

## **FACTOR SECURITY APPLICATION – PRIVACY POLICY**

The Factor Security App (the “**App**”) is operated by Factor Security Ltd (“**Factor Security**”, “**we**”, “**us**”, and “**our**”) for its corporate customers and is available as a mobile application and browser extension.

The App is designed to protect users against malicious activity that may result from the opening of a link.

This in-app privacy policy (the “**Policy**”) explains which personal data the App collects, the purposes for which it collects such data, and how such data is handled by us, including how and for how long it is stored and with whom it is shared.

Factor Security does not collect any personal data via the App.

### **1. Information We Receive and Collect**

The App collects URLs visited, usernames and passwords (which are neither directly nor indirectly connected to any personal identifiers (i.e., anonymous)) and the domain names used to access the URL. This information also provides us with the dates and links used to access the URL.

### **2. Information Storage and Security**

The App is operated through Firebase, an app development platform provided by Google, where all information collected and processed in relation to the App is stored in a database managed by us.

Firebase and Google provide extensive security measures to secure their servers and we use two-factor authentication (2FA) for access to our database, which is only granted to prior-approved members of our staff.

### **3. How We Use and Share Your Information**

All information we collect in the App is anonymized during our processing and used to: (a) operate, support, and improve the App; (b) provide you with the App features; (c) enable us to resolve technical issues; and to (d) assure the security of the App and its collected information, including for investigating suspicious activity.

We do share personal data we collect through the App with our corporate customers. Though any personal data we process is anonymized throughout the entirety of our processing, once transferred to our corporate customers, it is considered pseudonymized personal data. If you have any questions concerning the processing of such pseudonymized personal data, you should contact the specific corporate customer directly.

We do not share personal data we collect through the App with other third parties. Nevertheless, we will collect and share information with third parties if we have a good-faith belief that it is necessary in order to: (a) comply with any applicable law, regulation, legal proceeding, order, or instruction of a competent authority; (b) detect, investigate, prevent, and address fraud or other illegal activity or to address security or technical issues; (c) protect the rights, property, and safety of Factor Security, of other users, or anyone else; and to (d) pursue and resolve legal disputes or proceedings that we or any of our affiliates are involved in.

### **4. Your Rights**

Though we do not collect personal data, depending on the jurisdiction applicable to your personal data, you may have various data subject rights. If the European Union’s General Data Protection Regulation 2016/679 or its UK equivalent applies, you may have a right to access, erase, or correct any

personal data of yours collected by us, as well as other informational rights. If you are a resident of California, Virginia, Colorado, Connecticut, Nevada, Utah or any other US state with an applicable privacy law, you may have similar or additional rights. We will respect any lawful request to exercise such a right, subject to applicable law.

#### **5. Changes to this Privacy Policy**

We may change this Policy from time to time and, if we do, we will publish a prior notice (unless mandatory law or regulation requires otherwise, or unless such change is in your favor). If you continue to use the App after such changes are in effect, you agree to the revised Policy.

You may contact our Data Protection Officer at: [info@myedpo.com](mailto:info@myedpo.com).

This Policy was last updated on: February 22, 2026