

Laolab Privacy Policy

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INTRODUCTION

LAOLAB CYBER SECURITY - L.L.C (“**Laolab**”, “**We**”, “**Our**” and “**Us**”) values relationship with customers, users, and any persons who may be interested in Laolab's services and solutions for any reason (“**Customer**”, “**You**”, “**Your**”), and is committed to protecting Your information by handling it responsibly and safeguarding it using appropriate security measures.

This Privacy Policy (“**Policy**”) outlines the types of personal data collected on Our website, how this data is used and safeguarded. Laolab is committed to complying with

applicable laws that are designed to protect individual privacy, however, this document has been drafted to comply with the UAE Federal Decree Law No. 45 of 2021 '*On the Protection of Personal Data*' ('**UAE PDPL**'). Therefore, some of Laolab's obligations and the rights of any UAE data subjects identified in this Policy, or any other document, procedure or guideline may not be applicable to non-UAE Data Subjects, who will be subject to the rights available to them in their respective jurisdiction and as per the local data protection laws that may be applicable.

This Privacy Policy applies to UAE data subjects when they utilize any of Laolab's online channels and platforms, including Laolab's website. This coverage extends to off-site services, if any, integrated into Our digital properties.

Unless stated otherwise this Privacy Policy uses the definitions and interpretation (capitalized terms) set forth in Our Terms of Service.

Glossary of Terms and Definitions

Term	Definition
Access ('Subject Access Request')	Means a request to receive a copy of Your data from Laolab in an accessible, readily available, and legible format. Such requests are limited to information that is specific and limited to You.
Data Subject	Means the individual to whom the personal data relates to.
International Data Transfers	Means the transfer of data from one jurisdiction to another.
Personal Data	Means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier.
Service(s)	Means the software as a service (SaaS) based external Attack Surface management services, including Surface Monitoring and Application Scanning or any related professional services made available by Laolab through Laolab's website.
Subscription	Means the terms and conditions of Your usage of the Services as described in the Terms and the Plan You have selected or made available.

Supervisory Authority	<p>Means the local data protection regulators who are responsible for overseeing data protection compliance within a given jurisdiction. Such regulators are responsible for the following:</p> <ul style="list-style-type: none"> - Monitoring and enforcing data protection compliance- - Prepare key guidance documents - Proposing and approving codes of practice - Investigate complaints made by data subjects - Preparing guidance <p>UAE: The competent national supervisory authority in the UAE is the Data Office.</p>
Supplier / Third Party	<p>Means an entity, whether or not affiliated to an organisation, that is in a contractual arrangement with Laolab. These third-party relationships include, but are not limited to, activities that involve outsourced products and Services, use of independent consultants, networking and marketing services arrangements, merchant payment processing services, services provided by affiliates and subsidiaries, joint ventures and other business arrangements where Laolab has an ongoing relationship.</p>

Scope

This Privacy Policy applies to Laolab and Laolab Affiliates, subsidiaries, and contracted service providers who will collect, use, and maintain Your personal data in connection with the Services You have requested and through other interactions and communications You have with Us.

Personal Data Collection Methods

Information That You Provide to Us

We obtain personal data directly from individuals in a number of ways, including collecting personal data from individuals who provide Us with their business card, and/or completing Our online forms. We may also obtain personal data directly when, for example, We are establishing a business relationship, performing professional services through a contract, or through Our hosted software applications.

Information We Collect From Other Sources

We obtain personal data indirectly about individuals from a variety of sources, including recruitment services, other third-party providers We engage for the purpose of identifying and forming business contacts and Our customers. We may attach personal data to Our customer relationship management records to better understand and serve Our business customers, subscribers, and individuals or satisfy applicable legal obligations.

Personal data may be obtained from public registers (such as registers of legal entities), news articles, sanctions list, and Internet searches.

You understand that by browsing, using Laolab's website or any other online channels, You authorize Us to collect personal data that You submit to Our website for the purposes mentioned in Our website privacy policies. Laolab may also use cookies and other tracking technology and the same technologies it uses to analyze the effectiveness of its online resources. More information about how Your data will be used by Laolab can be found below.

