

# Privacy Notice

EFFECTIVE OCTOBER 16, 2023

Qrator Labs CZ s.r.o. (the Czech Republic) and their subsidiaries and affiliated companies listed herein below (together, “**Qrator**”, “**we**”, “**us**” or “**our**”) are committed maintaining your privacy and will process any personal data only in accordance with applicable data protection laws. This Privacy Notice describes our current policies and practices with regard the information we collect from you directly and/or through your use our websites, our Services (as defined below), and/or through our business dealings with or in relation to you, and how we process that personal data.

The references to “**you**” or “**your**” in this Privacy Notice are to the individual who is visiting our websites, is accessing, using or applying to use our Services (as defined below) either on your own account or on behalf of a business. This includes, in relation to a customer or prospective customer of Qrator, any sole trader and any principals, including the managing and financial directors, any other directors and officers, shareholders, partners and beneficial owners of a customer, as well as any member of staff accessing or using the Services on behalf of a customer.

We appreciate that you trust us when you provide us with your information. Protection of information is our top priority because we want to keep your trust.

This Privacy Notice applies to our “Services”: information services for network incident notifications, analysis of anomalies, traffic monitoring including but not limited to DDoS attacks mitigation, Web Application Firewall (WAF), Bot Protection, Ingress: Service Provider Protection, DNS protection, Content Delivery Network, Real-time BGP monitoring, and public parts of our websites, including, but not limited to <https://qrator.net> and <https://radar.qrator.net> and <https://blog.qrator.net/>.

Our right to process personal data also is described in our Agreements with Customers and other applicable documents (“**Customer Agreements**”) with you. In our Customer Agreements Qrator is typically contractually prohibited from accessing the personal data that you process through Qrator’s Services, and it is not a purpose of Services to access any personal data which you process with the use of our Services. If a provision of a Customer Agreement conflicts or otherwise is inconsistent with a provision of this Privacy Notice, then the term of the Customer Agreement will prevail to the extent of the conflict or inconsistency.

We design all of our Services with data protection in mind. We work hard to keep your information secure. We regularly monitor and update our security practices to help better protect your privacy.

Please read this Privacy Notice carefully. If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice. IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY NOTICE, THEN PLEASE DO NOT PROVIDE YOUR PERSONAL DATA TO US OR USE OUR SERVICES AND/OR WEBSITES.

## **QUICK LINKS**

We recommend that you read this Privacy Notice in full to ensure you are fully informed. However, if you only want to access a particular section of this Privacy Notice then you can click on the relevant link below to jump to that section.

[need to provide links to the sections, as this is a GDPR requirement to privacy policy/notice to be concise, transparent, intelligible, and easily accessible form]

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## **THE TYPES OF DATA WE COLLECT**

We collect data about you that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you (“**Personal Data**”). Personal Data can be provided voluntarily by you or they can be collected automatically. This Privacy Notice applies to the Personal Data we process as a “data controller”, meaning, as the party that determines what data is collected and why. Please note that this Privacy Notice does not apply to the extent we process Personal Data in the role of a “data processor” on behalf of our customers in the course of providing our Services. Provisions set out within the General Data Protection Regulation ((EU) 2016/679) (“**GDPR**”) requires controllers to put agreements in place with their processors that contain rules governing processing data for the controller. If we are

acting as a Processor in our business relationship with you, we will be happy to enter a Data Processing Agreement or Amendment to the Customer Agreement (the “DPA”) with you. Please download our DPA available at: [recommended to provide the link to our template of the DPA] fill out the relevant information, sign it and send us back to us at [privacy@qrator.net](mailto:privacy@qrator.net).

When you use our Services and websites, we collect the Personal Data that you give us, which includes:

- **Information that you provide voluntarily**

Certain parts of our websites, Services may ask you to provide Personal Data voluntarily: e.g., we may ask you to provide your contact details in order to access a free trial of our Services, to access to additional resources and documentation (e.g., Services guides) to register an account with us, to subscribe to marketing communications from us, and/or to submit enquiries to us. The Personal Data that you are asked to provide, and the reasons why you are asked to provide it, are stated in this Privacy Notice or will be made clear to you at the point we ask you to provide your Personal Data and may include:

- Contact information, such as your name, postal address, email address, telephone number (each whether associated with you in your personal or professional capacity);
- Authentication data, such as user name, password, password hints, social media handle, and other similar information used to verify the identity of our customers;
- Commercial information, such as information about Services you subscribe to and payment information you provide in connection with these transactions (including billing address and bank details);
- Professional information, such as your current or former employer company name and job title;
- Preferences, such as how you prefer to communicate with us, Services that you are interested in, or other preferences you communicate to us; and
- Other information you provide, such as information in emails or other communications that you send to us or otherwise contribute (e.g., customer support inquiries).

