

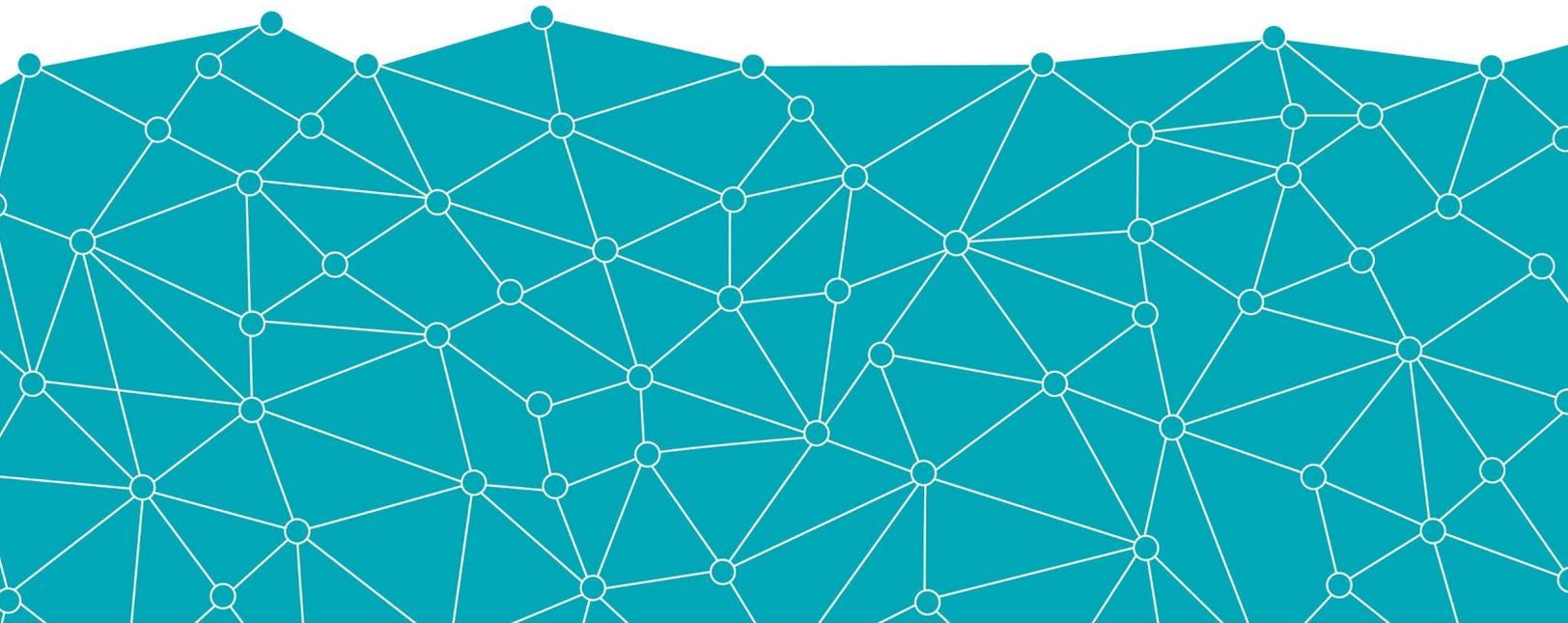


# NeuraLegion

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## Privacy Policy

**Last updated on 22nd December 2018**





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# Privacy Policy

NeuraLegion Ltd. ("NeuraLegion", "our," "us," or "we"), an Israeli company with its principal place of business in Tel Aviv, Israel, is the owner and operator of <https://www.neuralegion.com> and <https://nexploit.app/> (the "Website"), which is intended to supply various services as more fully described in the Website (the "Services"). We care about your privacy and we are committed to protecting your information.

This Privacy Policy constitutes an integral part of our Terms of Use, Client Agreement and Partner Agreement and is subject to the provisions thereof, including with respect to Limitation of Liability and governing law. It is advised that you read our Privacy Policy as part of your evaluation process and to return to it again when we notify you of changes to any of our terms, from time to time.

