

1. Terms of Service

This Privacy Policy forms an integral part of Perimeter 81's Terms of Service, and the provisions thereof, including (without limitation), the provisions regarding limitation on damages, governing law and dispute resolution, apply to this Privacy Policy.

Unless otherwise stated, any defined terms used herein shall have the meaning assigned to them in the Terms of Service.

For the purposes hereof, "Information" means facts and other information and data about you, including (but not limited to) your personal information which you elect to disclose by using the Service, such as your name, telephone number, and email address.

"Personal Data/Personal Information" means personal data within the meaning of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (The General Data Protection Regulation – GDPR), processed by Perimeter 81 Ltd. (or a Sub-processor) on behalf of the Customer pursuant to or in connection with the Agreement.

2. Your Consent

By accessing, viewing and/or otherwise using the Site and Service, you consent to:

- (i) The collection, transfer, manipulation, storage, disclosure and other uses of your Information as described in the Terms of Service and in this Privacy Policy, and
- (ii) To the transfer of such Information outside of the country where you reside in and outside the European Economic Area ("EEA"), to other countries for storage, processing and use by us, and to the transmission of data on an international basis.

3. Collection of Information

- **Creating a Tenant:** When a User creates or reconfigures a Tenant, the business owner provides his/her e-mail address, company name, contact details and any other personal or preference information that you elect to provide to us.

- **PERIMETER 81's Website Data:** Our website servers automatically record information created by User's use of our website. Such data is collected by web server logs and cookies (see explanation in Section 4 below) and may include information such as the date and time of visits to PERIMETER 81's website, the pages viewed, time spent at our Site, and the Internet sites visited just before and just after our Site.

- **Service Use Data and Logs:** We collect minimal usage statistics to maintain our quality of service. To protect your business and provide the business owner with valuable audit and monitoring data we record the following data:

1. - Admin actions – We record all admin actions including: inviting new team member, deleting a team member, changing team permissions, creating new cloud-based access gateways and any other action that can be taken on our management portal.

2. – Team member actions – We record connection and login timestamp, login success / error, location of the device that was connected, the hostname of the connected devices of the team members, the server the business user has been connected to and the time stamps of the connections. As for private access gateways, which are used to access secured business environments we do log origin IP address that have been connected from to enhance the security and business audit capabilities. For public locations (based on the business owner permissions) we do not log any IP addresses.

- **Payment Data:** In order to pay for the use of our Service, we will direct you to perform payment through one of the Third-Party Payment Processors we work with. The Third-Party Payment Processor of your choosing will provide us with, and we shall then store, the date on which you made the payment and the date that your Subscription Plan will expire, along with a generic number (the "Order ID Number"). We need your Order ID Number in order to link your order to your Tenant.

In addition, in case you selected to pay through a credit card we will also store the last four (4) digits of your credit card number.

We also store your name and address, and this data may also be independently stored by the Third-Party Payment Processor handling the transaction.

We store this information as it enables us to know when your Subscription Plan will expire and to prevent and detect fraud.

You may contact us, as specified in Section 11 below, in order to request the deletion of your home address from our servers.

We are not responsible for any Third-Party Payment Processor handling your transaction and you should refer to the Third Party Payment Processor's privacy policy to see how they use your data since it is subject to their rules and policies.

- **Information Posted on the Site:** As a User you may post Comments on the Site. Any personal information you elect to post on the Site as part of such Comments, and the sharing of such personal information, is done at your own risk. Any personal information post by you on the Site may be saved, copied, re-sent or otherwise used by other Users, and we cannot control the use of such personal

information by any such recipients. We cannot and do not guarantee that personal information posted by you will not be used by unauthorized persons. You understand and acknowledge that, even after personal information, that was posted by you, was removed from the Site, such personal information may be collected, used and redistributed if stored by other Users.

- **Contacting PERIMETER 81:** If you email or otherwise contact us, we may keep your message, email address, and contact information to respond to your request. Your provision of such information is entirely optional.

4. Cookies

A cookie is a small text document, which often includes an anonymous unique identifier. When you visit an Internet site, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each Internet site can send its own cookie to your browser if your browser's preferences allow it, but to protect your privacy, your browser only permits an Internet site to access the cookies it has already sent to you, not the cookies sent to you by other sites.

As you use our Site, the Site uses its cookies to differentiate you from other Users. Cookies, in conjunction with our Internet server's log files, allow us to calculate the aggregate number of people visiting our Site and which parts of the Site are most popular. This helps us gather feedback in order to constantly improve our Site and better serve our customers. Cookies do not allow us to gather any personal information about you and we do not generally store any personal information that you provided to us in your cookies.

5. Information Sharing and Disclosure

We may use Information we collect in order to:

- facilitate the provision of the Service to you,
- maintain and improve Perimeter 81's site and services,
- sending notices to you, and to
- protect the rights of Perimeter 81, of its Users and of other third parties (e.g., in order to prevent and detect (i) fraud against our Service (such as credit card fraud (and (ii) abuse of our network (such as spamming other illicit activity).

We do not disclose personally identifying Information to third parties, except if we -

- believe that it is necessary to comply with a law, regulation, legal request or legal process; to protect the rights, property or personal safety of Perimeter 81, its Users and any other person; to address fraud, security or technical issues; or to protect Perimeter 81's rights (including investigation of potential violations thereof) or property;
- are involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, where your Information may be sold or transferred as part of that transaction. In any such transfer of Information, we will ensure the confidentiality of any personal Information involved in such transactions and provide notice before personal Information is transferred and becomes subject to a different privacy policy;
- believe that it is necessary for the provision of the Service, such as responding to your requests for customer services or disclosure to third parties who host the Service at a co-location facility for servers; or
- have obtained your consent, as provided, for example, under Section 2 above.

We may share with third parties certain pieces of aggregated Information, which does not identify you individually.

6. Protection of Personal Information

- We take administrative and technical measures to safeguard your personal Information against loss, theft, and misuse, as well as unauthorized access, alteration, disclosure or destruction.
- We process personal Information on servers located in various countries worldwide.
- Any improper collection or misuse of Information provided via our Site or Service is a violation of this Privacy Policy.
- We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between PERIMETER 81 and an individual.

7. External Sites

We are not responsible for the practices employed by External Sites uploaded or linked to or from our Site, nor the information or content contained therein. When a User uses a link to go from our Site to External Sites or when a User accesses an External Site while using our Service, our Privacy Policy is no longer in effect. A User's browsing and interaction on any External Site, including, but not limited to, Internet sites which have a link on our Site, is subject to that External Site's own rules and policies.

8. Changes to this Policy

We may revise this Privacy Policy from time to time. Your continued use of the Site and/or Service will be deemed to constitute your acceptance of any and all such changes.

9. Information Access

If under applicable law, you have the right to access Information held about you, such right of access can be exercised in accordance with the applicable law. Any access request may be subject, to the extent allowed by applicable law, to a fee of US \$10 (ten US dollars) to meet our costs in providing you with details of the Information we hold about you. To make an access request please email: legal@Perimeter81.com.

10. Contact Information

If you have any questions or comments about this Privacy Policy, please contact us at legal@Perimeter81.com.

You can [view](#) our Data Processing Agreement/addendum (DPA) online. If you need a signed copy of the DPA, you can download it, send a signed copy to legal@Perimeter81.com, and we will provide you a countersigned copy.

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This Privacy Policy is effective as of July 22, 2019 and was amended as of January __, 2021.