

Data Privacy Policy

Version: March 2023

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, Phone: +49 (0) 89 24418490. Especially with regard to data protection issues, you may also contact the Data Protection Officer at 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. In some cases, we like to record customer meetings for internal training purposes. The recordings should be used to train our employees to enable a higher quality in our customer meetings. The recording is done. e.g. by MS Teams. We only record client meetings after you have given your consent. The consent is obtained online. We store the recordings for 2 years. You can revoke your consent at any time. For this purpose, please contact us using the contact details provided in this privacy policy in chapter 1.
8. 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.
9. You can participate in the Maltego Academic Program which is designed to enhance innovation by giving eligible participants access to the Maltego Software. The program is destined to NGOs and other non-profit companies that are granted with Maltego licenses for conducting a research project for non-commercial purposes. Each participant shall complete an online application indicating the project for which the Participant would like to use the subscription licenses. Within the application the following data is collected: email address, name, physical address, LinkedIn accounts, Twitter accounts, Github accounts, project/training descriptions, NGO registration numbers, documents justifying registrations, countries partners are from, email address of students, names of students. The processing of this data is necessary to participate in the Maltego Academic Program. Please note that you need to inform your employees about the data processing if you register them for the program. The data is stored until the purpose no longer applies (end of the program) or until you request us to delete it.
10. If you participate in the Train the Trainer Program your personal data is processed. This program is designed to empower trusted trainers to deliver training content developed by Maltego. Maltego teaches the registered participants on how to train others on Maltego products. If the participants successfully complete the training program they will be certified

as Maltego trainers and will be able to deliver Maltego trainings according to program's terms and conditions. The data is stored until the purpose no longer applies (end of the program) or until you request us to delete it.

The processing activities and **categories of personal data processed within this program are the following:**

- Processing of personal data of program participants (companies in the program and the designated employees from their side): personal data is requested in the registration process and is needed to communicate with Maltego.
Data categories: full name, organization, organization address, registration number, title, email address.
 - Processing of personal data of Maltego customers for whom Maltego requests newly certified trainers to provide training services.
Data categories: full name, organization, organization address, title, email address.
 - Processing of personal data of Maltego customers participants when issuing certificates for them (based on the info provided by the newly trainers).
Data categories: full name, name of course, course completion date.
11. 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.
12. Maltego processes personal data if you apply for a job. Detailed information about data processing can be found in the [Applicant Privacy Policy](#).
13. Fraud checks. In exceptional cases it might happen that your purchase is set on review. In this case Maltego requires further information for internal fraud checking purposes, to ensure the security of your data and to execute the purchase. In order to minimise these cases, Maltego has already banned the use of unusual email addresses and will also set on internal fraud check review of public email addresses.

As part of the fraud checking process, we will ask you to provide us the following information via phone (phone calls are never recorded) or via business email address:

- a picture of the physical credit card used during payment, showing only the last 4 digits of the entire card number (all other data should be blurred or blackened).
- any form of proof that there is a connection between you and the credit card holder, at your own discretion.

You will be asked to provide the above documents within the next 24 business hours. Otherwise, we have to suspend the license key until further notice. Please note that the

refund will be initiated and the payment will be processed again as soon as the account will be validated.

Within the purchasing process Maltego never has access to view the full credit card number or security code, but Maltego has access to view the card type, expiration date, and last 4 digits of the card.

All data which is collected during the fraud checking process is stored until the purchase is validated and the amount is credited on Maltego's accounts. Immediately after, the data is deleted as the purpose of the processing disappears.

14. 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.

15. In order to provide good customer service and quick response times, your customer enquiries may be forwarded to our resellers. The resellers will handle your request. We only forward your contact details and the request to the resellers. We also ensure that the reseller is located in the same country as you. Our resellers are contractually obliged to comply with the data protection regulations. The legal basis for the data transfer is our legitimate interest. You can object to the processing at any time with effect for the future.

16. 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.

You can find the service providers we are using in the table below.

