

## Data Privacy Policy

Version: December 2021

By providing the following information, we want to give an overview of the processing of your personal data which is carried out by us and of your rights under the data protection law in the framework of the contractual relationship with Maltego Technologies GmbH (registered in the Commercial Register of the District Court under HRB 236523, hereinafter referred to as "Maltego"). Which data is processed specifically and in what way it is used substantially depends on the ordered services. Therefore, not all parts of the provided information may apply to you.

1. The data protection controller is Maltego Technologies GmbH, Paul-Heyse-Str. 29, D - 80336 Munich, Email: [contact@maltego.com](mailto:contact@maltego.com), Phone: +49 (0) 89 24418490. Especially with regard to data protection issues, you may also contact the Data Protection Officer at [dataprotection@maltego.com](mailto:dataprotection@maltego.com) at any time.
2. We process personal data which we receive from our customers or other parties concerned in the course of our business relationship. In the context of the business relationship you are obliged to provide such personal data which is required in order to enter, conduct or terminate a business relationship and to perform the corresponding contractual obligations or such personal data which we are legally obliged to collect. Without this data we shall regularly not be able to conclude a contract with you or to conduct or terminate such a contract.
3. For the performance of the contract we process the following information:
  - Your contact details (especially title, first name, last name, email address, address, telephone numbers, position, company details),
  - Your payment information (bank details),
  - Your data provided in the context of search queries with our software (IP address, contents of the search input, date and time of the request, operating system and Java Virtual Machine information, language and version of the browser software).
4. We process personal data in accordance with the provisions of the EU General Data Protection Regulation (GDPR) for the performance of contractual obligations (Article 6 (1) sentence 1 lit. b of the GDPR).

The processing of data is carried out in order to provide goods and services in the course of the performance of the contracts with our customers or the performance of pre-contractual measures that are provided upon request. The purposes of the processing primarily depend on the actual product (e.g. distribution of software licenses) and can include, inter alia, needs analysis and consulting.
5. To the extent necessary for the performance of our services, we also process personal data which we obtain from public sources (e.g. the press, internet) or which is transferred to us by affiliated companies of Maltego or other third parties (e.g. a credit reporting agency).

6. We also process personal data based on your consent (Article 6 (1) sentence 1 lit. a of the GDPR). If you give your consent to the processing of personal data for a specific purpose (e.g. disclosure of data to subcontractors, evaluation of license and payment data for marketing purposes, newsletters) the processing is considered lawful based on your given consent. Declarations of consent must be given freely. The declaration of consent must indicate the purpose of the processing of data. If you have given your consent to the processing of your data, you may withdraw your consent at any time without having to provide reasons. The lawfulness of processing based on an effectively given consent remains unaffected until the time the consent has been withdrawn.
7. When you participate in a webinar that is either hosted or co-hosted by Maltego, you may be asked to provide your personal information, which will allow you to sign into, or otherwise participate in, the webinar. Webinars may be hosted and recorded by Maltego, its co-hosting partner and/or a sponsor of the webinar (each a “Host” and together the “Hosts”, whereby all Hosts will be disclosed as part of the webinar offering). Please refer to all other Hosts’ privacy policies for further information on how they use your personal information, as Hosts may collectively use and transfer amongst one-another your personal information, including, for example, your webinar sign-in information and any audio and/or video recordings of the webinar (if applicable) so long as the transfer is consistent with the uses contained in this paragraph and the relevant Host’s privacy policy. Accordingly, you will be asked to provide your consent to our and our Hosts’ use of your personal information for such purposes. Subject to any other terms and conditions of your consent, in addition to using your personal information for providing you with webinar access, information collected during a webinar may also be used by Maltego or a Host to understand industry-wide pain points, to enhance Maltego’s or a Host’s products and/or service offerings, or for Maltego’s or any Host’s general marketing purposes.
8. The processing of your personal data can also take place if this is necessary to realise the legitimate interests of Maltego (Article 6 (1) sentence 1 lit. f of the GDPR). Legitimate interests exist for example, if we assert a legal claim against you or we need to defend ourselves in a legal dispute. The processing of personal data on the basis of a legitimate interest shall not take place if there is an indication that the interest in the processing is overridden by your legitimate interest in that particular case. The existence of legitimate interests shall be assessed in each case of processing.
9. Within Maltego, your data may only be accessed by those who need this data to fulfil our contractual and legal obligations. Service providers and vicarious agents can also receive data for this purpose. These are companies in the categories IT-services, logistics, debt collection, consulting as well as sales and marketing. We only pass on your personal data to third parties, if:
  - you have explicitly given your consent to this in accordance with Article 6 (1) sentence 1 lit. a of the GDPR,
  - this is permitted by law and - in accordance with Article 6 (1) sentence 1 lit. b of the GDPR - necessary to process contracts we concluded with you,

