

Privacy Policy

Last Update: July 16, 2025

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1. INTRODUCTION

Cycode Ltd. and our affiliates (together, “**Cycode**”, “**we**”, “**our**” or “**us**”) provides software supply chain security services (the “**Services**”). As part of its Services, Cycode provides its customers with a complete source code control, vulnerability detection and response platform, and a dedicated runtime security tool which monitors customer’s CI/CD pipeline tools (“**Cimon**”), as part of the platform, or as a standalone tool (collectively, the “**Platform**”).

Cycode respects the privacy of its customers, partners, vendors, service providers, Platform users, website visitors and employment candidates, and is committed to protecting the personal information that is shared with us (these and any others with respect to whom we collect personal data, shall collectively be referred to as “**you**” or “**Data Subjects**”).

In order to ensure transparency and give you more control over your Personal Data, this privacy policy (“**Privacy Policy**”) describes how we process, use, collect and store Personal Data (defined below) that we receive from or about you in different scenarios.

For instance, when you browse or visit our websites, www.cycode.com and <https://cimon.build/> (collectively, together with their subdomains, the “**Website**”) and use its various offerings (like booking a demo, requesting a free trial, downloading resources, and subscribing to newsletters), create an account and log in to our Platform, and any other software application that we license, show interest in our Services, take part in our marketing activities, interact with us on our social media profiles, or apply for a job with us, as well as when we acquire your Personal Data from third-party sources for marketing or outreach, process your Personal Data, all as detailed below.

Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. **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.**

“**Personal Data**” means any information that can be used, alone or together with other data, to uniquely identify any living human being and any information deemed as Personally Identifiable Information by applicable privacy laws. It does not include anonymous or de-identified data that does



not identify an individual or cannot reasonably be linked to an individual. 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 discussed below is relevant to individuals protected by the European Union General Data Protection Regulation (also, as it forms part of the laws of England and Wales, Scotland and Northern Ireland, the “**EU GDPR**”), the United Kingdom General Data Protection Regulation (“**UK GDPR**”) (together, the “**GDPR**”), and other applicable data protection laws.

We may update this Privacy Policy from time to time and therefore we ask you to check back periodically for the latest version. If we implement any significant changes 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.

This Privacy Policy forms part of our Website [Terms of Use](#). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms.

2. WHO IS THE CONTROLLER OF YOUR DATA

Cycode as a Controller

For the purposes of the GDPR and other applicable privacy laws, Cycode is a data controller (“**Controller**”) in relation to the Personal Data of individuals who directly engage with us in a business relationship management capacity, such as the representatives of our customers and prospective customers (e.g., account managers, procurement leads, or legal contacts), partners, vendors, website visitors and employment candidates.

Cycode’s Contact details are: privacy@cycode.com; postal address - If to **Cycode, Inc.**: 228 Park Ave S PMB 388308, New York, New York 10003-1502 US; If to **Cycode Ltd.**: 12 Leonardo da Vinci St., Tel Aviv - Jaffa, Israel.

Cycode as a Processor

As part of delivering our Services, we also process Personal Data on behalf of our customers, who act as the Controllers of such data. We do so solely in accordance with their instructions, as set out in our customer agreements and applicable Data Protection Addendum (DPA). For the purposes of the GDPR and other applicable privacy laws, Cycode is a data processor (“**Processor**”) in relation to the processing of such data. This typically includes data related to:

- **Platform Users** – individuals authorized by the customer to access and use Cycode’s Platform (such as employees, contractors, or other individuals authorized by our customers).
- **Third-Party System Users** – individuals whose information is accessible via integrations with third-party services (e.g., GitHub, GitLab, Bitbucket, Azure).

If you are a Platform User, or if we may otherwise process your Personal Data on behalf of our customers as part of our Services, please refer to section 3(ii) below, titled “When we act as a Processor”. In such cases, your organization (our customer) is the Controller responsible for providing you with relevant privacy notices and for addressing your rights under applicable privacy laws. We encourage you to contact your organization directly to receive additional information regarding the processing of your Personal Data on the Platform as part of our Services.

3. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

We collect and use the following information:

- (i) **When we use Personal Data of our customer representatives as Controllers (e.g. as part of our business relationship and account management)**

- a. Personal Data we may collect directly from you or from your employer who provides us with your contact details: Full name, business email address, phone number, company, job title, role, business address, country, payment information (if applicable and only to the extent that includes Personal Data), as well as any other Personal Data you decide to provide us with (e.g. any feedback you provide).
- b. For what purposes: (i) To manage our business relationship, (ii) to provide our Services and perform our agreements with our customers, (iii) to provide support, (iv) to communicate with you and allow you to provide feedback on our Services, (v) to maintain and improve our Services, (vi) for billing and account management, (vii) to send you service-related or marketing communications, subject to applicable laws, and (viii) to comply with applicable laws (e.g., bookkeeping, tax).
- c. Legal basis: Performance of a contract to which the customer is party, compliance with legal obligations (e.g. tax laws, bookkeeping laws, etc.), legitimate interest (to provide and improve our Services, manage the customer relationship, send you contract-related communication, marketing or updates about our Services) or consent (for marketing, if required under applicable law).
- d. Consequences of not providing the Personal Data: We may not be able to communicate with you, manage the customer account, or provide updates about our Services or perform our obligations.

(ii) When we act as a Processor (e.g., for Platform Users, Third-Party System Users, and other data subjects whose data is accessed as part of the Services):

- a. Personal Data we may collect: The types of Personal Data we process in connection with the Services are determined by our customer (the Controller) and depend on the specific Services and configurations they use. Such Personal Data may include: (i) account credentials (e.g., business email address and password); (ii) full name, role, job title, company, and contact details (e.g., phone number, email address); (iii) IP address and other server log data (e.g., access times, usage data, configuration, performance and security logs); (iv) support communications submitted via tickets or chat; (v) metadata from third-party system integrations (e.g., configuration data, repository identifiers, user account names, roles, contact information, or other identifiers embedded in system metadata, including data about misconfigurations or security violations that may be linked to specific individuals); (vi) unstructured Personal Data that may be temporarily processed during scanning features, such as content from code repositories or communication tools (e.g., Slack), depending on the customer's environment and choices; and (vii) any other Personal Data that our customer may choose to make available through their use of the Services.
- b. For what purposes: We process Personal Data on behalf of our customers for the following purposes: (i) to provide the Services and perform our agreements with our customers; (ii) to enable Platform Users to access and use the Platform; (iii) to ensure the functionality, security, availability, and performance of the Platform, including for logging, monitoring, debugging, user authentication, and abuse prevention; (iv) to support integrations with third-party systems as configured by the customer; (v) to process support requests and communicate with Platform Users (e.g., through ticketing); (vi) to maintain and improve the functionality of our Services and address operational issues; (vii) to generate analytics and diagnostics related to usage and performance, as permitted by our agreement with the customer; and (viii) to otherwise process our customer's Personal Data strictly in accordance with the customer's documented instructions.
- c. Legal basis: As we act as a Processor, the legal basis for the processing of Personal Data is determined solely by the customer, who is the Controller. Customers are responsible for ensuring that they have a valid legal basis under applicable law (e.g., consent, performance of a contract, legitimate interest) for the collection and processing of Personal Data via the Services. If you are a data subject and have questions about how your Personal Data is processed, please contact the relevant customer organization that provided your data to Cycode.
- d. Consequences of not providing the Personal Data: The customer controls which data must be provided to enable use of the Services. However, where required data is not provided or permitted to be processed, the functionality of the Services may be impaired,

and Platform Users may not be able to access or fully use the Platform or related features configured by their organization.

