

Privacy and Cookie Policy (“Policy”)

Last update: January 1st 2020

Sanguine Security BV is operating under Sansec.io (“We”, “Us” or “Our”), and collects personal and non-personal data (including usage data) from the visitors of our website and users of our eComscan services.

1. The data controller is:

Sanguine Security BV, registered under number KVK 77165187, and located at: Europalaan 20, 3526 KS Utrecht, the Netherlands.

For questions regarding this Privacy and Cookie Policy and the way we protect your personal data, e-mail us at: info@sansec.io

2. Types of data we collect

There are different types of Personal Data that Sansec.io collects: first and last name, e-mail address(es), physical address, phone number, credit card information, IP addresses, country and city, as well as meta-data resulting from our scan services. More details on each type of (personal) data we collect are provided in each of their respective sections in this Privacy and Cookie Policy. We may also explain which type of data we collect on our website before we collect such data.

The User may provide us with his/her personal data without any restriction. Unless indicated otherwise, all personal data we request is obligatory and the failure or unwillingness to provide such data means that we cannot provide our services to you. Sansec.io may state that providing certain data is not mandatory, and Users are free to refrain from communicating this data with us. This has no consequences to the availability or the functioning of our services. Users who are uncertain which Personal Data is mandatory are welcome to contact us at: info@sansec.io.

Any use of Cookies and other tracking tools, by Sansec.io or by third-party services contracted by Sansec.io, serve the purpose of providing the services required by the User, in addition to any other purposes described in this Privacy and Cookie Policy.

Users are fully responsible for any Personal Data from third-party published or shared with Sansec.io, and Users confirm that they have obtained third party's consent to provide such data to us.

3. Methods of processing

Sansec.io will take all necessary security measures to prevent unauthorized access, disclosure or modification of all data. The data processing is carried out using computers and other IT enabled tools, following organizational procedures and methods strictly connected to the purposes indicated in these Policies.

All data may be accessible to persons in our organization that are in charge and involved in the daily operations of Sansec.io. This includes authorized external parties (third-party service providers, mail carriers, hosting providers and data analytics) appointed by us. When these authorized external parties are considered processors or controllers under the applicable laws, they are mentioned in these Policies and reference is made to their

respective privacy policies. The most recent list of these parties may be requested from us at any time.

4. Legal basis of processing

We may process Personal Data relating to Users under the following circumstances:

1. Users have given their consent for one or several purposes. In some jurisdictions, we may be allowed to process Personal Data until the moment the User unequivocally objects to the processing of his/her data, and without relying on his/her consent. In other cases, the storing and processing of Personal Data is subject to the EU General Data Protection Regulation;
2. The delivery of the (personal) data is necessary for the performance of a contract with the User and/or pre-contractual obligation;
3. The storing and processing is necessary to comply with a legal obligation to which we are subject;
4. The storing and processing is necessary to carry out for reasons of public interests.

We are always prepared to answer any question in order to clarify the legal basis that applies to the storing and processing of personal data.

5. Place

The data can be processed at our offices, or any other place where the organization may be located. The transfer of data may occur, which could involve transferring the User's data to a country other than his/her own. You can find more information in the respective section about third party processors and controllers.

6. Retention time

Your collected Personal Data shall be stored and processed for as long as the legitimate purpose requires such storing and processing. Personal Data collected for the purposes of our legitimate interests shall be kept as long as necessary to fulfill these purposes. Users may find specific information regarding this Paragraph within the relevant sections of these Policies or by contacting us.

We may retain Personal Data for a longer period of time as long as you have not withdrawn your consent. Furthermore, we may be obliged to retain Personal Data for a longer period of time for the performance of a legal duty or after a (judicial) order issued by an authority.

Once the retention period expires, Personal Data shall be fully deleted by us. And as a consequence the right to access, delete, correct and transfer your data cannot be exercised by you.

7. The purposes of storing and processing

The data in connection with the User is collected to allow us to provide our services, as well as for the following purposes:

- Registration, authentication and login credentials and procedures;
- Access to third-party accounts;
- Analytics and content features and/or A/B testing;

- Displaying content from external and third parties' platforms
- Payments and completion of invoices;
- Heat mapping and session recording;
- Managing support services and contact requests;
- Behavioral targeting
- Social plugins and spam protection;
- User database management;
- Meta-data sent from our scanner to the server for quality control and product enhancement;
- IP addresses to check whether the software is not used on more places than is agreed.

8. Third-Party processors and controllers

Personal data may be shared with third-party processors and/or controllers. These types of services allow processors and controllers to access data from your account. These services may require your authorization.

Here you find a list with all Processors and Controllers. Please follow their respective Privacy Policies.

