



HUB Cyber Security Ltd.

Website Privacy Policy

2023

Policy Owner and Custodian

Version and Policy Number

Policy effective from (Date of Board approval)

Chief Data Protection Officer

Version #1 – DP/Website Privacy Policy-01/Feb2023/V.#1

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Version Status

Version	Date	Author	Description	Status
1.0	Feb 2023	Chief Data Protection Officer	External Website Data Protection and Privacy Policy	Effective
2.0	Jan 2024	Chief Data Protection Officer	Updated External Website Data Protection and Privacy Policy	To be reviewed, amended as and if necessary, and approved

Document Owner

Document Owned by	Name	Date	Signature
Chief Data Protection Officer	Osher Partok Rheinisch	[●]	[●]

Executive Approvals

Approved by	Name	Date	Signature
CEO	Uzi Moskovitch	[●]	[●]

Nominating, Governance, Compliance and Sustainability Committee Approvals

Approved by	Name of Board member	Date	Signature
Chairman of the Committee		[●]	[●]
Member of Committee		[●]	[●]
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Board of Directors Approvals

Approved by	Name	Date	Signature
Chairman of the Board		[●]	[●]
Board of Directors Member		[●]	[●]
Board of Directors Member		[●]	[●]
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WEBSITE PRIVACY POLICY - OVERVIEW

1. OVERVIEW

- This website privacy policy represents the minimum standard required to comply with the transparency requirements under Art 13 of the General Data Protection Regulation (“**GDPR**”) and the UK data protection regime (UK GDPR plus the DPA 2018).
- The Guidelines on transparency under the GDPR issued by the Art 29 Data Protection Working Party (“**Guidelines**”) encouraged the use of layered privacy notices. As the nature of this notice is limited, we have not done so here. Please let us know if you require a more comprehensive privacy notice.
- It is important that you identify the “audience” of your site and tailor the language accordingly. This should be kept under review and updated if your audience changes. Please consider testing the language through user panels.

2. PRIVACY POLICY TERMS AND STRUCTURE

- It is a requirement of English and wider European law that the site user is fully and clearly informed of the processing of their personal data. It is therefore important to have a privacy policy that is concise, transparent and intelligible, and that uses clear and plain language to describe the data that the business collects, how it collects it and how it uses such data.
- Careful consideration should be given to the description of the data and respective processing in this privacy policy, to ensure they accurately reflect the data processing activities of your specific site. The descriptions and sections in this privacy policy are given as examples of common types of processing, but they may not be relevant or sufficient for your site. A number of the clauses also contain options which may be selected as appropriate. Specific advice should be sought in the context of your site and your data processing as a whole.
- Please note that any information contained in the privacy policy should be provided in as simple a manner as possible, avoiding complex sentence and language structures. The information should be concrete and definitive; it should not be phrased in abstract or ambivalent terms or leave room for different interpretations. In particular the purposes of, and legal basis for, processing the personal data should be clear.
- Section 2 of this policy provides information on how personal data is used, and on what legal basis, in bullet point format. Alternatively, and particularly for more extensive/ complex data processing, this could be set out in a table format (example below). If this approach is taken, Section 1 of the policy could be stripped back to give a high level overview of the personal data collected, with the specific detail on each data category set out in the table.



Personal Data	Use	Legal Basis
Information you give to us		
Name and profile/ account name	We use this information to create and maintain your account for the Services	Necessary to perform our contract with you to provide the Service
		[It is in our legitimate interest to provide effective services to you / be responsive to you / ensure the security of our Services] [We use this information with your consent]

- The privacy policy should provide information about data subject rights and how the data subject can exercise such rights. Moreover, it should allow data subjects to assess, on the basis of their own situation, what the retention period will be for specific data/purposes. The Guidelines clearly state that it is *not* sufficient to generically write that “*personal data will be kept for as long as necessary for the legitimate purposes of the processing*” – this will not meet the transparency obligation.
- It is a requirement to provide information on the existence of automated decision-making, including profiling, along with meaningful information about the logic involved and the consequences of the processing for the website user.
- The privacy policy should be translated into one or more languages if you target users speaking those languages. It is a requirement to ensure that all translations are accurate and that the phraseology and syntax makes sense in the second language(s) so that the translated text does not have to be deciphered or re-interpreted.

