

ZAFRAN PRIVACY POLICY

Last Updated: January 4, 2026

This privacy policy ("Privacy Policy") governs how we, Zafran Security Inc., and its affiliates ("Zafran" "we", "our" or "us") use, collect, disclose, and store Personal Data we collect or receive from or about you ("you") such as in the following use cases:

- (i) When you browse or visit our website <https://www.zafran.io> ("Website");
- (ii) When you make use of, or interact with, our Website and/or platform
 - a. When you create an account and sign in
 - b. When you use our services
 - c. When you use our AI chatbot feature
 - d. When you subscribe to our distribution list(s) / newsletter(s) / blog(s)
 - e. When we process your job application
 - f. When you contact us (e.g. customer support, need help, submit a request)
- (iii) When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data
- (iv) When we acquire your Personal Data from third-party sources (such as lead-generation companies)
- (v) When we use the Personal Data of our customers (e.g. contact details)
- (vi) When we use the Personal Data of our service providers (e.g. contact details)
- (vii) When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

Please read this Privacy Policy carefully, so you can understand our practices and your rights in relation to personal data. "Personal Data" or "Personal Information" 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 privacy laws. 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 in the table below is only relevant to GDPR-protected individuals.

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This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement 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.

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

Specific Personal Data we collect	Why is the Personal Data collected and for what purposes?	Legal Basis (As applicable, for GDPR Purposes)	Consequences of not providing the data	
When you browse or visit our Website				
• Data collected through cookies, analytic tools and log files	<ul style="list-style-type: none"> • To review and improve the usage and operations of our Website • To analyze trends • To administer the Website • To track users' movement around the Website 	<ul style="list-style-type: none"> • Consent • Legitimate interest (e.g., necessary cookies) 	<ul style="list-style-type: none"> • Certain non-essential Website features may not be available 	
• IP addresses	• To monitor who is visiting the Website	<ul style="list-style-type: none"> • Consent • Legitimate interest (e.g., necessary cookies) 	<ul style="list-style-type: none"> • Cannot monitor who is visiting the Website 	
When you make use of or interact with our Website and/or platform				
When you create an account and sign in	<ul style="list-style-type: none"> • Full name • Email address • Username and password • Phone number • Any other data you decide to provide us with. 	<ul style="list-style-type: none"> • To be able to create an account. • To be able to log in. • To be able to use the Website. • To be able to enjoy features available to registered users only. • To personalize your experience. • To send you marketing communication, updates, offers and other relevant promotions or news. 	<ul style="list-style-type: none"> • The processing is necessary for a contract we have with you. • Legitimate interest (in order to create your account and in order to personalize your experience) • Consent 	<ul style="list-style-type: none"> • Cannot be able to create an account. • Cannot be able to log in. • Cannot be able to use the Website. • Cannot be able to enjoy features available to registered users only. • Cannot personalize your experience. • Cannot send you marketing communication, updates, offers and other relevant promotions or news.
When you use our services	<ul style="list-style-type: none"> • Log files, cookies. • You user activity. • Any information you choose to provide us with. 	<ul style="list-style-type: none"> • To provide our services to you. • To personalize your experience. • To understand your usage of our services. • To improve our services. 	<ul style="list-style-type: none"> • Cannot provide our services to you. • Cannot personalize your experience. • Cannot understand your usage of our services. • Cannot improve our services. 	<ul style="list-style-type: none"> • Processing is necessary for the performance of a contract to which the data subject is party (our terms and conditions) • Legitimate interest.
When you use our chatbot feature	• Full name	• To provide you with the chatbot feature	• Cannot provide you with the chatbot feature	• Processing is necessary for the performance of a contract to which the data subject is party (our terms and conditions)
When you subscribe to our distribution list(s)/ newsletter(s)/ blog(s)				
• Full name	<ul style="list-style-type: none"> • To add you to our mailing list • To send newsletters or other marketing communications. 	• Consent	<ul style="list-style-type: none"> • Cannot add you to our mailing list • Cannot send you marketing communications 	
When we process your job application				
• Full name	<ul style="list-style-type: none"> • To process your job application • To assess you as a candidate 	<ul style="list-style-type: none"> • In order to take specific steps before entering into a contract with you. 	<ul style="list-style-type: none"> • Cannot process your job application • Cannot assess your suitability as a candidate 	
When you contact us. (e.g. customer support, need help, submit a request)				

