PRIVACY POLICY

Last Updated: April 14, 2026

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1. INTRODUCTION

This Privacy Policy describes how Picus and its Affiliates listed in Section 11 (collectively, "Picus", "we", "us", or "our") process, collect, use and protect personal data in connection with our websites, products, services, and related interactions.

Picus is committed to protecting personal data and maintaining transparency regarding its processing activities. This Privacy Policy applies to personal data processed through our websites (including www.picussecurity.com and app.picussecurity.com), our Services (as described below), and any other electronic communications networks by Picus.

This document is an informational disclosure of our privacy practices. While the use of our Services is subject to the *Picus Subscription Agreement (PSA),* this Policy serves to inform you about how and why we collect, process, and protect your personal data.

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:

2.1. Information you directly provide to us

We collect information when you request a service, register for an event, or communicate with us.

a. **Free-trial & Demo requests:** Under your free-trial or demo requests, we may collect your first name, last name, company name, company email address, country, and phone number (optional).

b. **Platform account:** We may collect your company email addresses for authentication and logging into our online platform.

c. **General Inquiries (Contact 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 submitted to facilitate the inquiry.

d. **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.

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e. **Partner account & User application:** Under our partner program, we may collect your corporate email address.

f. **Picus Technology Alliances Partner Program application:** Under our Technology Alliances Partner Program (TAP), we may collect your first name, last name, work email address, and role information.

g. **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.

h. **Blog:** If you subscribe to our blog, we may collect your company email address.

i. **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.

j. **Content Requests (Webinars, Case Studies, Reports):** For webinars, case studies, and reports requests, we may collect your full name, company email address, company, country, and job title information.

k. **Exclusive Reports:** Under exclusive report requests, we may collect your full name, company email address, company name, title, 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.

2.2. 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.

For more details on automatically collected information about your visit to our website, please see our Cookie Policy and Section 5.

2.3. 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

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disclosure of your personal information, as governed by their own privacy policies and such third parties are responsible for their own processing activities in accordance with their respective privacy policies.

3. USE AND CONTROL OF YOUR PERSONAL INFORMATION

We process personal data depending on the nature of our relationship with you (e.g., customer, prospective customer, user, partner, or job applicant) and the context in which the data is collected.

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

Service Delivery and Contractual Obligations: To provide, operate, and maintain our products and services, including responding to requests, fulfilling contractual obligations, and delivering requested information.

Communication and Customer Engagement: To communicate with you regarding our products, services, updates, support requests, and relevant business communications.

Marketing and Events: To send marketing communications, event invitations, and promotional materials, in accordance with your preferences and, where required, your consent.

Platform Improvement and Analytics: To analyze usage, improve functionality, optimize performance, and enhance user experience across our websites and services.

Security and Fraud Prevention: To maintain the security of our systems, detect, investigate, and prevent unauthorized access, fraud, abuse, or other illegal activities.

Legal and Regulatory Compliance: To comply with applicable laws, regulations, legal processes, and enforceable governmental requests.

Legal Basis for Processing (GDPR): Where applicable, we rely on the following legal bases under GDPR:

- Performance of a contract (Article 6(1)(b))

- Compliance with legal obligations (Article 6(1)(c))

- Legitimate interests (Article 6(1)(f)), such as improving services and ensuring security

- Consent (Article 6(1)(a)), where required (e.g., marketing communications)

Marketing Preferences: You may opt out of marketing communications at any time by following the unsubscribe instructions in our emails or contacting us directly. You may also withdraw your consent at any time where processing is based on consent.

We will collect and use your personal data (as described in section 3) in accordance with applicable data protection laws. Our grounds for processing your personal data are as follows:

- **Explicit Consent**: Where necessary we will only collect and process your personal data if you have given your clear and affirmative consent for us to do so.

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- **Legitimate Interests:** We may use and process some of your personal data where we have sensible and legitimate business grounds for doing so. Our legitimate interests for processing your personal data are for us to enable you access and use of our Services, to create and update our active cybersecurity initiatives or activities having been flagged with previous intent to conduct fraudulent or criminal activity, to effectively implement our features, to understand and to administer our technical and customer support for the delivery of our Services.
- **Legal obligations:** We may need to process your personal data when we are required to comply with a legal obligation.
- **Performance of a contract:** Provided that it is directly related to the establishment or performance of the contract, it is necessary to process the personal data of the parties to the contract. We may need to process your personal data when we provide Services to you or when we communicate with you about the Service.

