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censornet.

Privacy Policy

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Issued: December 2020

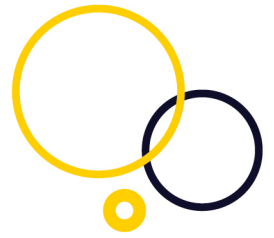




Privacy Policy

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Introduction

Welcome to the Censornet Privacy Policy. Censornet respects your privacy and is committed to protecting your Personal Data. This Privacy Policy will inform you as to how we look after your Personal Data when you visit our website (regardless of where you visit it from) or use any of our services and tell you about your privacy rights and how the law protects you.

This Privacy Policy is provided in a layered format, so you can click through to the specific areas set out in the table of contents. Alternatively, you can download a pdf version of the policy [here](#). Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

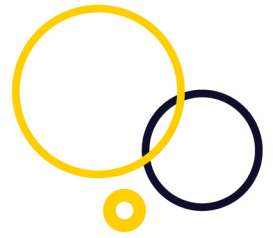
1. Important information and who we are

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Censornet collects and processes your Personal Data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service or take part in a survey.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we may provide on specific occasions when we are collecting or processing



Personal Data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

Controller

This Privacy Policy is issued on behalf of Censornet Limited. Censornet is the Controller and responsible for this website and policy.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

Our full details are:

Full name, registered number and registered office address of legal entity: Censornet Limited (Co. No. 05518629), the registered office of which is at Highlands House, Basingstoke Road, Spencers Wood, Reading, Berkshire, RG7 1NT, UK

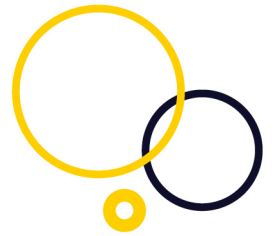
Name or title of DPO: Laura Harding

Email address: DPO@Censornet.com

Postal address: Matrix House, Basing View, Basingstoke, RG21 4DZ, UK

Telephone number: 0845 230 9590

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would,



however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

EU Representative

To comply with the General Data protection Regulation (2016/679) we have appointed a European representative. If you wish to contact them, their details are as follows:

Bird & Bird GDPR Representative Services SRL

Email address: EUrepresentative.Censornet@twobirds.com

Postal address: Avenue Louise 235, 1050 Bruxelles, Belgium

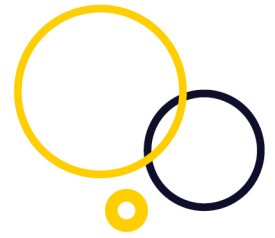
Changes to this Privacy Policy and your duty to inform us of changes

The version number and date are stated at the top of this policy. We reserve the right to make changes to this policy and the latest version will apply.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Policy of every website you visit.



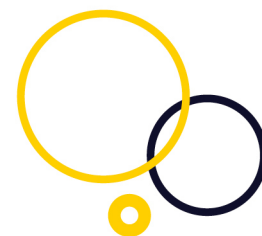
2. The data we collect about you

Personal Data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, IP address, device id, MAC address, Active directory (AD) username or similar identifier, email address, telephone number.
- **Contact Data** includes email address and telephone numbers and, where applicable, billing address.
- **Financial Data** includes, where applicable, bank account and payment card details.
- **Traffic Data** includes data relating to website browsing activity, to cloud application activity, to multi-factor authentication activity and to external email messages sent and received, relating to the Censornet Web Security, Cloud Application Security (CASB), Multi-Factor Authentication (MFA), Email Security services and Autonomous Security Engine (ASE). It also includes data captured on our Partner Portal.
- **Transaction Data** includes, where applicable, details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website or our services.
- **Profile Data** includes your username and password, purchases or orders made by you, your feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific



website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

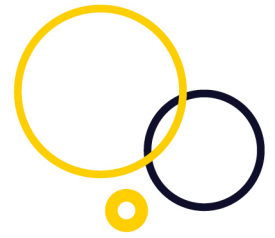
If you fail to provide Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide or procure the provision of that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:
 - apply for our products or services;
 - request a free trial, or demo request, of our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - request us to contact you using our 'Contact Us' forms;
 - enter a competition, promotion or survey;
 - give us some feedback;
 - register for and/or attend events or exhibitions; or
- use the Censornet App. We will log Traffic Data relating to each message transmission, including the time of the transmission. We store temporary messages, until they are downloaded by the Censornet App. Such messages are stored in encrypted form. Any keys needed to decrypt such messages are stored on Customer's devices and not by Censornet.



