

Privacy Policy

Last Updated: July 6, 2025

This Privacy Policy ("**Privacy Policy**") describes how Akeyless Security Ltd., together with its subsidiary Akeyless Security USA, Inc. (collectively, "**Akeyless**", "**we**", "**us**" or "**our**") collect, use and disclose certain information including Personal Data, and the choices you make about the information.

This Privacy Policy is an integral part of our <u>Terms of Service</u> ("**Terms**"), and governs our practices regarding the collection, processing, usage and transfer of certain data, including Personal Data (as defined below), from:

- a) Customers who sign up for and use our cloud-based SaaS solution ("Customer" and "Services" respectively);
- b) Individuals who visit and browse our website available at: <u>https://www.akeyless.io/</u> ("website"), or engage with our blogs, demos, or other similar forums available through the website ("Prospect"); and
- c) Individuals who visit our webpage for partners available at our website at <u>https://www.akeyless.io/partners/</u> to learn about or become our reseller partner, or to register a deal through the Partner Account or otherwise on the website designated form ("Partners" and "Partner's Deal" respectively).

Any capitalized terms not defined herein shall have the meaning ascribed to them in the Terms. Customers, Prospects and Partners shall be further, collectively and separately, referred to as "**you**".

Any Personal Data you provide is made at your free will and consent (where required under applicable data protection laws), and you acknowledge that you are not under any statutory obligation to provide us with Personal Data. However, we must collect or receive some Personal Data to provide the Service, and if you will not provide us with such Personal Data, we will not be able to fulfill certain purposes, for example, provide certain Services or enable use of certain features – all as described under Section 4 below - "**Personal Data Sets We Process & Purpose of Collection and Use**" which details the purposes for which each Personal Data set is collected

This Privacy Policy applies to all individuals world-wide, however, certain jurisdictions require that applicable disclosures will be provided in a certain way and format, and therefore additional notices apply as follows:

Additional Information to California Residents: In the event you are a California resident– please also review our <u>CCPA Privacy Notice</u> to learn more about our privacy practices with respect to the California Consumer Privacy Act.

Additional Notice to Specific US States Residents: In the event you are a resident of certain US states, additional disclosures and rights may apply to you – please also review Section 13 below, "US States Privacy Notices", to learn more about our privacy practices and your rights under the privacy and data protection legislation which may apply to you as a resident of those states.



In addition to this Privacy Policy, in the event you apply for a job ("**Candidate**"), please review the <u>Candidate Privacy Notice</u> which applies to the processing of Personal Data during, or after, the hiring process, in Akeyless.

1. POLICY AMENDMENTS

We reserve the right to amend this Privacy Policy from time to time, at our sole discretion. The most recent version of this Privacy Policy will always be posted on the website and the update date will be reflected in the "Last Amended" heading. We will provide notice to you if these changes are material, and, where required by applicable law, we will obtain your consent. Any amendments to the Privacy Policy will become effective immediately, unless we notify otherwise. We recommend you review this Privacy Policy periodically to ensure that you understand our most updated privacy practices.

2. CONTACT INFORMATION AND DATA CONTROLLER INFORMATION

Akeyless Security Ltd. is incorporated under the laws of the state of Israel, is the Controller (as such term is defined under the General Data Protection Regulations "**GDPR**" or equivalent privacy legislation) of the Personal Data we collect from you. Meaning, we control the processing of Personal Data described under this Privacy Policy and decide upon the purpose and means of collection and processing.

For any question, inquiry or concern related to this Privacy Policy or the processing of your Personal Data, you may contact as follows:

DPO Contact Information: privacy@akeyless.io

By Mail:

Akeyless Security Ltd.

Ze'ev Jabotinsky St. 7, 33 Floor, Ramat Gan, Israel 5252007

Representative for Data Subjects in the EU and UK Contact Information:

We value your privacy and your rights as a data subject and have therefore appointed **Prighter Group** with its local partners as our privacy representative and your point of contact. Prighter gives you an easy way to exercise your privacy-related rights (e.g., requests to access or erase personal data). If you want to contact us via our representative, Prighter, or make use of your data subject rights, please visit the following website <u>https://prighter.com/q/19968914192</u>

Please note that Akeyless <u>Data Protection Agreement</u> (DPA) governs how Akeyless process Personal Data in its role as a "Data Processor" (or a comparable role such as "service provider" in certain jurisdictions) on behalf of its Customers and is not governed by this Privacy Policy.

