

Privacy Policy

Conduit Security, on behalf of its affiliates and subsidiaries (collectively, “**Conduit Security**,” “**us**,” “**we**,” or “**our**”) has prepared this Privacy Policy (“**Privacy Policy**”) to describe to you as an individual, or if you represent an entity or other organization, that entity or organization (in either case, “**you**”) our practices regarding the personal information that Conduit Security collects, uses, and shares on behalf of visitors to our website available at <https://conduitsecurity.com> (the “**Website**”).

Conduit Security reserves the right, at any time, to modify this Privacy Policy. If we make revisions that change the way we collect, use, or share personal information, we will post those changes in this Privacy Policy. You should review this Privacy Policy periodically so that you keep up to date on our most current policies and practices. We will note the effective date of the latest version of our Privacy Policy at the end of this Privacy Policy. Your continued use of the Website following posting of changes constitutes your acceptance of such changes.

1. COLLECTION OF PERSONAL INFORMATION

1.1. Personal information you may provide to us through the Website or otherwise includes:

- Activity data that we collect automatically when you visit our Website, such as IP address.
- Contact details, such as your first and last name, email and mailing addresses, and phone number.
- Business data, such as such as the company you work for, company description and job title.
- Communications that we exchange, including when you contact us with questions, feedback, or otherwise.
- Cookies and internet activity, such as text files that websites store on a visitor’s device to uniquely identify the visitor’s browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns.
- Marketing data, such as your preferences for receiving communications about our products, services, activities, events, and publications, and details about how you engage with our communications.
- Other information that we may collect which is not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed on the Website at the time of collection.

1.2. **Deidentified or Aggregate Information** – Personal information does not include Deidentified and Aggregate Information. “**Deidentified Information**” means information that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular individual, and for which Conduit Security has implemented technical safeguards and business processes that prohibit reidentification of the individual. “**Aggregate Information**” means information that relates to a group or

category of individuals, from which individual identities have been removed, that is not linked or reasonably linkable to any individual or household, including via a device.

1.3. Sources of Personal Information. We obtain personal information from the following categories of sources:

- Personal Information You Provide. Conduit Security collects personal information when you voluntarily submit it to us.
- Personal Information that is Automatically Collected. In addition to personal information that we may receive directly from you, Conduit Security indirectly collects other information from you automatically, such as log information about you, your computer or mobile device, and your activity on our Website, including pages you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
- Personal Information Obtained from Third Parties. Conduit Security may receive personal information about you from other third party sources, including from business partners or data providers. We may merge or combine such personal information with the personal information we collect from you directly or automatically.

2. USE OF PERSONAL INFORMATION

Conduit Security may also use personal information for various purposes, including, without limitation, to:

- Provide, operate, maintain, and improve our Website (and our products and services).
- Understand and analyze the usage trends and preferences of visitors to our Website to make our Website (and our products and services) better, diagnose technical issues, prevent fraud, and develop new features and functionality for our Website (and our products and services).
- Personalize your experience on the Website and to deliver information about offers relevant to your interests.
- Verify your identity or determine your eligibility for offers and promotions.
- Communicate with you, including responding to any of your requests or questions.
- Perform market research.
- Provide you with support including responding requests for support or responding to your feedback.
- Send you materials, updates, information, special offers, and promotional material from us, including through using direct marketing or behavioral-based advertising.
- Respond to requests from law enforcement and as required by applicable law, court order, or government investigation.

3. SHARING OF PERSONAL INFORMATION

In addition to the specific situations discussed elsewhere in this Privacy Policy, Conduit Security may share your personal information in the following circumstances:

- 3.1. Related Companies and M&A Transactions.** We may share your personal information with companies that are affiliated with us (that is, that control, are controlled by, or are under common control with us). In addition, if we sell all or part of our business or make a sale or transfer of assets or are otherwise involved in a merger or business transfer, we may transfer your personal information to a third party as part of that transaction, including at the negotiation stage.
- 3.2. Consent.** We may ask if you would like us to share your personal information with other unaffiliated third parties who are not described elsewhere in this Privacy Policy, and we may do so with your consent.
- 3.3. Legal Compliance.** We may disclose personal information in response to subpoenas, warrants, or court orders, in connection with any legal process, and to comply with relevant laws. We may also share your personal information in order to establish or exercise our rights; to defend against a legal claim; to investigate, prevent, or take action regarding possible illegal activities or fraud; to protect the safety and security of our Website; and to prevent a violation of our Terms of Use located at [https://conduitsecurity.com/public/docs/Conduit%20Security%20-%20Master%20Services%20Agreement%20\(Online\).pdf](https://conduitsecurity.com/public/docs/Conduit%20Security%20-%20Master%20Services%20Agreement%20(Online).pdf)
- 3.4. Service Providers.** We may share your personal information with third parties who perform services for use or on our behalf that are reasonable for the orderly operation of the Website. Among other things service providers may help us perform website hosting, app design, maintenance services, database management, web analytics, app analytics, billing, payment processing, marketing, or any other use set out in this Privacy Policy.
- 3.5. Behavioral-Based Advertising Partners.** We participate in behavioral-based advertising. This means that a third party advertising Conduit Security may use technology (e.g., a cookie) to collect information about your use of our Website so that we can provide advertising about products and services tailored to your interests. That advertising may appear either on our Website, or on other websites.