4. HOW WE SHARE YOUR PERSONAL DATA

We do not sell your personal information. We only share your personal data in the following circumstances:

- **Service Providers (Data Processors):** We share data with trusted third-party vendors who provide services on our behalf, such as cloud hosting, CRM, analytics, and email delivery. These providers are strictly bound by data processing agreements.
- **Affiliates:** We may share data within the Picus affiliates (defined in Section 11) to support global service delivery and operations.
- **Legal & Regulatory Authorities:** We may disclose your information if required by law, court order, or governmental request, or to protect the rights, property, and safety of Picus, our users, or the public.
- **Business Transfers:** In the event of a merger, acquisition, or sale of all or a portion of our assets, personal data may be transferred to the acquiring entity.

5. COOKIES

Cookies are small files or identifiers placed on your device when you visit our websites. They enable us to recognize your device, facilitate navigation between pages, enhance user experience, and maintain the security and functionality of our platforms.

We use cookies on our Websites (www.picussecurity.com and app.picussecurity.com) to track user preferences, improve user experience, analyze usage and conduct behavioral advertising.

You can manage or withdraw your consent at any time through our cookie preference settings.

For detailed information, including how to manage your preferences, please visit our Cookie Policy.

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6. INTERNATIONAL DATA TRANSFERS

As a globally operating company hosted on cloud-based infrastructure, personal data may be transferred to and processed in countries outside of your jurisdiction (such as the United States).

We ensure that such transfers comply with applicable data protection laws. Regardless of the destination, we utilize legally recognized transfer mechanisms, including the European Commission's **Standard Contractual Clauses (SCCs)**, where applicable, to guarantee an adequate level of data protection.

You have the right to obtain information about the safeguards we use for international transfers of your personal data and to exercise other rights described in Section 8. For more information about international transfers affecting your data, please contact us as described in Section 10.

7. DATA SECURITY AND RETENTION

We implement robust technical and organizational measures to protect your personal data and prevent unauthorized access, disclosure, use, or modification. At Picus, we utilize industry-standard technologies, operational security methods, and cyber security solutions, including access controls, encryption, and monitoring mechanisms, for the protection of 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. While we take reasonable steps to protect personal data, please note that no method of transmission over the internet or method of electronic storage is completely secure. For more information, please see our Corporate Practices.

In general:

- Personal data related to customer accounts is retained for the duration of the contractual relationship and for a limited period thereafter as required for legal, tax, and audit purposes;
- Personal data processed for marketing purposes is retained until you withdraw your consent or object to such processing;
- Personal data related to inquiries, demos, or communications is retained for a reasonable period necessary to respond to and follow up on such requests.

Where retention is based on our legitimate interests, such interests include maintaining records for security, fraud prevention, dispute resolution, and regulatory compliance, and are balanced against your rights and freedoms.

When personal data is no longer required for these purposes, it is securely deleted, destroyed, or anonymized in accordance with applicable laws and our internal policies.

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

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8. YOUR RIGHTS

We respect your privacy and your rights under applicable data protection laws, including the GDPR, CCPA, and KVKK. Depending on your jurisdiction and the nature of our processing, your rights may include:

Right to Access: Request a copy of the personal data we hold about you, along with information about how we process it, including the purposes of processing, categories of personal data concerned, recipients or categories of recipients, retention periods, and your other rights.

Right to Rectification: Request the correction of inaccurate or incomplete personal data, including by means of providing a supplementary statement.

Right to Erasure ("Right to be Forgotten"): Request the deletion of your personal data under certain conditions set forth in Art. 17 GDPR.

Right to Restriction of Processing: Request that we limit how we use your data under certain conditions set forth in Art. 18 GDPR.

Right to Data Portability: Request the transfer of your data to another organization or directly to you in a structured, commonly used, and machine-readable format.

Right to Object: Object to the processing of your data based on legitimate interests or object at any time to the processing of your personal data for direct marketing purposes.