- **Information that we collect automatically**

When you visit our websites and/or use our Services, we may collect certain information automatically from your device (e.g., information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (i.e., country or city-level location) and other technical information) through the use of cookies, pixel tags, log files, local storage objects and other tracking technology. We may also collect information about how your device has interacted with our websites and/or Services, including the pages accessed and links clicked. In some countries, including countries in the European Economic Area, this information may be considered Personal Data under applicable data protection laws.

The Personal Data we may obtain through cookies includes:

- Unique identifiers, such as IP address, browser type, operating system, the pages you view on the websites, the pages you view immediately before and after you access the websites, and the search terms you enter on the websites, Internet or other electronic network activity information;
- General location data; and
- Inferences drawn from the above categories.

For more information about how we use cookies, the types of cookies we use, about similar tracking technology, and how to manage your cookie preferences, please refer to our “Cookies Notice”, and for more information about cookies please refer to [[insert link to the Cookies notice](#)] below.

In some cases, your Personal Data will be supplemented by information retrieved from public sources, such as online media or employer websites, for the purpose of confirming your current professional position or address.

#### **Information collected when you use the Services -**

When you use the Services, we collect information about which features you use and how you use them (collectively, "**Usage Data**"). Usage Data might be considered Personal Data under certain privacy laws.

Qrator collects the following Usage Data:

*Services usage information:* We collect information about which features you use and how you use them, including: date/time stamps associated with service usage; integrations; how often you use the Services and in which circumstances; Services performance metrics; features you use and the results of their operations; information about disabled features; and information about errors and crashes and activities which led to them.

*Activity and audit logs on Qrator websites:* An activity log is a list of user activities. Qrator’s servers automatically collect and store in logs your search queries, Internet Protocol (IP) address, browser type and language, time zones, date and time of your request and referral URLs and certain cookies that identify your browser or Customer Account.

We may link Personal Data and Usage Data or different types of Usage Data. We also may link Personal Data that we collect with publicly-available personal data, such as personal data available in public databases. If the linked information directly or indirectly identifies an individual natural person, we will treat it as Personal Data.

#### **Information received from third parties and other sources**

We may collect or receive information about individuals from service providers, and other third parties, such as our customers, representatives and professional advisers, content providers, government authorities, public sources and records, and other third parties (such as ISPs, platforms, operating systems, and social media platforms).

### **Personal Data Qrator does not seek to collect**

Qrator does not need special categories of personal information (also known as “sensitive personal information or data”), as defined by the GDPR, to provide its Services. Qrator avoids collecting sensitive Personal Data from you through the Services, websites or otherwise. Unless Qrator specifically requests it, please do not provide sensitive Personal Data to Qkator. If you choose to provide Qkator with unsolicited sensitive Personal Data, QRator will process it only as necessary to establish, exercise or defend legal claims. In the rare circumstances in which Qkator does seek to collect sensitive Personal Data, Qkator will do so in accordance with data protection laws and/or ask for your consent.

### **HOW WE USE YOUR DATA AND OUR LEGAL BASIS TO PROCESS YOUR DATA**

We use the Personal Data primarily *to provide Services (including via targeted advertising), and respond to requests we receive from you.* We use account-related data provided by customers to us in connection with the purchase, sign-up, use or support of Customer Account (such as usernames, email address and billing information) to provide you with access to our websites or Services, to contact you regarding your use of our Services, to notify you of important changes to our websites or Services, when you contact Qrator by email or when you otherwise use the functionality of the Services. Such processing is necessary for the performance of the Customer Agreement or other contract for usage of our Services between you and Qrator when you ask for information about our Services (for example, when you ask us to send you offers or price information), we will use your contact information to respond to your requests. Such processing is necessary to respond to or implement your request prior to entering into a contract with us. We process service data which we collect in the process of Services performance for the purpose of providing Services to customers in accordance with applicable Customer Agreement.

