

# URBAN VPN

## PRIVACY COMPLIANCE OVERVIEW

*[Last Updated: Sep 15, 2020]*

Urban Cyber Security Inc. (“**Company**” or “**we**”) is committed to ensure that its services comply with applicable privacy laws, and that its users, visitors or customers (“**you**”), can continue to use the services securely. The Company has put efforts for the sole purpose of ensuring all required actions are taken to achieve privacy compliance and data protection.

This overview details the Company’s activities and efforts made to comply with data protection and privacy laws and standards, including the EU General Data Protection Regulation (“**GDPR**”) and the California Consumer Privacy Act (“**CCPA**”)“nonpublic Personal Data” as defined under the Gramm-Leach-Bliley Act (“**GLBA**”).

Further, as an app or extension, we make all efforts to comply with the applicable platforms such as (but not limited to) Google, Mozilla or Apple, and to constantly ensure that we are up to date with new requirements therein.

### URBAN VPN SERVICES AND DATA PROCESSING

Our services include collection and processing of certain data. Under certain jurisdictions such data may be considered as personal data or personal information. For instance, we collect online identifiers, such as IP address, and website browsing data, such as advertisement clicked or visited by you. We use this data to develop insights and aggregated anonymized used behavior data. We never share, sell or process information directly associated with individuals.

We collect process and retain the data in accordance with privacy and data protection laws, and we ensure that all of our databases are protected by security and data protection means, as further explained herein.

### DATA PROTECTION

We have implemented appropriate organizational and technical measures in accordance with standard data protection requirements. We will continue to be informed of the latest state of the art technologies in the field of privacy and data protection, and the emerging regulations, to first and former ensure compliance with the applicable laws, assist our customers to comply with the privacy and data protection laws, including the GDPR and to safeguard and protect Company’s databases, including any personal data therein. For additional information, please see The Company’s [Privacy Policy and Security Policy](#).

We have built an internal team that constitutes of professionals from all aspects and departments, starting from security and legal teams to product and sales team, in order to ensure that our services and legal terms are in line with the relevant privacy and data protection regulations.

We will constantly ensure that they are up to date. To achieve compliance, we implemented the following actions:

- We filter the data on the client side and even on the server side to ensure we filter personal data and personal sensitive data.
- We strengthen the security of our databases and systems by using customary measures, including using encryption of our databases and HTTPS protocol.
- We collect logs and security alerts to ensure that we have control over data we have.
- We use Virtual Private Network (VPN) when connecting to our databases.
- We undergo risk assessments and penetration tests to reveal any gaps.

- We mapped our processing activities to manage and control our data tightly.
- We delete or anonymize data of users after we aggregate the data.
- We have internal policies and procedures in place to ensure compliance with applicable privacy laws, including the GDPR and CCPA.
- We adjusted our contracts to include privacy regulations requirements. For instance, we have updated our Privacy Policy in accordance with GDPR and CCPA.
- We execute appropriate contracts with our vendors to include all data processing requirements.
- Our office network is heavily segmented and centrally monitored.
- We have a dedicated internal security team that constantly monitors our environment for vulnerabilities.

## **TRAINING AND AWARENESS**

The Company ensures that all its personnel undergo training and awareness sessions with regards to privacy laws, including GDPR and CCPA, and emphasizes the importance of data security.

## **USER RIGHTS**

In accordance with privacy laws, data subjects may exercise their rights easily in case a data subject wants to exercise any of its rights under applicable privacy laws he/she can do it easily by using a designated form we have created just for this purpose.

We have also implemented a “Do Not Sell” page available at: <https://www.urban-vpn.com/about-us/do-not-sell/>.

We have also trained our designated privacy and security team to respond to such request and follow the privacy by design and privacy by default values when developing additional platforms, features, and services.

## **INCIDENT RESPONSIVENESS**

We implemented procedures to handle any security events (including data breach) and will provide you or the regulators with an immediacy of notification to the extent required under applicable law, if required.

## **LEGAL DOCUMENTATION**

We shall continue to monitor the emerging privacy laws, including and development in connection with GDPR and CCPA, to ensure that our product and processes are in line with the regulatory requirements.

For additional information please contact us at: [privacy@urban-vpn.com](mailto:privacy@urban-vpn.com).

*RESPONSIBLE DISCLOSURE: THIS DOCUMENT IS NOT INTENDED TO PROVIDE A CONSULTATION ON DATA PRIVACY LAWS. INSTEAD, IT PROVIDES BACKGROUND INFORMATION TO HELP YOU BETTER UNDERSTAND HOW WE, AT THE COMPANY, HAVE ADDRESSED SOME IMPORTANT LEGAL POINTS WITH RESPECT TO DATA PRIVACY.*