

# Website Privacy Policy

Version: February 2019

## Section 1 Information on the collection of personal data

(1) The following information concerns the personal data we collect while our website is being used. Personal data is defined as any data that can be related to you, such as your name, your address, your email addresses, your user behaviour.

(2) The data controller in accordance with Article 4 Nr. 7 of the EU-General Data Protection Regulation (GDPR) is Maltego Technologies GmbH, Thomas-Wimmer-Ring 17, 80539 Munich, contact@maltego.com (see our legal notice).

(3) We store the data you disclose when contacting us by email or using a contact form (your email address and, if provided by you, your name, department, license key and order number) to answer your questions. It is necessary to enter a valid email address so we can find out who the request is from and to enable us to respond to it. Further information can be given on a voluntary basis. The processing of data for the purposes of contacting us is carried out according to Article 6 (1) sentence 1 lit. a GDPR on the basis of your freely given consent. After the storage is no longer required we delete all data collected in this context or we restrict the processing, if there are legal obligations to retain such data.

(4) In case we engage service providers for individual functions offered on our website or we want to use your data for marketing purposes, we will provide detailed information on these processes below. We also define the criteria determined for the duration of the storage below.

## Section 2 Your rights

(1) We adhere to the principles of data avoidance and data minimization. Therefore we store your personal data only for as long as necessary 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.

(2) 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 DSGVO;
- 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 DSGVO;
- 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.

(3) You also have the right to lodge a complaint with a supervisory authority regarding the processing of your personal data by us.

**(4) 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.

### **Section 3 Collection of personal data when visiting our website**

(1) In case you use the website for informational purposes only and you choose not to register or provide information to us in another way, we only collect the personal data your browser transfers to our server. When you look at our website, we collect the following data that is technically necessary in order to be able to display our website to you and to ensure the stability and security (the legal basis for this is Article 6 (1) sentence 1 lit. f GDPR). This information is temporarily stored in a so-called log file on a regular basis. This exclusively concerns information which does not permit any conclusions to be drawn about you as a person and that is produced inevitably when using the Internet. Anonymous information of this kind is evaluated by us for statistical purposes in order to optimize our website and the technology behind it:

- IP address
- Date and time of the request
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- Volume of data transferred in each case
- Website the request comes from
- Browser
- Operating system and its interface
- Language and version of the browser software.

The data mentioned is processed by us for the following purposes:

- Ensure a smooth connection set-up of the website,
- Ensure a comfortable use of our website,
- Ensure the system security and stability, as well as
- For further administrative purposes.

Our legitimate interest results from the data collection purposes listed above.

#### **Section 4 Further functions and offers on our website**

(1) In addition to the use of our website for informational purposes only, we provide a variety of services you may use if you are interested. To use these services, you usually need to enter further personal data, which we then use to provide the relevant service. The above mentioned principles for data processing also apply to such personal data.

(2) 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.

(3) We can also pass on your personal data to third parties if we offer participations in campaigns, competitions, contracts or similar services in cooperation with other partners. Further information on this will be made available to you when entering your personal data or at the description of the service.

(4) Your personal data is not transferred to third parties for purposes other than those listed in the following. 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 GDPR,
- the transfer pursuant to Article 6 (1) sentence 1 lit. f 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,
- there is a legal obligation to transfer personal data according to Article 6 (1) sentence 1 lit. c GDPR and

- this is permitted by law and - in accordance with Article 6 (1) sentence 1 lit. b GDPR - necessary to process contracts we concluded with you.

(5) As far as our service providers or partners have their registered office in a country outside the European Economic Area (EEA), we will provide information on the consequences of this fact in the description of the service.

## Section 5 Cookies

"Cookies" are small files that are stored on the user's computers and that are able to store different kinds of information. Primarily, a cookie is used to store information with regard to the user (or the device that stored the cookie) during or after his visit of the offered online service. Temporary cookies are cookies that will be deleted after the user leaves the online service and closes his browser. Such cookies can store the contents of a shopping basket in online shops or a login status. Permanent cookies are cookies that remain stored even after the browser was closed. Thus, the login status can be stored in case the user returns to the online service after several days. Such cookies can also store the user's interests for audience measurement or marketing purposes. "Third-party cookies" are cookies that are placed by other providers than the controller of the online service (in case the controller places cookies, these are "first-party cookies"). We may use temporary and permanent cookies and we provide information on our cookie policy in our Website Privacy Policy. In case users do not wish to store cookies on their computer, they are being asked to disable the relevant option in their browser settings. Cookies that were already stored on the computer can be deleted in the browser settings. In case cookies are not accepted, this can limit the functions of the online service. The use of cookies for the purposes of online marketing, especially tracking techniques, can be generally objected to via the US website <http://www.aboutads.info/choices/> or the European website <http://www.youronlinechoices.com/>. Alternatively you can disable third-party cookies via the opt-out page of the Network Advertising Initiative at <https://www.networkadvertising.org/choices/>, which contains more information and provides help to manage your choices to opt-out.