3. DATA EXPORT

- There is a general prohibition on transfers of personal data outside the European Economic Area (EEA) or the UK, as relevant, without ensuring an adequate level of protection for such data. Transfers of personal data to non-EEA or non-UK countries are prohibited, except for transfers to countries that the European Commission or UK government “white lists” via an adequacy decision as providing adequate protection for personal data.
- Users should be notified of all the countries their data may be transferred to and adequate safeguards such as model clauses should be put in place and notified to users. In some instances, consent can be obtained from users to legitimise the transfer of personal data outside the EEA, however caution should be exercised in these cases. Please contact L&W if you wish to discuss these options further.



HUB Cyber Security Ltd.
Website Privacy Policy

HUB CYBER SECURITY LTD. (“we”, “our”, “us”) is committed to protecting and respecting your privacy. We are a corporation established in Israel with a registered office at 17 Rothschild Blvd, Tel Aviv, Israel 6688120 and registered company number 333-267035, and for the purpose of applicable data protection laws, we are the data controller.

This Privacy Policy sets out the basis on which we will process any personal data or usage information we collect from you, or that you provide to us, in connection with your use of our website at <https://hubsecurity.com> (our “Website”) and in connection with the cyber security services and products we provide to you (together, the “Services”).

Please read this Privacy Policy carefully so that you understand your rights in relation to your personal data, and how we will collect, use and process your personal data. This Privacy Policy supplements any other privacy related notices and policies we may provide to you from time to time and is not intended to override them. If you do not agree with this Privacy Policy in general or any part of it, you should not access the Website, use our Services or otherwise provide your information to us.

Our Website and Services are not intended for children, and we do not knowingly collect data relating to children. Children must not use the Services, except where their parent or guardian has provided consent, if this option is available in your location.

We change our Privacy Policy from time to time. Updates to our Privacy Policy will apply only to information collected after the date of the change. We will note on our Website when our Privacy Policy has been updated. Please check the Website regularly for notices of changes to our Privacy Policy.

1. THE INFORMATION WE COLLECT

Information you give to us

You may provide some or all of the following personal data to us by applying or subscribing to our products or services, creating an account with us, setting up a profile on our Services, contacting us via our Website, our Services or by telephone, text/SMS, email, social media, instant chat, our “contact us” page, or otherwise signing up for our newsletters or alerts:

- First name, last name, job title, email address, phone number, company and IP and traffic source. This information is required to enable us to fulfil our contract with you. If you do not provide this information, we will not be able to provide you with our services.

Information we collect automatically

When you visit our Website and use our Services we automatically collect the information sent to us by your computer, mobile phone or other device. This information includes: (i) your IP address; (ii) device information including, but not limited to, name and type of operating system; (iii) mobile network information; (iv) standard web information such as your browser type and the pages you access on our Website; (v) transaction information (but not payment card or account details), including device information, transaction details, and IP address; (vi) security information including a list of certain installed software, device and internet connection information, and available space on the device.



Information we collect from third parties

We collect (i) IP addresses; (ii) device information including, but not limited to, name and type of operating system; (iii) mobile network information; (iv) standard web information such as your browser type and the pages you access on our Website; (v) transaction information (but not payment card or account details), including device information, transaction details, and IP address; (vi) security information including a list of certain installed software, device and internet connection information, and available space on the device.

2. HOW DO WE USE YOUR INFORMATION?

We process your personal data in order to perform our contract with you, such as:

- provide you with our Services, other content and Website functionality;
- register and maintain your account with us

We obtain your consent to process your personal data for the following reasons:

- sign you up for our newsletters or alerts;
- applying or subscribing to our products or services
- creating an account with us
- setting up a profile on our Services
- contacting us via our Website, our Services or by telephone, text/SMS, email, social media, instant chat, our “contact us” page, or otherwise
- signing up for our newsletters or alerts
- personalise our services for you; and
- if you opted into marketing, to communicate with you about products, services, marketing, promotions, events and other news and information we think will be of interest to you.

