JFrog Privacy Policy

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JFrog (including our Affiliates worldwide – collectively, "**JFrog**", "**us**", "**our**" or "**we**") is on a mission to enable continuous updates through liquid software, empowering developers to code high-quality applications that securely flow to end-users with zero downtime.

This Privacy Policy ("Policy") applies to JFrog's solution, products, platform, and services (the "Platform") and describes how we collect, use, and disclose your information. We respect the privacy of our customers, users, partners, and website visitors (collectively – "you", or "your") and are committed to protecting the personal information that you disclose to us. We have made efforts to make our Policy as clear and informative as possible and we encourage you to carefully read it.

At all times, you may choose whether to provide or disclose your personal information. Personal information means information that identifies, relates to, describes, is reasonably capable of being associated with, or linked, directly or indirectly, to an individual. Please note, this does not include aggregated and/or anonymized information. If you choose not to provide such personal information, you may still visit parts of the Websites or receive limited Services, but you may be unable to access certain options, programs, offers, and services that involve our interaction with you.

Please note that this Policy applies to the information provided by you through any website of JFrog, including https://www.jfrog.com/ (together with its sub-domains and portals, the "Websites") that link to this Policy, including, for example, by registering and/or attending events and meetups, or as you may otherwise interact with us (together with the Websites and Platform – the "Services"). By accessing and/or using our Services you agree to this Policy, including to the collection and processing of your personal information. In case you disagree with any of these terms please do not provide us with any personal information and avoid contacting us or using our Services.

1. What information do we collect and how?

Directly from you or via our customer (i.e., your employer or the organization you are related to). For example, if you fill out a form or communicate with us through our Websites, or when your organization subscribes and engages with JFrog to receive Services. This includes information such as business contact details – first and last name, job title, email address, company address, phone number, professional needs and interests, and your interactions with us, including posting comments or feedback on our forums, session recordings, correspondence or calls recordings and associated transcriptions (if applicable).

Directly and indirectly from you when using our Services. For example, usage details collected automatically during your interaction with our Services, such as the type of browser you use, IP address, device ID, cookies installed on the device, date/time stamp, referring/exit pages, clicked pages, the actions you take on the Services and any other information your browser may send us. We use industry standard tools and software to monitor your visits, navigation and interactions with the Services, your usage pattern-logs and other analytics information. We may also use cookies and/or similar technologies ("cookies"), which store certain information on your computer, and which allow us to enable automatic activation of particular features and improve your experience. Most browsers will allow you to erase such cookies, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you block or erase cookies, or change the applicable settings, your experience on our Services may be limited. For more information, please see our Cookie Policy.

From external providers that contract with us or interact with us in connection with the Services we provide. For example, from vendors and partners such as social media sites and analytics providers that integrate their services with ours or provide us access to their services.

2. How do we use the information collected?

We will only collect and process your personal information in order to abide by our legal obligations; comply with a contract between us and you or a third party you are associated with; for the performance of our Services; and to support our legitimate interests in maintaining and improving our Services (e.g., analyzing the use of our Services, advertising our Services, providing customer support, and protecting the security of our Services, as well as our own and our customers' data).

Your acceptance of our related **Terms of Use** and this Policy will be deemed as your consent, provided this is the only legal basis allowed for processing personal information in the applicable territory. If you wish to withdraw your consent for such processing, to the extent permitted by applicable law, please contact us at: **privacy@jfrog.com**.

We may use or disclose the personal information we collect for the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you
 disclose your name and contact information to request a price quote or ask a
 question about our Services, or to process your payment and facilitate billing
 communication (*Performance of Contract; Legitimate Interests*);
- To enable the use of the Services, including for registration and authentication. For example, in order to register to the Services, you will need to provide us with your name and email so we will be able to issue a license key (*Performance of Contract; Legitimate Interests*);
- To support, personalize, improve and develop our Services by learning about your preferences and general trends relating to the Services (*Legitimate Interests*);
- To create, maintain, customize, and secure your account with us (Performance of Contract; Legitimate Interests; Legal Obligation);
- To process your requests, transactions, payments and prevent fraud (Performance of Contract; Legitimate Interests; Legal Obligation);
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses (*Performance of Contract; Legitimate Interests*);
- To personalize your Websites experience and to deliver content, product and service offerings relevant to your interests, regarding new products, events, offers, services, features, enhancements, special offers, upgrade opportunities, and events, including targeted offers and ads through our Websites, third-party service providers' ("Service Providers") sites or via email (Legitimate Interests; Consent);
- To help maintain the safety, security, and integrity of our Services, databases and other technology assets and businesses (*Performance of Contract; Legitimate Interests; Legal Obligation*);
- To create aggregated statistical data, rendered non-personal, for internal use (Legitimate Interests);
- To respond to law enforcement requests as required by applicable law, court order, or governmental regulations (*Legitimate Interests; Legal Obligation*);
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all JFrog's assets, whether as an ongoing concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by JFrog about you is among the assets transferred (*Legitimate Interests; Legal Obligation*).