Personal Data Laolab Collects and Processes

The personal data We collect and process may include Your:

- Full name;
- Email address;
- Phone number;
- IP address;
- Your residence address;
- The grounds of Your authority to bind the individual, company or legal entity You represent (in case You are acting on behalf of another individual, company or other legal entity) to the extent that such grounds contain Your personal data; and
- and other information that You voluntarily provide to Us.

If You choose not to provide, or object to Us processing, the information We collect, We may not be able to process Your instructions or continue to provide some or all of Our Services to You or Our customer. We will notify You of such data at the time that We collect this data.

When You use the Service, reports will be generated containing information about Your website (i.e. the website You choose to scan using the Service). All such reports generated by the Services will be stored by Us for the purpose of making them available to You. Reports may be deleted by You at any time. Such report may contain personal

data if the Service accesses such data during security testing. In such cases, Laolab acts as a data processor acting on Your behalf but is not a data controller.

Use of Your Personal Information

We use Your personal information for a variety of reasons. The table below illustrates such uses:

Category	Description
Advertising and/or Marketing	Used to display or target ads, marketing communications, or measuring advertisements performance. Used to promote Our professional services, products, and capabilities to existing and prospective business customers.
Authentication	To authenticate registered users to certain areas of Our websites.
Contact Information	Used to reach out to You in relation to Our Services.
Due Diligence Checks	Used to assess and improve Our Services.
Financial Information	Used to process payment relating to a Service You have availed of. This may include Your invoices, and banking account details.
Inquiry Information	Used to respond to any queries received from potential and actual Customers of Laolab.
Invitations & Events	To send invitations and provide access to guests attending Our events and webinars or Our sponsored events.
Monitoring and Enhancing Applications	Used to provide You with Our Services.
Personalise Customer Experience	To personalize online landing pages and communications We think would be of

	interest based on interactions with Us and Our affiliates.
Security	To administer, maintain, and ensure the security of Our information systems, applications, and websites.
Trial and Subscriptions	Used to activate Your trial and/or Subscription.

Disclosure of Your Information By Us

We only disclose Your personal information outside of Laolab in limited circumstances. If We do, We will put in place appropriate controls and data sharing agreements that require recipients to protect Your personal information, unless We are legally required to share that information.

Any contractors or recipients that work for Us will be obliged to follow Our instructions. We do not sell Your personal information to third parties. We may disclose Your information to Our third-party Service providers, agents, and subcontractors (**‘Suppliers’**) for the purposes of providing services to Us or directly to You on Our behalf.

When We use Suppliers, We only disclose to them any personal information that is necessary for them to provide their services and only where We have a contract in place that requires them to keep Your information secure and not to use it other than in accordance with Our specific instructions.

We take steps to ensure that any third-party partners who handles Your information comply with data protection legislations and protect Your information to the same extent that We do. We only disclose personal information which is necessary for them to provide the service they are undertaking on Our behalf. We will aim to anonymise Your information or use aggregated non-specific data sets where possible.

We may share non-personal, anonymized, and aggregated information that no longer constitutes personal data under the UAE PDPL with third parties for several purposes, including data analytics, research, submissions, thought leadership, and promotional activity.

We attach a supporting schedule with a list of the categories of third parties with whom We may share Your data.

Category of Third Party	Description of Service Provided	Lawful Basis for Processing
IT Products and/or Service Providers	<p>System based processing of personal details as part of organisational/operational requirements. e.g. cloud hosting services; application development and support services; IT Infrastructure services; email services; call recording services.</p> <p>Help maintain the safety, security, and integrity of Our Services and Your data.</p>	Performance of a Contract
Law Enforcement Agencies & Authorities	To assist law enforcement agencies for the purposes of preventing, detecting, investigating, or prosecuting criminal offences.	Legal Obligation
Courts, Regulators, and Government Authorities	<p>We may share Your personal information with these parties where We believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect Our rights or the rights of any third party.</p> <p>To investigate or address claims or disputes relating to the use of Laolab Services, to satisfy requirements under applicable laws, regulations, or operating licenses or agreements, or pursuant to legal processor governmental request, including from law enforcement.</p>	Legal Obligation
Legal/Professional Advisors	The provision of business consulting, audit and legal services including access to and analysis of personal data as part of business initiatives, statutory audits, legal	Legitimate Interest

International Data Transfers

Your personal information may be stored or processed in any country where We have Our facilities or where in which We engage Service providers and subcontractors.

