

Cyber Risk Aware
Creating your human firewall!!

Privacy Policy

Member of
**Microsoft Intelligent
Security Association**



Gartner
Market Guide
Security Awareness
Computer-Based
Training



**DIGITAL
SECURITY
PROVIDER**



Contents

| | |
|---|----|
| 1. Introduction | 3 |
| About Us | 3 |
| About our Privacy Policy | 3 |
| Controller | 3 |
| 2. The Information We Collect | 3 |
| Information you give us | 4 |
| Information we collect about you | 4 |
| What We do With Your Information | 5 |
| Change of purpose | 8 |
| How long we keep your information? | 8 |
| 3. Disclosure of Your Information | 9 |
| 4. International Transfers | 10 |
| 5. Security Measures | 11 |
| 6. Your Personal Data and Your Rights | 11 |
| Accessing your Personal Data | 11 |
| Right of Restriction | 11 |
| Corrections or Erasure (Right to Rectification and Right to Be Forgotten) | 12 |
| Your Right to Object | 12 |
| Data Portability | 13 |
| Profiling | 13 |
| Personal Rights | 13 |
| 7. Marketing Communications | 13 |
| General | 13 |
| Your right to object | 14 |
| 8. Third Party Material | 14 |
| 9. Changes to This Policy | 14 |
| 10. Questions or Complants | 15 |
| Approval and Review Details | 15 |

support@cyberriskaware.com

1. Introduction

About Us

Cyber Risk Aware Limited (“**Cyber Risk Aware**”) is a private company limited by shares incorporated in Ireland with company number 575504 and having a registered office at Talent Garden Dublin, Claremont Avenue, Glasnevin, Dublin 11, Republic of Ireland (“**we**”/ “**us**”/ “**our**”/ “**Cyber Risk Aware**”). We are a software security company and we provide cyber security training to help prevent cyber security breaches (the “**Services**”).

About our Privacy Policy

We respect your right to privacy and take seriously our responsibilities in relation to the processing of personal data. We do not collect or process personal data unnecessarily.

This privacy policy (the “**Policy**”) sets out important information about your rights in relation to the processing of your personal data, and the basis on which any personal data we collect from you, or that you provide to us, will be processed in connection with your use of this website (www.cyberriskaware.com) (“**our Site**” or “**the Site**”) and/or the Services. We do not knowingly attempt to solicit or receive information from children.

Controller

Under this Policy, and unless we have entered into a different agreement with you, we will be what’s known under the General Data Protection Regulation (EU) 2016/679 (the “**GDPR**”) as the “processor” of the personal data you provide to us.

2. The Information We Collect

We will collect and process the following data about you for the following purposes:

Information you give us

Your Data. This is information about you that you give us by filling in forms on our Site or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you use our Site, or the Services, or report a problem with our Site.

This is information about you that you give us by filling in forms on our site *.cyberriskaware.com ("**our site**") or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site. The information you give us may include your name, business address, work e-mail address, department name and phone number, financial and credit card information.

The information you give us may include:

- **Identity Data:** your full name, address, e-mail address, mobile phone number, address, department, country, language, business entity name, business sector, IP address per user, Web Browser version per user, Operating System version per user, Risky User Behaviour Alarm Code and Description, Employee ID number.
- **Financial Data:** your financial data, including bank account details, billing contact email address and VAT number.
- **Reported Data:** a staff member can report an actual or suspected phishing email to the clients own security team using the Cyber Risk Aware provided "PhishHuk" email client plugin; a risky user behaviour alarm code and description from a technical defense integrated with Cyber Risk Aware.

Information we collect about you.

Automatically Collected Information. With regard to each of your visits to our Site we will automatically collect the following information:

- **[Technical Data:** technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, how often you use the application and other performance data;] and
- **[Usage Data:** information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, length of visits to

certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, number of reported emails using PhishHuk, number of conducted scheduled and real-time training, phishing, smishing and cyber knowledge assessments, results of conducted scheduled and real-time training, phishing, smishing and cyber knowledge assessments, and any phone number used to call us.]

Where you subscribe to our services or enrol in any phishing or training campaign via our site, we will record when you open phishing emails, click on test website links, open test email attachments, visit and enter data in test websites, open training enrolment emails, take training courses, complete training courses, take a knowledge assessment quiz and how you answer each question, if you report an actual or suspected phishing email using PhishHuk or if you watch one of our security videos.

