

JOE SECURITY PRIVACY POLICY

Welcome to the website of Joe Security GmbH (“Joe Security” or “we”). The protection of your personal data and the preservation of your privacy are of central importance to us. This Privacy Policy illustrates which types of personal data we process, how we process the personal data and for which purposes we process it.

1. When does this Privacy Policy apply?

This Privacy Policy applies to our processing of personal data in the course of your visit of our website www.joesecurity.org. Please note that this Privacy Policy is not applicable to the processing of personal data in the course of our provisioning of Joe Sandbox Cloud Services. For details on the processing of personal data in the course of the provisioning of Joe Sandbox Cloud Services, please refer to the *Joe Sandbox Cloud Basic Personal Data Protection Policy* and the *Joe Sandbox Cloud Pro Personal Data Protection Policy*.

2. Who is the controller of the data processing?

Under data protection law, the controller of a particular data processing is the entity that determines the purpose and means of that data processing.

Controller of the processing of personal data within the scope of this Privacy Policy:

Joe Security GmbH
Christoph Merian-Ring 11
4153 Reinach
Switzerland

3. What personal data do we process for the provision of our website?

If you visit our website, the data that your browser automatically sends us is logged in “log files”. This data includes your IP address, the website from which you came to this website (referrer), the date of your visit, product and version information on the browser (user agent) used by you, the operating system used by you and language settings.

The afore-mentioned data is used by us to ensure the functionality of our IT systems, to optimize our website and the technology behind it, for internal statistical evaluation regarding the use of our website and to provide prosecution authorities with the required information in case of a cyberattack. This is our legitimate overriding interest in the data processing. The data is not saved together with any other personal data of yours. Further, the data is not analyzed for marketing purposes.

We host the content of our website with the following provider: cyon GmbH (“Cyon”), Brunngässlein 12, 4052 Basel, Switzerland. For details, please refer to Cyon’s privacy policy. <https://www.cyon.ch/legal/datenschutzerklaerung>

4. How and for what do we use cookies?

In order to make visiting our website attractive, efficient and enable the use of specific functions, we use what are known as cookies on various pages of our website. These are small text files which are stored on your computer or end device. Some of the cookies we use are deleted at the end of the browser session, i.e., when you close your browser (known as session cookies). Other cookies are stored on your computer or end device and allow us to recognise your browser next time you visit our website (persistent cookies). You can configure your browser such that no cookies are stored on your

computer or end device, or that you are informed about the storing of cookies and can decide on an individual basis whether to accept cookies in individual cases or not. Information on how to delete cookies and change cookie settings in the most common browsers can be found on the following websites:

- Google Chrome Desktop: <https://support.google.com/chrome/answer/95647?hl=en>
- Google Chrome Mobile: <https://support.google.com/chrome/answer/2392709?hl=en&co=GENIE.Platform%3DAndroid&oco=1>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop?redirectslug=enable-and-disable-cookies-website-preferences&redirectlocale=en-US>
- Apple Safari Mobile: <https://support.apple.com/bg-bg/HT201265>

Not accepting cookies can limit the functionality of using our website.

5. What personal data do we process to analyze and improve the use of our website?

This website uses Google Analytics, a web analysis service provided by Google Ireland Limited („Google“), Gordon House, Barrow Street, Dublin 4, Ireland. Google uses cookies that enable an analysis of your use of our website. The information collected by means of the cookies about your use of our website is generally transferred to a Google server in the USA and stored there. Google will use this information on our behalf to evaluate your use of the website and to compile reports on website activities. The reports provided by Google Analytics serve to analyze the performance of our website.

We use Google Analytics only with IP anonymization activated. Due to IP anonymization, your IP address will be shortened by Google within member states of the European Union or in other states party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. According to Google, the IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

You can prevent the storage of cookies from the outset by setting your browser software accordingly (please see Section 4 above). However, if you configure your browser to reject all cookies, this may result in a restriction of functionalities on this and other websites. In addition, you can prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google, by downloading and installing the browser add-on to disable Google Analytics here: <https://tools.google.com/dlpage/gaoptout?hl=en>

For more information on Google Analytics' terms of use and Google's privacy policy, please visit <https://marketingplatform.google.com/about/analytics/terms/us/> and <https://policies.google.com/?hl=en>.

