7amleh's Digital Security Helpdesk Privacy Policy

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7amleh – the Arab Center for Social Media Advancement (R.A) ("7amleh", "Us" or "We") operates the "Digital Security Helpdesk" platform (the "Platform" or the "Helpdesk") at https:// help.7amleh.org (the "Website"). We respect the privacy of the visitors of our Website and users of the Helpdesk ("User" or "You") and believe that You have a right to know our practices regarding the information We may collect when You visit the Website and/or use or visit the Helpdesk and/or use the features and/or services available on the Helpdesk (the "Services").

By accessing and utilizing the Helpdesk, Users can report various types of digital security incidents, such as cyber-attacks, online harassment, hacking attempts, and privacy breaches (each, an "Incident"). The Helpdesk facilitates a support mechanism wherein a team of experts review reported Incidents and provides response, advice, guidance and technical support to help resolve issues in relation to such Incidents and strengthen Users' digital security posture.

By accessing the Helpdesk, through any means, You agree to abide by this Policy. Your use of our Services constitutes a consent by You to the collection, transfer, processing, storage, disclosure, and other uses of information as outlined in this Policy.

BY ENTERING TO AND/OR USING/VIEWING THE HELPDESK AND/OR USING ANY OR ALL OF THE SERVICES, YOU ACKNOWLEDGE THAT YOU HAVE AGREED AND UNDERSTOOD THE TERMS OF THIS PRIVACY POLICY, INCLUDING TO THE COLLECTION, USE, PROCESSING AND DISCLOSURE OF YOUR PERSONAL INFORMATION (AS DESCRIBED IN THIS POLICY AND IN OUR TERMS OF SERVICE (THE "TERMS")). IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN OR IN THE TERMS, YOU MAY NOT USE THE HELPDESK OR THE SERVICES.

The terms of this Policy will govern the collection, use and disclosure of any information collected through the Website and the Helpdesk and/or in our campaigns through websites of any of our affiliates. We reserve the right to change this Policy (or any part hereof) at any time, so please re-visit this page from time to time. In case of any material change, We will post a notice on the Helpdesk. Changes to this Policy are effective as of the stated "Last Update" and your continued use of the Helpdesk and/or the Services on or after the Last Update date will constitute acceptance of, and agreement to be bound by, those changes.

1. Collection of Information.

You are not legally obligated to provide Us any personal information. However, We require certain information in order for You to able to use the Helpdesk and the Services. If You choose not to provide us with such information, You may not be able to use the Helpdesk and/or receive the Services (or any part thereof).

When You submit an Incident report either through the Helpdesk or through any of our online platforms (e.g. online form, WhatsApp, Signal, E-mail, etc.), we typically collect and handle

specific types of Personal Information and Technical Information (defined below) to fulfill common business needs, comply with legal requirements, and for other purposes such as security, auditing, and fraud prevention.

The following categories of Personal Information are gathered and processed:

- A. Contact Information and Personal Identifiers: We collect and maintain contact information or other personal identifiers that You choose to share, such as your name, email address, mailing address, telephone number, or similar identifiers.
- B. Additional Profile Information: The Helpdesk may allow You to provide additional information like job title, years of experience in your profession, and educational background.
- C. Communications and User Generated Content: We collect information and content submitted by You when You ask questions, fill any reports or consent forms, and/or post information on the Helpdesk (e.g., questions, answers, and forum posts), or communicate with us directly. This includes information submitted through contact, sign-up, email communications, and other submissions (e.g., reviews and surveys) as well as conversations with our staff members/representatives (whether through phone calls, email, Whatsapp/SMS messaging service, or otherwise).
- D. Audio and Visual Information: We receive any photos you share through our Helpdesk, including through conversations with our staff members/representatives. Additionally, we may record customer service telephone calls to maintain quality standards and fulfill legal obligations.

In addition to Personal Information, We also collect anonymous technical information ("**Technical Information**"). To put it simply, We are not aware of the identity of the User from which We collect the Technical Information. The Technical Information We gather consists of technical information and behavioral information, including, among others, user surfing patterns, browser plugin types and versions, the pages on the Website or the Helpdesk that You visit, the time and date of your visit, and other diagnostic data; type of Incidents and troubles submitted (per user, region etc.) and feedbacks.

To avoid any doubt, any Technical Information connected or linked to any Personal Information, including, without limitation, IP address, are considered Personal Information as long as such connection or linkage exists.

The Helpdesk can also be accessed at any of our social media platforms such as Instagram, Facebook, Twitter, and Instagram (together, the "Social Media Pages"). When You engage with our Social Media Pages, we may collect the personal data You voluntarily share with us, like your contact details and social media usernames. Moreover, the social media platform providers may also share aggregated information and usage analytics related to our Social Media Pages, which helps us understand and improve our online presence.

2. Usage of Information

In general, We use Your Technical Information and Personal Information in order to operate, manage and improve the Helpdesk and the Services.