No special categories of personal data.

We do not require or collect any personal data that is your sensitive personal data or any special category of personal data under the GDPR, unless you decide to provide this information to us.

COOKIES: What are they and why we use them?

The Site uses cookies to distinguish you from other users of our Site. "Cookies" are small text files which are stored by your browser on your computer and are normally used to gather statistical information and to analyse trends of use or access to a website. Cookies cannot be used to run programs or deliver viruses to your computer. We use cookies to collect such information as IP-address, type of operating system, browser type, browser language, the history of queries, data concerning shows of advertising messages and user's clicks on them.

Cookies may be used to save your personal preferences so you do not have to re-enter them each time you access the Site.

What We do With Your Information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interest (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We have set out below, in table format, a description of the ways we plan to use your personal data and the legal basis we rely only to do so. We have also identified our legitimate interests where appropriate:

| Purpose/Activity | Type of data | Legal basis for processing |
|---|--|---|
| <i>To respond to your queries and to provide you with the information you request from us in relation to our Services,</i> | <ul style="list-style-type: none"> - Identity Data - Technical Data - Usage Data | <ul style="list-style-type: none"> - Necessary for our legitimate interests (to respond to new or existing customer queries and grow our business) - Performance of a contact with you |
| <i>To provide the Services, including but not limited to Cyber Security training</i> | <ul style="list-style-type: none"> - Identity Data - Technical Data - Usage Data | <ul style="list-style-type: none"> - Necessary for our legitimate interests (to respond to new or existing customer queries and grow our business) - Performance of a contract with you |
| <i>To carry out the Cyber Security training, simulated phishing, smishing, cyber knowledge assessments and forward any phishing email reported by a client staff member using our "PhishHuk" plugin to the clients security team.</i> | <ul style="list-style-type: none"> - Identity Data - Usage Data - Technical Data - Reported Data | <ul style="list-style-type: none"> - Performance of a Contract |
| <i>To manage our relationship with you,</i> | <ul style="list-style-type: none"> - Identity Data - Technical Data | <ul style="list-style-type: none"> - Performance of a contract |

| | | |
|---|---|--|
| <p><i>including notifying you about changes to the Services, or our Privacy Policy.</i></p> | <p><i>- Usage Data</i></p> | <p><i>- Necessary to comply with a legal obligation</i> <i>- Necessary for our legitimate interests (to keep our records updated and to study how customers use our products and services).</i></p> |
| <p><i>To provide you with information about services we offer that are similar to those that you have enquired about.</i></p> | <p><i>- Identity Data</i> <i>- Technical Data</i> <i>- Usage Data</i></p> | <p><i>- Necessary for our legitimate interests (to develop our products or Services and grow our business)</i></p> |
| <p><i>Where you have given us your consent to do so, to provide you with information about other services we feel may interest you.</i></p> | <p><i>- Identity Data</i> <i>- Technical Data</i> <i>- Usage Data</i></p> | <p><i>- Consent</i></p> |
| <p><i>To ensure that content is presented in the most effective manner for you and for your computer or device.</i></p> | <p><i>- Identity Data</i> <i>- Technical Data</i> <i>- Usage Data</i></p> | <p><i>- Necessary for our legitimate interests (to keep our Site and the Services updated and relevant and to develop and grow our business).</i></p> |
| <p><i>To administer and protect our business, our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.</i></p> | <p><i>- Identity Data</i> <i>- Technical Data</i> <i>- Usage Data</i></p> | <p><i>- Necessary for our legitimate interests (for running our business and as part of our efforts to keep our Site and the Services safe and secure)</i></p> |
| <p><i>To use data analytics to improve or optimise our Site, marketing, customer</i></p> | <p><i>- Technical Data</i> <i>- Usage Data</i></p> | <p><i>- Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Site and the</i></p> |

| | | |
|---|---|--|
| <i>relationships and experiences.</i> | | <i>Services updated and relevant, to develop and grow our business and inform our marketing strategy).</i> |
| <i>To measure or understand the effectiveness of advertising we serve to you and others, and, where applicable, to deliver relevant advertising to you.</i> | <ul style="list-style-type: none"> - Identify Data - Technical Data - Usage Data | <i>- Necessary for our legitimate interests (to study how customers use our products or Services, to develop them, to grow our business and to inform our marketing strategy).</i> |

Change of purpose

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 at support@cyberriskaware.com. 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. Please note that we may process your personal data without your knowledge or consent, in compliance with this Policy, where this is required or permitted by law.