This Privacy Policy also governs personal information that NeuraLegion collects from its customers, partners, attendees and online visitors ("you" or "your") in connection with your use of NeuraLegion's websites and NeuraLegion's services, applications and products (including support, training and education), and corporate meetings and other events (collectively, the "Services") where we post or link to this Privacy Statement, as well as information we automatically collect from your online visits (e.g. data collected via cookies).

For the purposes of this Privacy Policy, "personal information" means any information that, by itself, can identify you or can be combined with other information to identify you. It does not include data where the identity has been removed (anonymous data).

Your continued use of our service(s) and/or the website indicates your acceptance of the terms and conditions in this Privacy Policy.

## What is Covered in This Privacy Policy

This Privacy Policy clearly indicates:

1. What personally identifying information NeuraLegion collects.
2. How NeuraLegion uses the information.
3. Who NeuraLegion may share the information.
4. Legal basis we have for processing your personal data
5. How long we store the information
6. What choices are available to users regarding collection, use and distribution of the information.



7. What types of security procedures are in place to protect the loss, misuse or alteration of information under NeuraLegion's control.
8. How users can correct any inaccuracies in the information.

## What Information Do We Collect and How is it Used?

### Information You Provide to NeuraLegion

We may ask you to provide personal information when you:

- Contact us.
- Subscribe to newsletters, promotional emails or other NeuraLegion materials;
- Request a quote, service, product support, trial (including demo), whitepapers and related downloads, or additional information;
- Purchase a product or service;
- Register for webinars, seminars, conferences, or other events sponsored by us or a partner;
- Join NeuraLegion Communities;
- Register for training or courses;
- Participate in surveys or competitions;
- Apply for a job with NeuraLegion and submit your CV;

In order to use our Services, personal information we may require, request, collect, use, store and transfer, for example within our registration and authorised user form and throughout us providing our Service to you, includes information such as:

- **Your Personal Identity Data:** To include title, first name, last name, username, company name, job function, address
- **Contact Data:** To include your billing address, email address, telephone and mobile numbers.
- **Financial Data:** To include your bank account details used for the purpose of paying for our products or services.
- **Transaction Data:** To include specific account information about payments from you to us and any related refunds and other specific details of products and services purchased by you from us or that we have purchased from you.
- **Interaction Data:** To include events, social media, webinars registered or attended by you, emails, SMS or communication regarding our Services, Products or support purchased or subscribed to.



- **Technical Data:** To include URL and/or IP addresses, your login data, browser type and version, time zone, location, operating system and platform and other technology on the devices you use to access this website.
- **User Profile Data:** To include your username and password, purchases or orders made by you, account status, feedback and survey responses.
- **Usage Data:** To include information about how you use our website, products and services.
- **Marketing and Communications Data:** To include your marketing and communication preferences from us and our approved third parties and partners.

The information above is used by us to verify the ownership of servers, URL, and IP addresses, in order to perform non-invasive informational testing of users' servers and applications and to contact the user about Services for which they have expressed an interest. In order to use our Services, users must provide a username and password.

When you are asked to provide us with your personal information, we will advise you upon collection whether or not the provision of your personal information is mandatory. If personal information is requested through one of our registration and/or signup pages on our website and/or our application, you will have the option of not providing the information, in which case you may still be able to access other portions of the website, although you may not be able to access certain programs or services.

## **Information from Other Sources**

We may also obtain information about you from other sources and combine that with information we collect through our Services. For example, we may aggregate your personal information with information that you make publicly available on social media or third-party websites to better market our Services to you.

## **Information We Automatically Collect**

When you visit our website, we may automatically collect information about your visit, including pages visits, clicked links and actions taken by you in connection with NeuraLegion's Services. Specific information may be collected from your web browser, such as your operating system, any application software, browser type, ISP, IP address, access times, and the any websites you visited before and after our website(s).

