support)</li> <li>• Box.com (storage)</li> <li>• Microsoft O365 (email service)</li> <li>• Salesloft (customer engagement tool)</li> <li>• Docusign (digital signing tool)</li> </ul>	Cannot provide perform the contract  Cannot provide some or all of the services
<b>When you become our supplier</b>				
<ul style="list-style-type: none"> <li>• Name</li> <li>• Last name</li> <li>• Email address</li> <li>• Job title</li> <li>• Company name</li> <li>• Phone number</li> <li>• Contact information</li> <li>• Any other data you decide to supply in the context of the contract</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of the applicable contract</li> <li>• Contract-related communications</li> </ul>	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract  Legitimate interest (e.g. communicate with our suppliers)	3 <sup>rd</sup> party platforms, such as for the following purposes: <ul style="list-style-type: none"> <li>• Box.com (storage)</li> <li>• Microsoft O365 (email service)</li> <li>• Docusign (digital signing tool)</li> </ul>	Cannot provide perform the contract  Cannot provide some or all of the services
<b>When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Job position</li> <li>• Social media profile</li> <li>• Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To reply and/or respond to your request or question</li> <li>• To establish a first business connection/discussion</li> <li>• To send you more information about Silverfort</li> </ul>	Depending on the context, legitimate interest (B2B marketing), pre-contractual discussions or consent	3 <sup>rd</sup> party platforms, such as for the following purposes: <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> <li>• Salesloft (customer engagement tool)</li> </ul>	Cannot reply or respond to your request  Cannot establish a business connection
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To send marketing communications.</li> </ul>	Consent	3 <sup>rd</sup> party platforms, such as for the following purposes: <ul style="list-style-type: none"> <li>• Salesforce.com (CRM)</li> <li>• HubSpot (marketing communications)</li> <li>• Microsoft O365 (email service)</li> </ul>	Cannot send marketing communications

Finally, please note that some of the abovementioned Personal Data will be used for fraud detection and prevention, and for security purposes. The abovementioned Personal Data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize your Personal Data. “Anonymous Information” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

## 2. HOW WE PROTECT AND STORE YOUR INFORMATION

- 2.1. **Security.** We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 2.2. **Retention of your Personal Data.** Your Personal Data will be stored until we delete the record and we proactively delete it or you send a valid deletion request please note that in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings. We have an internal data retention policy to ensure that we do not retain your Personal Data perpetually. Regarding retention of cookies, you can read more in our cookie policy <https://www.silverfort.com/company-2/cookies-policy/>

## 3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your Personal Data as follows:

- 3.1. With our business partners with whom we jointly offer products or services. We may also share Personal Data with our affiliated companies.
- 3.2. To the extent necessary, we may share your Personal Data with on a “need-to-know” basis under an obligation of confidentiality to legal counsel(s), data protection advisor(s), and/or accountant(s).
- 3.3. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- 3.4. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your Personal Data to such third party (whether actual or potential) in connection with the foregoing events;
- 3.5. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your Personal Data in connection with the foregoing events, including, in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company; and/or
- 3.6. Where you have provided your consent to us sharing or transferring your Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

If you want to receive the list of the current recipients of your Personal Data, please make your request by contacting us to [privacy@silverfort.com](mailto:privacy@silverfort.com)

#### 4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

4.1. **Storage:** We store your Personal Data with the storage providers below in the specified jurisdictions:

- AWS – Ireland.
- Microsoft Azure – UK.
- Microsoft Azure – US – transfer subject to Microsoft’s Privacy Shield certification.

4.2. Following the Court of Justice of the European Union’s invalidation of the EU-US Privacy Shield Framework in Case C-311/18, SilverFort will no longer rely on the EU-US Privacy Shield as a mechanism of international data transfer until further notice. SilverFort will however remain committed to maintaining its self-certification under the EU-US Privacy Shield Principles and respect its principles, as an additional measure of protection of its users’ privacy, until further notice.