We also use the Personal Data for *communication purposes*, including to send you newsletters, promotions, surveys and other Services-related information and to maintain our list of contacts. We will send you such information only based on your prior consent, which is given at the time you provide us with the respective Personal Data. In such case, if you do not provide us with your consent to the processing of your Personal Data for communication purposes, we will not send you respective information. You may withdraw your consent to receive such communications at any time. Please note that we will continue to contact you via email to respond to your requests and regarding the provision of our Services.

We use data relating to your use of the websites and Services to *analyze, administer, support and improve* your access to and use of the websites and Services, including fraud prevention. Collecting this information enables us to better understand the visitors who come to our websites and/or use our Services, where they come from, and what content on our websites is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our websites or Services to our customers and end users. We may also compile, anonymize and/or aggregate your Personal Data and other data and use such anonymized and/or aggregated data for our business purposes, including sharing such data with

affiliates and business partners. This aggregate information does not identify you, i.e., it is not considered Personal Data.

We also may use your Personal Data in other ways for which we provide specific notice at the time of collection and obtain your consent if required by applicable law. Additionally, we may anonymize or aggregate your information and use it for other purposes as permitted by applicable law.

#### **OUR BASIS FOR USING YOUR DATA**

If you access our Services from the European Economic Area, our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it. When processing Personal Data for the purposes described in this Privacy Notice, we will rely on any consents you have provided in respect of direct marketing activities or in reliance on our legitimate interests this interest will normally be to conduct our business and communicating with you as necessary to provide our Services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our Services, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

Where we rely on legitimate interests to process Personal Data, we will balance our need to process that information with any risks such processing poses to your rights and freedoms.

#### **SHARING AND DISCLOSURE**

We do not sell or otherwise make your Personal Data available to third parties, although we may disclose your Personal Data to the following categories of recipients: to our group companies (including those in Cyprus, Czech Republic, and UAE), third party services providers and partners who provide data processing services to us (e.g., to support the delivery of, provide functionality on, or help to enhance the security of our websites and/or Services), or who otherwise process Personal Data for purposes that are described in this Privacy Notice or notified to you when we collect your personal information (when they perform services on our behalf, mainly to maintain and support our IT systems).

We may also disclose your Personal Data to third parties including law enforcement bodies, regulatory, government agencies or other third parties in the following circumstances: (a) to undertake the activities listed above; (b) to conform to legal requirements or comply with legal process (including assisting in the investigation of suspected illegal or wrongful activity or to deal with any misuse of the Services); (c) to sell, make ready for sale or dispose of our business in whole or in part including to any potential buyer or their advisers.

#### **INTERNATIONAL DATA TRANSFERS**

Use of our Services sometimes involves cross-border transfers of Personal Data. Qrator may transfer your Personal Data to the following countries: Cyprus, Czech Republic, and UAE.

For cross-border transfers of Personal Data to jurisdictions not guaranteeing an adequate level of data protection, Qrator uses appropriate safeguards to guarantee that your personal data be protected in accordance with this Privacy Policy and applicable data protection laws. These

safeguards include implementing the European Commission’s 2021 Standard Contractual Clauses for international transfers (“SCCs”) (Art. 46 GDPR), adapted to satisfy applicable law requirements if necessary, which may be read [here](#) and other valid mechanisms for transfers of personal data among our affiliates, data processors or third parties.

### **MEASURES TO KEEP YOUR DATA SAFE**

We maintain reasonable and appropriate technical and organizational security measures to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction in light of the risks inherent in processing this information. We also expect that you will use appropriate security measures to protect your information. We regularly review our security policies and procedures to ensure our systems are secure and protected. For more information on what security measures Qrator applies, please check: [\[link to TOM\]](#).

### **DATA RETENTION**

We retain Personal Data we collect from you as long as we have an ongoing legitimate business need to do so (e.g., to provide you with a Service you have requested or to comply with applicable legal, tax or accounting requirements). To determine the appropriate retention time for your Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data, and whether we can achieve these purposes through other means, as well as applicable legal requirements.

When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymize it or, if this is not possible (e.g., because your Personal Data has been stored in backup archives), then we will securely store your Personal Data and isolate it from any further processing until deletion is possible.

### **YOUR RIGHTS**

You may have rights with respect to your Personal Data conferred upon you by applicable law. Please consult the relevant section for further information about your available rights and means to exercise them.

