

KODEM PRIVACY POLICY ("PRIVACY POLICY")

IMPORTANT: BY OPENING AN ACCOUNT AT, USING OR SUBSCRIBING TO KODEM SECURITY LTD.'S ("COMPANY" OR "WE") PROPRIETARY SOLUTION ("SOLUTIONS") YOU ("YOU") CONSENT TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND CONSENT THAT ALL PERSONALLY IDENTIFIABLE INFORMATION ("PII") THAT YOU SUBMIT OR THAT IS PROCESSED OR COLLECTED THROUGH THE SOLUTIONS, MAY BE PROCESSED BY THE COMPANY AND ITS AFFILIATES IN THE MANNER AND FOR THE PURPOSES DESCRIBED IN THE FOLLOWING PRIVACY POLICY.

WE DEFINE "PII" TO MEAN ANY INFORMATION RELATING TO AN IDENTIFIED OR IDENTIFIABLE NATURAL PERSON; AN IDENTIFIABLE NATURAL PERSON IS ONE WHO CAN BE IDENTIFIED, DIRECTLY OR INDIRECTLY, IN PARTICULAR BY REFERENCE TO AN IDENTIFIER SUCH AS A NAME, AN IDENTIFICATION NUMBER, LOCATION DATA, AN ONLINE IDENTIFIER OR TO ONE OR MORE FACTORS SPECIFIC TO THE PHYSICAL, PHYSIOLOGICAL, GENETIC, MENTAL, ECONOMIC, CULTURAL OR SOCIAL IDENTITY OF THAT NATURAL PERSON.

YOU ARE NOT LEGALLY REQUIRED TO PROVIDE US WITH PII, HOWEVER, SOME OF THE SOLUTIONS REQUIRE YOU TO DO SO PURSUANT TO THIS PRIVACY POLICY. IN THESE CASES, IF YOU CHOOSE TO WITHHOLD ANY PII REQUESTED BY US, IT MAY NOT BE POSSIBLE FOR YOU TO ACCESS CERTAIN SOLUTIONS. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS SET FORTH HEREIN PLEASE DO NOT USE THE SOLUTIONS.

We recognize that privacy is important. This Privacy Policy applies to all of the services, information, tools, features and functionality available on the Solutions offered by the Company or its subsidiaries or affiliated companies and covers how PII that the Company collects and receives, including in respect of any use of the Solutions, is treated. If you have any questions about this Privacy Policy, please feel free to contact us at: ops@kodemsecurty.com.

- 1. Information We Collect and How We Use It.** In order to provide and improve our Solutions, understanding usage trends, user preferences, in order to adjust and personalize use of the Solutions, marketing and customer relations purposes, we may collect and process PII, including the following types of information:
 - 1.1. Information You Provide.** As part of the registration/ onboarding to use the Solutions we ask you to provide or we may collect PII, including: full name, company name of your employer, job title and email address.
 - 1.2. User Communications.** When you send email or other communication to the Company, we may retain those communications in order to process your inquiries, respond to your requests and improve our Solutions. When subscribing to Company's mailing lists on our Websites we collect your e-mail address and country of your residence. We may send you news and updates in respect of the Solutions. We may also send you newsletters and promotional communications, you may opt-out of this service, including participation in mailing list, at any time by submitting a request at the following link ops@kodemsecurty.com. Please note that even if you opt-out of receiving the foregoing communications, we may still send you a response to any "Contact Us" request as well as administrative e-mails (e.g. in connection with password reset request) necessary to facilitate your use of the Solutions.
 - 1.3. User Information.** When you use the Solutions, we may automatically receive and record information from your browser or device, including without limitation information and statistics about your online/offline status, your IP address, internet service provider, search history, pages visited, date and duration of the visit, type of browser or device, your

regional and language settings and software and hardware attributes. Our systems may automatically record and store technical information regarding the method and nature of your use of the Solutions. An IP address is a numeric code that identifies your browser or device on a network, or in this case, the Internet. Your IP address is also used to gather broad demographic information. The Company uses all of the PII that we collect to understand the usage trends and preferences of our users.

