



PRIVACY POLICY

Silobreaker respects your privacy and is committed to protecting your personal data.

This privacy policy aims to give you information on how Silobreaker collects and processes your personal data through your use of our website, through our services, or in connection with our services. It will also include information about your privacy rights and how the law protects you.

1. WHO WE ARE

1.1 Silobreaker is made up of different legal companies:

1.1.1 Silobreaker Limited, registered in England

1.1.2 Silobreaker Services Limited, registered in England

1.1.3 Silobreaker AB, registered in Sweden

1.2 This privacy notice is issued on behalf of the Silobreaker group of companies, so when we mention "Silobreaker", "we", "us" or "our" in the privacy notice, we are referring to the relevant company in our group responsible for handling your personal data. We will let you know which company is responsible for your data when you purchase a service from us. You can also contact us to ask who the responsible company is over particular data sets at any time.

1.3 The controller and responsible for this website is Silobreaker Limited, whose business address is Holden House, 4th Floor, 57 Rathbone Place, London W1T 1JU, United Kingdom.

1.4 We have appointed a data protection manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us at privacy-inquiries@silobreaker.com.

1.5 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2. **WHAT WE DO**

2.1 The purpose of our services is to collect data from thousands of publicly accessible sources on the internet, cut through the data noise and find and present contextually relevant information to our clients.

2.2 We do this to help our clients better understand risks and other developments related to their organisations and the business of their organisations.

2.3 The tools we provide through our services help users search and analyse the data as well as visualise the results.

2.4 Our services are utilised by our clients for the following use-cases:

2.4.1 **Cyber Security** – to understand the threat landscape; be alerted of reported malware, vulnerabilities and exploits; gauge the severity of threat indicators of compromise; discover leaks and breaches; and other cyber-related queries.

2.4.2 **Business Watch** – to follow news and trends about companies, sectors and industries; find out about innovation, product releases and new technologies; be updated about deal announcements and competitors' activities; and other business-related queries.

2.4.3 **Corporate Risk** – reputational risk and brand monitoring, to follow trends in e-crime, fraud and other corporate crimes; monitor world events and geopolitical developments; stay updated on regulatory changes and new legislation; and other risk-related queries.

2.4.4 **Incident and Crisis Management** – to gain situational awareness around natural and man-made disasters, monitor world events and geopolitical developments; gain situational awareness around security incidents and terror attacks; and other incident-related queries.

3. **HOW WE COLLECT AND USE PERSONAL DATA**

3.1 **When you purchase our services:**

3.1.1 When you become a client of Silobreaker, we will use your personal data to provide the services you have purchased. The details we collect from you when you sign up to our services are: name and email address, phone number and details required for making payments.

3.1.2 To complete your purchase and provide the services to you, we share your personal data with our payment processing and data storage subcontractors, on some occasions we may share business details with credit reference agencies who we use to assess fraud, credit and/or security risks.

3.1.3 We need to process your personal data in this way to fulfil the contract between us.

3.2 **When our software captures your information:**

3.2.1 We search, index and store parts of the information available on the web to check for security risks and other developments that that may be relevant to our clients. The data we aggregate from public sources will include information about entities like companies, people, places and products. Such information refers usually to public figures like politicians and business executives at large organisations but can include information about anything and anyone. As part of this, we may capture your personal data which is publicly available on the web. We only do this as part of providing services to our clients – we do not target or focus our efforts on collecting data relating to particular members of the public who have no links to our clients.

3.2.2 Generally, if we capture any personal data about you, it may include your name, work and home address, email address, contact details, aliases and social media accounts.

3.2.3 If relevant to our clients, we may use publicly available information to help address security issues. This may include personal data that has been published on the internet.

3.2.4 We process your personal data for these reasons because we have a legitimate interest in providing a comprehensive service to our clients.

3.2.5 You have various rights in connection with our use of your information. For more detail on these rights, please see the “Your Rights” section below.

3.3 **When you attend a Silobreaker event:**

3.3.1 When you attend one of our events (such as a webinar or hosted event at a location), we may collect the following information from you: name, address, email address, and phone number. If you are already a client and register to attend an event, we will use the details we already hold for you to confirm your booking. We need to use your personal data in this way to complete the booking contract between us.