If you are located in the European Economic Area, please see the [EU Privacy Notice](#) [\[link to be provided to the section below\]](#).

If you are located in the United Arab Emirates, please see the [UAE Privacy Notice](#) [\[link to be provided to the section below\]](#).

IF YOU ARE LOCATED IN A JURISDICTION WITH DATA PROTECTION LAWS THAT OFFER YOU PRIVACY RIGHTS NOT DESCRIBED IN THIS PRIVACY NOTICE, PLEASE CONTACT US AT [privacy@qrator.com](mailto:privacy@qrator.com). We respect your privacy rights and will do our best to accommodate your requests.

### **EXERCISING YOUR RIGHTS**

You may exercise your rights by contacting us as indicated in the “Contact Us” section below.



## **CHILDREN**

Qrator does not intend to and not knowingly collect Personal Data from children under the age of 16, and our Services are not directed to or intended for use by minors. If you have reason to believe that a child under the age of 16 has provided Personal Data to Qrator through this website without his or her parents verified consent, please contact us at [privacy@qrator.com](mailto:privacy@qrator.com) and we will endeavor to delete that information from our databases.

## **COOKIES AND SIMILAR TRACKING TECHNOLOGY**

We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you including to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our [Cookie Policy](#) [\[provide link\]](#).

## **LINKS TO OTHER WEBSITES AND SERVICES**

The Services may include links to third-party websites and services that are not operated by us. When you click these links, you will be directed away from the Services. A link to a third-party website or service does not mean that we endorse it or the quality or accuracy of information presented on it. If you decide to visit a third-party website or service, you are subject to this third party’s privacy practices and policies, not ours. This Privacy Notice does not apply to any personal data that you provide to these other websites and services.

## **REVISIONS TO OUR PRIVACY NOTICE**

We reserve the right to revise this Privacy Notice or any part of it at any time. Please review the Privacy Notice periodically for changes. We will post all changes to this Privacy Notice on this page and notify you via appropriate means, where required by applicable law. By continuing to use the websites and/or the Services or providing us with information following such a replacement Notice being uploaded, you agree that you will be deemed to have agreed to be bound by the Privacy Notice as changed.

## **EU Privacy Notice**

Within the EU, the data controller (i.e., the person who or entity that determines the purpose and means of processing) for the Personal Data collected pursuant to this Privacy Statement is Qrator Labs CZ S.R.O., address: Růžová 1416/17, Nové Město, 110 00 Praha 1.

Under the GDPR you have the following rights in relation to your Personal Data:

*Right of access:* You have the right to know if and what Personal Data we process about you and may request a copy of that Personal Data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

*Right to rectification:* You are entitled to have incorrect or incomplete Personal Data about you corrected or completed. If we have shared your Personal Data with others, we will tell them about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.



*Right to erasure:* You may ask us to delete your Personal Data. Under some circumstances we might not be able to delete your Personal Data (e.g., in case we are required to keep your Personal Data by law). If we have shared your Personal Data with others, we will inform them about the erasure where possible. If you ask us, where possible and lawful to do so, we will also inform you with whom we shared your Personal Data so that you can contact them directly.

*Right to restrict processing:* You may ask us to restrict or ‘block’ the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to the processing of it. We will tell you before we lift any restriction on processing. If we have shared your Personal Data with others, we will inform them about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

*Right to object:* You may ask us at any time to stop processing your Personal Data, and we will do so:

- if we are relying on a legitimate interest to process your Personal Data — unless we demonstrate compelling legitimate grounds for the processing; or
- if we are processing your Personal Data for direct marketing purposes.

Please note that the limitation or deletion of your Personal Data may mean that we will be unable to provide you our Services described above.

*Right to data portability:* You also have the right to receive your Personal Data in a machine-readable format and have the data transferred to another party responsible for data processing.

*Rights in relation to automated decision-making and profiling:* You have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

*Right to withdraw consent:* If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. To opt out of any received emails or other promotional communication, please unsubscribe by selecting “unsubscribe” at the bottom of a received e-mail or by contacting us as indicated in the “Contact Us”. This will not affect the lawfulness of processing based on your prior consent.