3. INFORMATION PROCESSED BY AKEYLESS

We may collect two types of information from you, depending on your interaction with us.



The first type of information is non-identifiable and anonymous information ("**Non-Personal Data**"). We are not aware of the identity of the individual from who we have collected the Non-Personal Data. Non-Personal Data collected may include technical information regarding your device or browser, type of operating system, scope, frequency, interactions with the website, and other technical information regarding the device used – all is considered as Non-Personal Data when collected on an aggregate basis, or otherwise not combined with any identifiers. We may further process and anonymize Personal Data in a manner that the data will be Non-Personal Data. Non-Personal Data may be used by us without limitation and for any purpose. Some of this information may be considered "de-identified" under applicable laws and when we rely on data that has been "de-identified", we will take reasonable measures to ensure that the de-identified information cannot be associated with an individual, household, or device and not attempt to re-identify it.

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual ("**Personal Data**").

For the avoidance of doubt, any Non-Personal Data connected or linked to Personal Data shall be deemed as Personal Data as long as such connection or linkage exists.

4. PERSONAL DATA SETS WE PROCESS & PURPOSE OF COLLECTION AND USE

The table below details the types of Personal Data we process, the purpose and our processing operations, and the lawful basis for such processing (subject to GDPR, if applicable):

PERSONAL DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
	PROSPECTS, CUSTOMERS, PART	NERS
Online Identifiers and Usage Data: When you interact with our website, landing pages, or otherwise, we may collect your online identifiers, such as IP address and Cookie ID, unique identifiers, etc. ("Online Identifiers"). Additional information is automatically collected regarding your website online behavior. Such information includes the pages you viewed, click stream data, access time stamp, referrals, etc.	 Online Identifiers and certain Usage Data are used: 1. To operate the website and enable its proper functionality (for example, to automatically recognize you the next time you enter the website); 2. For security and fraud prevention purposes (for example, to authorize you are a person); 3. For debugging and to resolve technical problems, 4. To understand how individuals use the website; 5. To measure the effectiveness of marketing 	Online Identifiers which are collected through strictly necessary cookies which are required for the proper and basic operation of the website will be processed in our legitimate interest. Usage Data collected through third-party tracking technologies, including any analytic or marketing cookies, will be processed based on your consent which we will obtain through our cookie notice and consent management. You may withdraw consent at any time by using the cookie preference settings: <u>https://www.akeyless.io/ cookie-declaration/</u>



PERSONAL DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
(collectively " Usage Data "). We are further able to track your behavior with other assets, such as – did you open and read the emails we sent. Online Identifiers and Usage Data are collected through our use of our or third party's tools such as cookies and similar technologies.	campaigns we run in order to track conversions, build targeted audience, and market our services to people who have taken some action on the website. Certain Online Identifiers and Usage Data are indirectly processed by third-party marketing and analytic tools, for analytic, marketing and targeting purposes.	
Website Engagement Data & Sales Activity Data: We use tools on our website which provides us with information and insights regarding your website interactions such as business intelligence tools that may identify your business organization's IP referring URL (i.e., the webpage or advertising campaign that directed you to our website), and other similar business websites you visited during your session ("Website Engagement Data"). If Website Engagement Data is associated with an Online Identifier, we process it as Personal Data in accordance with our privacy practices. We use marketing tools that may combine the Website Engagement Data with additional activities	 Website Engagement Data & Sales Activity Data are used: 1. To support and enhance our go-to-market services; 2. To maintain and improve relationships with Prospects by tracking interactions and engagement; 3. To analyze and optimize sales and marketing strategies, campaigns, and performance; 4. To generate reports and insights that inform business decisions and strategy; 5. To facilitate and manage communications and meetings with Prospects; 6. To measure the effectiveness of marketing campaigns we run in order to track conversions, build targeted audience, and market our Services to people who have taken some action on our website. 	Website Engagement Data collected through third-party tracking technologies will be processed based on your consent which we will obtain through our cookie notice and consent management. You may withdraw consent at any time by using the cookie preference settings: <u>https://www.akeyless.io/ cookie-declaration/</u> , or by managing opt-out through your browser or device. Processing your Sales Activity Data for marketing purposes is made subject to our legitimate interest.