- in case there is a legal obligation to transfer personal data according to Article 6 (1) sentence 1 lit. c of the GDPR, and
  - the transfer pursuant to Article 6 (1) sentence 1 lit. f of the GDPR is necessary for the establishment, exercise or defence of legal claims and there is no reason to believe that you have an overriding legitimate interest in not passing on your data.
10. We partially use external service providers to process your data. These have been carefully selected and commissioned by us. They are bound by our instructions and controlled regularly. As far as our service providers or partners have their registered office in a country outside the European Union (so called third countries), we will provide information on the consequences of this fact beforehand. A transfer to third countries is carried out, as far as
- this is required for the (partial) provision of the contractual performance (e.g. search queries with our software), or
  - you have given your consent.
- To the extent that this is necessary, your personal data is transferred to an IT-service provider in the United States or another third country in order to ensure the IT operations in compliance with the European data protection level.
11. Maltego uses the payment service provider Stripe and Zuora for billing purposes. During the order process, the contact details provided by the Maltego user as well as information regarding the order (first name, surname, address, email address, telephone number, bank account number, bank identification number, possibly credit card number, invoice amount, currency and transaction number) are transmitted to the payment service provider that was chosen by the Maltego user in accordance with Article 6 (1) sentence 1 lit. b of the GDPR. The transmission of data takes place only for the purpose of payment processing with the payment service provider and only to the extent necessary. Personal data is transmitted to the USA by the use of Zuora and Stripe. Maltego has signed standard contractual clauses with Zuora and Stripe to ensure an appropriate level of data protection within the meaning of Art. 46 para. 2. c) GDPR. The relevant privacy statements and contact details of the payment service providers are listed at the end of this privacy policy
12. Maltego uses the service provider Thinkific for providing online training. For this purpose, the first name and surname as well as the email address provided by the Maltego online training participants are transmitted to Thinkific in accordance with Article 6 (1) sentence 1 lit. b of the GDPR. The transmission of data takes place only for the purpose of participating in online training and only to the extent necessary. Personal data is transmitted to Canada by the use of Thinkific. Thinkific processes all data in compliance with the European standards for data protection. The privacy statement and contact details of thinkific are listed at the end of this privacy policy.
13. Maltego uses the service provider SendGrid to send order confirmations. For this purpose, the first name and surname as well as the email address provided by the Maltego user are transmitted to SendGrid in accordance with Article 6 (1) sentence 1 lit. b of the GDPR. The transmission of data takes place only for the purpose of sending order confirmations and only to the extent necessary. The processing of this data can be objected to at any time by

