

JOE SANDBOX CLOUD BASIC DATA PROTECTION POLICY

Welcome to *Joe Sandbox Cloud Basic*, a service provided by Joe Security GmbH (“Joe Security” or “we”). The protection of your data and the preservation of your privacy are of central importance to us. This *Joe Sandbox Cloud Basic Data Protection Policy* (“Data Protection Policy”) illustrates which types of personal data we process, how we process the personal data and for which purposes we process it.

1. When does this Data Protection Policy apply?

This Data Protection Policy applies to our processing of personal data in the course of your visit of our website www.joesandbox.com. Please note that this Data Protection Policy is not applicable to the processing of personal data in the course of our provisioning of *Joe Sandbox Cloud Pro* services. For details on the processing of personal data in the course of the provisioning of *Joe Sandbox Cloud Pro* services, please refer to the *Joe Sandbox Cloud Pro Data Protection Policy*.

2. Who is the controller of the data processing?

Under data protection law, the controller of a particular data processing is the entity that determines the purpose and means of that data processing.

Controller of the processing of personal data within the scope of this Data Protection Policy:

Joe Security GmbH
Christoph Merian-Ring 11
4153 Reinach
Switzerland

3. What personal data do we process for the provision of our website?

If you visit our website, the data that your browser automatically sends us is logged in “log files”. This data includes your IP address, the website from which you came to this website (referrer), the date of your visit, product and version information on the browser (user agent) used by you, the operating system used by you and language settings. The afore-mentioned data is used by us to ensure the functionality of our IT systems, to optimize our website and the technology behind it, for internal statistical evaluation regarding the use of our website and to provide prosecution authorities with the required information in case of a cyberattack. This is our legitimate overriding interest in the data processing. The data is not saved together with any other personal data of yours. Further, the data is not analyzed for marketing purposes.

We host the content of our website with the following provider: Hetzner Online GmbH (“Hetzner”), Industriestr. 25, 91710 Gunzenhausen, Germany. For details, please refer to Hetzner’s privacy policy. <https://www.hetzner.com/de/legal/privacy-policy>

4. How and for what do we use cookies?

In order to make visiting our website attractive, efficient and enable the use of specific functions, we use what are known as cookies on various pages of our website. 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 our website (persistent cookies). You can configure your browser such that no cookies are stored on your

computer or end device, or that you are informed about the storing of cookies and can decide on an individual basis whether to accept cookies in individual cases or not.

Information on how to delete cookies and change cookie settings in the most common browsers can be found on the following websites:

- Google Chrome Desktop: <https://support.google.com/chrome/answer/95647?hl=en>
- Google Chrome Mobile: <https://support.google.com/chrome/answer/2392709?hl=en&co=GENIE.Platform%3DAndroid&oco=1>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop?redirectslug=enable-and-disable-cookies-website-preferences&redirectlocale=en-US>
- Apple Safari Mobile: <https://support.apple.com/bg-bg/HT201265>

Not accepting cookies can limit the functionality of using our website.

5. What personal data do we process to analyze and improve the use of our website?

This website uses Google Analytics, a web analysis service provided by Google Ireland Limited („Google“), Gordon House, Barrow Street, Dublin 4, Ireland. Google uses cookies that enable an analysis of your use of our website. The information collected by means of the cookies about your use of our website is generally transferred to a Google server in the USA and stored there. Google will use this information on our behalf to evaluate your use of the website and to compile reports on website activities. The reports provided by Google Analytics serve to analyze the performance of our website.

We use Google Analytics only with IP anonymization activated. Due to IP anonymization, your IP address will be shortened by Google within member states of the European Union or in other states party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. According to Google, the IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

You can prevent the storage of cookies from the outset by setting your browser software accordingly (please see Section 4 above). However, if you configure your browser to reject all cookies, this may result in a restriction of functionalities on this and other websites. In addition, you can prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google, by downloading and installing the browser add-on to disable Google Analytics here: <https://tools.google.com/dlpage/gaoptout?hl=en>

For more information on Google Analytics' terms of use and Google's privacy policy, please visit <https://marketingplatform.google.com/about/analytics/terms/us/> and <https://policies.google.com/?hl=en>.

6. What personal data do we process if you register for *Joe Sandbox Cloud Basic* services via the registration form on our website?

Registration form

You may register for *Joe Security Cloud Basic* services via the registration form (“Joe Sandbox Cloud Basic registration form”) available on our website. To register via such form, we require the following information:

- Your name
- Company webpage
- Your business email address

We process the above information to enter into contracts on *Joe Security Cloud Basic* services with you and to provide *Joe Security Cloud Basic* services to you. It is our legitimate overriding interest to enter into contracts for our services and to fulfill these contracts.

Google reCaptcha

We use the reCaptcha service provided by Google, Inc., 1600 Amphitheater Parkway Mountain View, CA 94043, USA ("Google") to protect the registration form on our website from unauthorized use. This service allows us to differentiate between entries made by a human being or improperly by an automated machine. The integration of reCAPTCHA takes place via an interface ("API") to the Google services. By integrating reCAPTCHA, Google may collect information (including personal data) and process it. It cannot be ruled out that Google also transmits the information to a server in a third country.

reCAPTCHA may use "cookies", which are text files placed on your device and which allow an analysis of the use of the websites you visit. In addition, reCAPTCHA also uses so-called WebBeacons, i.e., small pixels or graphics. The information generated by the cookie, possibly in connection with the WebBeacon, about your use of this website (including your IP address) is transmitted to a Google server, possibly in the USA or other third countries, and stored there.

For more information on how reCAPTCHA works, see: <https://developers.google.com/recaptcha/>

For more information about Google's privacy policy, please visit: <https://policies.google.com/privacy>

By integrating reCAPTCHA, we pursue the purpose of determining whether entries on our website are made by a real person or by a bot. This is our legitimate overriding interest in the data processing.

