

## SwordSec Privacy Policy

SwordSec Siber Güvenlik Teknolojileri A.Ş. (“SwordSec,” “we,” “our,” or “we”), is aware that your privacy is very important. SwordSec provides multi-factor authentication and other services to users (“User”, “Users”, “you” or “your”) and Corporate Users around the world (“Corporate User”, “Corporate Users”) Your use of our website (“Website”), mobile application (“application”) and services offered on the Site (“Services”) are subject to these Privacy Rules, “Terms and Conditions” (these “Terms”) for users and the SwordSec Data Processing Agreement for Corporate users. This Privacy Policy (“Privacy Policy”), SwordSec Siber Güvenlik Teknolojileri A.Ş.'s websites, our Application, our services and other web-based applications (collectively the “Services”). explains how it collects, uses and shares information in connection with your use (unless their terms and conditions are expressly excluded, including swordsec.com and subdomains of this site).

SwordSec Siber Güvenlik Teknolojileri A.Ş. is aware that your privacy is very important. SwordSec provides DDoS testing and other services to users and Corporate Users around the world. Your use of our website, mobile application and services offered on the Site are subject to these Privacy Rules, “Terms of Service” for users and the SwordSec Data Processing Agreement for Corporate users. This Privacy Policy, SwordSec Siber Güvenlik Teknolojileri A.Ş.'s websites, our Application, our services and other web-based applications. explains how it collects, uses and shares information in connection with your use (unless their terms and conditions are expressly excluded, including swordsec.com, subdomains of this site).

This Privacy Policy does not apply to information and validity processed by using our Services. Any registration processing using the Customer's Services is subject to and enforceable by its own privacy policy, written data agreements between SwordSec and the customer.

Our Cookie policy and Clarification Text are an integral part of this Privacy Policy.

If there is any enforcement regarding this Privacy Policy or SwordSec’s data collection, use and disclosure practices, please contact [info@swordsec.com](mailto:info@swordsec.com)

## Information We Collect

Information we collect and it collects information from your following departments and devices:

### 1. Information collected when you visit our websites

We use cookies on our sites to improve user experience and improve our services. Therefore, when you visit our websites, our servers may automatically save standard data provided by your web browser. It may include your Internet Protocol (IP) address, operating system platform, browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, your clicks, scrolls, and other details.

We may also collect contact and/or professional data about you through our websites and through tools such as online forms and/or communications. For example, when you sign up to learn more about SwordSec's products and services, download content, register for an event, and visit our offices, you may provide us with your name, surname and contact information, as well as your professional information.

### 2. Physically collected information

During our physical marketing efforts and commercial activities, you may provide your contact and professional information, especially in business card format or verbally. If you attend an event, we may receive contact and professional details about you by completing a form or providing us with a business card or other means by which you share your Personal Data with us, as well as providing photos and videos that can be shared on social media to illustrate Corporate activities. Typically, contact data includes your name and contact methods such as phone number, email address, and postal address, and professional data includes details such as your affiliation, your job title, and industry.

### 3. Information collected when you use our services

The information collected by our systems is as follows:

How do we collect information?

We collect information in accordance with the rules and legally within your knowledge and consent. We also let you know why we collect the information and how it will be used. You are free to decline our request for information with the understanding that we may not be able to provide some of the services you request without it.

## **Use of information**

We use your data to enhance the security of your authentication processes and to prevent malicious cyber attacks against your identities.

We may use a combination of identifying and non-identifying information to understand who our visitors are, how they use our Services, and how we can improve their experience with our Services in the future. We do not publicly disclose details of this information, but we may share aggregated and anonymized versions of this information, for example in website and customer usage trend reports.

We may use your personal information to contact you with promotional content that we believe may be of interest to you, as well as updates about our Services. If you wish to opt out of receiving promotional content, you may follow the "unsubscribe" instructions provided with the promotional communications.

## **Data processing and storage**

We only transfer data in jurisdictions subject to data protection laws that reflect our commitment to protecting the privacy of our users.

We only retain personal information for as long as necessary to provide a service or improve our services in the future. While we may retain this data, we will protect it to the maximum extent by commercially acceptable means to prevent loss and theft, as well as unauthorized access, disclosure, copying, use or modification. However, we would like to inform you that no electronic transmission or storage method is 100% secure and cannot guarantee absolute data security.