- sending a message to SendGrid. Personal data is transmitted to the USA by the use of SendGrid. Maltego has signed standard contractual clauses with SendGrid to ensure an appropriate level of data protection within the meaning of Art. 46 para. 2. c) GDPR. The privacy statement and contact details of SendGrid are listed at the end of this privacy policy.
14. Maltego uses a software provided by the service provider Freshworks, especially Freshsales and Freshdesk, to manage customer relationships. This software enables Maltego to manage and view all customer- and sales-related activities, in particular the entire communication (via email, chat, telephone, newsletter or contact form) by using one service only. The software manages the following personal data: First name and surname, user name, email address, telephone number, company, industry. Freshworks may also use subcontractors to provide their service. Personal data is transmitted to the USA by the use of Freshworks. Maltego has signed standard contractual clauses with Freshworks to ensure an appropriate level of data protection within the meaning of Art. 46 para. 2. c) GDPR. If the customer objects to the use of the services of Freshworks, the product shall not be used. The privacy statement and contact details of Freshworks are listed at the end of this privacy policy.
  15. Maltego uses a software provided by the service provider Keylight to manage the online shop as well as the customer and order data. The software manages the following personal data: first name and surname, user name, email address, telephone number, orders, order number, encrypted password. The privacy statement and contact details of Keylight are listed at the end of this privacy policy.
  16. Maltego uses the service provider Nicereply to receive and organize customer feedback. Nicereply enables Maltego so send out surveys to customers in order to receive crucial feedback on customer service, communication and the Maltego product. For this purpose the following customer data is transmitted to Nicereply: User name, email address. The privacy statement and contact details of Nicereply are listed at the end of this privacy policy.
  17. Maltego uses certain Microsoft 365 tools, especially Microsoft Forms and PowerBI. Microsoft Forms enables Maltego to create important documents for our service as well as receive feedback for our product. PowerBI enables us to visualize our business intelligence. For this purpose, the following customer data is transmitted to Microsoft: First name, last name, email address, position, company. Personal data is transmitted to the USA by the use of Microsoft Forms. Maltego has signed standard contractual clauses with Microsoft to ensure an appropriate level of data protection within the meaning of Art. 46 para. 2. c) GDPR. If the customer objects to the use of the services of Microsoft, the product shall not be used. The privacy statement and contact details of Microsoft are listed at the end of this privacy policy.
  18. Maltego uses the tool Matillion to analyze and organize customer data. Matillion enables Maltego to automate data pipelines and build cloud warehouses from scratch. The software manages the following personal data: First name and surname, username, email address, telephone number, company, industry. Personal data is transmitted to the USA by the use of Matillion. Maltego has signed standard contractual clauses with Matillion to ensure an appropriate level of data protection within the meaning of Art. 46 para. 2. c) GDPR. If the

- customer objects to the use of the services of Matillion, the product shall not be used. The privacy statement and contact details of Matillion are listed at the end of this privacy policy.
19. Maltego uses the cloud data platform Snowflake. Maltego uses Snowflake to store its system and business data in a cloud. For this purpose the following personal data is transmitted to Snowflake: First name and surname, user name, email address, telephone number, company, industry. Personal data is transmitted to the USA by the use of Snowflake. Maltego has signed standard contractual clauses with Snowflake to ensure an appropriate level of data protection within the meaning of Art. 46 para. 2. c) GDPR. If the customer objects to the use of the services of Snowflake, the product shall not be used. The privacy statement and contact details of Snowflake are listed at the end of this privacy policy.
  20. Maltego uses debounce.io to prevent spam email addresses on our email lists. For this purpose the following personal data is transmitted to debounce.io: email address. The privacy statement and contact details of debounce.io are listed at the end of this privacy policy.
  21. Maltego uses the eSignature tool PandaDocs to send out contracts to customers and partners in order to receive signed versions of those contracts. For this purpose, the following personal data is transmitted to PandaDocs: First name, last Name, email address. Personal data might be transmitted to the USA by the use of PandaDocs. Maltego has signed standard contractual clauses with PandaDocs to ensure an appropriate level of data protection within the meaning of Art. 46 para. 2. c) GDPR. If the customer objects to the use of the services of PandaDocs, the product shall not be used. The privacy statement and contact details of PandaDocs are listed at the end of this privacy policy.
  22. Maltego uses the service provider Asana for internal task co-ordination and project management of its business activities. The software manages the following personal data: First name and surname, user name, email address, telephone number, company, industry. Asana may also use subcontractors to provide their service. Personal data is transmitted to the USA by the use of Asana. Maltego has concluded standard contractual clauses with Asana to ensure an appropriate level of data protection within the meaning of Art. 46 para. 2. c) GDPR. If the customer objects to the use of the services of Asana, the product shall not be used. The privacy statement and contact details of Asana are listed at the end of this privacy policy.
  23. Maltego uses the software solution GoToWebinar from LogMeIn Ireland Unlimited Company (“LogMeIn”) to organise, host and record online webinars. The following personal data is collected: First name and surname, email address, telephone number, company and number of employees, industry, country. LogMeIn may also use subcontractors to provide their services. Personal data may be transmitted to the USA by the use of LogMeIn. Maltego has concluded standard contractual clauses with LogMeIn to ensure an appropriate level of data protection within the meaning of Art. 46 para. 2. C) GDPR. If the customer objects to the use of the services of LogMeIn, the product shall not be used. The privacy statement and contact details of LogMeIn are listed at the end of this privacy policy.
  24. We adhere to the principles of data avoidance and data minimization. Therefore we store your personal data only for as long as required to achieve the purposes mentioned here or

for the duration of the diverse storage periods specified by the legislator. After the respective purpose has ceased to exist or after the expiry of these storage periods, the corresponding data is blocked or deleted routinely and in accordance with the legal provisions.