When SilverFort engages in such transfers of personal information, it relies on i) Adequacy Decisions as adopted by European Commission on the basis of Article 45 of Regulation (EU) 2016/679 (GDPR) (for example, when we access from Israel), or ii) Standard Contractual Clauses issued by the European Commission. SilverFort also continually monitors the circumstances surrounding such transfers in order to ensure that these maintain, in practice, a level of protection that is essentially equivalent to the one guaranteed by the GDPR.

4.3. **Internal transfers:** We ensure transfers within the Silverfort group will be covered by an agreement entered into by members of the Silverfort group (an intra-group agreement) which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred to.

4.4. **External transfers:** Where we transfer your Personal Data outside of the EU/EEA, for example to third parties who help provide our products and services, we will obtain contractual commitments from them to protect your Personal Data. Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

#### 5. YOUR PRIVACY RIGHTS. HOW TO DELETE YOUR ACCOUNT

5.1. **Rights:** The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- You have a right to access Personal Data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we rectify any Personal Data we hold that is inaccurate or misleading;
- You have the right to request the erasure/deletion of your Personal Data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your Personal Data, for example for the establishment, exercise or defense of legal claims;
- You have the right to object, to or to request restriction, of the processing;
- You have the right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You also have a right to request certain details of the basis on which your Personal Data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

You can exercise your rights by contacting us at [privacy@silverfort.com](mailto:privacy@silverfort.com). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

5.2. **Deleting your account:** Should you ever decide to delete your account, you may do so by emailing [privacy@silverfort.com](mailto:privacy@silverfort.com). If you terminate your account, any association between your account and Personal Data we store will no longer be accessible through your account. However, given the nature of sharing on certain services, any public activity on your account prior to deletion will remain stored on our servers and will remain accessible to the public.

#### 6. USE BY CHILDREN

We do not offer our products or services for use by children. If you are under 18, you may not use the Website, or provide any information to the Website without involvement of a parent or a guardian. We do not knowingly collect information from, and/or about children. For the purposes of the GDPR, we do not intend to offer information society services directly to children. In the event that we become aware that you provide Personal Data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at [privacy@silverfort.com](mailto:privacy@silverfort.com).

#### 7. LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS

We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

#### 8. LOG FILES

We use log files. We use such information to analyze trends, administer the Website, track users’ movement around the Website, and gather demographic information.

#### 9. ANALYTIC TOOLS

- **Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- **HubSpot.** The website uses a tool called “**HubSpot**” for marketing automation and analytics.
- **WPEngine.** The website uses a tool called “**WPEngine**” for secure website hosting, that also provides basic analytics.
- **Facebook Pixel.** The website uses a tool called “**Facebook Pixel**” for management, optimization and measurement of marketing campaigns.

- **LinkedIn Pixel.** The website uses a tool called “LinkedIn Pixel” for management, optimization and measurement of marketing campaigns.

We reserve the right to use other analytic tools.

#### **10. CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@silverfort.com](mailto:privacy@silverfort.com). Please note that we will respond to one request per customer each year, unless otherwise required by applicable law.

#### **11. OUR CALIFORNIA DO NOT TRACK NOTICE**

We may collect personally identifiable information about an individual consumer’s online activities over time and across different web sites when a consumer uses the Website. If you choose to operate your web browser “do not track” signals or any other mechanism that provides consumers the ability to exercise choice regarding the collection of such information, we will abide by your request and stop collecting such information. We may allow third parties such as such as companies that provide us with analytics tools, to collect personally identifiable information about an individual consumer’s online activities over time and across different web sites when a consumer uses the Website.

#### **12. DELETION OF CONTENT FROM CALIFORNIA RESIDENTS**

If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or personal information you have publicly posted. If you wish to remove such content or personal information, please send an email to [privacy@silverfort.com](mailto:privacy@silverfort.com) and specify which content or personal information you wish to be removed, and we will do so in accordance with applicable law. Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or personal information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

#### **13. CONTACT US**

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [privacy@silverfort.com](mailto:privacy@silverfort.com).