• Full name • Email address • Support information • Any other data you decide to provide us with	• To respond to your query • To communicate with you • To provide you with support • To analyze your experience with Statement • To send you marketing communications	• Legitimate interest (in order to answer your query) • Consent	• Cannot respond to your query • Cannot communicate with you • Cannot provide support • Cannot analyze your experience with Statement • Cannot send you marketing communications
When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data			
• Email address • Full name • Phone number • Company • Job title • Any other information you choose to share with us	• To contact you for business and partnership matters. • To provide you with information and assistance. • To send marketing communications	• Consent	• Cannot contact you for business and partnership matters. • Cannot provide you with information and assistance. • Cannot send you marketing communications
When we use the Personal Data of our customers (e.g. contact details)			
• Email address • Full name • Phone number • Company name • Job title • Payment information • Any other information you choose to share with us • Any other information you already agreed for us to collect	• To provide our services • To perform the applicable agreement • To communicate with our customers	• The processing is necessary for a contract we have with you. • Legitimate interest (the processing is necessary for a contract that we have with your employer).	• Cannot provide our services • Cannot perform the agreement • Cannot communicate with you
When we use the Personal Data of our service providers (e.g. contact details)			
• Email address • Full name • Phone number • Company • Job title • Any other information you choose to share with us	• To provide our services • To engage in commercial agreements with such third parties • To perform the applicable agreement • To communicate with our service providers, suppliers and developers	• The processing is necessary for a contract we have with you. • Legitimate interest (the processing is necessary for a contract that we have with your employer).	• Cannot provide our services • Cannot engage in commercial agreements with such third parties • Cannot perform the applicable agreement • Cannot communicate with our service providers, suppliers and developers
When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)			
• Full name • Email address • Account name • Any other data you decide to provide/ supply	• To reply to your request or question • To establish a business connection with you.	• Legitimate interest (in order to respond to your question).	• Cannot reply or respond to your request or questions. • Cannot establish a business connection 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 or will anonymize or de-identify your Personal Data and further use it for internal and external purposes, including, without limitation, to improve the services and for research purposes. “**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 without restrictions (for example, in order to improve our services and enhance your experience with them).

2. HOW WE PROTECT AND RETAIN YOUR INFORMATION

- 2.1. **Security.** We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. 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.
- 2.2. **Retention of your Personal Data.** Until we no longer need the information and proactively delete it, or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws. Please note that in some 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, 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 have an internal data retention policy to ensure that we do not retain your Personal Data perpetually.

3. HOW WE SHARE YOUR PERSONAL DATA

We may share your Personal Data as follows:

- 3.1. We may also share information with our affiliated companies about you.
- 3.2. We may use third party service providers to process your information for the purposes outlined above, including, without limitation:
 - 3.2.1. With cloud service providers for hosting purposes;
 - 3.2.2. With websites and web content creation platforms in order to help us manage our Website;
 - 3.2.3. With email providers, marketing, CRM, other similar tool providers; and
 - 3.2.4. With analytic companies, in order to help us understand and analyze information we collect in accordance with this policy.
- 3.3. To the extent necessary, with regulators, courts, banks or competent authorities, 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, as well as for internal compliance procedures and to protect the safety, security, and integrity of Statement, our services, customers, employees, property, and the public.
- 3.4. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your information to such third party (whether actual or potential) in connection with the foregoing events (including, without limitation, our current or potential investors). In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your information in connection with the foregoing events.
- 3.5. Where you have otherwise provided your consent to us for sharing or transferring your information.

If you want to receive the list of the current recipients of your Personal Data, please make your request by contacting us to privacy@zafran.io.