## **How NeuraLegion uses your personal information**

NeuraLegion may use your personal information for legitimate business purposes, including:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- Setting up a User Profile
  - We store personally identifying information that we collect, logging files and creating a profile of our users. Users' profiles are used to tailor a user's visit to our Website and to tailor marketing content and/or promotions to them.
- Administering your account, including the verification of your information;
- Billing you for products and services;
- Providing and delivering any of our Services and any renewals thereof requested by you, including a partner or independent reseller contacting you to facilitate any renewal, support or purchase of the products/services, but only to the extent where such third party has executed a confidentiality agreement obligating them to protect your personal data;
- Sending you Service transaction information, including but not limited to confirmations and status, product and services information, updates, security alerts and support and administrative messages, whether by email, telephone and/or SMS;
- Responding to your comments and questions and provide customer support or other services;
- Live Chat customer service assistance for the delivery of Services you requested
- Operating and improving our website(s), products, and services;
- Processing and delivering competitions and rewards;
- Survey participation and testimonial requests in order to measure performance and client satisfaction to improve our products, services and customer journey and experience;
- Communication of new services, promotions and upcoming events;
- Providing additional information to you about current and new products and services offered by NeuraLegion and selected partners, as was as notifying you about changes to our service;
- Planning and hosting corporate events, exhibitions, forums (including those online), communities and social networks;
- Link or combine with other information we get from third parties, to assist us in understanding your needs and requirements to customise our offerings and to market our Services specific to your needs and requirements; and



- Perform other functions or serve other purposes, as disclosed to you at the point of collection, or as otherwise required or allowed under applicable law.

## **Legal Basis of Processing**

NeuraLegion uses your personal data provided by you to supply you with services requested by you, to send important notices and for any internal purposes such as auditing, data analysis and research to provide you with relevant information needed for you to make informed purchasing decisions.

NeuraLegion may rely on any of the following legal bases in order to collect, use and process your personal information:

- **Legitimate Interest**
  - NeuraLegion's legitimate interest in providing its website and making our Services available to you, provided our interest is not infringing any of your rights and freedoms.
- **Your Consent**
  - Where NeuraLegion has obtained your consent to process your personal information for certain activities. Consent may be withdrawn by you at any time by contacting [privacy@NeuraLegion.com](mailto:privacy@NeuraLegion.com), noting that your withdrawal of consent will not affect the lawfulness of any use of your personal information by NeuraLegion based on your consent prior to withdrawal.
- **Contractual Obligations**
  - To fulfil any contractual obligations, such as where you have purchased a product or service from NeuraLegion. For example, we may require your contact details in order to deliver your order if you have purchased a product from us.
- **Compliance and Our legal Obligations**
  - For compliance with NeuraLegion's legal obligations where applicable laws require NeuraLegion to process your personal information.

Should you have any questions or require any clarification or additional information regarding the legal basis on which we collect your personal information, please contact us at [privacy@NeuraLegion.com](mailto:privacy@NeuraLegion.com).

### **How Long We Store Your Information**

NeuraLegion may retain any of your personal information data as long as is required and necessary for us to fulfil the purposes for which it was collected, in full accordance with NeuraLegion's record retention policy and applicable law.

### **Cross-Border Data Transfers**

NeuraLegion may transfer your personal information to other NeuraLegion entities located in several different countries and jurisdictions around the world if required for the purposes described in this Privacy Policy. This may include transferring your personal data to countries outside your home country, including, if you are within the European Economic Area (EEA), outside of this area, which may not have the same level of protection as your home country. For example, since NeuraLegion is headquartered in Israel, NeuraLegion entities in the EEA may need to send your personal information to our servers located in Israel or the US for legitimate business purposes. In order to provide adequate protection for the transfer of your personal information, we rely on various mechanisms, including Binding Corporate Rules, EU Standard Contractual Clauses and/or the need to process your personal information in order to provide the requested products or services, as the bases for transferring your personal information.

