

## JOE SANDBOX CLOUD BASIC PERSONAL DATA PROTECTION POLICY

### **1. Preamble**

This Personal Data Protection Policy illustrates the types of personal data we collect, save, process and for which purposes Joe Security LLC ("Joe Security" or "we") uses the personal data and for which you as a Customer ("Customer" or "you") of Joe Security LLC are responsible in order to provide you the Service. All terms used herein and not defined herein shall have the definitions set forth in the "JOE SANDBOX CLOUD BASIC ONLINE SERVICE TERMS AND CONDITIONS OF USE".

You must ensure that the Sample contains no personal data or if so, that you have the full and informed consent of the individual or another lawful basis to transfer such personal data. You shall be responsible for any conflict arising out of your submission of personal data of third parties involved in your Sample.

If you have any questions relating to this Personal Data Protection Policy or the usage of personal data for which you are responsible, feel free to contact us by email or by postal at the (Email) addresses stated below at clause 13.

### **2. Collection and processing of personal data, newsletter**

We collect and process personal data for a variety of reasons, including: to the extent it is necessary to provide you with the Service, to further our business relationship with you, to protect the legitimate interests of you, Joe Security, and/or to the extent you consent to such processing.

#### **Potentially personal data collected from a file in Sample.**

You deliver Samples to the Service so that we can analyse it for potential Malware.

You agree not to deliver Samples that contain personal data to the Service, or if you deliver Samples that contain personal data, you warrant to Joe Security either to have received the explicit consent from the individual to whom the personal data relates or you have another lawful basis for the delivery of such personal data.

We collect and process your Internet Protocol (IP) address, the Sample and generate a Report based on the analysis conducted in an isolated environment. By executing your file on the isolated environment, you acknowledge that any artefact of that environment (e.g. the Windows license key), submitted files/ URL or any downloaded, generated or extracted data as laid out in memory or on disc may be transmitted to a third party if the isolated environment is connected to the Internet. By default, all isolated environments are connected to the Internet. You can disable Internet for the isolated environment by de-selecting the option "Internet Access" in the Internet section located on the submission page.

#### **Personal information that is collected when you visit our website**

Our webserver collects and processes guest information every time you submit a file or visit our website. When submitting a file, this guest information contains the time of submission, the file name, your IP-address, status, amount of data transferred and the website from which you came to the requested page (referrer), product and version information of the browser (user agent), operating system and language settings.

#### **Personal information that is collected when you create an account**

If get an account from us, then you understand that it is necessary for Joe Security to process personal information you provide, such as your name, email address, company name and webpage, to validate, create, maintain, protect, and provide the account.

### **How we use personal data**

We may use personal data, in our sole discretion, to meet any applicable legal requirement, investigate and prevent potential fraud, abuse, or other unlawful activity, enforce our terms and conditions, enhance cybersecurity, study usage metrics, provide the Service or other products and services, protect the legal interests of Joe Security, or develop and improve our products and services.

### **When we share personal data**

We may share personal data we process to the extent it is necessary, in our sole discretion, to meet any applicable legal requirement, investigate and prevent potential fraud, abuse, or other unlawful activity, enforce our terms and conditions, enhance cybersecurity, analyse trends, provide the Service or other products and services or protect the legal interests of Joe Security.

We may share personal data with our affiliates and contracted third parties to process, consistent with the terms of this policy and the adoption of adequate technical and organisational measures.

We may publish or share anonymised or aggregated data derived from personal data with our affiliates or partners or make such data public as part of research analysis.

### **How we use personal data to contact you**

Moreover, we may process your personal data in order to

- provide an individual service and support for you
- inform you about our or our new products and services
- make personal and individual advertisements to you
- modify our websites with regard to your interests
- contact you in cases of troubleshooting and requests

In the event that we are involved in a merger, acquisition or asset sale, we may disclose your personal data to the prospective seller or buyer of such business or assets.

### **Newsletter**

With your special consent in line with the opt-in procedure, we use your e-mail address you have entered to send out our newsletter, from which you can unsubscribe at any time by clicking on the deactivation link provided in every newsletter.

The text of the consent is as follows: *Would you like to receive our newsletters? Yes / No.*

### **Rights**

Pursuant to applicable data protection laws, you may have the right of information, notification, blocking or deletion and revocation (see below at clause 11).

### **3. Consent**

By submitting a file or an URL and expressing your explicit consent by activating the checkbox (see below) at the click of a mouse, you are giving your personal consent that we can process and use your personal data and the submitted file for the execution of the malware analysis and processing the data in order to generate a report and any other uses specified in the "JOE SANDBOX CLOUD BASIC ONLINE SERVICE TERMS AND CONDITIONS OF US".