4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

- 4.1. **Internal transfers:** Transfers within Zafran will be covered by an internal processing agreement entered into by members of the Zafran group (an intra-group data processing agreement) which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred to.
- 4.2. **External transfers:** Where we transfer your Personal Data outside of EU/EEA (for example to third parties who provide us with services), we will generally obtain contractual commitments from them to protect your Personal Data. When Zafran engages in such transfers of personal information, it relies on i) Adequacy Decisions as adopted by European Commission on the basis of Article 45 of Regulation (EU) 2016/679 (GDPR) (for example, when we access from Israel), or ii) Standard Contractual Clauses issued by the European Commission. Zafran also continually monitors the circumstances surrounding such transfers in order to ensure that these maintain, in practice, a level of protection that is essentially equivalent to the one guaranteed by the GDPR.
- 4.3. In order to run our business and provide our Website and services to you, we transfer Personal Data to certain countries around the world, including to our affiliates and service providers, many of whom are located outside of your jurisdiction. Therefore, your Personal Data may be processed in countries with privacy laws that are different from privacy laws in your country. Whenever we make such transfers, we will use commercially reasonable efforts to implement an appropriate level of protection to your Personal Data by implementing at least one of the following safeguards: 4.3.1. making sure the destination country has been deemed to provide an adequate level of protection for Personal Data; and/or 4.3.2. by executing implement data onward transfer instruments such as data processing and protection agreements.

5. YOUR PRIVACY RIGHTS. HOW TO DELETE YOUR ACCOUNT

- 5.1. The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by specific laws):
 - 5.1.1. You have the right to withdraw consent to the processing, where consent is the basis of processing.
 - 5.1.2. You have the right to access the personal information that we hold and request further details about how we process it, under certain conditions.
 - 5.1.3. You have the right to demand rectification of inaccurate personal information about you. We will promptly correct any information found to be incorrect.
 - 5.1.4. You have the right to object to unlawful data processing under certain conditions.

- 5.1.5. You have the right to erasure of past data about you (your “right to be forgotten”) under certain conditions.
- 5.1.6. You have the right to demand that we restrict the processing of your personal information, under certain conditions, if you believe we have exceeded the legitimate basis for processing, the processing is no longer necessary, or if you believe your personal information is inaccurate.
- 5.1.7. You have the right to data portability of personal information concerning you that you provided us in a structured, commonly used, and machine-readable format, subject to certain conditions.
- 5.1.8. The personal information we collect is not used for automated decision-making and profiling, except for automated processes in the context of marketing. As stated above, you can opt out of direct marketing by Zafran by contacting Zafran directly or by following the unsubscribe options in our email messages.
- 5.2. You can exercise your rights by contacting us at privacy@zafran.io. 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 need 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 requested, we will address your request to the maximum extent possible, all in accordance with applicable law.
- 5.3. **Marketing emails - opt-out:** You may choose not to receive marketing email of this type by sending a single email with the subject "BLOCK" to privacy@zafran.io. Please note that the email must come from the email account you wish to block OR if you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails, and we will process your request within a reasonable time after receipt.
- 5.4. **Deleting your account:** Should you ever decide to delete your account, you may do so by emailing privacy@zafran.io. If you terminate your account, any association between your account and Personal Data we store will no longer be accessible through your account. However, given the nature of sharing on certain services, any public activity on your account prior to deletion will remain stored on our servers and will remain accessible to the public.

6. USE BY CHILDREN

We do not offer our products or services for use by children and, therefore, we do not knowingly collect Personal Data from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any Personal Data to us without involvement of a parent or a guardian. For the purposes of the GDPR, we do not intend to offer information society services directly to children. In the event that we become aware that you provide Personal Data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@zafran.io.

7. INTERACTION WITH THIRD PARTY PRODUCTS

We enable you to interact with third party websites, mobile 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 can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. LOG FILES

We use log files. We use such information to analyze trends, administer the Website, track users' movement around the Website, and gather demographic information.

9. COOKIES AND ANALYTIC TOOLS

- **Cookies.** Our Services may utilize “cookies”, anonymous identifiers and other tracking technologies in order to for us to provide our Services and present you with information that is customized for you. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Services. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address, previously indicated by a user. 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.
- **Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with Personal Information we collect. Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- We reserve the right to remove or add new analytic tools.

10. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

10.1. California Privacy Rights:

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@zafran.io. Please note that we are only required to respond to one request per customer each year.

11. CONTACT US

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@zafran.io

Data controller: Zafran Security Inc. a company incorporated under the laws of the State of Delaware having its principal place of business at 169 Madison Ave STE 11482 New York, NY 10016.

DocuSigned by:

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