25. Your data will no longer be used and will be deleted after the contract with you has ended. Exceptions are only the use for recovery measures to the extent permitted by law or statistical evaluations or market research, provided you have given your consent. Apart from that, your data is stored only for as long as this is necessary to observe statutory obligations to archive and to retain the data.
26. We use appropriate technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against access by unauthorized third parties. Our security measures are continuously improved in line with technological development.
27. You have the right:
  - to access information on your personal data which has been processed by us in accordance with Article 15 GDPR. In particular, you may access the information on the purposes of processing, the categories of personal data, the categories of recipients to whom your personal data has been or will be disclosed, the envisaged period of storage, the existence of the right to rectification, erasure, restriction of processing data or objection, the existence of the right to lodge a complaint, the source of your data, insofar as it was not collected on our part, as well as the existence of automated decision-making, including profiling and, if applicable, meaningful information on the details;
  - to claim rectification of inaccurate personal data or the completion of incomplete personal data that is stored with us in accordance with Article 16 GDPR;
  - to claim the erasure of the personal data stored with us according to Article 17 GDPR, unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defense of legal claims;
  - to claim the restriction of processing of your personal data according to Article 18 GDPR as far as the accuracy of the personal data is contested, the processing is unlawful but you oppose to the erasure and we no longer need the data, but you require them for the establishment, exercise or defense of legal claims or you have



objected to the processing of your personal data in accordance with Article 21 GDPR;

- to receive the personal data you provided to us in a structured, commonly used and machine readable format or to claim the transmission to another controller according to Article 20 GDPR;
- to withdraw your given consent at any time by notifying us in accordance with Article 7 (3) GDPR. This has the consequence that we cannot continue the data processing which was based on this consent in the future and
- to complain with a supervisory authority in accordance with Article 77 GDPR. In general, you may turn to the supervisory authority of your habitual residence or your place of work or of the locations of our law office.

**28. Information on your right to object in accordance with Article 21 of the GDPR**

**You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning yourself which is based on Article 6 (1) sentence 1 lit. f of the GDPR (processing on the basis of a balance of interests).**

In case you object we shall no longer process your personal data, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or the processing serves the establishment, exercise or defence of legal claims.

In individual cases we process your personal data for direct marketing purposes. You have the right to object at any time to the processing of personal data concerning yourself for such marketing purposes.

29. This Privacy Statement is currently valid and is dated as of August 2021. We reserve the right to adjust this Privacy Statement occasionally to make sure it always complies with the current legal requirements or to implement changes to our services in the privacy statement, for example, if new services are introduced.
30. **For the performance the services of Maltego, personal data of Maltego users are transmitted to the following third parties for the following purposes:**

Third Party name:	Purpose of the processing:	Categories of personal data:	Legal basis:	Name and address of the service provider:	Privacy statement and contact details:
Asana	Internal task co-ordination and project management	Customer data	Performance of contract, Article 6 (1) sentence 1 lit. b of the GDPR	Asana, Inc, 1550 Bryant Street, Suite 200, San Francisco, CA 9411103, USA	<a href="https://asana.com/de/terms#privacy-policy">https://asana.com/de/terms#privacy-policy</a> <a href="mailto:privacy@asana.com">privacy@asana.com</a>
Debounce.io	Validating email addresses	Customer data	Legitimate Interest, Article 6 (1) sentence 1 lit. f of the GDPR	debounce.io, 411088, Hadapsar, Maharashtra, Pune, India	<a href="https://debounce.io/privacy-policy/">https://debounce.io/privacy-policy/</a>
Freshworks	Management of customer relationships, newsletter distribution, management of inquiries via the contact form of the website,	Customer data	Performance of contract, Article 6 (1) sentence 1 lit. b of the GDPR	Freshworks Inc., 1250 Bayhill Drive, Suite 315, San Bruno, CA 94066, USA	<a href="https://www.freshworks.com/privacy/">https://www.freshworks.com/privacy/</a> <a href="mailto:support@freshworks.com">support@freshworks.com</a>
GoToWebinar (LogMeIn Ireland Unlimited Company)	Organise, host and record online webinars	Customer Data	Consent from the customer, Article 6 (1) sentence 1 lit. a of the GDPR	The Reflector, 10 Hanover Quay, Dublin 2, D02R573, Ireland	<a href="https://www.logmein.com/legal/privacy">https://www.logmein.com/legal/privacy</a> <a href="mailto:privacy@logmein.com">privacy@logmein.com</a>
Keylight	Management of the online shop and the user accounts	Customer data, contract data	Performance of contract, Article 6 (1) sentence 1 lit. b of the GDPR	Keylight GmbH, Nürnberger Straße 8, 10787 Berlin, Germany	<a href="https://www.keylight.de/de/privacy-policy">https://www.keylight.de/de/privacy-policy</a> <a href="mailto:privacy@keylight.de">privacy@keylight.de</a>



