



SG-09 - PRIVACY NOTICE POLICY

(Updated July 31, 2023)

1. OVERVIEW AND SCOPE

1.1. Overview

This policy and applicable supporting procedures are designed to provide SecurityGate, Inc. with a documented and formalized process for protecting individuals' privacy. Respect for the privacy of personal and other information is fundamental to us. This privacy policy describes our collection of personal information from users of our Web site ("Website" or "Site"), our Platform, as well as all related applications, widgets, software, tools, and other services provided by us and on which a link to this Policy is displayed (collectively, together with the Website, our "Service"). This Policy also describes our use and disclosure of such information. By using our Service, you consent to the collection and use of personal information in accordance with this policy.

1.2. Scope

This policy and supporting procedures cover the privacy of all data collected by SecurityGate, Inc. in its interaction with individuals in its business operations.

2. ROLES AND RESPONSIBILITIES

The following roles and responsibilities are to be developed and subsequently assigned to authorized personnel within SecurityGate, Inc. regarding privacy practices:

- **Chief Privacy Officer:** Responsibilities include providing overall direction, guidance, leadership, and support on methods and tools for the implementation of a security and privacy-related program. The Chief Privacy Officer will conduct resource and investment planning to implement the management, operational, technical, and privacy requirements of the program.
- **Privacy Committee:** Responsibilities include approving and monitoring adherence to this policy, analyzing the organization's environment, and the legal requirements with which it must comply. Additional responsibilities include:
 - Execute the privacy operations of the firm, including monitoring the system used to solicit, evaluate, and respond to individual privacy complaints and problems.
 - Evaluate implemented privacy controls;
 - Assessing existing policies and procedures that address privacy areas;
 - Working with appropriate departments to ensure compliance with privacy policies and procedures;
 - Recommending and monitoring, in conjunction with the relevant departments, the development of internal systems and controls to carry out the organization's privacy objectives;
 - Report to the Chief Privacy Officer on the effectiveness of the privacy controls/program in meeting applicable regulatory requirements and standards.

3. PERSONAL INFORMATION

"Personal Information," as used in this policy, is information that specifically identifies an individual, such as an individual's name, social security number, telephone number, or e-mail address. Personal information also includes information about an individual's activities, such as information about his or her activity on the Site or credit history, and demographic information, such as date of birth, gender, address, geographic area, and preferences, when any of this information is linked to personal information that identifies that individual.

Personal information does not include "aggregate" or other non-personally identifiable information. Aggregate information is information that we collect about a group or category of products, services, or users that is not personally identifiable or from which individual identities are removed. We may use and disclose aggregate information, and other non-personally identifiable information, for various purposes.

4. COLLECTION OF INFORMATION

4.1. Passive Information Collection

When you use the Service, some information may be automatically collected, such as your IP address, browser type, system type, the content and pages that you access on the Site, platform.securitygate.io or www.securitygate.io (i.e., the page

from which you navigated to the Site), the pages you navigate to on the Site, and from which you leave the Site, as well as the time you spend on the Site.

We collect this information passively using technologies such as standard server logs, cookies, and clear GIFs (also known as "Web beacons"). We use passively collected information to administer, operate, and improve the Site and our other services and systems, and to provide services and content that are tailored to you. If we link or associate any information gathered through passive means with personal information, we treat the combined information as personal information under this policy. Otherwise, we use information collected by passive means in a non-personally identifiable form only.

Also, please be aware that third parties may set cookies on your hard drive or use other means of passively collecting information about your use of their services or content. We do not have access to, or control over, these third-party means of passive data collection.

4.2. Collection of Voluntarily Provided Information

We may collect personal information that our users provide to us in a variety of ways through our Service. For instance, when you request information about our services or otherwise communicate with us, we collect the personal information that is provided to us. We may collect personal information such as name, e-mail address, city, state, country, other demographic information, and your interests and preferences in these manners.

4.3. Information from Other Sources

We may receive information about you, including personal information, from third parties, and may combine this information with other personal information we maintain about you. If we do so, this policy governs any combined information that we keep in a personally identifiable format. This personal information will not be processed other than initial intended use.

5. USE OF PERSONAL INFORMATION

We use personal information to provide services and information that you request; to enhance, improve, operate, and maintain the Site and Service, our programs, services, website, and other systems; to prevent fraudulent use of our Site and Service; to tailor your user experience; to maintain a record of our dealings with you, and for other administrative purposes.