(iii) When you browse or visit our Website:

- a. Personal Data we may collect: We may use analytics tools, cookies and log files on our Website which may collect Personal Data such as IP address, pages clicked, search and browser history, and device information. For more information about our use of cookies, please read our [cookies policy](#).
- b. For what purposes: We use such information to analyze usage trends of the Website, maintain and improve the Website's functionality and our marketing and promotional efforts. We may also share certain parts of this information with third parties for these purposes. For more information, please refer to our [cookies policy](#).
- c. Legal basis: Legitimate interest (e.g., essential cookies required for the operation of the Website) or Consent (e.g., non-essential cookies, such as marketing or analytics cookies, to the extent required under applicable law).
- d. Consequences of not providing the Personal Data: Certain Website features may not be available and we may not be able to use the Personal Data for the purposes described above (e.g. analytics or marketing).

(iv) When you book a demo:

- a. Personal Data we may collect: Full name, business email address, as well as any other Personal Data that you decide to provide us with.
- b. For what purposes: To receive and respond to your request, to provide you with a product demo and to send you marketing communications via email. We may also record the demo and/or follow-up sessions, if you agree, for the purposes of business intelligence and improving our Services.
- c. Legal basis: Performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering a contract and/or legitimate interest (to provide you with a demo, marketing) or consent (for marketing, if required under applicable law).
- d. Consequences of not providing the Personal Data: We will not be able to provide a demo and/or send you marketing communications.

(v) When you request a free trial and during the trial period:

- a. Personal Data we may collect: Full name, job title, business email address, and any other Personal Data that you decide to provide us with.
- b. For what purposes: To provide you a free trial period and to send you marketing communications.
- c. Legal basis: 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 a contract, legitimate interest or consent (for marketing, if required by applicable law).
- d. Consequences of not providing the Personal Data: We will not be able to provide you with a free trial and/or send you marketing communications.

(vi) When you download our online resources:

- a. Personal Data we may collect: Full name, business email address.
- b. For what purposes: To provide our Services and to send you marketing communications.
- c. Legal basis: Legitimate interest (provide your requested materials) or consent (for marketing, if required under applicable law).
- d. Consequences of not providing the Personal Data: We will not be able to provide you with the requested online resources and/or send you marketing communications.

(vii) When you subscribe to our blog, newsletter(s) or distribution list(s):

- a. Personal Data we may collect: Full name, business email address.
- b. For what purposes: To subscribe you to our blog or newsletter and send you updates about Cycode, including marketing communications.
- c. Legal basis: Legitimate interest (in the context of B2B marketing) or consent (for marketing, if required under applicable law).

- d. Consequences of not providing the Personal Data: We cannot provide you with updates or send you marketing communications.

(viii) When you contact us regarding our Services (e.g. via submit a request or similar forms):

- a. Personal Data we may Collect: Full name, business email address, job title, work telephone number, as well as any other Personal Data that you decide to provide us with.
- b. For what purposes: To process and answer questions and to contact you upon your request, to provide support and to send you marketing communications.
- c. Legal basis: 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 a contract (i.e., the subscription agreement) and/or legitimate interest (e.g. respond to a query sent by you, marketing) or consent (for marketing, if required under applicable law).
- d. Consequences of not providing the Personal Data: We cannot answer your questions or send you marketing.

(ix) When you attend a marketing event or webinar, exchange business cards with us or otherwise provide us with your Personal Data for marketing purposes:

- a. Personal Data we may collect: Full name, business email address, job title, business address and phone number, as well as any other Personal Data you decide to provide us with.
- b. For what purposes: To establish a business relationship with you, contact you about our Services and send you marketing communications.
- c. Legal basis: Legitimate interest (in the context of B2B marketing) or consent (for marketing, if required under applicable law).
- d. Consequences of not providing the Personal Data: We cannot establish a business relationship or send you marketing communications.

