

# BLOCKAID PRIVACY POLICY

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## 1. INTRODUCTION

This privacy policy (“**Privacy Policy**”) describes how we, Blockaid Inc. and our affiliates (“**Blockaid**”, “**we**”, “**us**” or “**our**”) use, collect, process and store Personal Data (defined below) that we receive from or about you (“**you**”) in connection with your use of the Blockaid Website and our service offerings (the “**Services**”). This Privacy Policy applies to all our features and functionality offered to you, as well with respect to any electronic communications exchanged with you with respect to the Services or otherwise provided by you to us.

**Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory rights, including your rights to a remedy or other means of enforcement.

“**Personal Information**” and/or “**Personal Data**” mean any information that can be used, alone or together with other data, to uniquely identify any living human being and any information deemed as Personally Identifiable Information by applicable privacy laws.

This Privacy Policy forms an integral part with our Website Terms of Use (“**Terms**”) (available at <https://blockaid.io/legal/terms-of-use> ). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms.

## 2. WHAT PERSONAL DATA WE COLLECT, AND HOW WE USE IT

Sources	Category of Personal Information	Personal Information Collected	Purposes (How We Process Your Personal Information)	Legal Basis
Browsing or visiting our Website	Identifiers, Internet or other electronic network activity information; Other Information	IP address, pages clicked, search and browser history, device information	To analyze trends and behavior, maintain and improve the Website and Services, and for	Consent (non-essential cookies), Legitimate interest

Sources	Category of Personal Information	Personal Information Collected	Purposes (How We Process Your Personal Information)	Legal Basis
	(Geolocation information)		marketing and promotional efforts	(essential cookies, marketing)
<b>Subscribing to our blog/newsletter</b>	Identifiers	Full name, business email address	To send communications for which you have subscribed and other marketing communications	Consent
<b>Contacting us</b>	Identifiers; Professional or Employment-Related Information	Full name, business email, company, job title, work telephone number, country, message (to the extent it includes personal data), any other provided information	To answer questions, send marketing communications	Consent
<b>Applying for a job</b>	Identifiers; Professional or Employment-Related Information; Education Information	Full name, email, resume data, assessment responses, background check results, any other provided information	To assess as a candidate, review job application, communicate regarding application	Legitimate interest, Consent
<b>Providing personal data for marketing reasons</b>	Personal Information; Professional or Employment-Related Information	Full name, business email, job title, company, address, telephone number, country, any other provided information	To establish a business relationship, contact about services, send marketing communications	Legitimate interest, Consent (for marketing)
<b>Acquiring personal data from third-party sources for marketing</b>	Personal Information; Professional or Employment-Related Information	Full name, business email, job title, company, address, telephone number, country	To contact regarding services, send marketing communications	Legitimate interest, Consent (for marketing)
<b>Using personal data of business personnel of</b>	Identifiers; Professional or Employment-	Full name, business , Blockaid password, job title,	To allow registration and log-in, provide services, billing,	Performance of a contract, Compliance

Sources	Category of Personal Information	Personal Information Collected	Purposes (How We Process Your Personal Information)	Legal Basis
<b>our customers/ end-users of our platform</b>	Related Information Internet or other electronic network activity information; Other Information (Geolocation information)	role, company, address, telephone number, country, feedback, usage data (pages visited, IP address, browser information, access times)	support, monitoring, analytics, security, communication, marketing	with a legal obligation, Legitimate interest, Consent (for marketing)
<b>Using personal data of service providers/distributors</b>	Identifiers; Professional or Employment-Related Information	Full name, business email, job title, company, business address, telephone number, country, payment information, any other provided information	To perform agreement, communicate, comply with legal obligations	Performance of a contract, Compliance with a legal obligation, Legitimate interest
<b>Interacting on social media profiles</b>	Identifiers; Professional or employment-related information	Full name, business email, job title, company, telephone number, any other provided information	To respond to requests, establish business relationship, send marketing communications	Legitimate interest, Consent (for marketing)
<b>Search Technology</b>	Scanning the blockchain and publicly available resources	IP addresses, Geolocation	To enhance the Company's products and services and research purposes	Legitimate interest

**Tracking technologies** - When you visit or access our Website, we use (and authorize third parties to use) pixels, cookies, events and other technologies. Those allow us to automatically collect information about you, your device, and your online behavior in order to enhance your navigation in our Website, improve our Website's performance, perform analytics and customize your experience. In addition, we may merge information we have with information collected through these tracking technologies and information we may obtain from other sources and, as a result, such information may become personal information.

*To learn more about our Tracking Technologies please see our Cookie Policy available on our website.*

Finally, please note that some of the abovementioned Personal Information may be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Information may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims.

