

Privacy Policy

Experis Cyber Ltd.

This privacy policy (the “Privacy Policy”) provides a framework for understanding the Personal Information that is collected and processed through the security Operations Center (SOC) services operated by Experis Cyber Ltd. (“Experis”, “we”, “us”, “our”), intended for detecting, preventing, investigating, and responding to cyber threats (the “Services”). Personal Information collected by us in connection with the Services will be processed in accordance with the terms of this Privacy Policy.

This Privacy Policy describes the types of Personal Information we collect, how we use the Personal Information, how we process and protect the Personal Information we collect, for how long we store it, with whom we share it, and the rights that individuals can exercise regarding our use of their Personal Information. In general, our privacy practices conform with applicable laws and regulations, including where applicable Israeli privacy legislation and the provisions of the European Union’s General Data Protection Regulation (GDPR).

This Privacy Policy applies to the Experis’ SOC services only. For information regarding privacy when engaging with the Experis group’s various services or its website, which are subject to separate privacy policies, you may contact us at info@experis.co.il or visit the [website](#).

You have no legal obligation to provide us your Personal Information. However, if you do not provide us certain Personal Information, we may not be able to provide you with access to the Services or to contact you and provide you with information about our Services, if so requested by you. If you do not agree to the terms of this Privacy Policy, please do not use our Services.

1. Definitions

- 1.1. “Applicable Laws” means the Israeli Data Protection Legislation, the GDPR and any data protection, privacy and other laws and regulations applicable to the Services.
- 1.2. “GDPR” means the EU General Data Protection Regulation 679/2016.
- 1.3. “Israeli Data Protection Legislation” means the Privacy Protection Law 5741-1981, any regulations promulgated thereto and the guidelines of the Privacy Protection Authority.
- 1.4. The terms “Personal Information”, “Data Subjects” “Controller”, “Processor”, “processing”, shall have the meanings ascribed to them or to similar terms in the Applicable Laws.

2. Information We Collect

2.1. We collect Personal Information about you and your use of the Services through the Services' systems and we are a Processor of this type of Personal Information. We may collect the following types of Personal Information (as permitted under Applicable Laws):

- Name, email address.
- IP address, user names and logs. The logs include all actions taken by a user of our customers.

2.2. We also collect the names, roles and contact details (e-mail, phone number) of the customer representatives engaged with us in connection with the Services, regarding which Personal Information we are a Controller.

3. How We use the Information We Collect

We collect and use the Personal Information collected for the following main purposes (as permitted under Applicable Laws):

- 3.1. operating and providing the Services;
- 3.2. evaluating and improving our Services (including developing, enhancing, analyzing and improving our Services, managing our communications, performing data analytics);
- 3.3. responding to individuals' inquiries;
- 3.4. protecting against, identifying and seeking to prevent fraud and other unlawful activity, claims and other liabilities;
- 3.5. Subject to separate consent where required under applicable law and consistent with this Privacy Policy, to send promotional materials;
- 3.6. where permitted under Applicable Laws, for communicating about, and administering participation in, special events, promotions, programs, offers, surveys, contests and market research;
- 3.7. complying with, exercising and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies, complying with requests from competent authorities; resolving disputes.

4. Lawful Basis for Processing

We only process Personal Information where we have a lawful basis to do so. The lawful basis will depend on the reasons we collected the Personal Information and purposes we use your Personal Information, and may differ according to Applicable Laws.

- 4.1. All processing of Personal Information will be carried out based on lawful grounds (as required by Applicable Laws) which may fall into a number of categories, including:
- to ensure that we comply with a statutory or contractual requirement, or a requirement necessary to enter into a contract; or
 - it is essential and necessary for our legitimate interest, as described in more detail below.

4.2. Legitimate Interest

We may process Personal Information for certain legitimate business purposes, which includes some or all of the following:

- 4.2.1. to enhance, modify, personalize or otherwise improve our Services;
- 4.2.2. to identify and prevent fraud;
- 4.2.3. to enhance security of our network and information systems;
- 4.2.4. to better understand how people interact with our Services.

Whenever we process Personal Information for these purposes we will ensure that we take account of your rights. If you are an EU resident, you have the right to object to such processing, and may do so by contacting us as described below. Please bear in mind that if you exercise your right to object, this may affect our ability to carry out and deliver the Services to you for your benefit.

5. Information We Share

We may share Personal Information with third parties as set forth below, in various countries:

- 5.1. vendors and service providers who perform services on our behalf based on our instructions. We do not authorize these vendors to use or disclose the Personal Information except as necessary to perform services on our behalf or comply with legal requirements.
- 5.2. our subsidiaries and affiliates including our parent company, who assist us in performing the Services or have oversight over our operations.
- 5.3. (i) if we are required to do so by law or legal process; (ii) to law enforcement authorities or other government officials based on a lawful disclosure request; (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity; (iv) to establish, exercise, protect or defend our contracts or legal rights, or the rights of others.

5.4. in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, reorganization, dissolution or liquidation or similar corporate events).

6. International Data Transfers

We may transfer the Personal Information we collect about you to countries outside of the country in which the Personal Information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the Personal Information. When we transfer your Personal Information to other countries, we will protect that Personal Information as described in this Privacy Policy and such transfers will be in compliance with Applicable Laws. To the extent the Applicable Laws of your jurisdiction required your consent to such international transfers, such consent is deemed granted by the use of the Services.