In order to be responsive to you, to provide effective services to you, and to maintain our business relationship, as a matter of our legitimate interests, we will use your personal data to:

- administer the Website and Services, and for internal operations, in order to conduct troubleshooting, data analysis, testing, research, statistical and survey analysis;
- maintain the safety and security of our users, the Website, our Services, and business;
- send you announcements in relation to security, privacy or administrative related communications (these communications are not marketing orientated, and we do not rely on consent, so you may not opt out);
- personalize our Website and our Services to ensure content is presented in the most effective manner for you and your device; and
- improve and develop our products.

In addition, we will use some or all of the above information to comply with any applicable legal obligations, to enforce any applicable terms and conditions and/ or terms of service, and to protect or defend the Services, our rights, the rights of our users, or others.



3. COOKIES

We use cookies and other similar technologies to collect information about your browsing activities over time and across different websites following your use of our Services. Cookies allow us to recognize and count the number of users and to see how users move around our website when they are using it. This helps us to improve our Services and the way our website works. You can find more information about cookies and how to manage them [here](#).

4. HOW THE COMPANY SHARES YOUR INFORMATION

We do not use or share your personal data with others except as described in this Privacy Policy. In certain circumstances, we will share your information with third parties with your consent, as necessary, or as otherwise required or permitted by law. Specifically, we share your personal data:

- ***With service providers and vendors.*** Such third parties include: (i) data analytics vendors; (ii) security vendors; and (iii) website hosting vendors. These service providers assist us with many different functions and tasks, such as providing data storage and disaster recovery services and communicating with you.
- ***When you request us to share certain information with third parties, with consent or to perform a contract with you.*** With your permission or upon your discretion, we will disclose your personal data to relevant third parties.
- ***With professional advisors, in our legitimate interests or as required by law.*** As necessary, we will share your personal data with professional advisors functioning as service providers such as auditors, law firms, or accounting firms.
- ***For legal and security reasons and to protect our services and business, in our legitimate interests or as required by law.*** We will share your personal data with regulators, law enforcement agencies, public authorities, or any other relevant organisations: (i) in response to a legal obligation; (ii) if we have determined that it is necessary to share your personal data to comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries; (iii) to protect the interests of, and ensure the safety and security, of us, our users, a third party or the public; (iv) to exercise or defend legal claims; and (v) to enforce our terms and conditions, other applicable terms of service, or other agreements.
- ***With our affiliates, in our legitimate interests.*** We may share your personal data with companies within our corporate family.
- ***In connection with an asset sale or purchase, a share sale, purchase or merger, bankruptcy, or other business transaction or re-organisation, in our legitimate interests.*** We will share your personal data with a prospective buyer, seller, new owner, or other relevant third party as necessary while negotiating or in relation to a change of corporate control such as a restructuring, merger, or sale of our assets.

5. WHERE WE STORE YOUR INFORMATION

The personal data that we collect from you will be transferred to and stored at/processed in countries outside [the European Economic Area (“EEA”) and the United Kingdom (“UK”)]. Your personal data is also processed by staff operating outside the EEA and the UK, who work for us or one of our third party service providers or partners. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Policy.



For any transfers of data outside [the EEA or the UK, the data transfer will be under the European Commission’s model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses) (the “**Model Clauses**”), or any equivalent contracts issued by the relevant competent authority of the UK, as relevant, unless the data transfer is to a country that has been determined by the European Commission or the relevant UK authorities, as applicable, to provide an adequate level of protection for individuals’ rights and freedoms for their personal data. Please contact our Chief Data Protection Officer at DPO@hubsecurity.io should you wish to examine a copy of the Model Clauses.

EU-U.S. Privacy Shield

When we transfer personal data from the EEA, the UK, or Switzerland to the United States, we comply with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce. We are responsible for the processing of personal data we receive under the Privacy Shield Framework, including data we subsequently transfer to a third party acting on our behalf. We comply with the Privacy Shield Principles for all onward transfers of personal data from the EEA, UK and Switzerland, including the onward transfer liability provisions. We have certified to the Department of Commerce that we adhere to the Privacy Shield Principles. We are subject to the investigatory and enforcement powers of the Federal Trade Commission / Department of Transportation. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov>.