3.3.2 We may provide attendees lists to the organisations and other individuals who attend our events. We do this because our events provide a useful networking

opportunity and we have a legitimate interest in wanting to help build and develop the security and business communities. You can object to us using your information in this way by contacting us at privacy-inquiries@silobreaker.com.

3.4 When you phone or email us:

3.4.1 When you phone us or contact us by email with general queries, we may also handle your personal data (your name, contact details and the other details you provide to us) in order to provide the customer services you have asked us to. This could be when you ask us to provide more information about our software or explain how our search tools work.

3.4.2 We rely on your consent to handle your personal data in this way. If you do not provide us with the personal data we request from you for customer services purposes, we may not be able to fully answer your queries.

3.5 When you have expressed an interest in Silobreaker:

3.5.1 If you have opted in to receive marketing communications from us or have previously expressed an interest in Silobreaker and not opted out. We will handle your personal data (such as your name, email address, postal address, telephone number) to provide you with marketing communications in line with any preferences you have told us about.

3.5.2 When we send you marketing emails because you have opted-in to receive them, we rely on your consent to contact you for marketing purposes.

3.5.3 If you have not opted-in and we send you marketing emails, we do this because of our legitimate interest to promote our business.

3.5.4 Every email we send to you for marketing purposes will also contain instructions on how to unsubscribe from receiving them.

3.5.5 You are not under any obligation to provide us with your personal data for marketing purposes. You can tell us that you do not want your personal data to be processed in this way at any time by contacting us at privacy-inquiries@silobreaker.com or, where relevant, by following the unsubscribe link shown in every marketing communication you receive from us.

3.6 To make our website and services better:

3.6.1 We will also use your personal data to provide you with a more effective user experience.

- 3.6.2 Our use of your information in this way means that your experience of our website will be more tailored to you, and that the articles and links you see on our website may differ from someone accessing the same website with a different history or browsing habits.
- 3.6.3 We also share your aggregated, anonymous data with third party analytics and search engine providers that assist us in the improvement and optimisation of our website and services.
- 3.6.4 We will also use your personal data for the purposes of making our website and services more secure and to provide you with technical support as well as administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- 3.6.5 We process your data for this reason because we have a legitimate interest to provide you with the best experience we can, and to ensure that our website and services are kept secure.
- 3.6.6 You can prevent us from using your personal data in this way by using the 'do not track' functionality in your internet browser. If you enable do not track functionality, our website may be less tailored to your needs and preferences.

3.7 When we get personal data from other sources:

- 3.7.1 We work closely with third parties including, for example, business partners, sub-contractors, payment services, lead-sourcing firms and analytics providers, all of which may provide information about you.
- 3.7.2 We will use your personal data to promote, market, prepare, support and process products, deals and transactions.
- 3.7.3 We process your personal data for these reasons because we have a legitimate interest in promoting our business and providing a comprehensive service to our clients.

3.8 If our business is sold:

- 3.8.1 We will transfer your personal data to a third party:
 - 3.8.1.1 if we sell or buy any business or assets, we will provide your personal data to the seller or buyer (but only to the extent we need to, and always in accordance with data protection legislation);

3.8.1.2 if Silobreaker or the majority of its assets are acquired by somebody else, in which case the personal data held by Silobreaker will be transferred to the buyer.

3.8.2 We process your personal data for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your personal data in this way, the relevant seller or buyer of our business may not be able to provide services to you.

3.9 In some circumstances we may also need to share your personal data if we are under a duty to disclose or share it to comply with a legal obligation.

3.10 We will never share your personal data to third parties other than for the reasons outlined above.

4. **FAILURE TO PROVIDE PERSONAL DATA**

4.1 Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services).