PERSONAL DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
such as emails sent and received, calls conducted and recorded, call transcripts and insights on such calls and meetings, marketing campaigns, notes, pipeline status, lead sources and onboarding progress ("Sales Activity Data").		
Contact Information: In the event you voluntary contact us for support or any other inquiries, either through an <u>online</u> form available on the website, <u>support form</u> to submit a ticket, <u>Partner's</u> <u>Deal registration form</u> , by sending us an email or by any other means of communications we may make available to you, register to webinar, newsletter, provide your feedback, respond to a survey, or otherwise, you will be requested to provide us certain information such as your name, job title, company name, email address, phone number, as applicable ("Contact Information").	 Contact Information is used: 1. To provide you with the support you requested or to respond to your inquiries. The correspondence with you and its contents may be processed and stored by us in order to improve our customer service and in the event we believe it is required to continue to store it, for example, in the event of any claims or in order to provide you with any further assistance (if applicable); 2. If you registered to receive our newsletter or to webinar, we will use your Contact Information in order to provide you with the requested communications; 3. We may use your email address to send you service communications and marketing promotions, such as new features, additional offerings, special opportunities or any other information we think you 	We process the Contact Information in order to provide you the requested support or respond to your inquiry, maintaining a suppression list, providing Direct Marketing, subject to our legitimate interest. If you are contacting us on behalf of another person, we value your assistance and care for others, please note that it is your responsibility to make sure that any person whose Personal Data you provide is aware of the principles of this statement and agrees that you will provide Personal Data to us on this basis. If you register to receive our newsletter, provided us your feedback or responded to a survey, we process Contact Information and other data you provided subject to your consent. You may withdraw consent at any time using the " unsubscribe " option within the email, by contacting us or by submitting a DSR as available <u>here</u> .



PERSONAL DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
	 will find valuable ("Direct Marketing"); 4. We will further use your email address, if applicable, under our suppression list, when you request to optout to ensure we comply with such preference and choice. 	When you register to our webinar and we process your Contact Information in order to send you Webinar invitation, we do so subject to our legitimate interest to provide a seamless webinar experience, including sending confirmations and reminders
	CUSTOMERS, PARTNERS	
AccountDetails:In order to use our Services, (including the free trial) you will be required to register and create an account. During the registration process you will be requested to provide us with your Contact Information (as defined above) and additional information on the company you represent (if applicable), billing and payments information, etc. ("Account Details").Customers may gister through your GitHub or Google account, which may share certain information about you. You should always review, and if necessary, adjust your 	Account details are used to provide you customer or partner support needed, the Services and Partners' benefits (including billing and invoicing) and to send you Direct Marketing (as defined above) communications. We will retain such correspondence for as long as needed.	We process your Account Details to fulfill our contractual obligations to you, all as agreed in the terms of use, EULA or other agreement governing your use of the Service. Processing of your Account Details for Direct Marketing purposes is made subject to our legitimate interest. You can opt-out at any time using the " unsubscribe " option within the email.



PERSONAL DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
Telemetry Data and Device Data: When you use the Services, access your account, the web-app cloud-based environment is monitored, we automatically process, generate and collect information on how you use the Services, the click streams within Services, the features used, duration, the credentials (access logs that identify your email, user name, and credentials), crash data and analytics, etc. We record how you interact with our Service. We log crashes and access (collectively, "Telemetry Data"). We also collect technical information about your computer, or other devices you use to access the Services ("Device Data").	 Telemetry Data and Device Data are used: 1. To help us to understand how you are using the Services, and how to better provide and improve our Services; 2. To troubleshoot, to identify trends, usage, activity patterns, and areas for integration and to better understand our business, analyze our operations, maintain, improve, innovate, plan, design, and develop the Service and our new products, features and technologies that benefit our Customers and the public; 3. To resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair the services. 	We process Telemetry Data and Device Data subject to our legitimate interest.