Withdrawal of Consent: Where processing is based on your consent, you have the right to withdraw it at any time. This will not affect the lawfulness of processing carried out prior to withdrawal.

Right to Lodge a Complaint with Supervisory Authority: Lodge a complaint with a competent supervisory authority, in particular in the Member State of your habitual residence, place of work, or place of the alleged infringement.

Rights Related to Automated Decision-Making: Right to not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you, except where permitted by applicable law.

To exercise any of these rights, please fill out the initial request form here or contact us at **privacy@picussecurity.com** so that we can provide you the appropriate data subject request form depending on the legal source of your request. We may request additional information to verify your identity before responding to your request. Requests will be handled in accordance with applicable law, typically within one month of receipt.

We will not charge a fee for processing your request unless it is manifestly unfounded or excessive (particularly if repetitive). In such cases, we may charge a reasonable fee taking into account administrative costs or refuse to act on the request.

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9. CHILDREN AND SENSITIVE DATA

a. **Children:** Our Website, application, and services are intended for business use and are not directed to individuals under 16 years of age (or the applicable age of digital consent in your jurisdiction). We do not knowingly or intentionally collect personal data from anyone under the applicable age of digital consent .

If you believe that we may have collected personal data from a child, please contact us at **privacy@picussecurity.com**.

b. **Sensitive data:** We do not intentionally collect or process any sensitive categories of personal data, as defined under Article 9(1) of the GDPR, including data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (where used for identification purposes), data concerning health, or data concerning a natural person's sex life or sexual orientation.

We explicitly request that you do not provide or disclose any sensitive personal data to us, whether directly or through our products, AI features (which may process or analyze submitted content), or support channels (where communications may be reviewed by support personnel). Our systems are not intended for the processing of such data and are configured to limit the collection of personal data to what is necessary for the purposes described in this Privacy Policy.

If you nevertheless provide special categories of personal data to us, we will delete such data without undue delay upon becoming aware of it, unless we are legally required to retain it or have obtained a valid legal basis for its processing, such as your explicit consent.

In limited circumstances where the processing of special categories of personal data is necessary (for example, in connection with legal claims, regulatory obligations, or the establishment, exercise, or defense of legal rights), such processing will be carried out in accordance with Article 9(2) of the GDPR and subject to appropriate safeguards.

To the extent that such data is included in content submitted by our customers, Picus processes such data solely on behalf of the customer and in accordance with applicable data processing agreements.

10. CONTACT US

If you have any questions or concerns regarding this Policy or our data protection practices, or wish to exercise your data subject rights, you may contact us using the details below:

Picus Security, INC

1401 Pennsylvania Avenue Unit 105 Suite 104,

Wilmington, DE 19806

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1 (415) 8905105

privacy@picussecurity.com.

11. AFFILIATES

Picus Affiliates covered by this Policy include Picus Security, Inc., Picus Bilişim Güvenlik Ticaret A.Ş., and Picus Security US, LLC (collectively “Picus”).

We may share personal data within the Picus for purposes consistent with this Privacy Policy, including to support service delivery, customer relationship management, internal administration, security operations, and business continuity.

Depending on the context of the processing, Picus affiliates may act as independent data controllers, joint controllers, or data processors. Where affiliates process personal data on behalf of another Picus entity, such processing is governed by appropriate agreements in accordance with applicable data protection laws.

Where personal data is shared within the Picus, such sharing is based on our legitimate interests in operating and managing our business effectively, ensuring consistent service delivery, and maintaining the security and integrity of our systems, in accordance with Article 6(1)(f) of the GDPR.

12. CHANGES TO THIS PRIVACY POLICY

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

We encourage you to frequently check this page as the "Last Updated" date at the top of this Policy indicates the most recent modifications. Previous versions of this Privacy Policy may be made available upon request.

Where changes do not materially affect your rights or the way we process your personal data (for example, editorial updates or clarifications), we may not provide specific notice beyond updating this Privacy Policy.

Where changes materially affect how we process your personal data (including changes to the purposes of processing, categories of personal data processed, legal bases relied upon, or disclosures to third parties), we will provide a more prominent notice, such as via email or a notification within our platform, as required by applicable law.

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