We have put in place appropriate safeguards in accordance with the applicable legal requirements to ensure that Your data is adequately protected.

In other words, when We, or Our permitted third parties, transfer Your personal data outside the UAE or to countries not deemed adequate, We will impose contractual obligations on the recipients of that data to protect Your personal data to the standard required in the UAE and We may ask You to provide Your consent to such transfer. We or they may also require the recipient to subscribe to international frameworks intended to enable secure data sharing. If We transfer Your personal data outside of the UAE in other circumstances (for example, because We have to by law), We will make sure it remains adequately protected.

Security of Your Personal Data

We make every effort to ensure that Your personal data is secure. We have staff dedicated to maintaining Our security standards as set forth herein. We implement technical and organisational measures to ensure a level of security appropriate to the risk of the personal data We process. These measures are aimed at ensuring the ongoing integrity and confidentiality of Your personal data. We evaluate these measures on a regular basis to ensure the security of the processing.

We use a range of measures to ensure We keep Your personal data secure, accurate and up to date. These include but not limited to:

- Education and training to relevant staff to ensure they are aware of Our privacy obligations when handling personal data;
- Administrative and technical controls to restrict access to personal data to a 'need to know' basis;
- Technological security measures, including fire walls, encryption and antivirus software;

- We may apply pseudonymisation, de-identification and anonymisation techniques in efforts to further protect personal data; and
- Physical security measures, such as security passes to access Our premises.

The transmission of data over the Internet (including by email) is never completely secure. Although We use appropriate measures to try to protect personal data, We cannot guarantee the security of data transmitted to Us or by Us.

Cookies

A cookie is a small piece of data (text file) that a website deploys when visited by a Customer and asks Your browser to store on Your device to remember information about You, such as Your language preference or login information. Laolab deploys such cookies. Cookies that are set by Us are referred to as “first-party” cookies.

We also use third-party cookies which are cookies from a domain different than the domain of the website You are visiting. Such cookies may be used for Our advertising and marketing efforts.

There are other technologies which We deploy which track behaviour on Our website. ‘Tracker Pixels’ are a means of allowing Us to check whether You have viewed Our content. These “pixels” are essentially tiny, invisible images on Our web pages that, once loaded, will communicate Your interaction with Our content. This allows Us and Our partners to gauge the validity of material being presented to You.

We use third-party technologies across Our website. These technologies help Us to understand how You use the website and the ways in which We can improve Your Customer experience. These technologies may track certain information such as the pages You visit across Our website as well as how long Your visit lasts. This allows Us to continue providing engaging content.

We also use social media plugins on this website that allow You to view videos and otherwise interact with certain content. For these technologies to work, trusted third parties will set cookies and tracker pixels throughout Our website. Once enabled, these technologies may be used to enhance Your profile or to contribute to the data they hold for various purposes outlined in their respective privacy policies. For any third-party technology used on Our website, We will provide a link to that third-party’s respective cookie/privacy policy for Your information. We encourage Our visitors to review these policies in advance of granting consent to deployment.

For each visitor to Our site, We automatically gather certain potentially identifying information and store it. This information includes Your Internet Protocol (IP) address, Your browser type, internet service provider (ISP), referring/exit pages, Your operating system, date/time stamp, processor or device serial number, unique device identifier, and clickstream data. We collect this information on an individual basis and in aggregate, or combined form.

What Are Your Rights?