The countries to which we may transfer the Personal Information we collect about you may be within or outside the European Union.

When we transfer Personal Information from within the European Union to countries or international organizations that are based outside the European Union the transfer takes place on the basis of:

- An adequacy decision by the European Commission; or
- In the absence of an adequacy decision, other legally permitted grounds standard contractual clauses for the transfer of personal data to third countries, adopted by the European Commission via its implementing decision of 4 June 2021, or any set of clauses approved by the European Commission which amends, replaces or supersedes the SCCs.

Further details on the steps we take to protect your personal information, in these cases, is available from us on request by contacting us by email at info@experis-cyber.com at any time.

7. Data Retention

Subject to your right to have your Personal Information corrected, not further processed or deleted in accordance with Section 9, we retain different types of Personal Information for different periods, depending on the purposes for processing, the contracts with our customers, our legitimate business purposes as well as pursuant to legal requirements under applicable law. We will retain Personal Information for as long as required and needed to comply with our legal obligations or to pursue our legitimate business purposes and to establish, exercise or defend our legal rights. Unless otherwise restricted under applicable law, Non-Personal Data will be retained indefinitely.

8. Security

We are committed to protecting the security of Personal Information. We use a variety of administrative, technical, and physical security technologies and procedures to help protect your Personal Information from unauthorized or accidental access, use, or disclosure.

Although we strive to protect your Personal Information and employ security measures as outlined above, we cannot ensure or warrant the security of your Personal Information in all cases, due to reasons outside our control and accordingly you assume the risk of using our Services.

9. Your Rights as a Data Subject

You may have certain rights in connection with the Personal Information we process and, in most cases, you can exercise them free of charge. Please note that your rights may differ, dependent on your jurisdiction and the Applicable Laws. At any time, you may contact us at: info@experis-cyber.com and request to know what Personal Information we keep about you. We will make good-faith efforts to locate the Personal Information that you request to access. Where we are a Processor, we shall comply with your request only subject to the written instructions of the Controller of your Personal Information.

When you ask us to exercise any of your rights under this Privacy Policy and the applicable law, we may need to ask you to provide us certain credentials to make sure that you are who you claim you are, to avoid disclosure to you of Personal Information related to others and to ask you questions to better understand the nature and scope of Personal Information that you request to access.

We may redact from the Personal Information which we will make available to you, any Personal Information related to others. In addition, we may delete Personal Information if required by Applicable Laws.

Where the GDPR applies, and when authorized by Applicable Laws, a Data Subject which is an EU resident may exercise certain specific rights, such as:

- Right of access: a Data Subject may access his or her Personal Information in order to verify that his or her Personal Information is processed in accordance with the Applicable Laws.
- Right to rectification: a Data Subject may request the rectification of any inaccurate or incomplete Personal Information held about him or her, in order to protect the accuracy of such information and to adapt it to the data processing.

- Right to erasure: a Data Subject may request to erase information about him or her and to no longer process that Personal Information.
- Right to restriction of processing: a Data Subject may request to restrict the processing of some of his or her Personal Information.
- Right to data portability: a Data Subject may request data portability, meaning that the Data Subject can receive the originally provided Personal Information in a structured and commonly used format or that the Data Subject can request the transfer of the Personal Information provided by him or her to another data controller.
- Right to object: a Data Subject may object, at any time, to the Personal Information processing on a number of grounds as set out under GDPR.
- Right not to be subject of automated individual decision-making: a Data Subject may request not to be subject to a decision based solely on automated processing, including profiling, if such profiling produces a legal effect concerning the Data Subject or similarly significantly affects him or her.
- Right to lodge a complaint with a supervisory authority: a Data Subject may have the right to lodge a complaint with an applicable data protection supervisory authority; in particular in the EU Member State of his or her habitual residence, place of work or place of the alleged infringement if the Data Subject considers that the processing of Personal Information relating to him or her infringes GDPR.

Whenever Personal Information processing is based on consent, the Data Subject may withdraw his or her consent at any time. to withdraw consent, please contact us at info@experis-cyber.com.

If you require more information about the processing of your Personal Information, please refer to the 'How to Contact Us' section below.

10. [Updates to Our Privacy Policy](#)

This Privacy Policy may be updated periodically to reflect changes in our privacy practices and legal updates. We will post those changes on our Website so that you may be aware of the changes and the date of the change will be marked on the top of the updated policy under "Last Updated". For significant changes, we will notify you by posting a prominent notice on our Services indicating at the top of each notice when it was most recently updated.

11. [Our Policy towards Children](#)

Our Website is not meant to be used by or for persons under 18, as such, we do not knowingly collect Personal Information from minors younger than 18. Insofar as Personal Information may be collected based on your consent, the Data Subject must be above the age of 18. If these age requirements are not met, please do not use the Services.

12. How to Contact Us

If you have any questions or comments about this Privacy Policy, or if you would like to exercise your rights, please contact us at the contact details provided below and we will make good-faith efforts to address your concerns. We are usually able to resolve privacy questions or concerns promptly and effectively. If the GDPR applies and you are not satisfied with the response you receive from us, you may escalate concerns to the applicable privacy regulator in your jurisdiction. Upon request, we will provide you with the contact information for that regulator.

Contact details: Experis Cyber Ltd., e-mail: info@experis-cyber.com