In certain cases, we may anonymize or de-identify your Personal Information and further use it for internal and external purposes, including, without limitation, to improve our services and for research and development purposes. "Anonymous Information" means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

### **3. HOW WE PROTECT AND RETAIN YOUR PERSONAL DATA**

3.1. Security. We have implemented and maintain appropriate technical, organizational and security measures designed to protect your Personal Information and reduce the risks of damage, loss of information and unauthorized access or use of information. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

3.2. Retention of your information. We may store your Personal Information for as long as necessary to fulfil the purpose for which we collected it, and as long as necessary to fulfill your requests or inquiries or provide and improve our services or until we proactively delete it or you send a valid deletion request. In addition, in some circumstances we may store your Personal Information for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Information or dealings. We also periodically review and delete or de-identify inactive data and related personal data that has been inactive for four years. We have an internal data retention policy to ensure that we do not retain your Personal Data perpetually. Regarding retention of cookies, you can read more in our Cookies Policy.

### **4. HOW WE SHARE YOUR PERSONAL DATA**

Depending on the context described above, we may share your Personal Data to the following categories of third parties:

- Hosting/ storage providers
- Email system providers
- Authentication
- Support and ticketing
- Logging and monitoring
- Marketing partners

- CRM systems
- Data enrichment
- E-mail verification
- Sales Engagement
- Sales automation tools
- Analytics and business intelligence services
- Document management / automation tools
- Conducting background checks (for job applicants)
- Automation / management of HR and job application process
- Other service providers to the extent required to fulfil the purposes listed above

We may also share your Personal Data as follows:

- a) to detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of the Services; to investigate violations and enforce our policies, and as required by law, regulation or other governmental authority; to comply with a subpoena or similar legal process or respond to a government request or to investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; for the purpose of collaborating with law enforcement agencies; to establish or exercise our rights to defend against legal claims; and in case we find it necessary in order to enforce intellectual property or other legal rights;
- b) with our business partners with whom we jointly offer products or services;
- c) with our affiliated companies to the extent necessary to fulfil the purposes listed above;
- d) if, in the future, we sell or transfer some or all of our business, shares, or assets to a third party, we may disclose information to a potential or actual third party purchaser of our business, shares or assets. In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Information in connection with the foregoing events;
- e) with service providers and third parties for our operational purposes and to guarantee our Services' improvement, such as analytics partners;
- f) with social media platforms for the purposes mentioned above;
- g) where you have provided your consent to us disclosing or transferring the Personal Information.

## 5. YOUR PRIVACY RIGHTS

5.1. 5.1 The following rights (which may be subject to certain exemptions or derogations) may apply to certain individuals depending on their jurisdiction of residence:

- **Right of access** – you may have the right to request a copy of the personal information we have about you and to request supporting information explaining how the personal information is used;
- **Right of rectification** – you may have the right to request that we rectify inaccurate personal information about you;
- **Right of erasure** – you may have the right to request that we erase personal information about you;
- **Right to restrict processing** – in some situations, you may have the right to request that we do not use the personal information you have provided (for example, if you believe it to be inaccurate);
- **Right to data portability** – you may have the right to receive your personal information in a structured, commonly used and machine-readable format and to transmit such information to another controller;
- **Right to withdraw consent** – where we process your personal information based on consent (including direct marketing consents), you have the right to withdraw consent at any time. However, this will not affect the lawfulness of the processing based on consent before its withdrawal. Furthermore, even in case of a withdrawal we may continue to use your personal information as permitted or required by law;

- **Right to object** – where we are processing your personal information based on a legitimate interest (or those of a third party) you may challenge this. However, we may be entitled to continue processing your personal information based on our legitimate interests or where this is relevant to legal claims. You also have the right to object where we are processing your personal information for direct marketing purposes.

5.2. To the extent privacy laws applicable to you afford you with the rights referenced above, we will respect your rights and comply with such laws. You can exercise your rights by contacting us at [privacy@blockaid.co](mailto:privacy@blockaid.co). You may use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. To protect your privacy, we may take steps to verify your identity before fulfilling your request. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. If you are an authorized agent making a request, we may require and request additional information to protect the Personal Data entrusted to Blockaid, including information to verify that you are authorized to make that request. There may be situations where we cannot grant your request, for example, in the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

5.3. We will not discriminate against you (e.g., by restricting or denying you access to our Services) because of choices and requests you make in connection with your Personal Data. Please note, certain choices may affect our ability to deliver the Blockaid Services. For example, if you sign up to receive marketing communications by email, then ask Blockaid to delete all of your information, we will be unable to send you marketing communications. You may choose not to receive marketing emails by sending a single email with the subject "BLOCK" to [privacy@blockaid.co](mailto:privacy@blockaid.co). Please note that the email must come from the email account you wish to block OR if you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails, and we will process your request within a reasonable time after receipt.