- 1.4. **Aggregate and Analytical Data.** In an ongoing effort to better understand and serve the customers of the Solutions, we often conduct research on its customer demographics, interests and behavior based on the PII and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and we may share this aggregate data with our affiliates, agents and business partners. This aggregate information does not identify you personally. We may also disclose aggregated user statistics in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes. We also use aggregate data for monetization.
2. **Cookies.** In order to collect the data described herein we may use temporary cookies that remain on your browser or device for a limited period of time. We may also use persistent cookies that remain on your browser or device until the Company's Solutions are removed, in order to manage and maintain the Solutions and record your use of the Solutions. Cookies by themselves cannot be used to discover the identity of the user. A cookie is a small piece of information which is sent to and stored on your browser. Cookies do not damage your browser or device. Most browsers and devices may allow you to block cookies but you may not be able to use some features on the Solutions if you block them. You may set most browsers or devices to notify you if you receive a cookie (this enables you to decide if you want to accept it or not). We may also use web beacons via the Solutions to collect information. Web beacons or "gifs", are electronic images that may be used in our Solutions or in our emails. We use Web beacons to deliver cookies, count visits and to tell if an email has been opened and acted upon.
3. **Links.** Links to other Solutions, sites and applications may be provided by the Company as a convenience to our users. The Company is not responsible for the privacy practices or the content of other sites and applications and you visit them at your own risk. This Privacy Policy applies solely to PII collected by us.
4. **Children.** If you are a child under the age of 18, you must obtain parental consent prior to using our Solutions. The Company will not knowingly contact or engage with children under the age of 18 without said parental consent. If you have reason to believe that a child has provided us with their PII, please contact us at the address given above and we will endeavor to delete that PII from our databases.
5. **Information Sharing.** As part of providing the Solutions our affiliates, agents and representatives may have access to your PII. We require these parties to process such information in compliance with this Privacy Policy and subject to security and other appropriate confidentiality safeguards. The Company may also share PII in the following circumstances: (a) as required for the provision, maintenance and improvement of the Solutions; (b) if we become involved in a reorganization, merger, consolidation, acquisition, or any form of sale of some or all of our assets, with any type of entity, whether public, private, foreign or local; (c) when permitted by you; (d) to ensure security and for purposes of debugging; (e) to our affiliates or other trusted businesses or persons, agents, third party service providers, subcontractors and representatives for the purpose of processing PII on our behalf in Israel and/or abroad; and/or (f) to satisfy applicable law or prevention of fraud or harm or to enforce applicable agreements and/or their terms, including investigation of potential violations thereof.
6. **Information Security.** We follow generally accepted industry standards to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of PII. 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 PII, we cannot

guarantee its absolute security. We retain your PII only for as long as reasonably necessary for the purposes for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

7. Data Integrity. The Company processes PII only for the purposes for which it was collected and in accordance with this Privacy Policy or any applicable service agreements. We review our data collection, storage and processing practices to ensure that we only collect, store and process the PII needed to provide or improve our Solutions. We take reasonable steps to ensure that the PII we process is accurate, complete, and current, but we depend on our users to update or correct their PII whenever necessary. Nothing in this Privacy Policy is interpreted as an obligation to store information, and we may, at our own discretion, delete or avoid from recording and storing any and all information.

8. Your Rights.

8.1. Right of Access and Rectification. You have the right to know what PII we collect about you and to ensure that such data is accurate and relevant for the purposes for which we collected it. We allow our users the option to access and obtain a copy of their PII and to rectify such PII if it is not accurate, complete or updated. However we may first ask you to provide us certain credentials to permit us to identify your PII.

8.2. Right to Delete PII or Restrict Processing. You have the right to delete your PII or restrict its processing. We may postpone or deny your request if your PII is in current use for the purposes for which it was collected or for other legitimate purposes such as compliance with legal obligations.

8.3. Right to Withdraw Consent. You have the right to withdraw your consent to the processing of your PII. Exercising this right will not affect the lawfulness of processing your PII based on your consent before its withdrawal.

8.4. Right of Data Portability. Where technically feasible, you have the right to ask to transfer your PII in accordance with your right to data portability.

You may exercise the above rights by sending a request to ops@kodemsecurity.com.

8.5. Right to Lodge Complaint. You also have the right to lodge a complaint with a data protection supervisory authority regarding the processing of your PII.

9. Enforcement. The Company regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Privacy Policy or our treatment of PII by contacting us as provided above. When we receive formal written complaints, it is the Company's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of PII that cannot be resolved between the Company and an individual.

10. Changes to This Privacy Policy. The Company may update this Privacy Policy. We will notify you about significant changes in the way we treat PII by sending a notice to the email address provided by you or by placing a prominent notice on the Solutions. We encourage you to periodically review this Privacy Policy for the latest information about our privacy practices.

11. Consent to Processing. By providing any PII to us pursuant to this Privacy Policy, all users, including, without limitation, users in the United States, Israel and member states of the European Union, fully understand and unambiguously consent to this Privacy Policy and to the collection and processing of such PII abroad. The server on which the Solutions are hosted and/or through which the Solutions are processed may be outside the country from which you access the Solutions and may be outside your country of residence. Some of the uses and disclosures mentioned in this Privacy Policy may involve the transfer of your PII to various countries around the world that may have different levels of privacy protection than your country and may be transferred outside of the European Economic Area. If there is a transfer of your PII outside the EEA we will, in the absence of an EC Adequacy decision relevant to

the destination country or to the transfer, seek to rely on appropriate safeguards such as entering into appropriate EC approved standard contractual clauses (see http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm). By submitting your PII through the Solutions, you consent, acknowledge, and agree that we may collect, use, transfer, and disclose your PII as described in this Privacy Policy.

- 12. Your California Privacy Rights and Do Not Track Notices.** California Civil Code Section 1798.83 permits customers of Company who are California residents to request certain information regarding its disclosure of PII to third parties for their direct marketing purposes. To make such a request, please send an email to ops@kodemsecurity.com. Please note that we are only required to respond to one request per customer each year. You are also advised that Company does not respond to “Do Not Track” signals.

Last Date Updated: September 5, 2022