6. What personal data do we process if you contact us via the contact forms on our website?

Contact forms

You may contact us via the contact forms (“Contact”, “Trial for Cloud Pro” and “Purchase Cloud Pro”) available on our website. To contact us via such forms, we require in particular, without limitation, the following information:

- Your name
- Your email address

- Your phone number
- Company name
- Your job title
- The country you are submitting this request from
- Area of interest
- Required monthly analysis volume
- Message about your inquiry

We process the above information to validate your request, to contact and communicate with you regarding your request, to provide you with the requested information and in the event of follow-up questions. Further, we may process the information to enter into contracts on Joe Security services with you and to provide Joe Security services to you. It is our legitimate overriding interest to offer you the possibility to contact us at any time and to be able to answer your inquiries. Also, it is our legitimate overriding interest to enter into contracts for our services and to fulfill these contracts.

If you contact us via the "Career" form available on our website, your application, contact details, documents and other provided data will be processed by us solely for recruiting purposes within Joe Security. It is our legitimate overriding interest to give you the opportunity to apply for vacancies and to conduct selection processes to fill the vacancies with suitable candidates.

Jotform

For our contact forms as described above we use functions of the JotForm online formular builder. This is provided by JotForm Inc., 111 Pine St. Suite 1815, San Francisco, CA 94111, United States ("Jotform"). The data sent via these forms are transmitted ssl-encrypted to Jotform servers located in the EU and stored there. Also, Jotform stores your IP address in order to identify the geographical region from where the request is sent. We use that geo-location-information to validate your request.

More information on the handling of user data by Jotform can be found in the Jotform Private Policy <https://www.jotform.com/privacy/>.

A statement by Jotform regarding the storage of data on servers in the EU can be found here: <https://www.jotform.com/blog/178-EU-Safe-Forms-Our-Solution-to-the-EU-Safe-Harbor-Invalidation>

Google reCAPTCHA

We use the reCAPTCHA service provided by Google, Inc., 1600 Amphitheater Parkway Mountain View, CA 94043, USA ("Google") to protect the contact forms on our website from unauthorized use. This service allows us to differentiate between entries made by a human being or improperly by an automated machine. The integration of reCAPTCHA takes place via an interface ("API") to the Google services. By integrating reCAPTCHA, Google may collect information (including personal data) and process it. It cannot be ruled out that Google also transmits the information to a server in a third country.

reCAPTCHA may use "cookies", which are text files placed on your device and which allow an analysis of the use of the websites you visit. In addition, reCAPTCHA also uses so-called WebBeacons, i.e., small pixels or graphics. The information generated by the cookie, possibly in connection with the WebBeacon, about your use of this website (including your IP address) is transmitted to a Google server, possibly in the USA or other third countries, and stored there.

For more information on how reCAPTCHA works, see: <https://developers.google.com/recaptcha/>

For more information about Google's privacy policy, please visit: <https://policies.google.com/privacy>

By integrating reCAPTCHA, we pursue the purpose of determining whether entries on our website are made by a real person or by a bot. This is our legitimate overriding interest in the data processing.

You may refuse the use of cookies by selecting the appropriate settings on your browser (please see Section 4 above), however, please note that if you do this you may not be able to use the full functionality of this website.

7. How do we integrate videos on our website and what personal data is processed in this context?

This website uses the video portal «YouTube» provided by Google Ireland Limited („Google“), Gordon House, Barrow Street, Dublin 4, Ireland, for the integration of videos. Here, we use the "privacy enhanced mode" option provided by Google. When you visit a page that has an embedded video, a connection is established to Google's servers and the content is displayed on the website by informing your browser. According to Google's information, in "privacy enhanced mode" your data – in particular, which of our internet pages you have visited as well as device-specific information including the IP address – is only transmitted to the YouTube server in the USA when you watch the video. If you are logged in to YouTube or Google at the same time, this information will be assigned to your YouTube or Google member account. You can prevent this by logging out of your member account before visiting our website. Further information on YouTube's privacy policy is provided by Google at <https://policies.google.com/privacy>.

