



PICUS SECURITY PRIVACY POLICY

Last Updated: 01.11.2024

1. INTRODUCTION

This Privacy Policy applies to Picus Security, Inc. and its Affiliates listed in Section 10 ("Picus," "us," "we," or "our").

Picus is committed to protecting and respecting your personal information and privacy. This Policy outlines and is limited to the personal data processing practices carried out through the use of our Websites (www.picussecurity.com and app.picussecurity.com), our Services (as described below), and any other electronic communications networks by Picus.

Please read this Policy carefully to understand how and why we collect, process, and use your information.

By using our Website and Services, you agree to this Privacy Policy.

2. COLLECTION OF YOUR PERSONAL INFORMATION

Personal Data is any information that directly or indirectly identifies a natural person. We will ask for your consent when we need information that personally identifies you (personal information) or allows us to contact you to provide a service or carry out a transaction that you have requested, such as receiving information about Picus Security products and services, ordering email newsletters, joining a limited-access site or service, or purchasing, downloading and/or registering Picus Security products.

The channels and types of personal information we may collect, including but not limited to, are listed below:

Information you directly provide to us:

- a. **Free-trial:** Under your free-trial requests, we may collect your first name, last name, company name, company email, and country information.
- b. **Account:** We may collect our customers' company email addresses when logging into our online platform.
- c. **Demo Request:** Under your demo requests, we may collect your first name, last name, company email address, company name, phone number (optional), and country information.
- d. **Contacting us:** When you make inquiries, such as scheduling a demo, learning about pricing, or upgrading a product, we may collect your first name, last name, company email, company name, job title, country, phone number (optional) information and any descriptive message you submit to facilitate your inquiry.

- e. **Job application:** We receive your job applications through a third-party platform. If you apply for a job at Picus, we may collect your full name, email, resume/CV, phone (optional), current company (optional), LinkedIn Profile (optional), and any other optional information submitted within your application.
- f. **Partner account & User application:** Under our partner program, we may collect your corporate email address.
- g. **Picus Technology Alliances Partner Program application:** Under our Technology Alliances Partner Program (TAP), we may collect your first name, last name, work email, and role.
- h. **Picus Technology Alliances Team meeting request:** For meeting requests with the Picus Technology Alliances Team, we may collect your first name, last name, and email address.
- i. **Blog:** If you subscribe to our blog, we may collect your company email address.
- j. **Purple Academy by Picus:** If you wish to obtain a service from Purple Academy, we may collect your full name, company email address, company, country, and job title information.
- k. **Webinars, Case Studies & Reports:** For webinars, case studies, and reports requests, we may collect your company email address.
- l. **Exclusive Reports:** Under exclusive report requests, we may collect your full name, company email address, title, company name, and country information.

We may also collect your personal data such as your first name, last name, and email address when you follow us on social media, attend our events, or correspond with us by phone, email, social media, or otherwise.

Information from your visits to our website:

Our website enables us to communicate with you about us, our products, and our services. Even if you do not login with an account, we may automatically collect certain information each time you visit our website. This may include the name of the Internet Service Provider, Internet Protocol (IP) address, date and time of access browser type and version, time zone setting, operating system and platform, pages accessed, and the Internet address of the website from which you linked directly to our website. This information is mainly used to provide access to our website, improve the webpage view, and adapt to device settings and language. We also use this information to analyze trends and to improve our website and online services.

We process such personal data pursuant to Article 6(b) of the GDPR, as it is necessary to respond to your inquiry. For more details about automatically collected information about your visit to our website, please see our [Cookie Policy](#).

Information from other resources:

We may also collect your personal information indirectly from third party sources such as business partners, advertising networks, payment and delivery services as well as public records, such as social media platforms and industry associations. Please note that, in such cases, we strive to ensure that these parties adhere to privacy standards consistent with ours; however, we do not have any liability or responsibility over their use, storage, and disclosure of your personal information, as governed by their own privacy policies.

3. USE AND CONTROL OF YOUR PERSONAL INFORMATION

The purposes and processes for processing personal data by Picus vary according to the category of the individual (i.e. customer, potential customer, visitor, employee candidate, etc.) and the type of personal data.

