

Privacy Lock Privacy Policy

Last updated: June 22, 2024

Introduction

Privacy Lock Inc. ("Privacy Lock") is a software company that enables businesses to implement and automate data privacy and privacy compliance solutions. We believe in the importance of protecting personal information and develop our products under the principles of Privacy by Design and Privacy by Default whenever and wherever possible. This Privacy Policy applies to the Privacy Lock website, technology, and products and to all visitors to the Privacy Lock website and customers and users of the Privacy Lock platform.

Please be aware that this Policy does not cover processing personal information when Privacy Lock is instructed to do so on behalf of our customers. Any Personal information submitted for processing through our platform is solely for the purpose of providing our products. Privacy Lock does not require or request personal information from our customers, who are considered Controllers of any personal information that they choose to submit in connection with our product and service offerings. Privacy Lock acts as a Processor according to any applicable Agreement between us and our customer(s).

This Policy informs you about how we collect, use, disclose, and store Personal Information when you interact with us or our website, use our products, and how we use that information to manage our relationship with you.

Personal Information means information about an individual that, alone or in combination, can reasonably be used (directly or indirectly) to identify a person.

Controller means a party that sets out the purposes and means of processing personal information, and **Processor** means a party that processes personal information on behalf, and according to the instructions, of the Controller.

Information We Collect

You are not required to provide contact information on our website. If you choose to use our chat feature or fill out our early access request form, we will receive the contact information you provide. If you sign up for a user account or subscription, we will collect your contact information and any payment information you provide. This information is strictly for our internal use to provide our Products and optimize our customer relationships. We do not sell or rent this information to third parties.

Provided by you: We collect personal information that you provide us. This includes, for example, when you contact us to request a demo, sign up for a user account or subscription, and when you access our platform or use our services. This information

may include your name, phone number, email, company name, payment information, and other identifying information you choose to provide.

Information we automatically collect: When you visit our website, we automatically receive your IP address and information such as the user-agent of your web browser. Any website you visit online can collect this information. An IP address is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet. When you visit our website, we may view the IP address of the device you use to connect to the Internet. We use this information to determine the general physical location of the device and understand from what regions of the world our website visitors come. We also may use this information to enhance our website.

When you use the Products: We also collect Internet and other electronic activity information when you use our products. This can include **Usage and log Information** (such as which of our products you use, the configuration of your device or computer, and performance metrics related to your use of the products), **Cookies** (discussed below), and **Customer Feedback** that you choose to provide.

Information we collect from Third Parties

Privacy Lock does not collect information from third parties.

Cookies

The Privacy Lock website and platform may place cookies on your browser in order to identify you when you return to our website or log in to our platform. A cookie is a piece of information that a web server may place on your computer when you visit a website. Cookies are commonly used by websites to improve the user experience. Many cookies last only through a single website session or visit. Others may have an expiration date or may remain on your computer until you delete them.

We may use cookies for a number of purposes. For example, to maintain continuity during a user session, to gather data about the usage of our website for research and other purposes, to store your preferences for certain kinds of information and marketing offers or to store your username or encrypted identification number so that you do not have to provide this information every time you return to our website. Our cookies will track only your online activity relating to your interaction with this website and will not track your other Internet activity.

You can decide if and how your computer will accept a cookie by configuring your preferences or options in your browser. However, if you choose to reject cookies, you may not be able to use certain services or website features.

Certain pages on our websites contain “web beacons” (also known as Internet tags, pixel tags and clear GIFs). These web beacons allow third parties to obtain information such as the IP address of the computer that downloaded the page on which the beacon appears, the URL of the page on which the beacon appears, the time the page

containing the beacon was viewed, the type of browser used to view the page, and the information in cookies set by the third party.

Children's Privacy

Privacy Lock's website and products are not intended for children and we do not knowingly collect information about children or sell products to people under the age of 18. We do not knowingly store information about children and never sell information about minors. If you suspect that information about a minor has been sent to Privacy Lock, please notify us immediately.

How We Use the Information We Collect

Services. We use the information we collect in connection with the services we provide. This includes, for example, setting up your account; providing, operating, and maintaining our products and services; processing and completing transactions; providing customer service and support, responding to inquiries; sending communications; identifying and preventing fraudulent activity, and for any other reason based on our stated business purposes.