### **How does NeuraLegion share your personal information?**

NeuraLegion will not sell personal information to third parties without your consent.

We may disclose or transfer personal information provided by you to us or collected by us with third parties for the purposes described below.

- **NeuraLegion Subsidiaries**
  - We may share your personal information with our subsidiaries worldwide in order to improve our website and/or the Services, and to manage our customer relationships.
- **Third-Party Vendors/Service Providers**
  - We may, from time-to-time, rely on third-party vendors, consultants and other service providers to perform certain functions or to provide certain services on our behalf and under our instructions in order to make our websites and the Services available to you. For example, we may engage third parties to provide customer support or assist us in protecting our systems.



- **Business Partners**

- We may share your information with third parties with whom we do business, including in connection with your purchase of a NeuraLegion service through a business partner. Subject to NeuraLegion's business model and its regional coverage, NeuraLegion may not be able to provide the products or services directly to you. In these instances, NeuraLegion may disclose information to its business partners for reselling, marketing and other business purposes related to your specific interest in our products and/or services. We will only share your personal information with business partners who agree to abide by applicable laws and to protect your personal information and use it solely for the purposes specified by NeuraLegion.

- **Legal Obligations and Rights**

- To the extent such disclosure/transfer is required by law or in connection with any ongoing or prospective legal proceedings. We may disclose your personal information:
  - in connection with the establishment, exercise or defense of legal claims;
  - to comply with laws or to respond to lawful requests or legal process;
  - for fraud or security monitoring purposes (e.g. to detect and prevent cyberattacks);
  - to protect the rights of NeuraLegion or its employees; or
  - as otherwise permitted by applicable law.

- **Business Reorganization**

- We may share your personal information in connection with a sale or business transaction (e.g., merger or acquisition). If we restructure or sell all or part of our business or business operations, we may transfer your information as part of that activity. Where this is the case your information will be used in accordance with this Privacy Policy unless you are notified otherwise;

NeuraLegion may also use or share aggregate data (data from which personal information has been removed) for any purpose.

Except as described above, NeuraLegion will not disclose your personal information to third parties for their own marketing purposes without your consent.

## **How does NeuraLegion store and protect your personal information?**

NeuraLegion takes all reasonable steps to protect your information from loss, misuse, unauthorised access or disclosure, alteration, or destruction, including through the use of encryption when collecting or transferring sensitive data such as credit card information.

For those in the European Economic Area (“EEA”), any data that you provide to us or that we collect from you may be transferred to and stored at, a destination outside the EEA. We ensure that appropriate security measures are in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, access to your personal data is limited to those employees, agents, contractors and other third parties who have a business need to know. Your personal data will only be processed 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.

## **What rights and choices do you have regarding your personal information?**

### **Email and Marketing Communication**

NeuraLegion endeavours to provide you with options with relation to the personal information you provide, including choices with respect to marketing materials. You may manage your receipt of marketing and non-transactional communications by: (i) unsubscribing to communications by clicking on the “unsubscribe” link located at the bottom of our marketing emails; or (ii) checking certain boxes found on specific forms we use to collect personal information.

### **Exercising your Rights**

*This section applies to any personal data collected by NeuraLegion from EU residents.*

**Access, update or correct your data we hold:** If you wish to confirm that NeuraLegion is processing your personal data, or if you would like to access, update or correct the personal data NeuraLegion holds about you, please send an email to [data.request@NeuraLegion.com](mailto:data.request@NeuraLegion.com), with the words “Data Subject Rights Request” in the subject line.

**Erase, prevent or Opt-Out:** You can opt-out of marketing communications at any time by unsubscribing. If you want to have your personal data erased or to otherwise restrict NeuraLegion processing your personal data

please send an email to [data.request@NeuraLegion.com](mailto:data.request@NeuraLegion.com), with the words “Data Rights Request” in the subject line.