3. How can you control your information?

Privacy regulations worldwide such as the EU/UK General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and the Japan Act on the Protection of Personal Information (APPI) provide certain rights for data subjects. If you wish to exercise your rights under the applicable data protection regulation, please submit your request via JFrog Privacy Request Form.

You have a right to access and correct (rectify) the record of your personal information maintained by JFrog if it is inaccurate. You may request that JFrog erase that data or cease processing it, subject to certain exceptions, or to confirm whether we process your personal information, or if we comply with the right to non-discrimination of service and price (if applicable). Upon your request, and when technically feasible, JFrog will provide your personal information to you or directly transmit it (if applicable). You also have a right to access your personal information disclosed to/received from related third parties, to the extent permitted by applicable law.

Please note that: (a) we may require additional information in order to verify your request; (b) if you will not respond within 14 days from our initial verification email, you will be notified that your request was closed, and we will not be able to accommodate it; (c) your request may be recorded by us for legal obligations in accordance with **Section 6**; (d) if you are using the Services on behalf of our customer (i.e., your employer or the organization you are related to), you should contact your account administrator with your request, if you will contact us directly we will disclose such request with the relevant customer; and (e) we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive, manifestly unfounded, or if we required to or allowed by the applicable law or regulation.

You may also request that JFrog cease using your information for direct marketing purposes. Please note that you may manage the receipt of marketing information from us by clicking on the "unsubscribe" link located on the bottom of the email and/or by **updating your communication preferences via JFrog Subscription Center**. We may also contact you with service information such as billing/login issues, surveys, event information following your registration, etc.

Please also note that if you have concerns about how JFrog processes your personal information, you have a right to lodge a complaint with the appropriate local data protection authority. You can also call us at +1-408-329-1540 (for Californian Consumers) or contact us at: privacy@jfrog.com.

4. Who do we disclose information to?

Our Websites and some of the Platform allow you to disclose information to other users and create and publish content. Any content that you post on or via the Services ("**User Submissions**"), may be publicly available to other users. The notices and tools that we provide on the Services are intended to inform you which information will be made publicly available. If you publish your personal information in any User Submissions, you may receive unsolicited messages from other users of the Websites or the public. Therefore, we encourage you only to post information that you are sure you want to be accessible to anyone.

If you are using our Services on behalf of an organization or if you provide us with an email address which belongs to an organization, certain information provided to us may be accessible to the respective administrator or to other users of such organization.

JFrog uses contracted Service Providers to perform services on our behalf or to enable us to provide the Services. These Service Providers may have access to personal information, depending on their specific roles and purposes in facilitating our Services or other activities, and they are not permitted to store, retain, or use information collected by us except for the sole purpose of providing the Services in accordance with our agreement with them. Such Service Providers may include: billing and payment processing services; web and video hosting services; email communications and monitoring providers; analytics providers (such as Google Analytics or Heap); session or activity recording services; call recording, analytics and transcription services (transcriptions may be analyzed by machine learning and/or artificial intelligence platform in accordance with **Section 2** above); data storage providers; remote access services; performance measurement, data optimization and marketing services; social, marketing and advertising providers; lead generation, conversion and scheduling service providers; video conferencing solutions; support and customer relation management systems; and data and cyber security services.

When you visit our Websites, we may enable such Service Providers to use cookies and other trackers to show you ads on third-party websites that are more relevant to you. Under some data protection laws, like the CCPA, as amended, our disclosure of this data to third parties through cookies and other trackers for targeted advertising may be considered a "sale" or "sharing" of personal information. Please see our **Cookie Policy** for more information about the types of cookies we use, or click "Cookie Settings" at the bottom of the Websites to set your preferences and opt out of the sale or sharing (for targeted advertising) of your data. We don't have actual knowledge that we "sell" or "share" the personal information of individuals under eighteen (18) years of age (see **Section 9** below). For the purpose of the CCPA, specifically in the past 12 months, we may have collected and disclosed the following categories of personal information (as defined in the CCPA): Identifiers; Professional or Employment-Related Information; Internet or Other Electronic Network Activity information; and Geolocation information, to our Affiliates and Service Providers. We do not collect or disclose sensitive personal information as defined in the CCPA.