The Technical Information We collect is used mainly to learn about general trends of usage of the Helpdesk and the Website, enhance the user experience on the Website and the Helpdesk and promote its goals. For example, We are using the Technical Information to identify the type of the device You are using when visiting and/or viewing the Helpdesk, the operating system, as well as Your language preference and time zone. We will also use certain statistical information to promote certain features offered on the Helpdesk. The above usage of your Technical Information may assist Us in building a better Helpdesk and improve its user experience and efficiency.

The Personal Information is used mainly to provide You with the information, services, and support you have requested process. We may also use your Personal Information in order to contact You when We believe it is necessary, or as part of handling an Incident, among others in order to obtain additional information on the Incident You will report and to send You updates and periodic emails in connection with the Helpdesk. In addition, the Personal Information is used to personalize the User's experience, thus improving and enhancing such User's experience, learn more about Your preferences and suggest relevant content to You.

7amleh may also use statistical information about Incidents reported by You and/or other Users in Our statistical charts and/or reports in a form of aggregate data which provide general statistics about Incidents reported through the Helpdesk (on an anonymous basis and without including any information that may identify You) and may also publish such statistical charts and reports on the Helpdesk and/or on 7amleh's accounts on social media platforms. We may also share statistical information about Incidents with our donors as part of Our periodic and other status and update reports to such donors.

From time to time We may engage third party service providers to perform certain functions and provide services to Us, such as hosting and maintaining our servers and the Helpdesk, database storage and management, e-mail management etc. We may share your Personal Information and some Technical Information with these third parties to enable them to perform such services.

When You submit your email address on the Website and/or the Helpdesk, You agree to receive emails from Us. However, if at any time You decide to unsubscribe from receiving future emails from Us, You may do so by unsubscribing from Our emails list as indicated in the email You will receive (if at the time You will unsubscribe from Our email list the Incident may still be in progress, unsubscribing from the emails list will likely limit or restrict our ability to handle and pursue your Incident).

3. Remote Access and Data Handling:

In order to provide efficient and effective Services, the Helpdesk may require remote access to your device (computer, phone, etc.)(the "**Device**") with your explicit consent. By granting remote access, You acknowledge and agree to the following terms:

Our support team will have limited access to your Device, only for the purpose of resolving the specific issue for which You have requested assistance.

During the remote access session, our support team will handle your data in a professional and confidential manner, adhering to the principles of data privacy and security.

Our support team will not access or collect any personal data on your Device beyond what is necessary to resolve the issue, and will not share or disclose such information to any third parties without your explicit consent.

You understand that remote access involves inherent risks, and that You are responsible for maintaining the security of your Device and any data stored on it. We strongly advise You to keep your device updated and protected with appropriate security software at all times.

We reserve the right to terminate the remote access session if we identify any suspicious or unauthorized activity on your Device or if You do not comply with our instructions during the remote access session.

You acknowledge that You are solely responsible for backing up your data before granting us remote access to your Device. We shall not be liable for any data loss or corruption during or after the remote access session.

By using our Services and granting remote access to your Device, You acknowledge that You have read, understood, and agreed to this Remote Access and Data Handling clause.

4. Sharing the Information with Third Parties

We do not sell your personal information to third parties. In addition, We may disclose Personal Information in the following cases: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy and/or the Terms, including investigation of potential violations of any of the provisions of this Privacy Policy and/or the Terms; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to respond to Users' support requests; (e) to respond to claims that any content violates the rights of third-parties; (f) to respond to claims that contact information (e.g. name, email address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; (g) to protect the rights, property, or personal safety of Us, Our users, or the general public; (h) to notify You about changes to the Helpdesk; (i) to any of Our partner organizations or affiliates who may be involved in pursuing the Incident and for this purpose, including CiviCert; (k) in order to settle a dispute and/or review a claim submitted to Us with respect to any feature available on the Helpdesk; and (l) pursuant to Your explicit approval.

5. Cookies & Local Storage

When You use our Website, We may use industry-standard technologies such as "cookies" (or similar technologies), which store certain information on Your computer ("**Local Storage**") and make the User's browsing more convenient and effortless.

"Cookies" are small files that are stored on the users' computer. A cookie is primarily used to store information about a user (or, more precisely, about the device on which the cookie is stored) during or after the user's visit to an online service. Different data can be stored within the cookies. For the purpose of analyzing the use of the Website and for the purpose of user handling in the administration area of the Website, the IP data of the connection owner is stored within the framework of cookies used by Us. In addition, We store Your preferred

language, other personal page settings as well as the type of Your terminal device. The use of the Website is basically possible without cookies and You may elect to prohibit the Local Storage option. Most browsers will allow the User to erase cookies from their computer hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if You block or erase cookies, Your online experience on the Website may be limited and You may not be able to use some portions of the Services.

6. Security & Retention of Data

We take great care in maintaining the security of Your information and in preventing unauthorized access to it through the use of appropriate technology and internal procedures, including by using a Standard Transport Layer Security (TLS) certified encryption-based security of information on the Helpdesk. We also take industry standard steps to ensure the website on which the Helpdesk operates is safe. However, We do not guarantee that unauthorized access, viruses and other data security breaches will never occur.