## 6. TRANSFERS OF PERSONAL DATA

### 6.1. Internal transfers

Transfers within the Blockaid group will be covered by an internal data processing agreement between entities of the Blockaid group which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred to.

### 6.2. Cross-border transfers (GDPR/UK GDPR)

When Blockaid engages in transfers of GDPR and UK GDPR protected Personal Data outside of the EEA or UK (for example to third-party service providers for the purposes listed above), we generally rely on:

- Adequacy Decisions adopted by the European Commission under Article 45 of the GDPR (for example, when our team accesses Personal Data from Israel);
- the Standard Contractual Clauses issued by the European Commission or the United Kingdom (as updated from time to time); or
- another lawful transfer mechanism provided for under the GDPR, such as Binding Corporate Rules.

Blockaid also monitors the circumstances surrounding such transfers to ensure that Personal Data continues to be afforded a level of protection that is essentially equivalent to the one guaranteed by the GDPR and UK GDPR.

### 6.3. Transfers subject to Israeli law

Where Blockaid transfers Personal Data from Israel to recipients located outside of Israel, such transfers will be carried out in accordance with the Israeli Protection of Privacy Law, 5741-1981, and the Privacy Protection Regulations (Transfer of Data to Databases Abroad), 5761-2001. This means that we will only transfer Personal Data abroad where:

- the recipient country ensures a level of protection no less protective than Israeli law; or
- another condition under the Transfer Regulations applies, such as the data subject's consent, the necessity of the transfer for the performance of a contract or the protection of vital interests, or where the recipient has undertaken in writing to safeguard the Personal Data in accordance with Israeli standards.

Blockaid also ensures that international transfer agreements are in place prohibiting unauthorized onward transfers and requiring the recipient to implement appropriate safeguards.

As of 14 August 2025, transfers will further comply with **Amendment 13** to the Protection of Privacy Law, which introduces enhanced obligations regarding transparency, accountability, and oversight by the Israeli Privacy Protection Authority, including the appointment of a Privacy Protection Officer and strengthened protections for sensitive personal data.

## 7. USE BY MINORS

We do not offer our products or services for use by minors and, therefore, we do not knowingly collect information from, and/or about minors under the age of 18. If you are under the age of 18, do not provide any information to us without the involvement of a parent or a guardian. In the event that we become aware that you provide information in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at [privacy@blockaid.co](mailto:privacy@blockaid.co).

## 8. INTERACTION WITH THIRD PARTY PRODUCTS

We enable you to interact with third party websites, mobile software applications and products or services that are not owned, or controlled, by us (each, a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect information from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

## 9. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

If you are a California resident, the California Consumer Privacy Act (“CCPA”) requires us to provide you with the following additional information about: (1) the purpose for which we use each category of “personal information” (as defined in the CCPA) we collect; and (2) the categories of third parties to which we (a) disclose such personal information for a business purpose, (b) “share” personal information for “cross-context behavioral advertising,” and/or (c) “sell” such personal information. Under the CCPA, “sharing” is defined as the targeting of advertising to a consumer based on that consumer’s personal information obtained from the consumer’s activity across websites, and “selling” is defined as the disclosure of personal information to third parties in exchange for monetary or other valuable consideration. Please see the “What Personal Information we collect and how we use it” and the “How we share your Personal Information” sections above in our Privacy Policy for detailed information about our data collection and use practices, as well as for more information about our advertising practices. Blockaid does not sell your personal information.

**Your CCPA Rights.** To opt out of the offline disclosure of your personal information to third parties for the purposes detailed above, please send us a request via email to [privacy@blockaid.co](mailto:privacy@blockaid.co). If we ever offer any financial incentives in exchange for your personal information, we will provide you with appropriate information about such incentives. The CCPA also allows you to limit the use or disclosure of your “sensitive personal information” (as defined in the CCPA) if your sensitive personal information is used for

certain purposes. Please note that we do not use or disclose sensitive personal information other than for business purposes for which you cannot opt out under the CCPA. Please see, “Your Privacy Rights,” under this Policy for information about the additional rights you have with respect to your personal information under California law and how to exercise them.

**California “Shine the Light” disclosure.** The California “Shine the Light” law gives residents of California the right under certain circumstances to opt out of the disclosure of certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes, or in the alternative, that we provide a cost-free means for consumers to opt out of any such disclosure. For more information about our compliance under the Shine the Light law please contact us via [privacy@blockaid.co](mailto:privacy@blockaid.co).

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

This Privacy Policy may be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement material changes in the way we use your information, in a manner that is different from that stated at the time of collection, we will notify you by posting a notice on our Platform or by other means and take any additional steps as required by applicable law.

#### **11. CONTACT US**

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [privacy@blockaid.co](mailto:privacy@blockaid.co).

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