*Right to lodge a complaint with the data protection authority:* If you have a concern about our privacy practices, including the way we have handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

## **UAE Privacy Notice**

**For natural persons (data subjects) in UAE,** when we collect and use personal data (information) about you (“Personal Data”), we may be subject to the *Federal Decree-Law No. 45*

of 2021 on the Protection of Personal Data (United Arab Emirates) (“PPD”) and responsible as a ‘data controller’ for such Personal Data. Below you will find the additional specific provisions applicable to you in UAE; including your rights to your data as it may be processed by Qrator. Within the UAE, the data controller (i.e., the person who or entity that determines the purpose and means of processing) for the Personal Data collected pursuant to this Privacy Notice is Qrator Technologies FZ, address: [UAE Dubai, Dubai Media City, building 5, 1st floor, premises № 029].

### **Transferring UAE Data Subject information outside the UAE**

Qrator may transfer the Personal Data we collect about you to one of more countries outside UAE, including EU, in order to perform one of the activities listed above (see “HOW WE USE YOUR DATA AND OUR LEGAL BASIS TO PROCESS YOUR DATA”). Where there is no special legislation on Personal Data Protection meaning that these are not deemed to provide an adequate level of protection for your Personal Data - we have put in place the appropriate measures to ensure that your Personal Data will be secure. These measures include Data Processing Agreements. If you require further information about these protective measures, you can request it from us (see contacts below).

### **Your duty to inform us of changes**

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

### **Your rights in connection with Personal Data**

Under certain circumstances, by law you have the following rights:

- **Right to Obtain Information.** This right is commonly known as a “data subject access request”. This enables you to receive a copy of the Personal Data we hold about you upon submitting a request.
- **Right to Request Personal Data Transfer.** This enables you to ask us, in certain circumstances, to provide you with the Personal Data you have provided to us in a structured, commonly used and machine-readable format or to transmit the Personal Data that you have provided to us to another party, whenever this is technically feasible.
- **Request for Correction or Erasure.** This enables you to request for correction or erasure of the Personal Data that we hold about you. You can ask us to update any incomplete, inaccurate, or out of date information we hold about you, to be corrected or to delete or remove Personal Data where there is no good reason for us continuing to process it.
- **Right to Restrict Processing.** This enables you to ask us, in certain circumstances, to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Right to Stop Processing.** This enables you to object to and stop the processing if the processing of your Personal Data is for direct marketing purposes, including profiling related to direct marketing or for the purposes of conducting statistical surveys, unless the processing is necessary to achieve the public interest or if the processing is in violation of your rights.

- **Right to Processing and Automated Processing.** This right enables you not to be subject to a decision based solely on automated processing that produces legal effects concerning you or similarly significantly affects you.
- **Right to Filing a Complaint.** This enables you the right to file a complaint with UAE Data Office (established by virtue of Federal Decree-Law No. 44/2021), if you consider that the processing of your Personal Data infringes PPD. UAE Data Office is the regulatory and enforcing authority responsible for the protection of the privacy of individuals.  
If you are UAE resident and want to exercise a data subject right in connection to your Personal Data, please contact us (see contacts below).

### **What we may need from you**

If you exercise one of the above rights, we may need to request specific information from you to help us confirm your identity and that you are entitled to make such a request. This is to ensure that Personal Data is not disclosed to any person who has no right to receive it.

### **HOW TO CONTACT US**

If you have any questions about how we process your Personal Information, on update or deletion of your Personal Information, please feel free to contact Qrator at [privacy@qrator.com](mailto:privacy@qrator.com).

### **LIST OF THE MEMBERS OF QRATOR GROUP PROCESSING PERSONAL DATA**

Qrator group companies comprises of Qrator Labs CZ s.r.o. (the Czech Republic), Qrator Technologies FZ (UAE), Carquadrin Trading Limited (the Republic of Cyprus) and their affiliated companies. Below is the list of Qrator Group members that may process Personal Data withing the scope of this Privacy Notice:

- Qrator Labs CZ s.r.o. (the Czech Republic)
- CARQUADRIN TRADING LTD (Cyprus)
- Qrator Technologies FZ (UAE)

**Accountability:** you have the right to lodge a complaint with the appropriate data protection authority if you have concerns about how we process your Personal Data or if you would like to turn to the relevant authority in charge of oversight over the Personal Data protection policies, you have a right to do so, the appropriate data protection authority is “Úřad na ochranu osobních údajů” (website: [www.uoou.cz](http://www.uoou.cz); address: Pplk. Sochora 27, 170 00 Prague 7, Czech Republic).