Individuals in the EEA, UK and Switzerland who have inquiries or complaints regarding our compliance with the Privacy Shield program should first contact us, at DPO@hubsecurity.io.

6. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will retain your personal data as follows:

- your account data for as long as you keep your account open or as needed to provide you with our Services;
- if you contact us, we will keep your data for 36 months after you contact us;
- your technical usage information for 36 months; and
- data on your use of our Website and our Services is retained for 36 months .

We will also retain and use your personal data to the extent necessary to comply with our legal obligations, resolve disputes and enforce our terms and conditions, other applicable terms of service, and our policies. If you stop using our [services / Services] [or if you delete your account with us], we will store your information in an aggregated and anonymised format; we may use this information indefinitely without further notice to you.

7. SECURITY

Although we do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the Website or over email, text/SMS, or instant chat; any transmission is at your own risk.



8. YOUR RIGHTS

If you are located in the EEA or the UK, You have certain rights in relation to your personal data:

- **Access:** You have the right to access personal data we hold about you, how we use it, and who we share it with.
- **Portability:** You have the right to receive a copy of the personal data we hold about you and to request that we transfer it to a third party, in certain circumstances and with certain exceptions.
- **Correction:** You have the right to correct any of your personal data we hold that is inaccurate.
- **Erasure:** In certain circumstance, you have the right to delete the personal data we hold about you.
- **Restriction of processing to storage only:** You have the right to require us to stop processing the personal data we hold about you, other than for storage purposes, in certain circumstances.
- **Objection:** You have the right to object to our processing of your personal data.
- **Objection to marketing:** You can object to marketing at any time by opting-out using the unsubscribe/opt-out function displayed in our communications to you.
- **Withdrawal of consent:** Where we rely on consent to process your personal data, you have the right to withdraw this consent at any time by contacting us at DPO@hubsecurity.io.

Please note that a number of these rights only apply in certain circumstances, and all of these rights may be limited by law. For example, where fulfilling your request would adversely affect other individuals or our trade secrets or intellectual property, where there are overriding public interests or where we are required by law to retain your personal data.

To exercise any of these rights, you can contact DPO@hubsecurity.io. We will respond to requests to exercise these rights without undue delay and at least within one month (though this may be extended by a further two months in certain circumstances).

9. THIRD PARTY LINKS

Our Website may contain links to other online platforms, plug-ins or other applications operated by third parties. We do not control such other sites or applications, and are not responsible for their content, their privacy policies, or their use of your information. Information you provide on public or semi-public venues, including information you share on third-party social networking platforms, may also be viewable by other users of the Website and/or users of those third-party online platforms without limitation as to its use by us or by a third party. Our inclusion of such links does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators except as disclosed on the Website. We expressly disclaim any and all liability for the actions of third parties, including but without limitation to actions relating to the use and/or disclosure of personal data by third parties. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.



10. COMPLAINTS

If you have complaints about how we process your personal data, please contact our Chief Data Protection Officer at DPO@hubsecurity.io and we will respond to your request as soon as possible.

If you think we have infringed data protection laws in the UK or EEA country in which you live or work or where you think we have infringed data protection laws, you can file a claim with our supervisory authority, the Dutch Data Protection Authority (Autoriteit Persoonsgegevens, AP), or with the UK Information Commissioner's Office, as applicable to you.

11. CONTACT

We welcome your questions, comments, and concerns about this Privacy Policy or your personal data. Please send us any feedback to our Chief Data Protection Officer at DPO@hubsecurity.io.

12. LANGUAGE

Except as otherwise prescribed by applicable law, in the event of any inconsistency between the English language version and local language version of this Privacy Policy, the English language version will prevail.

THE COMPANY RESERVES THE RIGHT TO AMEND, MODIFY, WAIVE OR TERMINATE THE PROVISIONS OF THIS POLICY AT ANY TIME FOR ANY REASON.