How long we keep your information?

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, contractual or reporting requirements. This means that the period of time for which we store your personal data may depend on the type of data we hold. 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. For more information about our data retention policies please contact us at support@cyberriskaware.com.

3. Disclosure of Your Information

We do not sell your personal information to third parties for marketing purposes. We may disclose information to third parties if you consent to us doing so as well as in the following circumstances:

You agree that we have the right to share your personal information with the following recipients or categories of recipients:

- Any department or authorised person within our company or any member company within our group, which means any subsidiary or holding company within the meaning of sections 7 and 8 of the Companies Act 2014.
- Selected third parties including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you in relation to the Services;
 - advertisers and advertising networks that require the data to select relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users;
 - analytics and search engine providers that assist us in the improvement or optimisation of our Site;
 - government agencies, authorities or departments for the purposes of complying with any security requirements in relation to the Services;
 - analytics and search engine providers that assist us in the improvement and optimisation of our Site;
 - credit reference agencies for the purpose of assessing your credit score to the extent this is a condition of us entering into a contract with you.

We will disclose your personal information to third party recipients:

- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of our business or assets.
- if all or substantially all of our business or assets are acquired by or transferred to a third party whether in the event of a merger, reorganisation, transfer of undertakings, receivership, liquidation or other winding up or any other similar

circumstances, in which case personal data held by us will be one of the transferred assets;

- if we are under a duty to disclose or share your personal data in order to comply with any law, legal obligation or court order, or in order to enforce rights under the GDPR or other agreements.
- to protect our rights, property or safety, our customers, or others. This includes exchanging information with other companies and organisations for the maintenance and security of the Site and Services.

4. International Transfers

The data that we collect from you, where you are resident or registered in the European Economic Area ("**EEA**"), will be transferred to, and stored at, a destination in the EEA. In limited circumstances and where you are not EEA resident or registered the data that we collect from you may be transferred to, and stored at, a destination outside the EEA.

The data collected may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

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

Personal Data may be transferred to our trusted partners and service providers who maintain their servers outside of the European Economic Area ("EEA"), where the privacy and data protection laws may not be as protective as those in your jurisdiction. This is only for the purposes of providing, and to the extent necessary to provide, the Services to you. By default, all personal information remains in the "EEA". There are special requirements set out under Chapter V of the GDPR (with which we would comply) to regulate such data transfers and ensure that adequate security measures are in place to safeguard and maintain the integrity of your personal data on transfer.

For more information about this and the safeguards in place relating to the transfer, please contact us by email at support@cyberriskaware.com.

5. Security Measures

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. Your Personal Data and Your Rights

Accessing your Personal Data

You may request access at any time to a copy of the personal data we hold about you. Any such request should be submitted to us in writing and sent to support@cyberriskaware.com. We will need to verify your identity in such circumstances and may request more information or clarifications from you if needed to help us locate and provide you with the personal data requested.

There is usually no charge applied to access your personal data (or to exercise any of the other rights). However, if your request is clearly unfounded, repetitive or excessive, we may charge a reasonable fee. Alternatively, we may refuse to comply with your request in these circumstances.

Right of Restriction

You may restrict us from processing your personal data in any of the following circumstances:

- you have contested the accuracy of the personal data we hold on record in relation to you or for a period of time to enable us to verify the accuracy of the personal data;

- the processing of your personal data is unlawful and you request the restriction of use of the personal data instead of its erasure;
- we no longer require your personal data for the purpose of processing but you require this data for the establishment, exercise or defence of legal claims; or
- where you have contested the processing (under Article 21(1) of the GDPR) pending the verification of our legitimate grounds.

