

Brava Security Privacy Policy

Last modified: September 2024

Brava Security Inc., and its subsidiaries (“**Brava**”, “**we**”, “**our**” or the “**Company**”, and their affiliates) respects the privacy of its users and website visitors, and is committed to protecting personal information, which means any information that relates to an identified or identifiable natural person and (hereinafter, “**Personal Data**”), you may share with us. We also protect our followers, vendors, service providers, partners and others who contact us (these and any others with respect to whom we collect personal data, shall collectively be referred to as “**users**” or “**you**” or “**Data Subjects**”).

This policy and notice (the “**Privacy Policy**”) explains the types of information we may collect from you or that you may provide when you visit our website, <https://www.brava.security>, our social media pages, or you may provide us with such data in the course of business transactions, sales and support. We are transparent about our practices regarding the information we may collect use, maintain, and process and describe our practices in this policy and notice. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

1. WHICH INFORMATION MAY WE COLLECT?

Brava aims to process only adequate, accurate and relevant data limited to the needs and purposes for which it is gathered. We also aim to store data for the period necessary to fulfill the purpose for which the data is collected.

Brava only collects data in connection with a specific legitimate business purpose and only processes data in accordance with this Privacy Policy.

When you sign up to our website, or in processing data for our users we collect several categories of personal data. Personal Data which is being gathered consists of any details which are personally identifiable provided consciously and voluntarily by you through your use of the website (as described below):

Identifiable Data	<p>This may include your name (first and last), email address, phone numbers, postal address or other identifier by which you may be contacted online or offline as well as payment and billing details, billing address, login credentials, your Brava account username and password and usage details, and other information you may choose to provide to us.</p> <p>We may also obtain location data related to the geographic location of your device (such as laptop or mobile phone) on which the Brava website is used.</p> <p>Brava may also collect the email addresses of people who communicate with us via email or other media or create accounts and login credentials.</p>
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	<p>By registering for an account or submitting requests for support or information via the website, we will collect details, including also your name, phone number and personal or company email you provided, address and other such information.</p> <p>We may use this information to offer Brava's services and support, and will share this data across Brava group companies and affiliates to optimize its services.</p>
Statistical Data	<p>We may collect and share non-personally identifiable information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with third party service providers to help us understand the usage patterns for our service. Such data consist solely of non-identifiable information, which we may store indefinitely.</p>

You do not have any legal obligation to provide any information to Brava, however, we may require certain information in order to provide any services and products. If you choose not to provide us with certain information, then we may not be able to provide you with some or all of the services.

2. HOW DO WE COLLECT PERSONAL DATA THROUGHOUT OUR SERVICES?

We collect Personal Data through your use of our website. In other words, when you are using the website, we are aware of it and gather, collect and record the information relating to such usage, either independently or through the help of third-party services as detailed below. This includes technical information and behavioral information such as the User's Internet protocol (IP) address used to connect your computer to the Internet, your uniform resource locators (URL), operating system, type of browser, browser plug-in types and versions, screen resolution, Flash version, time zone setting, the User's 'clickstream' on the website, the period of time the User visited the website, methods used to browse away from a page, and any phone number used to call our User service number. We likewise place cookies on your browsing devices (see section 'Cookies' below), though you may block these.

We collect Personal Data required to provide services when you register interest and/or open an account. In addition, we collect your Personal Data, when you provide us such information by entering it manually or automatically, or through your use of our website, facilities and services, or in connection with site visits, in the course of preparing a contract, or otherwise in engaging with us.

3. WHAT ARE THE PURPOSES OF PERSONAL DATA WE COLLECT?

We will use Personal Data to provide and improve our services to our Users and others and meet our contractual, ethical and legal obligations, including for example:

- To present our website and its contents to you;
- administering your account with Brava including to identify and authenticate you;

- to provide you with the information, products and services that you request from Brava;
- verifying and carry out financial transactions in relation to payments you make in connection with the products;
- contacting you for the purpose of providing you with technical assistance and other related information about the products;
- to allow you to participate in interactive features on our website
- to carry out and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- notifying you about changes to our service and products;
- replying to your queries, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
- contacting you to give you commercial and marketing information about events or promotions or additional services and products offered by us and our affiliates, including in other locations;
- soliciting feedback in connection with your use of the services; tracking use of Brava facilities and services to enable us to optimize them;
- contacting you to inform you of additional services offered by us or our affiliates which may be of interest to you;
- compliance and audit purposes, such as meeting our reporting obligations in our various jurisdictions, and for crime prevention and prosecution in so far as it relates to our staff, Users, facilities etc;
- if necessary, we will use personal data to enforce our terms, policies and legal agreements, to comply with court orders and warrants and assist law enforcement agencies as required by law, to collect debts, to prevent fraud, infringements, identity thefts and any other service misuse, and to take any action in any legal dispute and proceeding;
- for security purposes and to identify and authenticate your access to the parts of the facilities.