You may refuse the use of cookies by selecting the appropriate settings on your browser (please see Section 4 above), however, please note that if you do this you may not be able to use the full functionality of this website.

7. What personal data do we process for the delivery of our newsletter?

When you register for *Joe Security Cloud Basic* services, you can choose to subscribe to our newsletter. The subscription to our newsletter is voluntary. By subscribing to our newsletter, you give your consent to the processing of your email address (as provided by you when subscribing to our newsletter) for the purpose of the newsletter delivery.

We use the newsletter service GetResponse for our newsletter delivery. GetResponse is a service that can be used, *inter alia*, to organize and analyze the delivery of newsletters. The service is provided by GetResponse S.A., Grunwaldzka 413, 80-309 Gdansk, Poland ("GetResponse"). Your email address (as provided by you when subscribing to our newsletter) is stored on GetResponse's servers. GetResponse's servers are located in the EU and the USA, so that it cannot be ruled out that the data is transferred to the USA.

GetResponse enables us to analyze the behavior of newsletter recipients. Among other things, we can analyze how many recipients have opened the newsletter message and how often which link in the newsletter was clicked on.

The processing of your personal data takes place on the basis of your consent. You can unsubscribe from the newsletter at any time. We provide a link for this purpose in each newsletter message.

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

8. What personal data do we process when using a Content Delivery Network?

We use a Content Delivery Network offered by Cloudflare Inc., 101 Townsend St. San Francisco, CA 94107, USA ("Cloudflare"). A Content Delivery Network is an online service that is used to deliver, in particular, large media files (such as graphics, page content or scripts) through a network of regionally distributed servers connected via the Internet. In the course of this, Cloudflare receives access to, *inter alia*, the connection data as specified in Section 3 above. The use of Cloudflare's Content Delivery Network helps us to optimize the loading speeds of our website.

The data processing is based on our legitimate overriding interest in the secure and efficient provision, as well as the improvement of the stability and functionality of our website.

Cloudflare has a certification according to the EU-US Data Privacy Framework (DPF). The DPF is an agreement between the European Union and the USA, which is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. For more information, please visit the following link: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt0000000GnZKAA0&status=Active>

You can find more information about security and privacy at Cloudflare here: <https://www.cloudflare.com/privacypolicy/>.

9. With whom do we share sample files, documents, URLs or e-mails ("Samples") submitted by you?

If you intend to submit Samples to have them analyzed by *Joe Sandbox Cloud Basic* services, please note, that the complete Sample and the corresponding analysis results will be published on www.joesandbox.com and accessible to anyone in each case.

Therefore, you may only submit Samples that you wish to publicly share.

You must not submit any Sample that contains confidential information and/or personal data without lawful permission. You shall be responsible for any conflict arising out of your submission of confidential information and/or personal data involved in a Sample.

10. With whom do we share personal data?

It may be necessary for us to disclose personal data to the following categories of recipients:

- Service providers: We may share personal data with the service providers as described in this Data Protection Policy.
- Authorities and courts: If we are requested to do so by authorities or courts and are legally obliged to do so, we will disclose personal data to these or other authorized third parties.

Section 9 above shall remain unaffected.

11. How do we protect your data?

This website uses TLS encryption for security reasons and to protect confidential information (e.g., requests you send us via our website). We secure our website and other systems by technical and organizational measures against loss, destruction, modification or access of your data by unauthorized persons.

12. How long do we keep your data?

We store personal data only as long as necessary for the intended purpose in each case or as required by law.

13. What rights do you have with regard to your personal data?

Within the framework of the data protection law applicable to you and to the extent provided therein, you may have, in particular, the following rights:

Right of access: You can obtain from us confirmation as to whether or not personal data concerning you is being processed by us. Where that is the case, you can obtain from us access to the personal data and information regarding, *inter alia*, the purposes of the processing, the categories of recipients to whom your personal data has been or will be disclosed, where possible the envisaged period for which the personal data will be stored (as applicable).

Right to rectification: You have the right to have inaccurate personal data concerning you rectified.

Right to erasure: You can obtain from us the erasure of your personal data stored by us, where a reason for erasure applies, such as: the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw your consent and there is no other legal ground for the processing; you object to the processing and there are no overriding legitimate grounds for the processing; the personal data has been unlawfully processed.

Right to restriction of processing: Under certain conditions, you can obtain from us restriction of processing of the personal data concerning you.

Right to notification: Where you have exercised your right to rectification or erasure of personal data, or restriction of processing, we may be obliged to communicate this rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data concerning you has been disclosed, unless this proves impossible or involves disproportionate effort.

Right to data portability: You may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and to transmit those data to another controller without hindrance from us.

Right to object: You may have the right to object to processing of personal data concerning you.

If you have any requests of this kind, please direct them to the addresses stated in Section 14 below.

14. How can you contact us with questions about data protection?

If you have any questions or requests relating to this Data Protection Policy, feel free to contact us. You can reach us by email to privacy@joesecurity.org or by post to the following address:

Joe Security GmbH
Christoph Merian-Ring 11
4153 Reinach
Switzerland

If and to the extent our data processing is subject to the EU General Data Protection Regulation (GDPR) and you have a question or request in this regard, please contact our representative in the EU, using the contact information below:

Rickert Rechtsanwaltsgesellschaft mbH
- Joe Security GmbH -
Colmantstraße 15
53115 Bonn
Germany
art-27-rep-joesecurity@rickert.law

15. How can we change this Data Protection Policy?

We reserve the right to change this Data Protection Policy at any time. The respective current version published on our website shall apply. In case of changes to this Data Protection Policy we will provide the updated version with the revision date here on our website.

Version: 19.12.2023