(x) When we acquire your Personal Data from third-party sources for marketing or enrichment purposes:

- a. Personal Data we may collect: Full name, business email address, job title, business address, business telephone number, country, publicly available professional profiles, career history, education, employer details, addition and other business information. Such data may be sourced from publicly available online sources (e.g. professional networking sites), or third-party data vendors (such as data enrichment providers) who may act as independent data controllers collecting and sharing data under their own lawful basis, such as legitimate interest or consent.
- b. For what purposes: To establish a first business connection, assess potential interest in Cyclope's services, to conduct marketing outreach and to send marketing communications. We may also use AI-based tools to analyze or enrich such data to help identify professionals or businesses who may be interested in our Services. Cyclope does not use such data for automated decision-making that produces legal or similarly significant effects.
- c. Legal basis: Depending on the context, legitimate interest (in the context of B2B marketing), consent (for marketing, if required under applicable law) or pre-contractual discussions.
- d. Consequences of not providing the Personal Data: We cannot contact you regarding our Services and establish a business relationship.

(xi) When we use Personal Data of our service providers or distributors:

- a. Personal Data we may collect: Full name, business email address, business phone number, job title, business address, country, payment information, and any other Personal Data that you provide us.
- b. For what purposes: (i) to perform our agreements with our service providers and distributors and communicate with the, and to comply with our legal obligations and record keeping requirements.
- c. Legal basis: Performance of a contract to which the service provider or distributor is a party, compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.), and/or legitimate interest (e.g. send you contract-related communications. to perform our

agreement with your employer).

- d. Consequences of not providing the Personal Data: We cannot perform our agreement with you or communicate with you.

(xii) When you interact with us on our social media profiles (e.g. Facebook, Instagram, Twitter, LinkedIn):

- a. Personal Data we may collect: Full name, business email address, any other Personal Data that you decide to share with us.
- b. For what purposes: To respond to your questions or request, establish a business relationship and send you marketing communications.
- c. Legal basis: Legitimate interest (e.g. responding to your request, marketing and business development) or consent (for marketing, if required under applicable law).
- d. Consequences of not providing the Personal Data: We can't respond to your requests, establish and business relationship and send you marketing communications.

(xiii) When we undertake social media marketing, including via use of audiences or list-based advertising

- a. Personal Data we may collect or receive: Full name, business email address, job title, telephone number, IP address, pages clicked, search and browser history, device information and any other Personal Data you or third parties provide us
- b. For what purposes: We may use your Personal Data to contact you via social media platforms in order to establish a business relationship with you and contact you about the Services. If you're outside the EU, we may also use your Personal Data in order to create lists of individuals that we would like our advertising about our Services to target via social media channels, including via direct messaging marketing solutions. You may be included in such a list (in which case you will see advertising related to CycloCode when you visit those social media platforms) or we may use your Personal Data to ask social media platforms to compile a list of other individuals who we think will be interested in our products, so that those individuals can be presented with advertising about CycloCode.
- c. Legal basis: Legitimate interest (marketing, advertising and business development) or Consent (if required by applicable law)
- d. Consequences of not providing the Personal Data: We can't establish a business relationship with you via social media platforms; you will be excluded from advertising and marketing campaigns on social media platforms.

(xiv) When you apply for a job with us:

- a. Personal Data we may collect: Full name, email address, any Personal Data contained in your resume (c.v.), your responses to any assessment, background check results (in accordance with applicable law), any other Personal Data that you decide to provide us with. Please note that, in most cases, we receive the information directly from you, but we may also receive information from recruitment companies, references or background check companies
- b. For what purposes: To assess you as a candidate, review and examine your job application and communicate with you.
- c. Legal basis: In order to take steps at the request of the data subject prior to entering a contract (employment contract) and legitimate interest (e.g. to assess you as a candidate, recruitment).
- d. Consequences of not providing the Personal Data: We cannot process your application or communicate with you.

Finally, please note that some of the abovementioned Personal Data will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. 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 anonymize or de-identify 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 for our business purposes and further use



such anonymized data for internal business purposes, including, without limitation, to improve our Services and for research and development purposes.

4. HOW WE PROTECT YOUR PERSONAL DATA

We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. Cycode implements, enforces and maintains security measures, technologies and policies to prevent the unauthorized or accidental access to or destruction, loss, modification, use or disclosure of Personal Data. We also take steps to monitor compliance of such policies on an ongoing basis. Where we deem it necessary in light of the nature of the data in question and the risks to data subjects, we encrypt data in transit and at rest. Likewise, we take industry standard steps to ensure our Website and Services are safe and to prevent unauthorized access to our data bases. Other security safeguards include, but are not limited to, firewalls, access logs, breach detection systems and physical access controls to buildings, systems and files.