17. The nature of a web-based service means that information will be available to persons all over the world. Whilst Maltego does not routinely transfer the information it holds outside the UE, it is possible for the information contained in the Maltego public records register to be accessed from anywhere in the world. Making such information available to all without restriction is consistent with our public interest mission.
18. 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.
19. 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.
20. 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.
21. 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 defence 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 defence 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.

22. 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.

23. 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.
24. **For the performance the services of Maltego, personal data of Maltego users are transmitted to the following third parties (subcontractors) for the following purposes:**

Third Party name:	Purpose of the processing:	Categories of personal data:	Legal basis and data protection contract:	Name and address of the service provider:	Privacy statement and contact details:
Asana	Internal task co-ordination and project management	Customer data: full name, user name, email address, telephone number, company, industry	Performance of contract, Art. 6 (1) (b) GDPR SCC concluded	Asana, Inc, 1550 Bryant Street, Suite 200, San Francisco, CA 9411103, USA	https://asana.com/de/terms#privacy-policy privacy@asana.com
Debounce.io	Validating email addresses and prevent spam email addresses	Customer data: email address	Legitimate Interest, Performance of contract, Art. 6 (1) (f) GDPR SCC concluded	debounce.io, 411088, Hadapsar, Maharashtra, Pune, India	https://debounce.io/privacy-policy/
Freshworks (Freshsales, Freshdesk)	Management of customer relationships, newsletter distribution, management of inquiries via the contact form of the website	Customer data: full name, user name, email address, telephone number, company, industry	Performance of contract, Art. 6 (1) (b) GDPR SCC concluded	Freshworks Inc., 1250 Bayhill Drive, Suite 315, San Bruno, CA 94066, USA	https://www.freshworks.com/privacy/ support@freshworks.com
GoToWebinar (LogMeIn Ireland Unlimited Company)	Organise, host and record online webinars	Customer Data: full name, email address, telephone number, company and number of employees, industry, country	Consent from the customer, Performance of contract, Art. 6 (1) (a) GDPR DPA concluded	The Reflector, 10 Hanover Quay, Dublin 2, D02R573, Ireland	https://www.logmein.com/legal/privacy privacy@logmein.com

Keylight	Management of the online shop and the user accounts	Customer data, contract data: full name, user name, email address, telephone number, orders, order number, encrypted password	Performance of contract, Art. 6 (1) (b) GDPR DPA concluded	Keylight GmbH, Nürnberger Straße 8, 10787 Berlin, Germany	https://www.keylight.de/de/privacy-policy privacy@keylight.de
Matillion, Ltd.	Cloud data Platform, analyze and organize customer data, automate data pipelines and build cloud warehouses from scratch	Customer data: full name, username, email address, telephone number, company, industry	Performance of contract, Art. 6 (1) (b) GDPR SCC concluded	Station House, Stamford New Road, Altrincham, Cheshire WA14 1EP	https://www.matillion.com/about/legal/privacy/
Microsoft	Microsoft Forms: Creating relevant documents for Maltego's service and surveys for customer feedback; PowerBI: visualize business intelligence	Customer data: full name, email address, position, company	Performance of contract, Consent from the customer Art. 6 (1) (a) and (b) GDPR DPA and SCC concluded	Microsoft Ireland Operations, Ltd. One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland	https://www.microsoft.com/licensing/terms/product/PrivacyandSecurityTerms/all
Nicereply	Creating and managing customer surveys, receiving customer feedback	Customer data: user name, email address	Consent from the customer, Performance of contract, Art. 6 (1) (b) GDPR DPA concluded	Nice Reply s.r.o, Stefanovicova 2971/8, Bratislava 811 04, Slovakia	https://www.nicereply.com/product/privacy-policy