Cookies can also be disabled in your browser settings. Please note that you may not be able to use all functions of the online service in this case.

## Section 6 Analytic tools

(1) The methods of tracking used by us - which are listed below - are performed on the basis of Article 6 (1) sentence 1 lit. f GDPR. With the methods of tracking used, we want to ensure a demand-oriented design and the continuous optimization of our website. Apart from that, we make use of methods of tracking to keep statistic records of the use of our website and to evaluate these for the purposes of optimizing our offer for you. These interests are considered to be legitimate according to the above-mentioned provision.

(2) For the purposes of a demand-oriented design and the continuous optimization of our website we use Google Analytics, a web analytics service provided by the Google Inc. (<https://www.google.de/intl/de/about/>) (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter referred to as "Google"). In this context pseudonymized user profiles are created and cookies are used. The information on your usage of the website generated by the cookie like

- browser-type/-version,
- used operating system,
- referrer URL (the previously visited website),
- host name of the accessing computer (IP address),
- time of the server request,

is transferred to one of Google's servers in the United States and is stored there. This information is used to evaluate the use of the website, to generate reports on the activity of the website and to perform further services in connection with the usage of the website and the internet for the purposes of market research and a demand-oriented design of these websites. Where appropriate, this information is also transferred to third parties, as far as this is required by law or to the extent that third parties process this data on behalf of Google. Under no circumstances will Google associate your IP address with any other data held by Google. The IP addresses are rendered anonymous, which makes an association impossible (IP masking). You can prevent the installation of cookies by adjusting your browser settings appropriately; however, please note you may not be able to fully use all features of this website in this case.

(3) Furthermore, you can prevent the collection of data generated by the cookie and related to your usage of the website (including your IP address) as well as the processing of this data by Google by downloading and installing a browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=de>).

(4) Find further information on data protection in connection with Google Analytics in the Google Analytics Help Centre (<https://support.google.com/analytics/answer/6004245?hl=de>).

## **Section 7 Objection or withdrawal concerning the processing of your data**

(1) If you have given consent to the processing of your data, you can withdraw this consent at any time. After notifying us, this withdrawal has influence on the legitimacy of the processing of your data.

(2) As far as the processing of your personal data is based on the balance of interests, you can object to the processing. This is the case, if the processing is particularly not required for the performance of a contract with you. In each case we outline this in the following description of the functions. When exercising such a right to object, we kindly ask you to set out the reasons why we should not process your personal data the way we do. In the case of a reasoned objection we shall consider the situation and then either stop or modify the data processing or point out compelling legitimate grounds based on which we will continue the processing.

(3) You may, of course, object to the processing of your personal data for marketing purposes and data analysis at any time. You can inform us on your objection against advertising via the following contact details:

Maltego Technologies GmbH

Thomas-Wimmer-Ring 17

80539 Munich

[contact@maltego.com](mailto:contact@maltego.com)

## **Section 8 Data security**

(1) In order to protect the security of your data during the transfer we use the latest encryption method (such as SSL) via HTTPS. You can find out whether a single page of our website is transmitted encrypted by looking for the icon showing a closed key or padlock in the lower status bar of your browser.

(2) Apart from that 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.

## **Section 9 Updates and changes of this Website Privacy Policy**

(1) This Website Privacy Policy is currently valid and is dated as of January 2019.

(2) We reserve the right to adjust this Website Privacy Policy occasionally to make sure it always complies with the current legal requirements or to implement changes to our services in the Website Privacy Policy, for example, if new services are introduced. In case you visit our website again, the new Website Privacy Policy shall apply.

(3) You can access and print the latest version of the Website Privacy Policy on the website ([https://www.maltego.com/website\\_privacy\\_policy.html](https://www.maltego.com/website_privacy_policy.html)) at any time.