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.

Within Cycode, we endeavor to limit access to Personal Data to those of our personnel who: (i) require access in order for Cycode to fulfill its obligations, including also under its agreements, and as described in this Privacy Policy, and (ii) have been appropriately and periodically trained with respect to the requirements applicable to the processing and security of the Personal Data, and (iii) are under confidentiality obligations as may be required under applicable law.

Cycode shall act in accordance with its policies and with applicable law to promptly notify the relevant authorities and data subjects in the event that any Personal Data processed by Cycode is lost, stolen, or where there has been any unauthorized access to it, all in accordance with applicable law and on the instructions of qualified authority. Cycode shall promptly take reasonable remedial measures.

5. HOW WE RETAIN YOUR PERSONAL DATA

We may store your Personal Data for as long as such Personal Data is necessary in accordance with the purpose for which we collected it, and as long as necessary to fulfill your requests or inquiries or provide services or until we proactively delete it or you send a valid deletion request.

In certain 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, and to meet any audit, compliance and business best-practices, 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 maintain a data retention policy which we apply to Personal Data in our care. Regarding retention of cookies, you can read more in our [cookies policy](#).

Data that is no longer retained will be anonymized or deleted. Likewise, some metadata and statistical information concerning the use of our Website and Services are not subject to the deletion procedures in this policy and will be retained by Cycode. We will not be able to identify you from this data. Some data may also be retained on our third-party service providers' servers until deleted in accordance with their privacy policy and their retention policy, and in our backups until overwritten.

6. HOW WE SHARE YOUR PERSONAL DATA

Depending on the context described in Section 3 above, we may share your Personal Data with the following categories of third parties:

- a. Third party service providers. Cycode has partnered with a number of selected service providers, whose services and solutions complement, facilitate and enhance our own (“**Third Party Service Providers**”). These may include service providers of the following services: hosting / storage, email distribution and monitoring, authentication, support and ticketing, logging and monitoring, CRM, data enrichment, sales and marketing engagement and automation, analytics and business intelligence, in- app notification and feedback, data and cyber security services, billing and payment processing services (only if applicable), fraud detection and prevention services, session recording and remote access services, and our legal and financial advisors, document management, only in case you are applying for a job with us- automation / management of HR and job application, and only in case of jobs in certain jurisdictions, and only with your consent- background checks. Depending on context, we may share the following categories of Personal Data with such Third Party Service Providers for business purposes: identifiers, including name, alias, unique personal identifiers, online identifiers, IP addresses, business email address or other similar identifiers, as well as information regarding services purchased, obtained, or considered.
- b. Cycode affiliated companies. We may share your Personal Data internally within our affiliated companies, to the extent necessary to fulfill the purposes listed above. Sharing Personal Data between of data subjects from the European Union, the United Kingdom and Switzerland between Cycode’s subsidiaries located outside these regions will always take place under an approved transfer mechanism, such as the relevant Standard Contractual Clauses (if required).
- c. Law enforcement, legal requests and duties. To the extent necessary and subject to applicable law, Cycode may disclose or otherwise allow access to any categories of Personal Data described in this Privacy Policy, with or without notice to you, to regulators, courts or competent authorities, pursuant to valid legal requests (such as a subpoenas, legal proceedings, search warrants or court orders), 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.
- d. In connection with a change in corporate control. Should Cycode or any of its affiliates undergo any change of control, including by means of merger, acquisition or purchase of substantially all of its assets, or in the event of bankruptcy or a comparable event, your Personal Data (to the minimum extent required) may be shared with the parties involved in such event.
- e. Social media platforms. For the purposes mentioned above.
- f. Online Trackers. Please be aware that data collected on our Website via cookies and other tracking technologies such as browsing behavior, device information, IP addresses and advertising IDs may be shared with third parties, such as analysts and marketing partners. Such third parties may include external social media platforms and advertising networks, who may use your data for their own personalized advertising purposes, subject to their own privacy policies and practices, which are not controlled by us. For more information and right to manage your consent regarding such data sharing, see our [cookies policy](#).
- g. With your consent or upon your further direction. Our Services enable you, through different techniques, to engage and procure different optional third party services, products and tools (for instance, log-in using an account you maintain with a third-party platform). If you choose to use such third party services, they may have access to and process your Personal Data. In addition, we may share your Personal Data where you have provided your consent to us sharing or transferring your Personal Data, or where you directed us to do so (e.g., where you opt-in to optional additional services or functionalities or applicable third-party services available on our Services). Please note that in such instances Cycode merely acts as an intermediary at your direction, allowing you to procure such third party services with which you are interacting directly, at your discretion and risk.