Corrections or Erasure (Right to Rectification and Right to Be Forgotten)

If we hold personal data concerning you which are no longer necessary for the purposes for which they were collected or if you withdraw consent for us to process your personal data, you can request the deletion of this personal data. This right, however, will not apply where we are required to process personal data in order to comply with a legal obligation or where the processing of this information is carried out for reasons of public interest in the area of public health. If the personal information we hold about you is inaccurate, you may request to have your personal information updated and corrected. To do so at any time, please contact us by email at support@cyberriskaware.com

Your Right to Object

You have the right to object to the processing of your personal data at any time:

- for direct marketing purposes
- for profiling to the extent it relates to direct marketing
- where we process your personal data for the purposes of legitimate interests pursued by us, except where we can demonstrate compelling legitimate grounds for this processing which would override your interests, rights and freedoms or in connection with the enforcement or defence of a legal claim.

To exercise your right to object at any time, please email support@cyberriskaware.com.

Should this occur, we will no longer process your personal data for these purposes unless doing so is justified by a compelling legitimate ground as described above. For more information about our marketing practices, please see the Marketing Communications section below.

Data Portability

Where we process your personal data by automated means (i.e., not on paper) and this processing is based on your consent or required for the performance of a contract between us, you have the right to request from us a copy of your personal data in a structured, commonly used machine-readable format and, where technically feasible, to request that we transmit your personal data in this format to another controller.

Profiling

Profiling is an automated form of processing of personal data often used to analyse or predict personal aspects about an individual person. This could relate to a person's performance at work, economic situation, health, personal preferences, reliability, behaviour, location or movements. An example of this would be where a bank uses an automated credit scoring system to assess and reject a loan application.

We do not engage in profiling or automated processing for profiling purposes.

Personal Rights

The rights described in this section are personal rights and are exercisable only by the individual person (or data subject) concerned.

7. Marketing Communications

General

We will not use your data to send marketing communications to you about promotions, competitions, updates and new products or services that may be of interest to you, unless we have your permission to do so.

Your right to object

You have the right to object to the processing of your personal data for our marketing purposes. To object or if you change your mind at any later time, you can withdraw your consent to the processing of your personal data for such marketing purposes by contacting us at support@cyberriskaware.com. You may also opt out of receiving marketing communications at any time by selecting the unsubscribe option when you receive an electronic marketing communication from us. The withdrawal of your consent will not impact upon the lawfulness of processing based on your consent prior to the withdrawal.

8. Third Party Material

We always endeavour to deal with vendors and other third parties who are GDPR compliant or, in the case of the third parties located outside of the EEA, who have adequate security measures in place to safeguard the security of personal data. That said, we, our employees, agents, holding company and subsidiaries, accept no liability howsoever arising for the content or reliability of any third party materials or websites referenced by hyperlink or other means on the Site or for the data collection and use practices or security measures used by such third parties. If you submit personal data to any of those sites, your personal data is governed by their privacy policy. We encourage you to carefully read their privacy policies.

9. Changes to This Policy

Any changes made to this Policy from time to time will be published at the Site.

Any material or other change to the data processing operations described in this Policy which is relevant to or impacts on you or your personal data, will be notified to you in advance by email. In this way, you will have an opportunity to consider the nature and impact of the change and exercise your rights under the GDPR in relation to that change (e.g., to withdraw consent or to object to the processing) as you see fit.

10. Questions or Complaints

Contact Us. If you have any questions or complaints relating to this Policy, please contact us at:

Cyber Risk Aware Limited

Talent Garden Dublin

Claremont Avenue, Glasnevin

Dublin 11,

Republic of Ireland

Email: support@cyberriskaware.com

www.cyberriskaware.com

Supervisory Authority. We are committed to complying with the terms of the GDPR and to the processing of personal data in a fair, lawful and transparent manner. If, however, you believe that we have not complied with our obligations under the GDPR, you have the right to lodge a complaint with the Office of the Data Protection Commissioner.

Approval and Review Details

| Approval and Review | Details |
|-------------------------|---------------------|
| Approval Authority | CEO – Stephen Burke |
| Data Protection Officer | Stephen Burke |
| Next Review Date | 01/05/2022 |

| Approval and Amendment History | Details |
|--------------------------------------|--------------------------|
| Original Approval Authority and Date | Stephen Burke 01/05/2018 |

| Approval and Review | Details |
|------------------------------|---|
| Amendment Authority and Date | 13 th July 2021 - CEO – Stephen Burke – amended that we are the processor and not the controller of client data when stored in each client portal. |