

10Guards PRIVACY POLICY

(Effective 8 of November 2018)

10Guards takes and considers your privacy seriously, respects and secures it.

This policy describes:

- Who is the data controller for your data under this policy and how you can contact us
- What information we may collect and process about you
- How we may obtain your personal information
- How we may use your personal information
- What is the basis for our use of your personal information
- For how long we keep your personal information
- How we may share your personal information with third parties
- Which countries we may transfer your personal information to
- Your rights regarding your personal information
- Changes to this privacy policy

Please read this policy carefully to be sure how 10Guards use your information.

WHO IS THE DATA CONTROLLER UNDER THIS NOTICE AND HOW YOU CAN CONTACT US?

10Guards LLC, 10Guards OU (collectively, "10Guards", "we", or "our") are controllers of your personal data.

If you have any questions or concerns regarding our treatment of your personal data, please contact us at: dataprivacy@10guards.com. Our office location is 3-5 Kruhlouniversitytetska str., Kyiv 01024, Ukraine.

WHAT INFORMATION WE MAY COLLECT AND PROCESS ABOUT YOU?

We may collect and process personal information from you in the course of our business, including through your use of our website; when you communicate with us via email or other channels; when you sign up for or request service on our website; when you give us data on a webinar, meeting, conference, or event; when you submit an application for a position with us; when you engage our legal or other services or as a result of your relationship with one or more of our staff and clients; and when you respond to our communications or requests for information.

The personal information or personally identifiable information that we may collect, and process includes:

- Basic information, such as your name (including name prefix or title), the company you work or worked for, your title or position and your relationship to a person (for our CRM system)
- Contact information, such as your postal address, email address and phone number(s)
- Financial information, such as payment-related information
- Technical information, such as information from your visits to our website or applications or in relation to materials and communications we send to you electronically
- Information you provide to us for our proposals and services receipt
- Identification and background information provided by you or collected as part of our business acceptance processes

- Identification and background information provided by you or collected as part of our hiring and employment processes
- Identification and background information collected as a part of our services providing to you or company you work for
- Personal information provided to us by or on behalf of our clients or generated by us in the course or providing services to them, which may include special categories of data

HOW WE MAY OBTAIN YOUR PERSONAL INFORMATION?

Personal information you provide to us

We collect and process personal information from you as part of our business acceptance processes, hiring and employment processes and about you and others as necessary in the course of providing our professional services to you or your company.

Information we may collect automatically

Visiting our website does not require you to provide any personally identifiable information, such as your name, address, e-mail address or phone number. When you visit our website, we automatically collect certain information, which, however, does not allow us to identify you. This information may include the following:

Browsing statistics

10Guards collects information about the websites' content mostly viewed by the visitors, frequency of the connections to the website, software and hardware exploited to visit our website, geography of our visitors. This information enables 10Guards to understand the manner how the visitors work with our website. In order to obtain such information we use Google Analytics (the detailed information about this tool is available [here](#)). You may disable any data collections by this tool at your discretion as instructed [here](#).

We rely on our legitimate interest to provide customized services and better our content when collecting your browsing statistics.

Logs

The hardware of our website hosting provider may record requests made by the visitors to the website, the information on software and hardware exploited to visit our website, IP address assigned as well as timing related to access. We use this information to enhance the security of our website.

We rely on our legitimate interest to ensure security of our website when collecting your logs data.

Cookies

A cookie is a text string that 10Guards website transfers to the cookie file of the browser on your computer so that the website can remember your preferences. You may find more information about cookies [here](#).

Cookie Name	Source	Expiration	Purpose
xguards_accept_cookie	10guards.com	4 years	Cookie policy agreement
_cfduid:Cloudflare	10guards.com	30 days	Used to maximize network resources, manage traffic, and protect our Customers' sites from malicious traffic

_gat:Cloudflare	10guards.com	10 minutes	Used for throttling requests to Google Analytics to increase the efficiency of network calls
_ga:Cloudflare	10guards.com	2 years	Used for visitor tracking
_gid:Cloudflare	10guards.com	24 hours	Used to group the user behavior together for each other
twofas_session_id	10guards.com	1 hour	Used for authentication on the site
xguards_post_{number}_liked	10guards.com	3 years	"Like" under post / article

We use cookies data to analyze visitor's behavior and improve user's experience. You may disable cookies by your browser settings or by clicking [here](#).

We rely on our legitimate interest to ensure technical functionality of the website when collecting your cookies data.

Information we collect from other sources

We may receive information about you from other sources, including third parties that help us: update, expand, and analyze our records; identify new customers; prevent or detect fraud. We may also receive information about you from social media platforms including but not limited to when you interact with us on those platforms or access our social media content. The information we may receive is governed by the privacy settings, policies, and/or procedures of the applicable social media platform, and we encourage you to review them.