Consistent with applicable law and choices that may be available to you, we may use your personal information for purposes, including but not limited to:

- Fulfilling contractual obligations and providing requested information, products, and services;
- Personalizing your experience on our website and services and customizing content;
- Carrying out marketing activities, as per your preferences and active consent where applicable;
- Responding to inquiries and requests, and capturing related data;
- Administering, operating, optimizing, and improving the quality of our website, products, services, and operations;
- Notifying you of changes to our company, products, services, terms of use and conditions;
- Communicating about products or services you requested;
- Maintaining a secure environment by detecting, investigating, and preventing fraudulent or illegal activities;
- Complying with legal requirements and standards.

We will send you information according to the preferences submitted via our online forms and in accordance with any consent you have actively given, where applicable. You may change these preferences and/or withdraw your consent at any time.

Based on your consent, we may send emails informing you of issues related to a product or service you requested or confirming you requested a product or service, such as invoices and confirmations. We may also occasionally communicate with you regarding our products, services, news, and events. You have the option not to receive this information. You can unsubscribe at any time by following the instructions at the bottom of our promotional emails.

Except as otherwise described in this statement, the personal information you provide on the Website will not be shared outside of Picus Security and its controlled subsidiaries and affiliates without your permission.

4. COOKIES

Cookies are text files placed on users' computers by visited websites. They can be used by web servers to identify and track users as they navigate different pages on a website and to identify users returning to a website.

We use cookies on our Websites www.picussecurity.com and app.picussecurity.com, to determine visitor preferences, facilitate user requests, improve website experiences, keep our services secure, and conduct online behavioral advertising.

For more detailed information, including cookie types and administration, please visit our [Cookie Policy](#).

5. SECURITY, STORAGE AND TRANSFER OF YOUR PERSONAL INFORMATION

In Picus, we implement technical and administrative measures to protect your personal data and prevent any unauthorized access, disclosure, use, and modification. We use industry standard technologies, operational security methods, and cyber security products for the protection of collected personal data. In this context, we regularly review and validate the adequacy and effectiveness of our security controls, tools, and procedures to maintain a secure environment. Please note that no security measures are fully-secure or impenetrable. For more information, please see our [Corporate Practices](#).

All systems related to Picus products are cloud based. As a globally operated company, the destination where we store or transfer your personal information may be different from the country in which the data was collected. Regardless of the country that we transfer, store, or process your data, we will take reasonable steps to ensure that your data is treated securely and in accordance with this Policy.

6. RETENTION OF YOUR PERSONAL INFORMATION

Picus retains personal information only for the period necessary to fulfill the purposes for which they were collected and, thereafter, for a reasonable period to meet audit, contractual, or legal obligations or where we have a legitimate interest in retaining it. In this context, retention periods for each type of personal data are determined, and if there is no reason to keep certain personal data, it is destroyed in accordance with the current legislation.

Adequate technical and administrative measures have been implemented within our Information Security Management System to ensure secure storage and destruction of personal information.

7. YOUR RIGHTS

We respect your privacy. If you wish to exercise your privacy and data subject rights subject to applicable law such as GDPR, CCPA, or KVKK, please fill out the initial request form here so that we can provide you the appropriate data subject request form depending on the legal source of your request.

8. CHILDREN AND SENSITIVE DATA

- a. **Children:** Our Website, application, and services are intended for business use and we do not expect them to be of any interest to minors. We do not knowingly or intentionally collect personal data from anyone under 16 years of age.
- b. **Sensitive data:** We do not collect or receive any sensitive categories of personal data. Also, we ask you to not send or disclose any sensitive personal information to us directly or through our products and services.

9. CONTACT US

If you have questions or concerns about this Policy or its implementation, please contact us by email at privacy@picussecurity.com.

10. AFFILIATES

Picus Security, Inc.; Picus Bilişim Güvenlik Ticaret A.Ş.; Picus Security US, LLC.

11. CHANGES TO THIS PRIVACY POLICY

We review this Privacy Policy regularly and may change it to reflect our product and service updates, corporate practices, regulatory requirements, or other purposes.

We encourage you to frequently check this page as we always display the latest modification date on this Policy. When required under applicable law and/or the change is significant, we will also notify you by using other means, such as email.