Please note that the actual processing operation per each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. The transfer of Personal Data to third-party countries, as further detailed in the "Data Transfer" Section 10 below, is based on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of the Services and to enforce the Terms, EULA or other agreement, as well as to protect the security or integrity of our databases and the Services, and to take precautions against legal liability. Such processing is based on our legitimate interests.

We may collect different categories of Personal Data and Non-Personal Data from you, depending on the nature of your interaction with the Services provided through the website and Services, as detailed above.

5. HOW WE COLLECT INFORMATION



Depending on the nature of your interaction with the website and Services, we may collect information as follows:

- Information you provide us directly for example, when you register and create an account or correspond with us.
- Information we receive from third parties for example, through Partners (as defined above), or data enrichment partners and business intelligence providers, or if you access the Services through a third-party connection or log-in, such as your GitHub or Google account, such third party may pass certain information about your use of their service to us.
- Information we receive automatically we will collect your Online Identifiers, Usage Data and Telemetry Data, including analytics data (or use third-party measurement and marketing tools). For more information on the cookies we use and how to opt out of third-party collection of this information, please see Section 6 below "Cookies & Tracking Technologies".

6. COOKIES & TRACKING TECHNOLOGIES

We use "cookies" (or similar tracking technologies) when you access or interact with the Services or the website. The use of cookies is a standard industry-wide practice. A "cookie" is a small piece of information that a website assigns and stores on your computer while you are viewing a website. Cookies can be used for various purposes, including allowing you to navigate between pages efficiently, for statistical purposes, as well as for advertising purposes. You can find more information about our use of cookies, as well as change your settings and preferences, as detailed under <u>cookie declaration</u>.

7. SHARING PERSONAL DATA

We share your Personal Data with third parties, including our Partners or service providers that help us provide our Services. You can find in the table below information about the categories of such third-party recipients.

CATEGORY OF RECIPIENT	DATA THAT WILL BE SHARED	PURPOSE OF SHARING
Service providers	All types of Personal Data	We employ other companies and individuals to perform functions on our behalf. Examples include: sending communications, processing payments, analyzing data, providing marketing and sales assistance (including advertising and event management), identifying errors and crashes, conducting customer relationship management, and providing training. These third-party service providers have access to Personal Data needed to perform their functions, but they are prohibited from using your Personal Data for any purposes other than providing us with requested services.



Marketing partners	Online Identifiers, Usage Data, Telemetry Data, Device Data	We engage with marketing partners and share Personal Data to market and promote our Services, including for targeted ads. These may include social media partners or other marketing services operators, including by way of placing their cookies or other tracking technologies on our website. These marketing partners may combine your Personal Data with other data they collect independently from you through other websites you visit online.
Any acquirer of our business	All types of Personal Data	We may share Personal Data, in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Privacy Policy.
Affiliated company	All types of Personal Data	We may share certain information with our affiliated company, for sales and marketing purposes.
Law enforcement, governmental agencies or authorized third parties	Subject to law enforcement authority request	For law enforcement, enforcement of our policies and agreements other customer rights and security detections, etc. We may share certain data when we believe it is appropriate to with, governmental agencies or authorized third parties, or protect the rights, property, or security of Akeyless, our customers, or others.

For more information about the third-party recipients, please see: <u>https://www.akeyless.io/list-of-sub-processors/</u>

8. DATA RETENTION

We retain Personal Data we collect as long as it remains necessary for the purposes set forth above, all in accordance with applicable laws, or until an individual expresses a preference to opt-out.

Other circumstances in which we will retain your Personal Data for longer periods of time include: (i) where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements; (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges; or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data. Please note that except as required by applicable law, we may at our sole discretion, delete or amend information from our systems, without notice to you, once we deem it is no longer necessary for such purposes.

