

Privacy Notice

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This Privacy Notice provides you with information about what personal data we collect about you, how and why we use it, with whom we share it, how we store it, and your rights with respect to your data.

We at Regulus Cyber Ltd. ("us", "we", or "our") recognize and respect the importance of maintaining the privacy of our website visitors. This Privacy Notice describes the types of information we collect from you when you visit our site(s) and/or use our services thereon (such services, together with the site, the "services"). "You" means an individual using the services, and "personal data" means any information that refers, is related to, or is associated with an identified or identifiable individual or as otherwise may be defined by applicable law. This Privacy Notice details which personal data we collect when we provide the Services to you.

You have no legal obligation to provide us with any personal data. If you are subject to the laws of the State of Israel, note that any personal data you choose to provide is provided with your consent as required under applicable law. Note that if you do not provide us with certain personal data, we may not be able to provide you with some or all of the associated services.

1. Personal Data We Collect

- 1.1. <u>Communications</u>. When you send us a message through the contact form on our site or other means, request information from us, sign up for our email list, complete online forms, or contact us for any other reason we collect any data you provide, such as your full name, company, email, the product you are interested in and the content of your message.
- 1.2. Activity and System Data (including Cookies). In addition, when you use the site, we may gather certain information automatically about your computer or mobile device, such as your operating system, your IP address, device ID, as well as your browsing history (e.g. other sites you've visited before ours) and any other information regarding your use of our site. This data is also collected via cookies (for more information, see the Cookies Section below).
- 1.3. Visitors to Our Social Media Pages. When you engage with our social media outlets, such as when you post, comment or otherwise engage with our LinkedIn or other social media pages, we collect the personal data you provide, such as the content of your post and the information available to us through your profile or account. The social media companies we use may also provide us with aggregate and analytical information about activity relating to us.
- 1.4. Job Applicants. If you apply for a job with us, we collect, directly or indirectly through our third-party service providers, the information you provide as part of your application and during the course of the application process. This may include your contact information, address, resumé information (including



information such as skills, work experience, education), notes submitted with the application, URL of your LinkedIn and other online profiles, the position for which you have been or are being considered, the source who submitted your candidacy, email correspondences between you and us and between the us and other sources (such as recruiting agency and referrals) about your candidacy, information from references, events in the lifecycle of your candidacy, your responses to questionnaires sent to you by us, information about your candidacy and employment options (such as availability to be hired and salary expectations), evaluations of your candidacy, internal discussions about your candidacy, materials you or other parties (such as evaluators or background check providers) submitted in relation to your candidacy. We may also collect any data as available on your social media accounts, if relevant.

Our third-party recruitment service providers may process analytical personal data related to your job application for quality assurance, business development and improvement of their services. They may also use aggregated data to provide benchmarks, such as salary ranges for job positions. For additional information regarding how your personal data is processed by our third party service provider, see

https://help.comeet.co/en/articles/3134994-privacy-notice-for-job-candidates. Additionally, such services also use analytics tools such as cookies and similar technologies to collect and analyze information regarding your recruitment process in order to monitor traffic patterns, analyze the types of internet browsers and operating systems used by you, and assess overall recruitment platform usage. For additional information regarding such use, see here: https://help.comeet.co/en/articles/5342603-careers-website-cookie-policy. For additional information on our use of cookies, please see the Cookies section below.

2. How We Use Your Personal Data

- General. We and any of our trusted third-party subcontractors and service 2.1. providers use the personal data we collect from and about you for any of the following purposes: (1) to provide you with the services; (2) to respond to your inquiries or requests, contact and communicate with you; (3) to develop new products or services and conduct analyses to improve our current content, products, and services; (4) to contact you with informational newsletters and promotional materials relating to our site and services; (5) to review the usage and operations of our site and services; (6) to use your data in an aggregated, non-specific format for analytical purposes (as detailed below); (7) to prevent fraud, protect the security of our site and services, and address any problems with the site and/or services; (8) for the management and strategy development of our business, predicting (potential) customer preferences and identify trends and preferences in the market; (9) to respond to your posts and comments and to analyze the effectiveness of our social media efforts; (10) to process your job application; and (12) to analyze effectiveness and improve recruiting efforts.
- 2.2. Statistical Information and Analytics. We and/or our service providers use



analytics tools to collect and analyze information about the use of the services, such as how often users visit the site, what pages they visit when they do so, and what other sites and mobile applications they used prior to visiting the site. By analyzing the information we receive, we may compile statistical information across a variety of platforms and users. This helps us improve our services by allowing us to identify new trends and customer needs, which in turn allows us to consider new products and services or tailor existing products and services accordingly. As part of our use of analytic tools, we may use Google Analytics. You can find more information about how Google collects information and how control such use you can at https://policies.google.com/technologies/partner-sites.

- 3. **Sharing the Personal Data We Collect.** We share your information, including personal data, as follows:
 - 3.1. Access-Holders. Access-holders who have access to personal data are personnel who have a need to know and process personal data in accordance with this Privacy Notice, and who are bound by confidentiality obligations towards us. It is hereby clarified that the identity and/or type of access-holders may change from time to time in accordance with our business needs. In case there is a material change in the types of access-holders, we will use commercially reasonable efforts to update you about such change.
 - 3.2. <u>Service Providers and Subcontractors</u>. We disclose information, including personal data we collect from and/or about you, to our trusted service providers and subcontractors, who use such information to: (1) help us provide you with the services; (2) aid in their understanding of how users are using our services; and (3) for the purpose of direct marketing (see above for more details).