#### Terms and Conditions

I agree to be bound by the [Terms and Conditions](#) and [Personal Data Protection Policy](#) and agree to have accepted and understood [Terms and Conditions](#) and [Personal Data Protection Policy](#).

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Furthermore, you consent to the transfer of such data, including any personal data you provide, to jurisdictions outside of where you are located, including but not limited to Switzerland and the European Union. We will apply the terms of this Personal Data Protection Policy regardless of where the personal data is transferred, but please note that data protection laws vary by jurisdiction. You may withdraw your consent to the processing or international transfer of your personal information, to the extent that the activity is based upon consent, at any time requesting Joe Security to delete your account.

#### 4. Use of cookies

In order to make visiting our website and using our Service attractive, efficient and enable the use of specific functions, we use what are known as cookies on various pages. These are small text files which are stored on your computer or end device. Some of the cookies we use are deleted at the end of the browser session, i.e. when you close your browser (known as session cookies). Other cookies are stored on your computer or end device and allow us to recognise your browser next time you visit (persistent cookies). You can configure your browser such that you are informed about the saving of cookies and can decide on an individual basis whether to accept cookies in individual cases or not. Not accepting cookies can limit the functionality of using our website.

#### 5. Data security and data integrity

The security of your personal data has highest priority for us. Your personal data is transmitted in encrypted form over the internet via an SSL process (Secure Socket Layer). We use adequate technical and organisational measures designed to secure our Service and the personal data for which you are responsible against loss, destruction, access, modification or distribution by unauthorised personnel. Your customer account can only be accessed by your authorised personnel entering their personal passwords. You are responsible for maintaining the confidentiality of all passwords, which should not be shared among your employees. You should always keep your password and access information confidential and close the browser window once you have finished communicating with us, especially if your personnel share a single computer with others. You have the below explained rights in order to control personal data for which you are responsible. We ensure that you have access to the personal data you provided us and that you can review and correct them if necessary. For further rights with regard to personal data (see below at clause 11).

#### 6. Google Analytics

The Service uses functions of the Google Analytics web analysis service. This is provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Google Analytics uses what are known as “cookies”. These are text files which are stored on your computer to enable an analysis of website use by you. The information generated by the cookie about your use of this website is generally transferred to a Google server in the USA and saved.

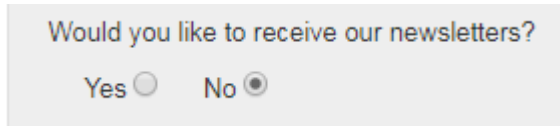
More information on the handling of user data by Google Analytics can be found in the Google guidelines on safeguarding your data: <https://support.google.com/analytics/answer/6004245?hl=en>

#### 7. GetResponse

The Service uses functions of the GetResponse marketing platform. This is provided by GetResponse Sp. z o.o. Ul. Arkońska 6/a3, 80-387 Gdańsk, Poland.

GetResponse uses what are known as “cookies”. These are text files which are stored on your computer to enable an analysis of website use by you. The information generated by the cookie about your use of this website is generally transferred to a GetResponse server in the USA and saved.

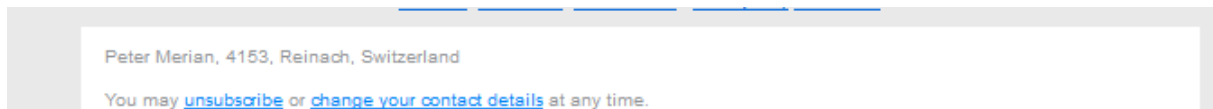
GetResponse asks to subscribe to our newsletter during the registration process:



Would you like to receive our newsletters?

Yes  No

You can unsubscribe at anytime. The unsubscribe information are located in the lower of the e-Mail newsletter:



More information on the handling of user data by GetResponse can be found in the GetResponse Private Policy <https://www.getresponse.com/legal/privacy.html>.

## 8. Use of Twitter and its social media plugin

Our website uses social media plugins (“plugins”) from the social network twitter.com operated by: Twitter, Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, United States of America (“Twitter”)

The Twitter plugins can be identified by the Twitter logo (a flying bird) on the top of our website. For more information visit this site <https://dev.twitter.com/web/overview>

Moreover, we have embedded windows with tweets from our Twitter account (@joe4security) showing the latest of our tweets.