4.2 In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

5. **CHANGE OF PURPOSE**

5.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

5.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. **TECHNICAL INFORMATION AND ANALYTICS**

6.1 When you visit our website or use our services we will automatically collect the following information:

- 6.1.1 technical information, including the IP-address from where you are connecting to our website or services, your login information, browser type and version, time zone setting, browser plug-in types and versions, screen resolution, operating system;
- 6.1.2 information about your visit, including the full URLs, clickstream to, through and from our site (including date and time), widgets, tools and functionality you use, errors you may experience, page response times, length of visits to certain pages, page interaction information and methods used to browse away from the page.
- 6.2 Information we receive from other sources: We are also working closely with third party analytics providers, hosting providers and search information providers from whom we may also receive general aggregated anonymous information about you.
- 6.3 We will combine the information you provide to us with information we collect about you.

7. **COOKIES**

- 7.1 Our website use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. By continuing to browse the website, you are agreeing to our use of cookies.
- 7.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.
- 7.3 We use the following cookies:
 - 7.3.1 Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website;
 - 7.3.2 Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- 7.4 You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Name	Purpose	More information
Authentication Cookie	.SILOBREAKERAUTH_PROD	1.3.1 – Stores encrypted authentication context for the user.	Service cannot be used without this cookie. Set when user has authenticated successfully. Encrypted.
“Pro” mode setting	Maximize	1.3.2 – User preference for if the UI should start in pro/maximized mode or normal.	Does not contain any user identifiable data
Session ID	ASP.NET_SessionId	1.3.1 – Session ID for keeping the user context	Does not contain any user identifiable data
Multi-factor “trust this browser”	Silobreaker-MFA{GUID}	1.3.2 – User preference for denoting a browser as “trusted”, skipping multi-factor authentication for 2 weeks.	When logging on using multi-factor authentication, a user can denote a browser as “trusted” as to not have to enter two-factor credentials again on the same browser. The setting is kept for 2 weeks, after which the user need to enter multi-factor credentials again.

7.5 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

7.6 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you will not be able to access any parts of our site.

7.7 Except for essential cookies, all cookies will expire after 2 weeks.

8. **HOW AND WHERE WE STORE PERSONAL DATA**

8.1 Although none of our group companies are based outside the European Economic Area ("EEA"), we work with third parties who are. This means the processing of your personal data will involve a transfer of data outside the EEA.

8.2 Whenever we transfer your personal data outside of the EEA, we ensure it is protected by making sure at least one of the following safeguards is in place:

8.2.1 by transferring your personal data to a country that has been deemed to provide an adequate level of protection by the European Commission;

8.2.2 by using specific contracts approved by the European Commission which give your personal data the same protection it has as if it stayed in the EEA;

8.2.3 where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield programme which requires them to provide similar protection to personal data shared between Europe and the US.

8.3 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8.4 All personal data that we collect or you provide to us is stored on our secure servers or those of our third party storage providers.

8.5 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website or services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

9. **HOW LONG WE KEEP PERSONAL DATA FOR**

9.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

9.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9.3 By law we have to keep basic information about our clients (including contact, identity, financial and transaction data) for six years after they cease being clients for tax purposes.

- 9.4 Data we aggregate from public sources, from which our software may capture personal data, is removed from our index and storage continually, in some cases as soon as after 60 days and normally no longer than two years from the publication date, unless there are specific reasons for us to keep it.
- 9.5 Personal data collected in relation to events or used for marketing and other activities to promote our company and offerings will be reviewed regularly and in cases for communications which you have opted-in to receive, we will contact you every four years to ensure you are happy to continue receiving these communications.
- 9.6 Where we have processed your data for any other reason (such as where you have contacted us with a question in connection with a customer service question) we will retain your data for two years.
- 9.7 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. YOUR RIGHTS

- 10.1 You have the right to:
- 10.1.1 **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
 - 10.1.2 **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
 - 10.1.3 **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
 - 10.1.4 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel

it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;

10.1.5 **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;

10.1.6 **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

10.1.7 **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

10.2 If you wish to exercise any of the rights set out above, please contact us at privacy-inquiries@silobreaker.com

11. **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

12. **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

13. **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14. **THIRD-PARTY LINKS**

Our website and services may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website or services, we encourage you to read the privacy notice of every website you visit.

15. **CHANGES TO OUR PRIVACY POLICY AND INFORMING US OF CHANGES**

15.1 Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

15.2 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

16. **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to privacy-inquiries@silobreaker.com.

This privacy policy was last updated on 24 May 2018