Website. We may use the information we collect to administer and improve the Privacy Lock website and platform.

Promotional Communications. With your consent, we may use your personal information to contact you with newsletters, marketing, or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the instructions provided in any email we send or by following the unsubscribe link in those emails.

Analytics. We may use aggregated information that's collected to understand general information and trends related to our website, such as how many users have visited our web site during a given period of time, and the types of devices the visitors use. The information can't be used to identify an individual and is used by us to help improve the solution for consumers.

IP addresses – Fraud Prevention. Our use of IP addresses is limited to helping identify and combat potentially fraudulent activity. IP addresses are stored in our log-files and are deleted after 30 days.

Respond to Inquiries. If you choose to contact us directly (by email, form, or postal mail) using the contact information we provide on the Privacy Lock website, we will use your contact information to respond to your inquiry.

Sharing Information

We DO NOT sell your information to any third parties, nor do we share, disclose, or provide any information collected with parties outside of our own organization unless we have a legitimate business need to do so. For example, we share financial account and

contact information with our payment processors, which may include personal information depending on the instrument you provide to us. If Privacy Lock is acquired by another company, we will transfer collected information to the acquiring company. Under certain circumstances, we may be required to disclose personal information if necessary to comply with a subpoena or court order, to establish or exercise our legal rights or defend against legal claims, or to cooperate with government and/or law enforcement officials.

Security of your Personal Information

Any sharing of personal information collected about you is limited to our employees, our affiliates' employees, those who are otherwise specified in this Policy, or others who need to know that information to provide the Services or in the course of conducting our business operations or activities. While no website can guarantee exhaustive security, we maintain appropriate physical, electronic and procedural safeguards to protect your personal information collected via the website. We protect our databases with various physical, technical and procedural measures and we restrict access to your information by unauthorized persons. We also educate all employees about their responsibility to protect customer data and we provide them with appropriate guidelines for adhering to our company's business ethics standards and confidentiality policies.

Physical Security

Privacy Lock's technical infrastructure is hosted on CariNet servers, which are located at SOC 2 accredited data centers, and regularly audited. Physical security controls at data centers include 24x7 monitoring, cameras, logs, and other security measures.

Access Control

All services related to operations and infrastructure are accessible only through secure connectivity (e.g., SSL, SSH). All systems require user authentication, and many include multi-factor authentication for additional security.

Security Review and Systems Management

All systems and applications undergo security review for vulnerabilities prior to production deployment. All application dependencies are monitored for vulnerabilities using third party dependency scanning tools. Privacy Lock maintains industry standard security incident response policies and procedures.

Data Retention

Privacy Lock does not retain information beyond the metes and bounds of the contractual relationship. If you stop using the Service, any personal information you have submitted will be deleted no later than 30 days after the termination of the Agreement between You and Privacy Lock.

Your Rights to Data Privacy

While the United States does not currently have a Federal Framework that governs privacy rights, a growing number of states offer enhanced consumer privacy rights.

Privacy Lock believes everyone deserves to be in control of their personal information and offers these rights to all customers and website visitors regardless of their jurisdiction. Thus, all users of our products and services may exercise the following rights with respect to information we collect:

- The right to be informed about how their information is used.
- The right to access the information we hold about individuals.
- The right to request the correction of inaccurate information we collect.
- The right to request that we delete information or stop processing or collecting it.
- The right to withdraw consent for other processing activities for which you have given us your consent.

California Consumers

The California Consumer Privacy Act (the “CCPA”) affords California consumers additional privacy protections, including the right to know what information we collect, disclose, and sell, as well as the right to request deletion of your data and to opt out of the sale of your data. Businesses can’t discriminate against you for exercising any of these rights. Privacy Lock complies with all CCPA standards and makes every effort to address consumer requests in accordance with the CCPA.

How to Contact Us

If you have any questions about this Privacy Policy or its implementation, or if you would like to exercise any of the rights enumerated above, you may contact us at the following email: welcome@myprivacylock.io.

Changes to this Privacy Policy

We may update this Privacy Policy from time to time based on changes to applicable laws and regulations or other requirements applicable to us, changes in technology, or changes to our business. Any changes we make to the Privacy Policy in the future will be posted on this page, so you should review it periodically.