4. DATA SHARING

We may transfer personal data within our group, and to third party service providers in the circumstances and for purposes as follows:

- **Affiliates and Subsidiaries.** This includes any member of our group, which means the Brava parent company and subsidiaries – whether wholly or partially owned by Brava, including other services we offer to our clients, including third parties. When we share data with our affiliates and subsidiaries, we will not use identified personal data.

- **Third Party Service Providers.** We transfer personal data to third parties in a variety of circumstances for the provisions of our Services to you. We endeavor to ensure that these third parties use your information only to the extent necessary to perform their functions, and to have a contract in place with them to govern their processing on our behalf. These third parties assist us in providing the services we offer, processing transactions, fulfilling requests for information, receiving and sending communications, analyzing data, providing IT and other support services or in other tasks, from time to time. These third parties also include analytics and search engine providers that assist us in the improvement and optimization of our website, and our marketing.

We periodically add and remove third party providers. At present our third-party providers to whom we may transfer personal data include also the following: Google; contracted developers; designers and consultants, our lawyers, accountants, local payroll service providers, other standard business service providers; Other industry standard business software and partners.

- **Change of Control.** In addition, we will disclose your personal data to third parties if some or all of our companies or assets are acquired by a third party including by way of a merger, share acquisition, asset purchase or any similar transaction, in which case personal data may be one of the transferred assets. Likewise.
- **Legal obligation.** We will transfer personal data to third parties if we are under a legal duty to disclose or share your personal data in order to comply with any legal or audit or compliance obligation, in the course of any legal or regulatory proceeding or investigation, or in order to enforce or apply our terms and other agreements with you or with a third party; or to assert or protect the rights, property, or safety of Brava, our Users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

For avoidance of doubt, Brava may transfer and disclose non-personal data to third parties at its own discretion.

5. WHERE DO WE STORE YOUR DATA?

We keep Personal Data in servers which controlled by Brava through reputable cloud-service providers in the US.

6. INTERNATIONAL DATA TRANSFERS

We may transfer your personal data outside of the EEA to be accessed from Israel or stored in the US, and as follows:

- store or backup the information;
- enable us to provide you with the services and products and fulfil our contract with you;
- fulfil any legal, audit, ethical or compliance obligations which require us to make that transfer;
- facilitate the operation of our group businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights;

- to serve our Users across multiple jurisdictions; and
- to operate our subsidiaries and affiliates in an efficient and optimal manner if relevant.

7. DATA RETENTION

In accordance with applicable privacy laws, we will only retain personal data for as long as is necessary for the purposes outlined in this policy or as required by law.

Specifically:

- User account information: retained for the duration of the active account and for 90 days after account closure.
- Transaction data: retained for 7 years to comply with applicable laws.
- Usage logs: retained for 90 days for security and performance analysis.
- Marketing communications data: retained for 2 years from the last interaction unless the user opts out earlier

We may also retain personal data to meet any audit, compliance and business best-practices.

Data with respect to which Brava is the Processor may be deleted only on action and/or instruction of the Controller, except where such data must be retained by us, in our judgment, as above.

Data that is no longer retained may be anonymized or deleted. Likewise, some metadata and statistical information concerning the use of our services are not subject to the deletion procedures in this policy and may be retained by Brava. We will not be able to identify you from this data. Some data may also be retained on our third-party service providers' servers until deleted in accordance with their privacy policy and their retention policy.

8. COOKIES AND EXTERNAL LINKS

When you access or use our services or website, Brava may use industry standard technologies such as cookies, pixels and similar technologies, which store certain information on your computer or browsing device and which will allow us to identify the computer or device and, in some cases, to identify them with the user, and to enable automatic activation of certain features, and make your user experience more convenient and effortless.

We use different types of cookies:

- **Strictly necessary cookies.** These are required for the operation of our website and services under our terms with you; this includes for example, cookies that enable you to log into secure areas of our services.
- **Analytical and performance monitoring cookies.** Those allow us to recognize and count the number of visitors and to see how visitors move around our website and services when they are using it.
- **Functionality cookies.** These are used to recognize you when you return to our Site. This enables us to personalize content to your preferences, including for example, your choice of language or region. You may control these in your browser settings.

