



**INVINCIBULL VPN  
SIGNALS OF TRUST  
March 19, 2019**

**InvinciBull VPN takes our customers' privacy seriously. We strictly adhere to our privacy policy (<https://ulm.finjanmobile.com/app-privacy-statement/>), never log user data, and are committed to keeping all users safe and anonymous.**

**Corporate Accountability & Business Model:**

1. InvinciBull by Finjan Mobile, Inc. is a service of Finjan Holdings, Inc., a NASDAQ company (NASDAQ:FNJN). Finjan licenses the VPN network from partner Avira.
2. Finjan Mobile, InvinciBull or Avira do not operate, own, nor do they have any involvement in VPN review websites.
3. The sole source of InvinciBull VPN revenue is from consumer subscriptions; InvinciBull operates as a freemium model.

**Privacy: Logging/Data Collection Practices and Responding to Law Enforcement:**

(4) InvinciBull does not store nor does it track any data or metadata generated during a VPN session, nor after the session is terminated. We require an email to register for the service, and know the date of registration, last log on and whether or not users paid for a subscription and/or participated in promotions.

(5) Furthermore the company does not store, nor does it share with others any user browsing and/or network activity data, including DNS lookups and records of domain names and websites visited.

(6) Finjan Holdings (InvinciBull's parent company) may share your email address if Finjan believes that such sharing is required by law. We will take commercially reasonable steps to notify you if we are required to provide your personal information to third parties as part of a legal process. Finjan also may use and disclose your information in the prosecution or defense by Finjan of any litigation involving Finjan that arises out of, or is related to, your use of any Finjan product, service or right.

**Security Protocols and Protections:** (7) InvinciBull is committed to protecting against unauthorized access to customer data flows over the VPN. InvinciBull does not have access to our customers' data flow, and we do not store it. All data that passes through the InvinciBull VPN is encrypted through patented, military-grade AES 256-bit encryption; and thus no one can see it.

(8) InvinciBull adheres to industry standard security protocols, backed up by a strong [privacy policy](https://ulm.finjanmobile.com/app-privacy-statement/), <https://ulm.finjanmobile.com/app-privacy-statement/> clearly available to all, and to which we adhere. Our goal is to protect customer information and we are continually improving and updating our protocols. We use WPENGINE to host the site and they are a leader in hosting, security, data integrity, monitoring, etc. (<http://www.wpengine.com>). We further secure the site with a number of security related plugins that require secure passwords, HTTPS security/ encryption, oauth2 API tokenization, blacklisting suspected IPs, etc. InvinciBull launched in September of 2018 and was independently audited by CybeRisk upon launch. We will continue to conduct periodic security audits of the site.

### **How do Finjan and Finjan Mobile secure and safeguard your information and notify you of a data breach?**

Finjan uses, and requires that its service providers use, commercially reasonable physical, technical, administrative, and other safeguards designed to prevent unauthorized access to, use of, alteration of, or destruction of your information. In addition, we limit the use and disclosure of your personal information, and work to ensure that anyone with whom we share such information treats that information with the privacy and security it deserves.

To the extent applicable law requires that Finjan notify you that your personal information was, or is reasonably believed to have been acquired by an unauthorized person, Finjan will provide that notice by email (using the latest available address in our records) or as otherwise required by applicable law.

Additionally, InvinciBull VPN adheres to these additional signals of trust through the use of open source code where possible, as stated in our [End User License Agreement](https://www.invincibull.io/eula/): <https://www.invincibull.io/eula/>.