Type of Service	Description	Personal Data Shared
Cloud Computing	We use service providers that	All personal data that we
	offer cloud computing services.	collect from you is stored
	They offer us space on their	on third party servers.
	servers for us to store our files	
	and programs, including your	
	personal data.	
Customer	We use an external CRM tool to	your name, company,
Relationship	help us keep track of our	email address, and phone
Management	customers and information	number.
(CRM)	related to them, including their	
	personal data.	
Email Marketing	We use an independent vendor	your name and email
	to send out marketing emails on	address.
	our behalf.	



Type of Service	Description	Personal Data Shared
Analytics Providers	We use a service provider to	Data collected
	assist us with analytics services.	automatically through our
		site, including IP
		addresses and cookie
		information.
HR Recruitment	We use service providers	Data collected when you
	assisting us with the processing	are applying for a job.
	of job applications.	

- 3.3. <u>International Transfers</u>. By accepting this Privacy Notice, you acknowledge and agree that we may use subcontractors and service providers who are located in countries other than your own and may send them information we receive (including personal data).
- 3.4. <u>Business Transfers</u>. Your personal data may be disclosed as part of, or during negotiations of, any merger, sale of company assets or acquisition (including in cases of liquidation). In such case, your personal data shall continue being subject to the provisions of this Privacy Notice.
- 3.5. <u>Law Enforcement Related Disclosure</u>. We may share your personal data with third parties: (i) if we believe in good faith that disclosure is appropriate to protect our or a third party's rights, property or safety; (ii) as is necessary to comply with any legal and/or regulatory obligation; or (iii) when required by subpoena, court order or the order of another governmental or law enforcement authority.
- 3.6. <u>Legal Uses</u>. We may use your personal data as required or permitted by any applicable law, for example, to comply with audit and other legal requirements.
- 4. **Security.** We make efforts to follow generally accepted industry standards to protect the personal data submitted to and collected by us, both during transmission and once we receive it. However, no method of transmission over the internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security. As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect user IDs and passwords, please take appropriate measures to protect this information.
- 5. Your Rights. Subject to applicable law, you may request to access any personal data you have provided to us and request that such personal data be corrected, updated, or deleted, including in accordance with Articles 13 and 14 of the Israeli Privacy Protection Law, 1981. You may exercise such rights by emailing us at info@regulus.com. You may have the right to delete your personal data subject to and in accordance with Article 3 of the Israeli Privacy Protection Regulations (Provisions Regarding Information Transferred to Israel from the European Economic Area), 2023.
- 6. Data Retention Subject to applicable law, we retain personal data as necessary for the



purposes set forth above and then delete the personal data once we deem it is no longer necessary for these purposes. In some circumstances, however, we may store your personal data for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, audit, accounting requirements and so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings.

- 7. **Cookies and Similar Technologies**. We use cookies and similar technologies for a number of reasons, including to help personalize your experience.
 - 7.1. What are Cookies? A cookie is a small piece of text that is sent to a user's browser or device. The browser provides this piece of text to the device of the originating user when this user returns.
 - 7.1.1. A "session cookie" is temporary and will remain on your device until you leave the site.
 - 7.1.2. A "persistent" cookie may be used to help save your settings and customizations across visits. It will remain on your device until you delete it
 - 7.1.3. First-party cookies are placed by us, while third-party cookies may be placed by a third party. We use both first- and third-party cookies.
 - 7.1.4. We may use the terms "cookies" to refer to all technologies that we may use to store data in your browser or device or that collect information or help us identify you in the manner described above, such as web beacons or "pixel tags".
 - 7.2. How We Use Cookies. We use cookies and similar technologies for a number of reasons, as specified below.

The specific names and types of the cookies, web beacons, and other similar technologies we use may change from time to time. However, the cookies we use generally fall into one of the following categories:

Type of Cookie	Why We Use These Cookies
Necessary	These cookies are necessary in order to allow the site to
	work correctly. They enable you to access the site, move
	around, and access different services, features, and tools.
	Examples include remembering previous actions (e.g.
	entered text) when navigating back to a page in the same
	session. These cookies cannot be disabled.
Functionality	These cookies remember your settings and preferences and the choices you make in order to help us personalize your experience and offer you enhanced functionality and content.
Security	These cookies can help us identify and prevent security
	risks.
Performance/Analytics	These cookies can help us collect information to help us



Type of Cookie	Why We Use These Cookies	
	understand how you use our site, for example whether	
	you have viewed messages or specific pages and how	
	long you spent on each page. This helps us improve the	
	performance of our site.	

- 7.3. How to Adjust Your Preferences. Most web browsers are initially configured to accept cookies, but you can change this setting so your browser either refuses all cookies or informs you when a cookie is being sent. In addition, you are free to delete any existing cookies at any time. Please note that some features of the services may not function properly when cookies are disabled or removed. For example, if you delete cookies that store your site preferences, you will be required to input these each time you visit.
- **8.** Third-Party Applications and Services. All use of third-party applications or services is at your own risk and subject to such third party's terms and privacy policies. We do not take any responsibility for the performance of other services.
- 9. Communications. We reserve the right to send you service-related communications, including service announcements and administrative messages, without offering you the opportunity to opt out of receiving them. Should you not wish to receive such communications, you may contact us at the address listed below.
- 10. **Children.** We do not knowingly collect personal data from children under the age of eighteen (18). In the event that you become aware that an individual under the age of eighteen (18) is using the services without parental permission, please advise us immediately.
- 11. Changes to the Privacy Notice. We may update this Privacy Notice from time to time to keep it up to date with legal requirements and the way we operate our business, and we will place any updates on this webpage. Please come back to this page every now and then to make sure you are familiar with the latest version. If we make material changes to this Privacy Notice, we will seek to inform you by notice on our site or via email.
- 12. **Comments and Questions.** If you have any comments or questions about this Privacy Notice or if you wish to exercise any of your legal rights as set out herein, please contact us at info@regulus.com.