Our services and website may, from time to time, contain links to external sites. We are not responsible for the operation, privacy policies and practices or the content of such sites.

9. INFORMATION SECURITY

We take great care in implementing, enforcing and maintaining the security of the personal data we process, whether as Processor or as Controller. Brava implements, enforces and maintains security measures, technologies and policies to prevent the unauthorized or accidental access to or destruction, loss, modification, use or disclosure of personal data. We likewise take steps to monitor compliance of such policies on an ongoing basis. Where we deem it necessary in light of the nature of the data in question and the risks to data subjects, we may encrypt data. Likewise, we take industry standard steps to ensure our website and services are safe.

Note however, that no data security measures are perfect or impenetrable, and we cannot guarantee that unauthorized access, leaks, viruses and other data security breaches will never occur.

Within Brava, we endeavor to limit access to personal data to those of our personnel who: (i) require access in order for Brava to fulfil its obligations, including also under its agreements, and as described in this Privacy Policy , and (ii) have been appropriately and periodically trained with respect to the requirements applicable to the processing, care and handling of the Personal Data, and (iii) are under confidentiality obligations as may be required under applicable law.

Brava shall act in accordance with its policies and with applicable law to promptly notify the relevant authorities and data subjects in the event that any personal data processed by Brava is lost, stolen, or where there has been any unauthorized access to it, all in accordance with applicable law and on the instructions of qualified authority. Brava shall promptly take reasonable remedial measures.

10. DATA SUBJECT RIGHTS

Data subjects have rights, and we respect them.

We enable privacy rights under generally accepted data protection laws, including the GDPR as follows: **Rights to data portability; Rights to access data; Right to rectify data; Right to rectify data; Right to object to processing; Right to erase data.**

Data subjects in the EU have the right to lodge a complaint, with a data protection supervisory authority in the place of their habitual residence.

If, for any reason, a data subject wishes to modify, delete or retrieve their Personal Data, they may do so, where applicable, by contacting Brava as detailed below.

Note that Brava will have to undertake a process to identify a data subject exercising their rights. Brava keeps details of such rights exercised for its own compliance and audit requirements. Please note that Personal Data may be either deleted or retained in an aggregated manner without being linked to any identifiers or Personal Data, depending on technical commercial capability. Such information will continue to be used by Brava.

Note, that data subject rights cannot be exercised in a manner inconsistent with the rights of Brava employees and staff, with Brava proprietary rights, and third-party rights.

11. FOR CALIFORNIA USERS

- We do not sell your personal information:

We do not sell any information that identifies you, such as your name or contact information. However, we may allow Ad Networks such as Facebook and Google to collect your electronic activity while on our website. Ad Networks may also collect IP addresses and information about your device and browser (such as the name and model number of your device) through cookies and similar tracking technologies on our website. They use this information to advertise to you after you leave our website. This is called “retargeted advertising.”

Under the CCPA’s broad definition of what it means to “sell” personal information, this form of advertising may be considered a “sale” of your information. If you do not want us to provide this information to our advertisers, you may opt-out here: <https://optout.aboutads.info/>

- Request Verification:

Before we can respond to any CCPA requests, we will need to verify that you are who you say you are. Verification is important for preventing fraudulent requests and identity theft.

The verification process depends on which type of request you make. For requests to access specific information or requests to delete information, we may require a higher level of verification. Typically, identity verification will require you to confirm certain information about yourself based on the information we have already collected. For example, we may ask you to reply from the email address we have on file for you that is associated with your name. If we cannot verify your identity, we cannot fulfill requests to exercise any rights accorded to you by CCPA.

12. GENERAL

- **Minors.** We do not knowingly collect or solicit information or data from children under the age of 16 or knowingly allow children under the age of 16 to register for Brava services. If you are under 16, do not register or attempt to register for any of the Brava Service or send any information about yourself to us. If we learn that we have collected or have been sent Personal Data from a child under the age of 16, we will delete that Personal Data as soon as reasonably practicable without any liability to Brava. If you believe that we might have collected or been sent information from a minor under the age of 16, please contact us as detailed below as soon as possible.
- **Changes to this Privacy Policy.** The terms of this Privacy Policy will govern the use of the services, website, and any information collected in connection with them. Brava may amend or update this Privacy Policy from time to time. Changes to this Privacy Policy are effective as of the stated “Last Revised” date and your continued use of our services will constitute your active acceptance of the changes to and terms of the Privacy Policy.
- Mailing address: privacy@brava.security