8. What data do we process when using a consent management tool?

On our website, we use the consent management tool "Cookiebot" provided by Cybot A/S, Havnegade 39, 1058 Copenhagen, Denmark. With the help of Cookiebot, you will be shown a so-called cookie banner when you first access our website, in which you can manage your consent to the setting of cookies or the use of cookie categories. You can also access the cookie banner at any time later and change your cookie settings. The settings you make are stored in separate cookies. These are the following categories of data:

- anonymized IP address
- date and time of consent
- browser details
- the URL of our subpage from which you gave your consent
- a random and encrypted key
- the consent status, which serves as proof of consent

It is our legitimate overriding interest to manage user consents to the setting of cookies on our website in accordance with data protection law.

For more information, please see the privacy policy of Cookiebot at: <https://www.cookiebot.com/de/privacy-policy/>

You may refuse the use of cookies by selecting the appropriate settings on your browser (please see Section 4 above), however, please note that if you do this you may not be able to use the full functionality of this website.

9. With whom do we share personal data?

It may be necessary for us to disclose personal data to the following categories of recipients:

- Service providers: We may share personal data with the service providers as described in this Privacy Policy.
- Authorities and courts: If we are requested to do so by authorities or courts and are legally obliged to do so, we will disclose personal data to these or other authorized third parties.

10. How do we protect your data?

This website uses TLS encryption for security reasons and to protect confidential information (e.g., requests you send us via our website). We secure our website and other systems by technical and organizational measures against loss, destruction, modification or access of your data by unauthorized persons.

11. How long do we keep your data?

We store personal data only as long as necessary for the intended purpose in each case or as required by law.

12. What rights do you have with regard to your personal data?

Within the framework of the data protection law applicable to you and to the extent provided therein, you may have, in particular, the following rights:

Right of access: You can obtain from us confirmation as to whether or not personal data concerning you is being processed by us. Where that is the case, you can obtain from us access to the personal data and information regarding, *inter alia*, the purposes of the processing, the categories of recipients to whom your personal data has been or will be disclosed, where possible the envisaged period for which the personal data will be stored (as applicable).

Right to rectification: You have the right to have inaccurate personal data concerning you rectified.

Right to erasure: You can obtain from us the erasure of your personal data stored by us, where a reason for erasure applies, such as: the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw your consent and there is no other legal ground for the processing; you object to the processing and there are no overriding legitimate grounds for the processing; the personal data has been unlawfully processed.

Right to restriction of processing: Under certain conditions, you can obtain from us restriction of processing of the personal data concerning you.

Right to notification: Where you have exercised your right to rectification or erasure of personal data, or restriction of processing, we may be obliged to communicate this rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data concerning you has been disclosed, unless this proves impossible or involves disproportionate effort.

Right to data portability: You may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and to transmit those data to another controller without hindrance from us.

Right to object: You may have the right to object to processing of personal data concerning you.

If you have any requests of this kind, please direct them to the addresses stated in Section 13 below.

13. How can you contact us with questions about data protection?

If you have any questions or requests relating to this Privacy Policy, feel free to contact us. You can reach us by email to privacy@joesecurity.org or by post to the following address:

Joe Security GmbH
Christoph Merian-Ring 11
4153 Reinach
Switzerland

If and to the extent our data processing is subject to the EU General Data Protection Regulation (GDPR) and you have a question or request in this regard, please contact our representative in the EU, using the contact information below:

Rickert Rechtsanwaltsgesellschaft mbH
- Joe Security GmbH -
Colmantstraße 15
53115 Bonn
Germany
art-27-rep-joesecurity@rickert.law

14. How can we change this Privacy Policy?

We reserve the right to change this Privacy Policy at any time. The respective current version published on our website shall apply. In case of changes to this Privacy Policy we will provide the updated version with the revision date here on our website.

Version: 13.11.2023