Data subject may exercise the following or any other rights that may be provided under the UAE PDPL:

1. **Information and Access:** In addition to the information set out in this Privacy Policy, You can ask Us to verify whether We are processing personal data about You, and if so, to provide more specific information. You have the right to obtain information on the categories of personal data being processed, the purpose of the processing, the decisions made upon automated processing, entities with whom the personal data is shared (Right of Access to Information).
2. **Correction:** You can ask Us to correct Our records, if You believe they contain incorrect or incomplete information about You. Please note that We may need to verify the accuracy of the new data provided.
3. **Erasure:** You can ask Us to erase (delete) Your personal data after You withdraw Your consent to processing or when We no longer need it for the purpose it was originally collected (Right to Rectification or Erasure of Personal Data).
4. **Restriction:** You can ask Us to temporarily restrict Our processing of Your personal data if You contest the accuracy of Your personal data, prefer to restrict its use rather than having Us erase it, or need Us to preserve it for You to establish, exercise, or defend a legal claim (Right to Restriction of Processing). A temporary restriction may apply while verifying whether We have overriding legitimate grounds to process it. You can ask Us to inform You before We lift that temporary processing restriction.
5. **Data Portability:** In some circumstances, where You have provided personal data to Us, You can ask Us to receive or transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company, if it is technically feasible (Right to Request Personal Data Portability).

6. **Automated Decision-making:** You can ask Us to review any decisions made about You which We made solely based on automated processing, including profiling, that produced legal effects concerning You or similarly significantly affected You and You have the right not to be subject to such decisions (Right of Processing and Automated Processing).
7. **Object:** You can object to Our use of Your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with Your request to discontinue marketing to You. Unless We expressly obtain Your consent, We will not use any personal data collected via Your use of Laolab's website to carry out direct marketing.
8. **Right to Withdraw Consent:** You can withdraw Your consent at any time that You have previously given to one or more specified purposes to process Your personal data. This will not affect the lawfulness of any processing carried out before You withdraw Your consent. It may mean We are not able to provide certain products or services to You and We will advise You, if this is the case.
9. **Right to Make a Complaint:** You can make a complaint at any time to the relevant supervisory authority in Your jurisdiction, depending on Your location. We would welcome the chance to deal with Your concerns before it approaches the supervisory authority.

You may lodge a complaint with the supervisory authority in Your country of residence, place of work or the country in which an alleged infringement of data protection law has occurred. The contact details of the competent national supervisory authority, the Data Office (UAE) are as follows:

UAE Data Office

Website: <https://u.ae/en/about-the-uae/digital-uae/data/data-protection-laws>.

Please note, all rights are subject to qualifications and limitations. In other words, there may be instances and justifiable grounds to deny any request where We are required or permitted by law to do so. We will always be clear and communicate this to You if and when these instances arise.

We may need to request specific information from You to help Us confirm Your identity and ensure Your right to access the information or to exercise any of Your other rights. This helps Us to ensure that personal data is not disclosed to any person who has no right to receive it.

Retention of Your Personal Data

We will keep Your personal information for as long as We have a relationship with You. Once Our relationship with You has come to an end, Your personal information may be retained for an extended period of time where We are required to do so, such as:

- To maintain business records for analysis and/or audit purposes;
- The period necessary for the relevant activity or Services that We are providing to You;
- To comply with record retention requirements under applicable laws; and
- To defend or bring any existing or potential legal claims.

We will delete Your personal information when it is no longer required for these purposes.

If there is any information that We are unable, for technical reasons, to delete entirely from Our systems, We will put in place appropriate measures to prevent any further processing or use of the data.

Following the expiry of the retention period We shall destroy or anonymize Your personal data in accordance with Our internal Data Retention Policy and Retention Schedule, which has been drafted to comply with applicable laws.

Link to Other Websites

Our website may contain links to other sites that are not governed by this Privacy Policy. Please review the destination websites' privacy policies (which shall be applicable in the place of this Privacy Policy) before submitting personal data on those websites. Whilst We try to link only to sites that share Our high standards and respect for privacy, We are not responsible for the content, security, or privacy practices employed by other sites.

Changes to This Privacy Policy and Contact Email

From time to time We may update this policy. When We do, We will publish the changes on Our website. We encourage You to periodically review this notice for the latest information on Our privacy practices..

This Privacy Policy was last updated September 27, 2024.

How to contact Us, request access to Your personal data or contact Laolab with questions or feedback?

If You have any queries relating to the processing/usage of information provided by You or Laolab Privacy Policy, You wish to exercise any of the data subject's rights or You wish to make a complaint, You may write to Us at support@laolab.org.