9. SECURITY



At Akeyless, security is our highest priority. We design our systems with your security and privacy in mind. We have implemented physical, technical, and administrative security measures for the Services that comply with applicable laws and industry standards. The methods that we use to protect your Personal Data includes: maintaining compliance programs that validate our security controls; protecting the security of your information during transmission to or from our website, applications, products, or Services by using encryption protocols and software; following the Payment Card Industry Data Security Standard (PCI DSS) when handling credit card data.

Please review our <u>Information Security Policy</u> to learn more.

Note that we cannot be held responsible for unauthorized or unintended access beyond our control, and we make no warranty, express, implied, or otherwise, that we will always be able to prevent such access.

Please contact us at: <u>privacy@akeyless.io</u> if you feel that your privacy was not dealt with properly, in a way that was in breach of our Privacy Policy, or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data. We will make a reasonable effort to notify you and the appropriate authorities (if required by applicable law) in the event that we discover a security incident related to your Personal Data.

10. DATA TRANSFER

Due to our global business operation, your Personal Data may be transferred to, and processed in, countries other than the country in which you reside. These countries may have data protection laws that are different to the laws of your country. However, in all cases, we will take appropriate measures to ensure that your Personal Data receives an adequate level of data protection upon its transfer.

Specifically, if and where Personal Data collected within the EEA are transferred outside the EEA, to countries or frameworks which were not granted with an adequacy decision by the European Union, and therefore do not provide an adequate level of protection to your Personal Data while it is transferred to such third-country or under such framework, such transfer is subject to and made pursuant with the <u>standard contractual clauses</u>.

Additionally, if and where Personal Data collected within the United Kingdom are transferred outside the United Kingdom, to countries or frameworks which were not granted with an adequacy decision by the UK Information Commissioner Office ("**ICO**") and therefore do not provide an adequate level of protection to your Personal Data while it is transferred to such third-country or under such framework, such transfer is subject to and made pursuant with the <u>UK standard contractual clauses</u>.

Personal Data transferred from within the EU and the UK to Akeyless Security USA Inc., are subject to the EU-U.S. Data Privacy Framework Principles with regard to the processing of Personal Data received from the European Union in reliance on the EU-U.S. DPF and the UK Extension to the EU-US DPF, as applicable, as detailed in our Data Privacy Framework Statement available at <u>https://www.akeyless.io/data-privacy-framework-statement/</u>.

11. PRIVACY RIGHTS



We acknowledge that different people have different privacy concerns and preferences. Our goal is to be clear about what information we collect so that you can make meaningful choices about how it is used. We allow you to exercise certain choices, rights, and controls in connection with your information. Depending on your relationship with us, your jurisdiction and the applicable data protection laws that apply to you, you have the right to control and request certain limitations or rights to be executed.

In the table below you can review your rights depending on your interaction with us, how you can exercise them, and appeal a decision we take in this regard, any specification per geo-location or territory are available below the table:

RIGHT TO BE INFORMED, RIGHT TO KNOW	You have the right to confirm whether we collect Personal Data about you. You may also have the right, at our option, to receive a list of the specific third parties to which we have disclosed either your Personal Data or any Personal Data. If you wish to know if we collect Personal Data about you, please review this Privacy Policy.
ACCESS RIGHTS	You further have the right to know which Personal Data we specifically hold about you, and receive a copy of such or access it, if you wish to receive a copy of the Personal Data or Personal Information, please submit a Data Subject Request form (" DSR ") as available <u>here</u> .
RIGHT TO CORRECTION	You have the right to correct inaccuracies in your Personal Data, taking into account the nature and purposes of each processing activity. Please submit a DSR as available <u>here</u> .
RIGHT TO BE FORGOTTEN, RIGHT TO DELETION	In certain circumstances, you have the right to delete the Personal Data we hold about you. Please submit a DSR as available <u>here</u> .
RIGHT TO PORTABILITY	You have the right to obtain the Personal Data in a portable, and to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance. We will select the format in which we provide your copy. If you wish to exercise this right, please submit our DSR as available <u>here</u> .
RIGHT TO OPT OUT OR WITHDRAW CONSENT UNDER THE EU, AND IN THE US THE RIGHT TO OPT OUT FROM: (I) SELLING PERSONAL DATA; (II) RIGHT TO OPT OUT FROM TARGETED ADVERTISING; AND (III) RIGHT TO OPT OUT FROM PROFILING	 Direct Marketing: You have the right to opt-out from Direct Marketing, by unsubscribing through the email received. Newsletter: you have the right to withdraw consent when you no longer wish to be in our newsletter list, by unsubscribing through the email received or by submitting a DSR as available here. Cookies: when you no longer wish for cookies to track your behavior for analytic and marketing purposes, change your preferences through the cookie settings available here. Sale of Personal Data for targeted advertising, monetary gain or profiling, or Share or Sale of Personal Information for analytic or marketing: If and to the extent applicable, you have the right to opt out of the sale of your Personal Data, for the purposes of targeted



AND AUTOMATED DECISION MAKING	advertising, sale to a third party for monetary gain, analytic, etc. through the cooking setting on our website, available <u>here</u> . Last, you are able to install privacy-controls in the browser's settings to automatically signal the opt-out preference to all websites you visit (like the " <u>Global Privacy Control</u> "). We honor the Global Privacy Control, where applicable, subject to your jurisdiction, as a valid request to opt- out of the sharing of information linked to your browser. Note you may have the right to authorize another person acting on your behalf to opt out (including by technical tools and opt out signals).
RIGHT TO APPEAL OR COMPLAINT	If we decline to take action on your request, we shall so inform you without undue delay as required under applicable laws. The notification will include a justification for declining to take action and instructions on how you may appeal, if applicable. Under the EU you have the right to lodge a complaint with the supervisor authority or the Information Commissioner in the UK.
NON-DISCRIMINATION	Such discrimination may include denying a good or service, providing a different level or quality of service, or charging different prices. We do not discriminate our users.

12. CHILDREN

Our Services are not intended for use by children, and we do not knowingly collect or maintain information about anyone under the age of 16. Please contact us at: <u>privacy@akeyless.io</u> if you have reason to believe that a child has shared any information with us.

13. US STATES PRIVACY NOTICES

(A) ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

This section applies only to California residents. Pursuant to the California Consumer Privacy Act of 2018 effective November 2020, and as amended by the CPRA, effective January 1, 2023 (collectively "**CCPA**").

Please see the CCPA Privacy Notice, available <u>here</u>, which discloses the categories of personal information collected, purpose of processing, source, categories of recipients with whom we share the personal information for a business purpose, whether the personal information is sole or shared, the retention period, and how to exercise your rights as a California resident.

(B) ADDITIONAL NOTICE TO US RESIDENTS

The section is applicable to residents of certain U.S. states (depending on the applicable state law, acting in an individual or household context and not in a commercial or employment context or as a representative of business), including the following state laws: Colorado Privacy Act; Connecticut Data Privacy Act; Delaware Personal Data Privacy Act; Florida Digital Bill of Rights; Indiana Consumer Data Protection Act; Iowa Consumer Data Protection Act; Kentucky Consumer Data Protection Act; Maryland Online Data Privacy Act; Minnesota



Consumer Data Privacy Act; Montana Consumer Data Privacy Act; Nebraska Data Privacy Act; Nevada S.B. 370; New Hampshire Data Privacy Act; New Jersey Data Protection Act; Oregon Consumer Privacy Act; Rhode Island Data Transparency and Privacy Protection Act; Texas Data Privacy and Security Act; Tennessee Information Protection Act; Utah Consumer Privacy Act, and Virginia Consumer Data Protection Act.

We are required to provide you with a clear and accessible privacy notice that includes the categories of Personal Data processed, purpose of processing, instructions for exercising consumer rights and appealing decisions, categories of Personal Data shared with third parties, categories of third parties with whom data is shared, and any sale of data or targeted advertising.