Entity Name	Sub-processing Activities	Country	Link to Privacy Policy
Google Analytics (Google LL.C)	Analytical information on visitors and ads	USA	https://policies.google.com/privacy?hl=en
Mouseflow	Analytical data on how people interact with the website	USA	https://mouseflow.com/privacy/
Freshworks Inc.	Helpdesk and CRM-software	USA	https://www.freshworks.com/privacy/
Protonmail Proton Technologies AG	E-mail Provider	Switzerland	https://protonmail.com/privacy-policy
Chargebee	Subscription management	USA	https://www.chargebee.com/privacy/
Stripe Inc.	Payment Service Provider	USA	https://stripe.com/privacy

Hubspot Inc.	Helpdesk, CRM and marketing software	USA	https://legal.hubspot.com/privacy-policy
Postmark App (Wildbit LLC)	US Mail Delivery	USA	https://wildbit.com/privacy-policy
Mailgun Technologies, Inc.	US Mail Delivery	USA	https://www.mailgun.com/privacy-policy
Hetzner Online GmbH	Server Hosting	Germany	https://www.hetzner.com/rechtliches/datenschutz
Sentry (Functional Software, Inc.)	Crash Report Analysis	USA	https://sentry.io/privacy/

9. Services and payment

The Personal Data collected by us, is used to complete an order on our website and to provide the Users with services, including payment and delivery. The Personal Data collected to complete a payment on our website includes credit card information, the bank account used for the transfer, and any other payment information.

10. Profiling: analysis and predictions

We may use the Personal Data we have collected through Sansec.io to create or update certain User's profiles, which allows us to evaluate User choices, preferences and behavior. By doing so, we fulfil our legal duties with regards to the legitimate purpose of creating these User profiles as outlined in these Policies. User profiles can also be created through the use of automated tools. To find out more about the profiling activities performed, Users can check the relevant sections in these Policies, in particular Paragraph 8. The User always has the right to object to this kind of profiling activities, for example to exercise its right to opt-out.

11. The rights of users

Users may exercise certain rights regarding their data stored and processed by us. Users have the right to do the following:

- Withdraw their consent at any time where they have given us their consent for the storing and processing of their Personal Data;
- The right to object to the storing and processing of their Personal Data where this is done on a legal basis other than consent;
- Access and obtain information regarding certain aspects of the processing of data and obtain a copy of the data that has been processed;
- Seek rectification, and the right to verify the accuracy of their data and request for a correction or update of that data;

- Have their Personal Data deleted or removed;
- Have their Personal Data transferred to another controller or processor in a structured and machine readable format, without any obstacles;
- File a complaint or claim before their national data protection authority.

12. Right to object to processing

Where Personal Data is processed for the public interest, exercising on behalf of an official authority or for the purposes of our legitimate interests, Users may object to such processing by providing a written complaint. Any requests to exercise User's rights can be directed to us through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by us as early as possible, and at least within one month.

13. Additional information

In addition to the information contained in these Policies, Sansec.io may provide the User upon request with additional and background information concerning the collection and processing of Personal Data for specific services. For operation and maintenance purposes, Sansec.io and any third-party service may collect files that record interaction with Sansec.io (system logs), and the use of other data for this purpose, for example IP-addresses.

14. Changes to privacy and cookie policy

We reserve the right to amend these Policies at any time, and we will make a reasonable effort to inform all Users of the change of our Policies. In addition, we strongly recommend Users to check our website regularly, referring to the date of the most recent modification of our Privacy and Cookie Policy. Should the changes affect processing activities performed on the basis of the User's consent, we shall collect again consent from the User when the applicable requires this.

Cookies

15. What are Cookies?

This website uses cookies which are tiny files that are downloaded to your computer to improve your experience. The use of cookies is common practice with almost all professional websites. This section describes what information these cookies collect, how we use it and why we sometimes need to store cookies. If you prevent these cookies from being stored on your computer, this may downgrade certain elements of our website's functionality.

16. How We Use Cookies

Cookies are used for a variety of reasons. Unfortunately there are no industry standards for disabling cookies without completely disabling the functionality and features they add to our website. We recommended you to you keep all cookies on if you are not sure whether you need them or in case they are used to provide a service that you use.

If you create an account with us then we will use cookies for the management of the signup process. These cookies will usually be deleted when you log out however in some cases they may function afterwards to remember your site preferences.

17. Disabling Cookies

You may disable cookies by adjusting the settings on your browser (see your browser Help for instructions). Disabling cookies will affect the functionality of our website and many other sites you visit. Therefore, we recommended you to not disable cookies.

18. Third Party Cookies

In some exceptional cases we also use cookies provided by trusted third parties. Cookies from Google Analytics may track how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

19. Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Article 13 and 14 of the General Data Protection Regulation (EU 2016/679). This Privacy and Cookie Policy relates solely to Sansec.io, if not stated otherwise in this document.