## **How does NeuraLegion use cookies and other tracking technologies?**

### **Cookies**

NeuraLegion uses “cookies” on its websites to enable you to sign in to NeuraLegion’s services and personalise your online experience. Cookies enable the information you previously provided can be retrieved on your next visit to our website so that your use of the website is more efficient.

Cookies are either disappear after you close your browser (session based) or remain on your computer after you close your browser or turn off your computer (known as persistent cookies). NeuraLegion may use any or all of the following:

- Required cookies - essential to core website functionality.
- Performance cookies - these collect information about your website visits in order to improve performance. Please note these do not collect personal information.
- Functional cookies - Cookies that track your preferences, such as your preferred language, customizing the website to you. Some of these cookies may be required cookies.
- Analytics cookies - allow us to measure and improve the performance of our websites and marketing campaigns by counting count page visits and traffic sources.
- Advertising cookies - these cookies may be applied through our website(s) by our advertising partners. Data may be collected by these partners to enable them to deliver customised advertisements on other websites (remarketing) that are relevant to your interests.

Some NeuraLegion pages use cookies that permit select third party partners, including Google, to provide you NeuraLegion related content, including NeuraLegion advertisements, on their sites or elsewhere on the Internet. This is based on your prior visits to the Sites.

Additionally, third parties may use cookies to allow you to link to social networking sites like Facebook, Twitter and LinkedIn.

Whilst you can control whether or not these cookies are used, preventing them may stop NeuraLegion from offering you some services.

Most web browsers are set to accept cookies by default, and only you can manage your browser settings.

### **Web Beacons**

NeuraLegion also uses web beacons alone or in conjunction with cookies to compile information about your usage of our websites and interaction with emails from us. A web beacon is an electronic image that can be used to recognize a cookie on your computer when you view a web page or email.

This Privacy Statement does not apply to, and we are not responsible for, third-party cookies, and NeuraLegion encourages you to check the privacy policies of advertisers and/or ad services to learn about their use of cookies and other tracking technologies.

### **Social Media Accounts**

Portions of our websites may link to forums, blogs and/or news groups. Any information that you disclose in these areas could be made public. As a consequence of this, we strongly suggest you exercise caution when deciding to disclose any personal information. Also, please note that use of these portions of our website may be subject to additional terms.

NeuraLegion's website(s) may include social media features and links, including the Facebook "Like" button, for example. These features and links may collect your IP address and identify the web page you are visiting on NeuraLegion's website. A cookie may also be set to enable the feature to function properly. You may be given the option by that social media site to post information about your activities on NeuraLegion's website(s) to your profile page on that social media site. Your interactions with these features are governed by the privacy policy of the company that is providing them.

### **Third-Party Websites**

NeuraLegion's website may contain links to other third-party websites. This Privacy Policy does not apply to, and NeuraLegion is not responsible for, the privacy practices or the content of such third-party websites, including business partner websites, and their use of personal information will be governed by their own privacy policies. This privacy policy applies solely to information collected by NeuraLegion.

### **How will you be notified about changes to this Privacy Statement?**

NeuraLegion may, from time to time, modify or update this Privacy Statement at any time without prior notice. If we make any changes to this Privacy Statement, we will change the “Last Updated” date at the beginning of this Privacy Statement. If we make material changes to this Privacy Statement that may impact individual rights, NeuraLegion will make prominent note of such change on its website at least one month prior to the change taking place.

### **Who should you contact with inquiries?**

If you have any questions, concerns, or comments about this Privacy Policy or our privacy practices, please contact NeuraLegion via email at [privacy@NeuraLegion.com](mailto:privacy@NeuraLegion.com).

You may also reach out by post to:

NeuraLegion, Ltd.

26 Hashahar St., Rishon Lezion, Israel

EU residents may also lodge a complaint with the data protection authority in the EU member state where they live, work or where an alleged infringement of applicable data protection law occurred.