- h. Data Enrichment Providers and AI-Based Services. We may engage third-party service providers who help us identify and enhance our business contact data. These providers can act either:
- **As our Processors**, when they process personal data that we provide to them (such as contact lists or CRM data) strictly on our instructions and for our business purposes.
 - **As independent Controllers**, when they share with us their own proprietary data or insights that they have collected or created under their own legal basis (such as legitimate interest or consent).

When we receive such proprietary data, we become an independent Controller of that data and use it for purposes such as identifying potential business contacts, business development, marketing, and analytics. We may also use artificial intelligence (AI) tools to analyze or enrich business data. We do not use AI tools for fully automated decision-making that has legal or similarly significant effects on individuals.

7. WHERE WE STORE YOUR PERSONAL DATA AND ADDITIONAL INFORMATION ABOUT TRANSFERS OF GDPR PROTECTED PERSONAL DATA

- a. Generally, and unless we've agreed otherwise in a separate customer agreement, your Personal Data is stored in data centers of our cloud hosting third party service providers that are located in the United States of America and the European Economic Area (EEA).
- b. Personal Data collected in the EU and UK is transferred to, and stored and processed at destinations outside the EEA and the UK. This includes transfers to our headquarters, located in Israel, a jurisdiction deemed adequate by the EU Commission and the UK, and transfers to our US Cycode entity and certain third party service providers in the USA, not currently deemed adequate. We transfer Personal Data to such locations in order to:
- store or backup the information;
 - enable us to provide you with the Services and fulfill our contract with you;
 - access data for support purposes;
 - fulfill any legal, audit, ethical or compliance obligations which require us to make that transfer;
 - facilitate the operation of our group businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights;
 - to serve our customers across multiple jurisdictions; and
 - to operate our affiliates in an efficient and optimal manner.
- c. Where your Personal Data is transferred outside of the EEA or UK, we will take all steps reasonably necessary to ensure that your Data is subject to appropriate safeguards, including entering into contracts that require the recipients to adhere to data protection standards that are considered satisfactory under the GDPR and other applicable laws, and that it is treated securely and in accordance with this Privacy Policy.
- d. The legal transfer mechanism for data transfers outside of the EEA and UK include:
- From the EEA to Israel: Transfers are made based on the European Commission's adequacy decision for Israel, which recognizes that Israel ensures an adequate level of data protection.
 - From the EEA to the USA: Where applicable, we rely on the EU-U.S. Data Privacy Framework (DPF) for data transfers to certified U.S. organizations. For other U.S. transfers, we use the European Commission's Standard Contractual Clauses (SCCs) to ensure adequate safeguards are in place.
 - From the UK to the EEA and Israel: Transfers are based on the UK's Adequacy Regulations, recognizing the EEA and Israel as jurisdictions providing an adequate level of protection.
 - From the UK to the USA: Where appropriate, we rely on the UK Extension to the EU-U.S. Data Privacy Framework. For other transfers, we use the UK's International