Under Section 4 – "Personal Data Sets We Process & Purpose of Collection and Use" of this Privacy Policy, we describe our collection and processing of Personal Data, the categories of Personal Data that are collecting and processing, and the purposes for which Personal Data is processed, stored or used.

Under **Section 7** – *"Sharing Data with Third Parties"* of this Privacy Policy, we detail and disclose the categories of third parties we share Personal Data with for business purposes. We will not collect additional categories of Personal Data or use the Personal Data we collected for a materially different, unrelated, or incompatible purpose without obtaining your consent.

Additionally, under **Section 11 – "Privacy Rights**" of this Privacy Policy, we detail and disclose your rights and how to exercise such requests.

<u>"Sale" of Personal Data</u>: Under certain US privacy laws the term "sale" is referring to disclosing or making available Personal Data to a third-party in exchange for monetary or other valuable consideration, including for targeted advertising purposes. We do not "sell" information as most people would commonly understand that term, we do not, and will not, disclose your Personal Data in direct exchange for money or some other form of payment. However, subject to the definition of the term "Sale" under certain US privacy laws, we may "sell" the following categories of Personal Data when we use cookies or other third-party services:

- Online Identifiers and Usage Data online identifiers such as IP and Cookie ID;
- Usage Data and Device Data such as your engagement with our website.

Appeal Rights

Depending on your state of residency, you may be able to appeal a decision we have made in connection with your privacy rights request, by contacting us as instructed in our response. Please send your appeal request with a summary of the request and decision you want to appeal to <u>privacy@akeyless.io</u>.

Not more than 60 days after receipt of an appeal, and always in accordance with the timelines set by the applicable US Privacy Laws, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reason for the decision.

If you are not happy with our response, depending on your jurisdiction, you may have the right to lodge a complaint against us with the relevant State's Attorney General:

- Colorado Attorney General as follows: Colorado AG at <u>https://coag.gov/file-complaint</u>.
- Connecticut Attorney General at link: <u>https://www.dir.ct.gov/ag/complaint /</u>.
- Delaware Attorney General at <u>https://attorneygeneral.delaware.gov/fraud/cmu/complaint/</u>.



- Florida Attorney General at <u>https://www.myfloridalegal.com/consumer-protection/consumer-complaint-form</u>.
- Indiana Attorney General at https://www.in.gov/attorneygeneral/consumer-protection-division/file-a-complaint/.
- Iowa Attorney General at <u>https://www.iowaattorneygeneral.gov/for-consumers/file-a-consumer-complaint</u>.
- Kentucky Attorney General at <u>https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm</u>.
- Maryland Attorney General at <u>https://www.marylandattorneygeneral.gov/Pages/CPD/Complaint.aspx</u>.
- Minnesota Attorney General at <u>http://www.ag.state.mn.us/</u>
- Montana Attorney General at <u>https://dojmt.gov/consumer/consumer-complaints/</u>.
- Nebraska Attorney General at <u>https://ago.nebraska.gov/constituent-complaint-form</u>.
- Nevada Attorney General at https://ag.nv.gov/Complaints/CSU_complaints_FAQ/
- New Hampshire Attorney General at <u>https://onlineforms.nh.gov/app/#/formversion/e0c5d644-c9d8-4056-a7cc-24d29c446fcb</u>.
- New Jersey Attorney General at https://www.njoag.gov/contact/file-a-complaint/.
- Oregon Attorney General at https://www.doj.state.or.us/consumer-protection/contact-us/.
- Rhode Island Attorney General at https://riag.ri.gov/forms/consumer-complaint
- Texas Attorney General at <u>https://www.texasattorneygeneral.gov/consumer-protection/file-consumer-complaint</u>.
- Tennessee Attorney General at <u>https://www.tn.gov/attorneygeneral/working-for-tennessee/consumer/file-a-complaint.html</u>
- Utah Attorney General at <u>https://www.attorneygeneral.utah.gov/contact/complaint-form/</u>.
- Virginia Attorney General at <u>https://www.oag.state.va.us/consumercomplaintform</u>.