When you enter a page on our website that contains a Twitter plugin your browser will directly connect to Twitter’s servers where the plugin is loaded from. The information that you (including your IP address) have visited our webpage will be transmitted to Twitter, even if you are not logged into your account. If you are actively using a Twitter plugin, Twitter may even process more data and publish content that you are entering into the dialogue box. This allows Twitter to map the visit of our pages to your user account. We would like to point out that as a provider of the pages we are not aware of the content of the transmitted data as well as their use by Twitter.

If you want to prevent the assignment of your visit of our websites to Twitter, you must log out of your Twitter account before you visit our site and delete any cookies placed by Twitter.

For more information on your rights and on how Twitter is recording and processing data please see Twitter’s Data Protection Policy which is available here: <https://twitter.com/privacy/>. You can change your privacy settings in the account settings of your Twitter profile at <http://twitter.com/account/settings>.

## 9. Objecting to data recording - Browser plugin

You can prevent cookies being saved by changing a setting in your browser software, but please be aware that this may mean you are not able to use all the website functions to their full extent. You can also prevent the recording of the data generated by the cookie relating to your use of the

website (including your IP address) and the processing of this data by Google by downloading and installing the browser plugin from the link below. <https://tools.google.com/dlpage/gaoptout?hl=en>

Further information on the use of data for advertising purposes by Google and configuration and opt-out options can be found on Google's website: <https://www.google.com/policies/privacy/partners/> ("How Google uses data when you use our partners' sites or apps"), <http://www.google.com/policies/technologies/ads> ("How Google uses cookies in advertising"), <http://www.google.com/settings/ads> ("Control the information Google uses to show you ads") and <http://www.google.com/ads/preferences/> ("Determine which ads Google shows you").

## **10. Objecting to data recording - Browser plugin**

You can prevent cookies being saved by changing a setting in your browser software, but please be aware that this may mean you are not able to use all the website functions to their full extent. You can also prevent the recording of the data generated by the cookie relating to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing the browser plugin from the link below. <https://tools.google.com/dlpage/gaoptout?hl=en>

Further information on the use of data for advertising purposes by Google and configuration and opt-out options can be found on Google's website: <https://www.google.com/policies/privacy/partners/> ("How Google uses data when you use our partners' sites or apps"), <http://www.google.com/policies/technologies/ads> ("How Google uses cookies in advertising"), <http://www.google.com/settings/ads> ("Control the information Google uses to show you ads") and <http://www.google.com/ads/preferences/> ("Determine which ads Google shows you").

## **11. Right of information; notification, blocking or deletion; revocation; making contact**

In accordance with the applicable statutory data protection regulations, Customers have the right to obtain access to their personal data stored by Joe Security and understand the purposes for which we process it. In the user settings of our website, you can view your account-related personal data. Please address your request to the (Email) address stated below at clause 10.

You are entitled to have any incorrect data about you corrected. To do this, please contact us and let us know the correct personal data. The correction is made immediately, subject to an integrity check.

You also have the right to request the deletion of personal data held about you. For example, if the personal data was saved without your authorisation or knowledge or if the personal data is no longer required in order to fulfill the purpose for which it was saved or to fulfil the role for which the relevant (public) body is responsible.

Instead of deletion, you have the right to have your personal data blocked, if deletion would contravene mandatory statutory requirements, deletion is not possible or would be unreasonably difficult or it is not possible to determine whether the personal data is correct or incorrect. In the case of deleting your personal data, such data will be deleted by us immediately; if you request blocking, your personal data will no longer be used by us.

In order to request deletion or blocking it is sufficient to send us an informal Email.

If there are any additional questions on the collection, processing or use of your personal data, if you wish to obtain information on or to correct, block or delete your data, if you wish to revoke previously issued consents, please contact [privacy@joesecurity.org](mailto:privacy@joesecurity.org).

## **11. Applicability; Changes to this Personal Data Protection Policy**

This Personal Data Protection Policy is applicable for the website [www.joesandbox.com](http://www.joesandbox.com). This Personal Data Protection Policy shall not apply to external websites linked on our websites.

In case of changes to this Personal Data Protection Policy we will provide the updated version with the revision date here on our website. If we make substantial changes to this Personal Data Protection Policy, we will possibly inform you by an email or by placing a notification window on our website.

### **13. Contact us**

This is the Personal Data Protection Policy of Joe Security LLC, Christoph Merian-Ring 11, 4153 Reinach.

If you have questions or requests regarding to or arising from this Personal Data Protection Policy feel free to contact us by post or writing an email to [privacy@joesecurity.org](mailto:privacy@joesecurity.org).

**Personal Data Protection Policy Effective Date: 4. June 2018**