We may also use the personal information you provide to contact you regarding our products and services. We allow you to opt out from receiving marketing communications from us as described in the "Choice" section below.

If we intend to further process the personal data for a purpose other than originally given, we will provide the data subject prior to that further processing with information on that other purpose.

Additionally, we support the:

- Right to be informed: Know how personal data is used.
- Right of access: Obtain and review personal data.
- Right to rectification: Correct inaccurate data.
- Right to erasure: Request data deletion.
- Right to restrict processing: Limit data usage in certain situations.
- Right to data portability: Transfer data between controllers.
- Right to object: Oppose data processing for specific purposes.
- Rights in automated decision-making: Avoid decisions based solely on automated processing.
- Notification of data breach: Be informed about high-risk data breaches.

We may request additional information to confirm the identity of the requester and will transmit the list of rights in communications. We shall provide information on action taken on a request to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, considering the complexity and number of the requests. We shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject. A subject has the right to contest decisions made by us.

Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a). charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or (b). refuse to act on the request.

6. DISCLOSURE OF PERSONAL INFORMATION

We will not disclose your personal information to third parties without your consent, other than as described in this policy. We may disclose personal information to third-

party service providers (e.g., data storage and processing facilities) that assist us in our work. We limit the personal information provided to these service providers to that which is reasonably necessary for them to perform their functions.

We may also disclose personal information if we believe that doing so is legally required or is in our interest to protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights or property of others.

In addition, information about our users, including personal information, may be disclosed as part of any merger, acquisition, debt financing, sale of company assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which personal information could be transferred to third parties as one of our business assets.

7. CHOICE

If you receive commercial email from us, you may unsubscribe at any time by following the instructions contained within the email. You may also opt-out from receiving commercial email from us by sending us an email to the address given at the end of this policy.

8. LINKS

For your convenience, the Site may contain links to other Web sites, products, or services that we do not own or operate. If you choose to visit or use any third-party products or services, please be aware that this policy will not apply to your activities or any information you disclose while using third-party products or services or otherwise interacting with third parties.

9. CHILDREN

Children's safety is important to us, and we encourage parents and guardians to take an active interest in the online activities of their children. We do not knowingly collect personal information from children under the age of 13 without obtaining parental consent.

10. INTERNATIONAL VISITORS

Our Site and Service is hosted in the United States and is generally intended for United States visitors. If you visit from the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please be aware that you are

transferring personal information to the United States. The United States does not have the same data protection laws as the European Union and some other regions. By providing personal information to us, you consent to the transfer of it to the United States and the use of it in accordance with this policy. Personal information will not be transferred to a third country or international organizations, subject to legal requirements.

11. SECURITY

We protect the Personal Information it collects with reasonable and appropriate physical, electronic, and procedural safeguards. We use reasonable security measures that are designed to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please note, however, that no data security measures can be guaranteed to be completely effective. Consequently, we cannot ensure or warrant the security of any personal information or other information. You transmit information to us at your own risk.

12. UPDATES TO THIS POLICY

We may occasionally update this Policy and note this at the beginning of the policy. Your continued use of this Service after such changes will be subject to the then-current policy. We encourage you to periodically review this policy to stay informed about how we collect, use, and disclose personal information.

13. CONTACTING US

If you have any questions, comments, or concerns about this privacy policy or your personal information, please contact us at privacy@securitygate.io. If you have a complaint that we have breached these privacy principles and attempted in good faith to resolve the complaint through our customer service process, but the complaint was not resolved by us within a reasonable amount of time, then you may enforce these privacy principles against us.

14. POLICY ADMINISTRATION

14.1. Ownership and Review

The Policy Owner owns this Policy and is responsible for reviewing the Policy for updates annually or following major changes to SecurityGate, Inc.'s compliance environment. The Policy Approver retains approving authority over this Policy.

14.2. Monitoring and Enforcement

SecurityGate, Inc. periodically monitors adherence to this Policy to help ensure compliance with applicable laws, requirements, and contractual agreements that apply to Client & Consumer Data. SecurityGate, Inc. may also establish enforcement mechanisms, including disciplinary actions, to help ensure compliance with this Policy.

14.3. Related Documents

- Information Security Policy
- Data Protection and Handling Policy
- GDPR