We will retain your Personal Information only for as long as it is necessary for the purposes set out in this Policy including, for the purpose of handling an Incident on your behalf, subject to applicable law. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (eg. if We are required to retain Your data to comply with applicable laws), resolve disputes, and enforce agreements and policies. Data that is no longer retained may be anonymized or deleted.

All information in our infrastructure, except for public information which is non-sensitive and does not include any personal data, is stored on password-protected platforms and in work devices with full-disk encryption. This kind of information is only transferred through end-to-end encrypted channels of communication. These are the minimum standards in place and, as they are also evolving, may change in the future.

7. Third Party Sites

While Visiting the Website and/or using the Helpdesk and the Services You may encounter links to third party sites and/or third-party content (such as, information, applications and other services) which are not operated or managed by Us (the "Third Party Services"). Please be advised that the Third Party Services are independent sites, and We assumes no responsibility or liability whatsoever for them with regard to privacy matters or any other legal matter, including, without limitation, the accuracy or completeness of their content and the opinions published thereon. If You decide to use such Third Party Services, including, if You decide to click on a link (on our Helpdesk or the Website) to any third party site, You do this at your own risk and responsibility. We encourage You to carefully read the privacy policies and terms and conditions of such third-party sites before using any of the features available on such sites. Such Third Party Services may use their own cookies or other methods to collect information about You.

Cross Border Transfer

We may need to transfer Personal Information to countries where We (eg. our team and personnel) and/or the Contractors operate. Such countries may be different from the country in which the data originated and where data protection laws may not be equivalent to, or offer the same protection as, those in Your country. By using the Services and/or submitting an

Incident, You agree to any such transfers. Otherwise, please do not use the Services or submit an incident.

8. Additional Information for Users in the EU

For the purposes of the EU General Data Protection Regulation ('GDPR'), We are the data controller of the personal data We process about You. You can contact us via help@7amleh.org.

We collect, store and process the personal data about You when You report an Incident on the Helpdesk which consists of Your personal identification information and other information You provide us related to Your enquiry. For more details please see Section 1. Your personal data is provided by You and We do not obtain Your personal data from third parties.

The purpose for processing Your personal identification information is to collect information on a specific Incident You report; the legal basis is consent and our legitimate interest, namely documenting incidents in the field of our activities. The purpose for processing analytics of non-identifiable and technical information is developing and improving the Helpdesk and the Services and the legal basis is our legitimate interests in understanding how users use the Helpdesk and making decisions on further development of the Helpdesk.

If We transfer Your personal data from the EU to other jurisdictions, We will do so by using appropriate safeguards particularly by Standard Contractual Clauses of the EU Commission (article 46(2) (c) GDPR). The personal data We collect is processed in Israel which is recognized by the European Commission in an <u>adequacy decision</u> as having adequate protection for personal data.

Chapter III of the GDPR gives data subjects the right to access your personal data, rectification of inaccurate data erasure of your personal data, object or restrict processing of your personal data. However, these rights do not apply with respect to aggregated analytics information that cannot be attributed to a specific user. In the circumstances where You may have provided your consent to the processing of your personal data for a specific purpose, You have the right to withdraw your consent for that specific processing at any time. You have the right to obtain a copy of your personal data. You are not required to pay any charge for exercising your rights. If You make a request, We have one month to respond to You but have the right to extend this period by two months. If We extend the response period, We will let You know within one month of your request. If You wish to exercise your rights listed above or have any concerns about our data collection practices, You can contact us by email at (enter email address).

Subject to applicable law, You have the right to lodge a complaint with your local supervisory authority. According to Article 77 of the GDPR, You can lodge a complaint to the supervisory authority, in particular in the Member State of your residence, place of work or of an alleged infringement of the GDPR. For a list of supervisory authorities in the EU, click <u>here</u>.

9. Data Breach

In case of a personal data breach which is likely to result in a risk to Your rights and freedoms, We shall notify You without undue delay and also notify the supervisory competent authority, without undue delay and where feasible, no later than 72 hours after having become aware of the breach, in accordance with the EU's General Data Protection Regulation.

In addressing data security breaches, We will take measures to mitigate damage, investigate, conduct remedial action and comply with regulatory requirements for information security.

10. Children's Privacy

We do not knowingly collect or process personal data from or with respect to children under the age of 18 and You must be 18 years of age or older in order to use our Services. If You are a parent or legal guardian and believe that your child under the age of 18 has submitted his or her personal data or other data without your consent, permission, or authorization – please let us know immediately, and We will take steps to remove that information from our servers promptly.

11. Accessing, Deleting or Updating Your Personal Information

You may ask to access the personal information about You that is stored in our systems, or have us update, correct or delete such information. You may also be entitled to obtain from us the personal data You provided us (including data We obtained from other sources) in a structured, commonly used and machine-readable format, and have the right to transmit those data to another data controller. If You wish to exercise any of these rights, contact us at: help@7amleh.org. [Better to use a designated email for this purpose]

12. Questions

Should You have any inquiries, complaints or suggestions, You may contact us at help@7amleh.org. We will do our best to resolve your issue in a timely manner.