HOW WE MAY USE YOUR PERSONAL INFORMATION?

10Guards collects and processes personal information about you in several ways, including through your use of our website and in the provision of services by us. We use that information:

- To respond to your requests
- To provide you with cybersecurity and other services that you request
- To provide and improve this website, including auditing and monitoring its use
- To manage and administer our relationship with you and our clients including to receive feedbacks and maintain our list of contacts
- To promote our services, including sending updates, publications and details of meetings, events, and seminars, proposals and other materials to support our business activities and provide you with our services
- To assess the quality of our services and the effectiveness of our events, promotional campaigns, and publications
- To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims, protecting your, our, or other's rights
- For the purposes of recruitment

WHAT IS THE BASIS FOR OUR USE OF YOUR PERSONAL INFORMATION?

We use your personal information on the following basis:

- To perform a contract, such as engaging with an individual to provide cybersecurity or other services
- To comply with legal and regulatory obligations
- For legitimate business purposes
- Consent – where required by applicable laws, we will rely on your consent for direct marketing

FOR HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

10Guards will retain collected personal information as long as necessary to fulfil the purposes for which it was collected and processed. An appropriate retention period is determined on the amount, nature and sensitivity of the data collected, the potential risk of harm from unauthorized use or disclosure of it, the purposes for which we process personal data and whether we can achieve those purposes through other means and applicable legal requirements.

Upon expiry of the applicable retention period we will securely destroy your personal data immediately.

HOW WE MAY SHARE YOUR PERSONAL INFORMATION WITH THIRD PARTIES?

We may also share your personal information with certain third parties in accordance with contractual arrangements in place with them, including:

- Our professional advisers, auditors, potential transaction partners
- IT service providers to 10Guards including providers of cloud services and client relationship management (CRM) services
- Third parties engaged in the course of the services we provide to clients and with their prior consent, such as consultants outside Ukraine and technology service providers
- Third parties involved in hosting or organizing meetings, events or seminars

Where necessary, or for the reasons set out in this policy, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavors to notify you before we do this, unless we are legally restricted from doing so.

If in the future we re-organise or transfer all or part of our business, we may need to transfer your information to new 10Guards entities or to third parties through which the business of 10Guards will be carried out.

We do not sell, rent or otherwise make personal information commercially available to any third party, except with your prior permission.

WHICH COUNTRIES WE MAY TRANSFER YOUR PERSONAL INFORMATION TO?

In order to provide our services, we may need to transfer your personal information to locations outside the jurisdiction in which you provide it or where you are viewing this website for the purposes set out in this privacy policy. This may entail a transfer of your information from a location within the European Economic Area (the "EEA") to outside the EEA, or from outside the EEA to a location within the EEA.

The level of information protection in countries outside the EEA may be less than that offered within the EEA. Where this is the case, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection laws including without limitation EU standard contractual clauses.

YOUR RIGHTS UNDER THIS POLICY

Contacting us via e-mail at dataprivacy@10guards.com you may exercise your right:

- The right to request access – You have right to request access to your personal data and request information in relation to its processing; Our Company will provide you copies of your personal data.
- The right to rectification – You have the right to request correction of any information you consider inaccurate. You also have the right to request completion the information you consider incomplete.
- The right to erasure – You have the right to request us to erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request us restrict your personal data processing, under certain conditions.
- The right to object processing - You have the right to object your personal data processing, under certain conditions.
- The right to withdraw consent - You have the right to withdraw consent to your personal data processing (if it was given).
- The right to lodge a complaint - You have the right to lodge a complaint in relation to 10Guards` processing of your personal information with a local supervisory authority Contact information of the local supervisory authority can be accessed at <http://www.ombudsman.gov.ua/en/page/applicant/>You may exercise your rights in accordance with applicable data protection laws.

If personal data is erased at your request, 10Guards will only retain such copies of the information as are necessary to protect our or third party legitimate interests, comply with governmental orders, resolve disputes, troubleshoot problems, or enforce any agreement you have entered into with 10Guards.

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above or that you may not be able to make use of the services and products offered by us. Please note that even after you have chosen to withdraw your consent, we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

MINOR'S DATA PROCESSING

Our site is neither directed nor targeted to individuals under the age of 18. If you are under the age of 18, do not provide us with any personal information. If we learn that someone under 18 has provided personal data at our website, we will erase it immediately.

LINKS

Our website may contain links to third-party websites. 10Guards is not responsible for the privacy practices or the content of such websites.

CHANGES TO THIS POLICY

We reserve the right to update this policy from time to time. Therefore, we encourage you to periodically review this page. If we make any material changes in the way we collect, use, and/or share the personal information that you have provided, we will notify you by posting notice of the changes in a clear and conspicuous manner on the 10Guards website.