8. YOUR PRIVACY RIGHTS; HOW TO DELETE YOUR DATA

- e. Rights. The following rights (which may be subject to certain exemptions or derogations) may apply to certain individuals (some of which only apply to individuals protected by the GDPR or other applicable data protection laws):
- 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;
 - Objection to direct marketing: the unconditional right to object to processing your data for direct marketing. This can be achieved by opting out using the unsubscribe/opt-out feature displayed in our communications with you.
 - Objection to processing based on our legitimate interests: the right to object, on grounds relating to your particular situation, to have your Personal Data processed in connection with activities that are based on our legitimate interests. In such cases, we will assess whether we have compelling legitimate grounds for the processing which override your rights, interests and freedoms and whether data is necessary for the establishment, exercise or defense of legal claims.
 - Where you have consented to the processing of your Personal Data, you have the right to withdraw your consent at any time and prevent further processing by contacting us as described in this Privacy Policy. 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.
 - If you may have certain additional rights under local privacy laws applicable in your jurisdiction. To the extent such privacy laws apply to you, we will respect your rights and comply with such laws.
- f. You can exercise your rights by contacting us at privacy@cycode.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.

- g. Deleting your Platform User account or other Personal Data processed by Cycode as a Processor. Please note that if you are a Platform User or if we may otherwise process any of your Personal Data on behalf of a customer as part of the provision of the Services through our Platform, please contact our applicable customer with any deletion or other data subject rights requests, and we will support our customer in fulfilling such requests, strictly in accordance with the customer's instructions.

9. USE BY CHILDREN

Our Services and Website are not intended for children under the age of eighteen (18), or under the age of majority in your jurisdiction if it is higher, so we do not knowingly collect Personal Data from, of, or about children under this age threshold. If you are under the age threshold, do not use our Services or Website and do not provide any Personal Data to us without involvement of a parent or a guardian. If you believe that we have such information, please contact us at privacy@cycode.com.

10. LINKS TO AND INTERACTIONS WITH THIRD PARTY SERVICES

Our Services may enable you to interact with, contain links to, or allow integration with your, or your employer's, third party accounts and other third party websites, 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 may collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service that you choose to use or interact with.

11. USE OF COOKIES, LOG FILES, ANALYTICAL TOOLS AND SIMILAR TECHNOLOGIES

We use various technologies and third-party tools to collect and process data for the purposes of analytics, marketing, user experience optimization, service administration, and security. These technologies include cookies and similar tracking tools, server log files, and behavioral analytics services.

- a. Cookies. We and our Third Party Service Providers use cookies and other similar technologies ("**Cookies**") to provide our Services and ensure that they perform properly, to analyze our performance and marketing activities, and to track your use of the Website and personalize your experience. You can learn more about how we use cookies and similar technologies and how you can exercise control over them by reviewing our [cookies policy](#).

Please note that we do not change our practices in response to a "Do Not Track" signal in the HTTP header from browsers; however, most browsers allow you to control Cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a Cookie, or you may choose to block Cookies with your browser.

Please also note that social media platforms may set cookies and other tracking technologies on your device when you visit their pages and when you navigate from their pages. The output of such information may be provided to us (usually for statistical purposes to see how users interact with our content on social media platforms). The social media platforms are responsible for how they handle your Personal Data. Information about how they collect and use Personal Data (and how they use cookies and similar technologies, including instructions

on how you can disable these) can usually be found in their respective privacy policies and cookies policies on their websites.