PandaDocs	eSignature	Customer data: full name, signature, email address	Performance of contract, Art. 6 (1) (b) GDPR SCC concluded	101 California Street, Suite 3975, San Francisco, California 94111, USA	https://www.pandadoc.com/privacy-notice/
SendGrid	Sending order confirmations	Customer data: full name, email address	Performance of contract, Art. 6 (1) (b) GDPR SCC concluded	SendGrid Inc., 1801 California St 500, Denver, CO 80202, USA	https://sendgrid.com/policies/privacy/ datasubjectrequests@sendgrid.com dpo@sendgrid.com
Snowflake, Inc.	Cloud data Platform	Customer data: full name, user name, email address, telephone number, company, industry	Performance of contract, Art. 6 (1) (b) GDPR SCC concluded	450 Concar Drive, San Mateo, CA, 94402, United States	https://www.snowflake.com/privacy-policy/
Stripe	Payment processing	Credit card information, customer data, contract data: full name, address, email address, telephone number, bank account number, bank identification number, credit card number, invoice amount, currency, transaction number	Performance of contract, Art. 6 (1) (b) GDPR SCC concluded	Stripe Inc., 185 Berry Street, Suite 550, San Francisco, CA 94107, USA	https://stripe.com/de/privacy info@stripe.com

Thinkific	Participating in Online-Training	Customer data: full name, email address)	Performance of contract, Art. 6 (1) (b) GDPR SCC concluded	Thinkific Labs Inc., 400 – 369 Terminal Ave, Vancouver, BC, V6A 4C4	https://www.thinkific.com/privacy-policy/ info@thinkific.com
Zuora	Management of billing data and subscriptions	Customer data, contract data, credit card data: full name, address, email address, telephone number, bank account number, bank identification number, credit card number, invoice amount, currency, transaction number	Performance of contract, Art. 6 (1) (b) GDPR SCC concluded	Zuora, Inc., 3050 S. Delaware Street, Suite 301, San Mateo, CA 94403, USA	https://www.zuora.com/privacy-statement/ support@zuora.com
Productboard	Product management, optimization of products	Customer data: email address	Performance of contract, Art. 6 (1) (b) GDPR SCC concluded	ProductBoard, Inc. Delaware corporation with offices at 612 Howard St., 4th Floor, San Francisco, CA 94105	https://www.productboard.com/privacy-policy/2021-10-20/ privacy@productboard.com gdpr@productboard.com
Sanscreen (BEX Components AG)	Screenings against sanctions lists	Company name, company address, full name, email address, phone number	Legal obligation, legitimate interest, Performance of contract, Art. 6 (1) (c) and (f) GDPR DPA concluded	BEX Components AG, Gartenstraße 97 in 73430 Aalen, German	https://www.bex.ag/en/data-protection/ ; info@bex.ag

Fastspring	Webshop hosting	Customer data, bank information,	Legal obligation, legitimate interest, Performance of contract, Art. 6 (1) (b) SCC concluded	Bright Market, LLC dba FastSpring. 801 Garden St., Santa Barbara, CA 93101	https://fastspring.com/privacy/privacy@fastspring.com
Digital River GmbH	Webshop provider	Customer data, bank information	Legal obligation, legitimate interest, Performance of contract, Art. 6 (1) (b) SCC concluded	Digital River, Inc., 10380 Bren Road West, Minnetonka, Minnesota 55343, USA.	Digital River Online Store - Privacy Policy
Make.com	Automatically performance of actions/updates in systems	Customer data: Depends on the integration. Ranges from names, email addresses, to transform usage or ARR	Legitimate interest, Performance of contract, Art. 6 (1) (b) GDPR DPA concluded SCC concluded	Celonis, Inc. One World Trade Center, 87th Floor, New York, NY, 10007, USA	Privacy notice Make info@make.com.
LearnWorlds	Learning Management System, participants training	Customer Name Customer Account Customer Email Address Customer Education progress (Certifications, for example) Maltego Employee Information (Names and titles of employees associated with training, likely only Training and SME Team members)	Legitimate Interest, Art. 6 (1) (f) GDPR, Performance of contract, Art. 6 (1) (b) GDPR	LearnWorlds (CY) Ltd, Gladstonos 120, Foloune Building, 2nd Floor, B1, 3032, Limassol, Cyprus	https://www.learnworlds.com/privacy-policy/