With regards to JFrog's Cloud Solution, please see our **Sub-Processors List**.

We also reserve the right to use or disclose your information if: (a) required by law, under a judicial proceeding, court order, or legal processor if we reasonably believe that such disclosure is required to protect our rights, including their enforcement; (b) to transfer or assign the personal information retained by us in the event that we are acquired by or merged with a third party entity; (c) to disclose information internally within JFrog; (d) in the event of bankruptcy or a comparable event; or (e) if we rendered such information non-personal.

JFrog (including our Affiliates worldwide listed **here**) may jointly use your personal information as stipulated in **Section 1** and **Section 2** of this Policy. For data protection matters, JFrog SAS and JFrog UK Limited have been designated as JFrog

representatives under the GDPR in the EU and the UK respectively, as well as JFrog Japan KK who has been designated as JFrog representative in Japan under the APPI.

5. How do we protect your information?

We use industry standard technologies and internal procedures to maintain the security and integrity of our Services and your information, and to prevent unauthorized access thereto. **Please visit JFrog Trust Center for further information.** Please note, however, that there are inherent risks in transmission of information over the internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use of your information will never occur.

6. Where is your information stored and for how long?

JFrog operates globally and our Services are provided from various locations. In order to allow us to perform our obligations and provide you with the Services, we may disclose information within our group of companies (a list thereof is available **here**) and with other contracted Service Providers, which may be located outside your country of residence.

When sharing such information, we use appropriate legal mechanisms to safeguard the transfer, such as the Standard Contractual Clauses (**SCC**), which have been approved by the European Commission Implementing Decision 2021/914, to safeguard the transfer of information from the European Economic Area and Switzerland (collectively – the "**EEA**") outside of the EEA. You can obtain a copy of the SCCs by contacting us at: **privacy@jfrog.com**.

Please note that we may transfer such information to a country and jurisdiction that may not have equivalent privacy and data protection laws that apply to your country of residence. Regardless of where your information is stored, we, our Affiliates and Service Providers apply equivalent protections to the ones described in this Policy.

With regards to JFrog's Cloud Solution, please see our **Data Processing Addendum** and **Privacy FAQs**.

JFrog may retain your information for a period consistent with the original purpose of collection, and/or in accordance with our legal and contractual obligations and the applicable law or regulation. For example, we will retain your information for as long as you are using our Services, and for a reasonable period thereafter. Please note, we are not required to retain personal information for a specific time period and are free to remove it at any moment. Aggregated and/or anonymous data, and any other non-personal information may be retained by us as permitted under the applicable privacy laws. Please note, your credit card details are not retained by JFrog (if relevant), but rather transported directly to the applicable Service Provider (per **Section 4** above).

7. Third-party websites and social media features

Our Services may include social media features ("Features"), for example, you can share posts and comments on or through your social media account. The Features may enable the applicable social networks to collect your IP address and other automatically collected usage details and may set a cookie to enable the functionality of the Feature (see Section 1). Your interactions with the Features are governed by the privacy policy of the third party who provided such Features, and we are not responsible for the privacy practices or the content of such third-party Features. Please be aware that the third parties providing the Features may collect personal information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each relevant third party that you choose to use or interact with.

In addition, certain links on our Websites, enable you to enter other sites or services. Those linked sites and services are provided solely as a convenience to you and are not under the control of JFrog. We are not responsible or liable for such linked sites and services' privacy practices and/or any other practices. Your access to, use of, and reliance upon any such sites, services and content and your dealings with such third parties are at your sole risk and expense.

8. Changes to this Privacy Policy

The terms of this Policy will govern the use of the Services and any information collected by JFrog. JFrog reserves the right to change this Policy at any time by posting an updated version on our Services. We will provide notice of substantial changes to this Policy on the homepage of the Websites. All other changes to this Policy are effective as of the stated "Last Updated" date and your continued use of the Services after the Last Updated date will constitute acceptance of, and agreement to be bound by, those changes. If the Policy is required to be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by the law and without any prior notice.

9. Our policy towards children

The Websites are intended for users over the age of eighteen (18). Therefore, JFrog does not intend and does not knowingly collect personal information from children under the age of eighteen (18). We reserve the right to request proof of age when needed. If we learn that we collected personal information from children under the age of eighteen (18) we will delete that information promptly. Please contact JFrog at privacy@jfrog.com if you have reasons to suspect that JFrog collected such information.

10. Got any questions?

We are committed to protecting your privacy. If you have any questions concerning this Policy, please contact us at: privacy@jfrog.com or write to us at: JFrog, 270 E. Caribbean Drive, Sunnyvale, CA 94089, and we will make an effort to reply within a reasonable timeframe.