Matillion, Ltd.	Cloud data Platform	Customer data	Performance of contract, Article 6 (1) sentence 1 lit. b of the GDPR	Station House, Stamford New Road, Altrincham, Cheshire WA14 1EP	<a href="https://www.matillion.com/about/legal/privacy/">https://www.matillion.com/about/legal/privacy/</a>
Microsoft	Creating relevant documents for Maltego's service and surveys for customer feedback	Customer data	Performance of contract, Article 6 (1) sentence 1 lit. b of the GDPR; Consent from the customer, Article 6 (1) sentence 1 lit. a of the GDPR	Microsoft Ireland Operations, Ltd. One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland	<a href="https://www.microsoft.com/licensing/terms/product/PrivacyandSecurityTerms/II">https://www.microsoft.com/licensing/terms/product/PrivacyandSecurityTerms/II</a>
Nicereply	Creating and managing customer surveys	Customer data	Consent from the customer, Article 6 (1) sentence 1 lit. a of the GDPR	Nice Reply s.r.o, Stefanovicova 2971/8, Bratislava 811 04, Slovakia	<a href="https://www.nicereply.com/product/privacy-policy">https://www.nicereply.com/product/privacy-policy</a>
PandaDocs	eSignature	Customer data	Performance of contract, Article 6 (1) sentence 1 lit. b of the GDPR	101 California Street, Suite 3975, San Francisco, California 94111, USA	<a href="https://www.pandadoc.com/privacy-notice/">https://www.pandadoc.com/privacy-notice/</a>
SendGrid	Sending order confirmations	Customer data	Performance of contract, Article 6 (1) sentence 1 lit. b of the GDPR	SendGrid Inc., 1801 California St 500, Denver, CO 80202, USA	<a href="https://sendgrid.com/policies/privacy/">https://sendgrid.com/policies/privacy/</a> <a href="mailto:datasubjectrequests@sendgrid.com">datasubjectrequests@sendgrid.com</a> <a href="mailto:dpo@sendgrid.com">dpo@sendgrid.com</a>
Snowflake, Inc.	Cloud data Platform	Customer data	Performance of contract, Article 6 (1) sentence 1 lit. b of the GDPR	450 Concar Drive, San Mateo, CA, 94402, United States	<a href="https://www.snowflake.com/privacy-policy/">https://www.snowflake.com/privacy-policy/</a>
Stripe	Payment processing	Credit card information,	Performance of contract, Article 6 (1) sentence 1	Stripe Inc., 185 Berry Street, Suite 550, San	<a href="https://stripe.com/de/privacy">https://stripe.com/de/privacy</a>

		customer data, contract data	lit. b of the GDPR	Francisco, CA 94107, USA	<a href="mailto:info@stripe.com">info@stripe.com</a>
Thinkific	Participating in Online-Training	Customer data	Performance of contract, Article 6 (1) sentence 1 lit. b of the GDPR	Thinkific Labs Inc., 400 – 369 Terminal Ave, Vancouver, BC, V6A 4C4	<a href="https://www.thinkific.com/privacy-policy/">https://www.thinkific.com/ privacy-policy/</a> <a href="mailto:info@thinkific.com">info@thinkific.com</a>
Zuora	Management of billing data and subscriptions	Customer data, contract data	Performance of contract, Article 6 (1) sentence 1 lit. b of the GDPR	Zuora, Inc., 3050 S. Delaware Street, Suite 301, San Mateo, CA 94403, USA	<a href="https://www.zuora.com/privacy-statement/">https://www.zuora.com/pri vacy-statement/</a> <a href="mailto:support@zuora.com">support@zuora.com</a>