- b. Log files. Our Services collect and store information that your browser automatically transmits to us in "server log files", which may include (but not limited to): IP addresses, browser type and version, operating system used, referring/exit pages URL, clicked pages, date/time stamp of the server request. We use such information to analyze trends, administer our Services and track the use of our Website.
- c. Analytics and Optimization tools. These tools help us understand how users engage with our Services and Website and support testing and optimization of our user interface and content.
 - **Google Analytics**: The Website uses "**Google Analytics**" a web analytics service provided by Google LLC. Google Analytics collects information such as how often users visit our Website, what pages they view, and what website referred them to us. This information is used to improve our Website and Services. Google Analytics primarily collects information about usage patterns and website interactions. We do not use Google Analytics to collect information that directly identifies you (such as your name or email address), nor do we attempt to link analytics data with personal identifiers. However, Google Analytics may collect certain technical data that is considered "personal data" under certain data protection laws, such as IP addresses or unique device identifiers. We do not combine this data with any Personal Data that we collect elsewhere. Google's use of this information is governed by the [Google Analytics Terms of Service](#) and the [Google Privacy Policy](#). You can learn how Google uses information from sites that use their services [here](#), and you may opt out by installing the [Google Analytics Opt-out Browser Add-on](#).
 - **Hotjar**: Provides visual insights through heatmaps and session recordings. Hotjar's Privacy Policy is available at: <https://www.hotjar.com/legal/policies/privacy/>. Hojar's Opt-Out Instructions can be found at <https://www.hotjar.com/policies/do-not-track/>.
 - **Nelio A/B Testing**: Enables A/B testing of page elements to evaluate design and content variations. Their Privacy Policy can be found at: <https://neliosoftware.com/legal/privacy/>.
- d. Marketing and Advertising Tools. These tools help us manage marketing campaigns, track user engagement, and measure advertising performance.
 - **HubSpot**: Used for CRM, lead tracking, and marketing automation. Privacy Policy; Cookie Policy.
 - **Google Ads**: Supports remarketing, conversion tracking, and ad performance measurement. Privacy Policy; Ad Settings & Opt-Out.
- e. Security and Fraud Prevention Tools. To ensure the integrity and security of our Services, we use the following technology:
 - **Google reCaptcha**: Our Platform uses "Google reCaptcha" ("reCAPTCHA") solely for protection against unauthorized access to, and abusive automated crawling and spam of, our Platform by bots and other automated means. reCAPTCHA analyzes the behavior of visitors of the Platform's log-in page based on various characteristics. This analysis starts automatically as soon as a Platform user reaches the log-in page, and it involves the evaluation of various information (e.g., device and application data, mouse movements and time spent in the log-in page, and the results of integrity checks). Such information is also shared with Google. We do not combine reCaptcha data with Personal Data we collect. For more information about Google's use of information processed by reCaptcha and Google's privacy practices, please visit: <https://www.google.com/reCaptcha/about/> and <https://policies.google.com/privacy>.
- f. AI-Based Analytics and Enrichment Tools. We may use artificial intelligence and machine learning technologies to analyze trends, enrich business data, and identify potential business contacts. Such tools help us support business development, marketing and outreach. We do not use AI tools for fully automated decision-making that has legal or similarly significant effects on individuals.

12. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

- a. Do Not Track Signals. Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers to inform websites that they do not want to be tracked. We do not respond to or honor DNT signals.
- b. California Consumer Privacy Rights (CCPA). Cycode does not meet the threshold of the California Consumer Privacy Act of 2018 (as amended) (“**CCPA**”), and therefore its data processing activities as a Business (such as regarding Website visitor data) are not governed by the CCPA. Cycode acts as a Service Provider (as defined in the CCPA) on behalf of its customers and, where the CCPA is applicable to its customers, Cycode is committed to processing Personal Information on their behalf in accordance with the CCPA.

13. CONTACT US; EU REPRESENTATIVE

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@cycode.com, or alternatively by postal address If to **Cycode, Inc.**: 228 Park Ave S PMB 388308, New York, New York 10003-1502 US; If to **Cycode Ltd.**: 12 Leonardo da Vinci St., Tel Aviv - Jaffa, Israel.

Cycode’s data protection officer (DPO) may be contacted at: privacy@cycode.com.

In addition, MyEDPO Ltd. has been appointed as Cycode's representative in the EEA for data protection matters, pursuant to Article 27 of the GDPR.

If you are in the EEA, MyEDPO can be contacted in addition to Cycode, only on matters related to the processing of Personal Data. To make such an inquiry, you may contact MyEDPO using the following details: email info@myedpo.com or alternatively by postal address you can write to MyEDPO Ltd, Unit 3d North Point House, North Point Business Park, New Mallow Road, Cork, Ireland.

14. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time so please review it occasionally. If we make material changes, we will take steps to notify you. The date of the most recent revisions will appear on the top of this page.
