

## SecureCo, Inc. Global Privacy Notice

Last Updated: 12/07/2023

SecureCo, Inc., any other of our subsidiaries and affiliates (collectively, “**SecureCo**,” “**we**,” “**us**,” or “**our**”) respects individual privacy and values the confidence of its customers, suppliers, business partners and others. SecureCo strives to collect, store, process and distribute personal information in a manner consistent with the laws of the countries in which it does business and adheres to high ethical standards in its business practices. This Privacy Notice is designed to help you understand how we collect, use, process, and share your personal information, and to help you understand and exercise your privacy rights.

### SCOPE AND UPDATES TO THIS PRIVACY NOTICE

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### SCOPE AND UPDATES TO THIS PRIVACY NOTICE

SecureCo provides network security solutions protected by stealth and obfuscation, shielding networks, APIs and cloud connections from reconnaissance, exploitation, and breach (collectively, our “**Products**”). Trusted for the most demanding commercial and government cybersecurity applications, we deliver high-performance, exceptionally secure endpoint and data transit protection, reducing attack surface, vulnerability and administrative overhead.

This Privacy Notice applies to personal information processed by us, including in connection with our Products, on our websites, our CONNECT mobile application and any other mobile applications we may create (an “**Application**”), and other online or offline offerings. To make this Privacy Notice easier to read, our Products, websites, mobile applications, and other offerings are collectively called the “**Services**.”

**An Important Note:** This Privacy Notice does not apply to any of the personal information that we transmit and secure on behalf of our customers through their use of our Products (“**Customer Data**”). Customer Data is encrypted and routed over the internet through our Products, and SecureCo does not store or decrypt Customer Data. Our customers’ respective privacy policies govern their collection and use of Customer Data. Our processing of Customer Data is governed by the contracts that we have in place with our customers, not this Privacy Notice. Any questions or requests relating to Customer Data should be directed to our customer.

**Changes to our Privacy Notice.** We may revise this Privacy Notice from time to time in our sole discretion. If there are any material changes to this Privacy Notice, we will notify you as required by

applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Notice if you continue to use our Services after the new Privacy Notice takes effect.

## 1. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

### A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

- **Account Creation.** We may collect personal information when you create an account, such as name, email address, telephone number, username, interests, and other account information.
- **Purchases.** We may collect personal information and details associated with your purchases, including payment and billing information, and history of purchases.
- **Your Communications with Us.** We may collect personal information, such as email address, phone number, or mailing address when you request information about our Products or Services, register for news and updates, request customer or technical support, or otherwise communicate with us.
- **Register to Use an Application.** When you register to use an Application, we may collect personal information so we can identify you (such as your email address, password, name, and company), which you provide to us directly in the Application.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., messaging and chat features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Services. If you respond to one of these postings, we may collect your personal information, such as your application, CV, cover letter, and/or any other information you provide to us.

### B. Personal Information Collected Automatically

We may collect personal information automatically when you use our Services.

- **Automatic Collection of Personal Information.** We may collect certain information automatically (with your consent if and as required by law) when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect (with your consent if and as required by law) information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services. When you download and use an Application, we may collect technical data, such as information about your usage of the Application (e.g., features used, dates and times of interactions) and technical data about your device, such as operating system, model, device identifier, and IP address.
- **Crash Reports.** Crash reports provided to us may include personal information related to such crash reports, including detailed diagnostic information about your device and the activities that led to the crash.
- **Cookie Policy (and Other Technologies).** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect (with your consent if and as required by law) information through your use of our Services.
  - **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
  - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Strictly Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics below*);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies, including cross-device tracking, to deliver content, including ads relevant to your interests, on our Services or on third-party digital properties.

See “[Your Privacy Choices and Rights](#)” below to understand your choices regarding these Technologies.

- **Analytics and Customer Support Tools.** We may use Technologies and other third-party tools to process analytics information. These Technologies allow us to better understand how our digital Services are used and to continually improve and personalize our Services. We may use other Technologies to provide customer support to individuals on our Services. Some of our analytics and customer support partners may include:
  - **Google Analytics.** For more information about how Google uses your personal information (including for its own purposes, e.g., for profiling or linking it to other data), please visit [Google Analytics’ Privacy Policy](#). To learn more about how to opt-out of Google Analytics’ use of your information, please click [here](#) or by contacting us as set forth in “[Contact Us](#)” below.
  - **LinkedIn Analytics.** For more information about how LinkedIn uses your personal information, please visit [LinkedIn Analytics’ Privacy Policy](#). To learn more about how to opt-out of LinkedIn’s use of your information, please click [here](#) or by contacting us as set forth in “[Contact Us](#)” below.
  - **HubSpot.** We utilize HubSpot’s customer relationship management platform. For more information about how HubSpot uses your personal information, please visit [HubSpot’s Privacy Policy](#).
- **Social Media Platforms.** Our Services may contain social media buttons, such as Meta (Facebook), X (Twitter), LinkedIn, Instagram, and YouTube, which might include widgets such as the “share this” button or other interactive mini programs). These features may collect personal information such as your IP address and which page you are visiting on our Services and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

### C. Personal Information Collected from Other Sources

**Third-Party Services and Sources.** We may obtain personal information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, such as a third-party login service, or a social networking site, we may collect personal information about you from that third-party application that you have made available via your privacy settings.

**Referrals and Sharing Features.** Our Services may offer various tools and functionalities that allow you to provide personal information about your friends through our referral service. Our referral services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to learn about our Products or use our Services. Please only share with us contact information of people with whom you have a relationship (e.g., friend or co-worker).