If you wish to have your personal information deleted or disassociated from our activities, we will erase your information from our system within a reasonable period after receiving the relevant request.

## **Cookies**

We use "cookies" to collect information about you and your activity on our site. A cookie is a small piece of data that our website stores on your computer and is accessed each time you visit it, so that we can understand how you use our site. This helps us deliver content to you based on the preferences you specify.

### **Third party access to information**

We use third-party services to:

- Analytics tracking
- Advertising and promotion
- Content marketing
- Email marketing
- Payment process
- Hosting

These services may access our data only for the purpose of performing certain tasks on our behalf. We do not share any personally identifiable information with them without your express consent. We do not allow the third party to disclose or use any of our personal data for any purpose other than those listed in the express consent statement.

From time to time, we may allow limited access to our data by external consultants and agencies for analysis and service improvement purposes. This access is only allowed as long as it is necessary to perform a particular function. We only work with outside organizations whose privacy policies are in line with ours.

If we believe a request is too broad or irrelevant for the stated purpose, we will reject administrative or legal action. However, the information requested is necessary and appropriate to comply with legal process, protect our rights and property, protect the safety of the public and any person, prevent a crime or prevent what we reasonably believe is illegal, legally actionable or unethical activity. We can cooperate if we believe.

We do not otherwise share or give personal information to third parties. We do not sell or rent your personal information to marketers or third parties.

### **Children's privacy**

SwordSec does not knowingly collect information from children under the age of 13 (thirteen), and children under the age of 13 (thirteen) are prohibited from using our Services. If you learn that a child has provided us with personal information in violation of this Privacy Policy, you can contact us at [info@swordsec.com](mailto:info@swordsec.com)

## **Limits of our policy**

This privacy policy covers only SwordSec's own data collection and processing methods. We only work with partners, affiliates, and third-party providers whose privacy policies are compliant with ours, but we cannot disclaim responsibility or liability for their respective privacy practices.

Our website may link to external sites not operated by us. Please note that we have no control over the content and policies of these sites and cannot accept responsibility or liability for their respective privacy practices.

## **Changes to the policy**

This Privacy Policy is subject to change from time to time, so please review it frequently. Changes to this Privacy Policy will be posted on our websites. If we significantly change the way we use or share personal information previously collected from you through our services, we will notify you through our services, email or other communication channels.

## **Your rights and responsibilities**

As a user, you have the right to be informed about how your data is collected and used. You have the right to know what data we collect about you and how it is processed. You have the right to correct and update personal information about you and to request that this information be deleted. You can change or remove your account information at any time using the links on our websites.

While maintaining the right to use your personal information for your own purposes, you have the right to restrict or object to our use of your data. You have the right to request that the use of data about you be discontinued only in decisions based on automated processing.

You can choose not to receive marketing emails and other marketing content. You can opt out of receiving marketing communications from us, such as marketing emails, by following the instructions in those communications or by changing your settings. Updated settings may not take effect immediately. Please note that you may continue to receive non-marketing communications about topics such as SwordSec services, terms of service, or this Privacy Policy.

You have the right to rectify or delete your personal data, object to the way we use and share your data, restrict the way we share your data or withdraw your consent.

We respond to all requests within a reasonable time. If you have an unresolved privacy or data usage question that we have not yet addressed to your satisfaction, you can contact [info@swordsec.com](mailto:info@swordsec.com) for unresolved complaints.

If you wish to exercise any of your above-mentioned rights as a data subject, please use the support options specified in the "Contact" section above. All requests are responded to in accordance with applicable laws. To protect your privacy, we may ask you for shopping invoice or other account information before fulfilling your request, ask you to link your

account with your email address, or add additional steps to verify your identity by asking you about your activities on our services.

### **Contact Us**

If you have any questions or concerns about this Privacy Policy, please do not hesitate to email us at [info@swordsec.com](mailto:info@swordsec.com)

SwordSec Siber Güvenlik Teknolojileri A.Ş. is the data controller of personal information in personal services, but it is data processor in Corporate services.

SwordSec