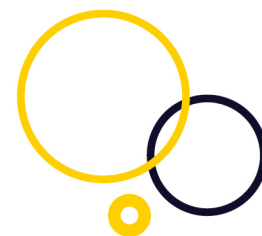
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We may receive Personal Data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers;
 - (b) advertising networks; and
 - (c) search information providers.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Identity and Contact Data from data brokers or aggregators.
 - Identity and Contact Data from publicly available sources.

4. How we use your Personal Data

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your Personal Data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [clicking here](#) or using the unsubscribe link which appears on all marketing communications that you receive from us.



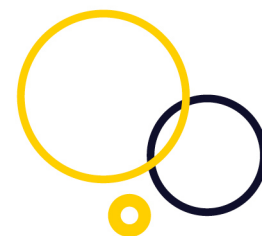
Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

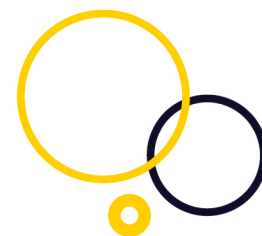
Our use of Personal Data varies depending on whether you are a customer, potential customer, an officer or employee of or a consultant (“Employee”) to a customer or a Reseller or Partner.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

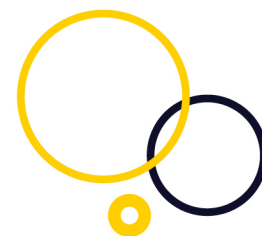
Type of Data Subject	Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Retention Period
Customer	To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you	6 years following you ceasing to be a Customer
Customer	To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)	6 years following you ceasing to be a Customer
Customer/ Employee/ Reseller	To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing & Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how	(a) 6 years following you ceasing to be a Customer / Employee / Reseller (b) Data for Marketing Communications : Indefinitely in our suspense



	(b) Asking you to leave a review or take a survey		customers use our products/services)	account after you have unsubscribed to our marketing communications to ensure no further communications are sent to you.
Customer/ Potential customer/ Reseller	To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)	(a) 6 years following you ceasing to be a Customer / Reseller (b) Data for Marketing Communications : Indefinitely in our suspense account after you have unsubscribed to our marketing communications to ensure no further communications are sent to you.
Customer/ Employee/ Reseller	To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation	6 years following you ceasing to be a Customer / Employee / Reseller
Customer/ Potential	To deliver relevant website content and advertisements to	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how customers use our products/services, to	(a) 6 years following you ceasing to be a Customer /



customer/ Reseller	you and measure or understand the effectiveness of the advertising we serve to you	(c) Profile (d) Usage (e) Marketing Communications (f) Technical	develop them, to grow our business and to inform our marketing strategy)	Reseller(b) Data for Marketing Communications : Indefinitely in our suspense account after you have unsubscribed to our marketing communications to ensure no further communications are sent to you.
Customer/ Potential Customer/ Reseller	To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage (c) Marketing & Communications	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	(a) 6 years following you ceasing to be a Customer / Reseller (b) Data for Marketing Communications : Indefinitely in our suspense account after you have unsubscribed to our marketing communications to ensure no further communications are sent to you.
Customer/ Potential Customer/ Reseller	To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing & Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)	(a) 6 years following you ceasing to be a Customer / Reseller (b) Data for Marketing Communications : Indefinitely in our suspense account after you have unsubscribed to



				our marketing communications to ensure no further communications are sent to you.
Customer/ Employee	To provide our monitoring services	(d) Identity Data Traffic Data (f) Technical Data (g) Usage Data	The legitimate interests of the Customer and CensorNet (to provide and receive monitoring services)	6 years following you ceasing to be a Customer / Employee.
Customer/ Employee	To provide our services protecting against identity theft, using the CensorNet App	(a) Identity Data (b) Traffic Data (c) Usage Data	The legitimate interests of the Customer and CensorNet (to provide and receive services to protect against identity theft)	6 years following you ceasing to be a Customer / Employee.

Marketing (Only relevant to Customers and Potential Customers)

We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising. We have established the following Personal Data control mechanisms:

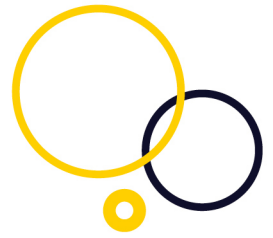
Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your Personal Data with any outside company for marketing purposes. If we receive your Personal Data from a third party, we will



ensure that you have actively opted in to receive information from us or from a company of our type.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by [clicking here](#) or using the unsubscribe link which appears on all marketing communications that you receive from us.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please [see here](#).

Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

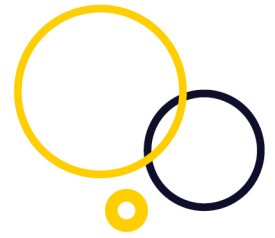
If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your Personal Data

We may have to share your Personal Data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.



- External Third Parties as set out in the *Glossary*.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

6. International transfers

Many of our external third parties are based outside the EEA so their processing of your Personal Data will involve a transfer of data outside the EEA.

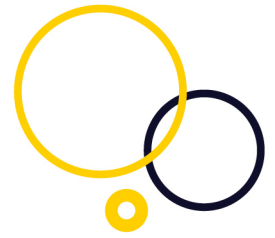
Whenever we transfer your Personal Data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where applicable, we will transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts in a form approved by the European Commission, which are intended to give Personal Data the same protection it has in the EEA. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the USA, we may transfer data to them if they provide similar protection to Personal Data shared between the EEA and the USA, including relying on their BCR-processor instrument (if any) or by entering into SCCs.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third



parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my Personal Data for?

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your Personal Data are set out in the table in paragraph 4 above. As regards Customers, by law we have to keep basic information about our Customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under Data Protection Legislation in relation to your Personal Data.

You have the right to:

Request access to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.



Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

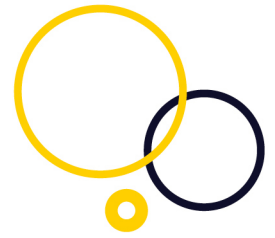
Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.



If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

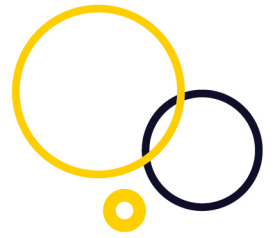
Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

In this Privacy Policy, unless the context otherwise requires, the following words and expressions have the following meanings:

“Controller”	has the meaning given in the GDPR.
“Data Subject”	has the meaning given in the GDPR.
“Data Protection Officer”	has the meaning given in the GDPR.
“Data Protection Legislation”	the General Data Protection Regulation (EU) 2016/679, the General Data Protection Regulation (EU) 2016/679 as amended by any legislation arising out of the withdrawal of the UK from the European Union, the Data Protection Act

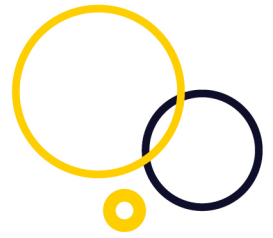


2018 and any national implementing laws, regulations and secondary legislation, as replaced, amended or updated from time to time in the UK, and all applicable law relating to data protection and the processing of personal data and privacy, including where applicable the guidance and codes of practice issued by the Information Commissioner.

“GDPR”	the General Data Protection Regulation (EU 2016/679) and the General Data Protection Regulation (EU 2016/679) as amended by any legislation arising out of the withdrawal of the UK from the European Union.
“Personal Data”	has the meaning set out in the GDPR and relates only to personal data, or any part of such personal data, of which the Customer is the Data Controller and in relation to which Censornet is providing Service(s) under the Contract.
“Processor” and “processing”	have the meaning set out in the GDPR.
“Sub-Processor”	any third party appointed to process Personal Data on behalf of Censornet related to this Agreement.
“SCCs”	means the model contract clauses set out in the European Commission’s Decision of 5 February 2010 on standard contractual clauses for the transfer of Personal Data to data-processors established in third countries, under the Directive 95/46/EC on the protection of individuals with regard to the processing of personal data and on the free movement of such data and any replacements or amendments to the SCCs from time to time.

Lawful basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can



obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

We may also rely on the legitimate interests of our customers in processing Personal Data.

Performance of Contract means processing your Personal Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third parties

External Third Parties

- Service providers acting as Processors based in the United Kingdom, EU and US who provide IT and system administration services.
- Professional advisers acting as Processors or joint Controllers including lawyers, bankers, auditors and insurers based in the United Kingdom and EU who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as Processors or joint Controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Marketing and communications companies acting as Processors or joint Controllers based in the United Kingdom, EU or US who provide services including digital marketing, market research, public relations, CRM, marketing automation and data analytics.