## 2. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our Services, as described below.

### A. Provide Our Products and Services

We use your information to fulfil our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Processing and fulfilling your order and notify you of your order status
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing your financial information and other payment methods for Services purchased;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

## **B. Administrative Purposes**

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing (with your consent if and as required by law), research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Short-term, transient use, such as contextual customization of ads;
- Improving, upgrading, or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Notice;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing personal information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

We may use your information for other legitimate business purposes as permitted by law.

## **C. Marketing and Advertising our Services**

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law. Some of the ways we market to you include email campaigns, custom audiences advertising, and “interest-based” or “personalized advertising,” including through cross-device tracking.

If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in “[Contact Us](#)” below.

## **D. With Your Consent**

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

#### **E. De-Identified and Aggregated Information**

We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about the device from which you access our Services, or other analyses we create.

#### **F. Other Purposes**

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

### **3. HOW WE DISCLOSE YOUR PERSONAL INFORMATION**

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

#### **A. Disclosures to Provide our Services**

The categories of third parties with whom we may share your personal information are described below.

- **Service Providers.** We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Services. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners.** We may share your personal information with business partners to provide you with a Product or Service you have requested. We may also share your personal information with business partners with whom we jointly offer Services.
- **Corporate Customers.** We may share your personal information with your company if you are using our Services under a corporate agreement with one of our customers.
- **Affiliates and Distributors.** We may share your personal information with our company affiliates and distributors for example: for our administrative purposes, IT management, or for them to provide services to you or support and supplement the Services we provide.
- **Other Users or Third Parties with which You Share or Interact.** As described above in “[Personal Information We Collect](#),” our Services may allow you to share personal information or interact with other users and third parties (including individuals and third parties who do not use our Services and the general public).
- **Advertising Partners.** Through our Services, we may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising,” “cross-context behavioral advertising,” or “personalized advertising.”

- **APIs/SDKs.** We may use third-party application program interfaces (“APIs”) and software development kits (“SDKs”) as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in “Contact Us” below.

We may also share your information with third parties as appropriate and permitted by law. The privacy choices you may have about your personal information are determined by applicable law and are described below.

#### **B. Disclosures to Protect Us or Others**

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

#### **C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers**

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

### **4. YOUR PRIVACY CHOICES AND RIGHTS**

**Your Privacy Choices.** The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Notice).
- **Mobile Devices.** We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device. You may opt out of this collection by changing the settings on your mobile device.
- **Phone calls.** If you receive an unwanted phone call from us, you may opt out of receiving future phone calls from us by following the instructions which may be available on the call or by otherwise contacting us as set forth in “[Contact Us](#)” below.
- **“Do Not Track.”** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not currently respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies and Personalized Advertising.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits or by using the cookie management tool on our website. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Digital Advertising Alliance](#), and [the Digital Advertising Alliance of Canada](#).

Please note you must separately opt out in each browser and on each device.

**Your Privacy Rights.** In accordance with applicable law, you may have the right to:

- **Access to and Portability of Your Personal Information**, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (also known as the “right of data portability”);
- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion** of your personal information;
- **Request Restriction of or Object to** our processing of your personal information where the processing of your personal information is based on our legitimate interest or for direct marketing purposes, including (i) the right to opt-out of the sharing of personal information, (ii) object to or restrict our use of or your sensitive personal information, including the right to opt-out of the sharing of sensitive personal information, and (iii) opt out of the processing of your personal information for purposes of (a) targeted advertising, and (b) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you; and
- **Withdraw your Consent** to our processing of your personal information. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in “[Contact Us](#)” below. We will process such requests in accordance with applicable laws.

**California Shine the Light.** The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

**Opt-out of “Sales” for Nevada Residents.** If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. You can exercise this right by contacting us at [info@secureco.io](mailto:info@secureco.io) with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us by contacting us as set forth in “[Contact Us](#)” below.

## 5. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy



Notice. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of personal information.

By using our Products and Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may notify applicable regulatory authorities if and as required by law and may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

## **6. INTERNATIONAL DATA TRANSFERS**

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws. For more information about the safeguards we use for certain international transfers of personal information, please [Contact Us](#).

If we transfer personal information which originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfers are the [UK International Data Transfer Agreement or Addendum](#) or [EU Standard Contractual Clauses](#).

## **7. RETENTION OF PERSONAL INFORMATION**

We store the personal information we collect as described in this Privacy Notice for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws, or based upon other criteria, including, but not limited to, the sensitivity and volume of such data. Additionally, we endeavor to retain all such personal information in accordance with legal requirements.

## **8. CHILDREN'S INFORMATION**

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our Services without your consent, you may contact us as described in "[Contact Us](#)" below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child's account.

## **9. OTHER PROVISIONS**

**Third-Party Websites/Applications.** The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

**Supervisory Authority.** If your personal information is subject to applicable data protection laws of the European Economic Area, Switzerland, or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority or attorney general if you believe our processing of your personal information violates applicable law:

- [EEA Data Protection Authorities \(DPAs\)](#)
- [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)
- [UK Information Commissioner's Office \(ICO\)](#)

## 10. CONTACT US

SecureCo is the controller of the personal information we process under this Privacy Notice.

If you have any questions about our privacy practices or this Privacy Notice, or to exercise your rights as detailed in this Privacy Notice, please contact us at:

SecureCo, Inc.  
Privacy Compliance Officer  
165 W. End Avenue, Suite 19N  
New York, NY 10023  
917-444-5753  
[info@secureco.io](mailto:info@secureco.io)