4. SECURITY OF PERSONAL INFORMATION

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from the risks presented by unauthorized access or acquisition, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any unauthorized access or acquisition of your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

5. YOUR CHOICES

You can make the following choices regarding your personal information:

- 5.1. Modifications to Your Personal Information.** We rely on you to update and correct the personal information provided to us. Note that we may keep historical information in our backup files as permitted by law. If our Website does not permit you to update or correct certain personal information, please contact us as described below.
- 5.2. Promotional E-mails.** You may choose to provide us with your e-mail address for the purpose of allowing us to send newsletters, surveys, offers, and other promotional materials related to our Website, as well as targeted offers from third parties. You can stop receiving promotional e-mails by clicking the “unsubscribe” links in the e-mails or by contacting us as described below. If you decide not to receive promotional e-mails, we may still send you service-related communications, to fulfill orders for offers you have requested, or deliver notifications directly to you through the Website.
- 5.3. Cookies.** Most browsers let you remove or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser’s settings. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, however, the Website may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org. We use Google Analytics to help us understand visitor activity and patterns on the Website. You can learn more about Google Analytics cookies by clicking [here](#) and about how Google protects your data by clicking [here](#). You can prevent the use of Google Analytics relating to your use of the Website by downloading and installing a browser plugin available [here](#).
- 5.4. Behavioral-Based Advertising.** We participate in behavioral-based advertising. This means that a third party may use technology (e.g., a cookie) to collect information about your use of our Website so that we can provide advertising about products and services tailored to your interest. That advertising may appear either on our Website, or on other websites. If you wish to limit third parties’ collection of information about your use of our Website, you can opt-out of receiving behavioral-based advertising from participating NAI and DAA members at http://www.networkadvertising.org/managing/opt_out.asp or optout.aboutads.info, respectively. Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above. ADDITIONALLY, PLEASE NOTE THAT OPTING-OUT OF BEHAVIORAL ADVERTISING DOES NOT MEAN THAT YOU WILL NOT RECEIVE ADVERTISING WHILE USING THE WEBSITE. IT WILL, HOWEVER, EXCLUDE YOU FROM BEHAVIORAL-BASED ADVERTISING CONDUCTED THROUGH PARTICIPATING NETWORKS, AS PROVIDED BY THEIR POLICIES AND CHOICE MECHANISMS.
- 5.5. Do-Not-Track.** Some web browsers and devices permit you to broadcast a preference that you not be “tracked” online. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

6. NOTICE TO CALIFORNIA RESIDENTS

Under California Civil Code Sections 1798.83-1798.84, California residents who have an established business relationship with Conduit Security are entitled to ask us for a notice describing what categories of personal information we share with third parties for their direct marketing purposes. This notice will identify the categories of information shared with third parties and will include a list of the third parties with which it is shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please submit your request to the address listed in the Section titled “CONTACTING US” below.

7. OTHER SITES AND SERVICES

The Website may contain links to other websites and online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or online services that are not associated with us. We do not control third party websites or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use, and sharing of your personal information. We encourage you to read the privacy policies of the other websites and online services you use.

8. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

Conduit Security is based in the United States of America. If you are from a country outside of the United States of America with laws governing data collection, use, and disclosure that may differ from U.S. law and you provide personal information to us, please note that any personal information that you provide to us may be transferred to the United States of America. By providing your personal information, where applicable law permits, you hereby specifically and expressly consent to such transfer and processing and the collection, use, and disclosure set forth herein or in the Terms of Service.

9. CONTACTING US

If you have any questions or concerns about our Privacy Policy or any other privacy or security issue, please contact us at:

info@conduitsecurity.com

Effective Date: April 27, 2022