

PALADIN CLOUD **PRIVACY POLICY**

This privacy policy (“**Privacy Policy**”) details how Paladin Cloud, Inc. and our affiliates (“**we**”, “**our**” or “**us**”) may access, collect, store, use and share Personal Data that we receive about or from you (“**you**”) when you use our products and services or visit our website (“**Services**”). We respect your privacy and your statutory rights and strictly adhere to the highest standards.

“**Personal Data**” means information used alone or in conjunction with other information that identifies an individual or may, with reasonable efforts, enable the identification of an individual, or as otherwise defined at Personally Identifiable Information (“**PII**”) by applicable privacy laws.

What information we collect

We collect Personal Data from you and any device you may use, in the following scenarios: **(i)** when you actively and voluntarily provide it to us, **(ii)** when you interact with our Services, and **(iii)** when other third parties provide it to us, as further described below.

Personal Data we collect when you share with us in connection with our Services:

- Contact Information: we collect details such as your full name, company name, account information, password information, username, job title, email address and phone number if you provide us with this information through website activity or through the use of our Services.
- Communications and Content: we collect information about your preferences for subscribing to our marketing activities including blogs, newsletters, content, webinars and other events.
- Job Postings: we collect information about you when you send us your resume in connection with a job posting on our website or on industry job boards.

Personal Data we collect when you use our Services:

- Device Data: we may collect data on how you interact with our Services including log-in credentials to access and connect with our Services. Device information may include machine data, network data, IP addresses, browser type, operating systems and related information.
- Utilization Data: we may collect data on how you interact with our Services including feature utilization, website clicks, videos viewed and other activities.
- Use of Cookies: we do not use cookies on our website to track or collect information about you.

Personal Data we receive from third parties services:

- Third Party Services: we may engage third party service providers to assist with marketing and advertising activities. In accordance with applicable privacy laws, we may receive business information including your full name, company name, job title, email address and phone number.
- Partner Introductions: we may engage with sales and marketing partners who may provide business information including your full name, company name, job title, email address and phone number.

How we use information we collect

In accordance with applicable privacy and data protection laws, we rely on a legal basis to use or process any Personal Data we may collect and how you choose to interact with us.

Personal Data used in connection with a contract for our Services

To the extent you have a business agreement or contract with us for Services, we use Personal Data solely for the purpose of fulfilling our contract obligations under a business agreement.

We may use Personal Data to provide and operate the Services and to fulfill our support obligations in accordance with the contract terms and provisions. This may include collecting Personal Data to assist in troubleshooting, debugging, system diagnostics, monitoring performance and reliability of the Services. We may also collect Personal Data when we process support requests, tickets, communications and other interactions designed to improve your customer experience and related to performing our contract obligations. We may also collect Personal Data in the event of an actual security incident where detection and response activities may necessitate use of Personal Data to ensure the security and efficacy of the Services. We may use Personal Data to take steps to detect, prevent, and prosecute fraud or other illegal activities.

The type of Personal Data we may collect and use includes business information such as your full name, company name, account information, password information, username, job title, email address and phone number. We may also collect and use Device Data such as how you interact with our Services including accessing and connecting with our Services. Device Information may include machine data, network data, IP addresses, browser type, operating systems and related information.

Personal Data used in connection with marketing our Services

We may use Personal Data to send you marketing communications about our Services to understand whether there may be legitimate interest in establishing a business relationship with you. Marketing communications may take the form of lead generation activities through LinkedIn and email campaigns, webinars, newsletters, meetings at conferences and other events and activities. We may use your Personal Data to contact you on social media platforms to understand whether there may be interest in establishing a business relationship about our Services. You will have control over whether to opt out of any marketing communications including removal of your Personal Data from our contact database.

Personal Data used for internal purposes

We may anonymize and aggregate your Personal Data for internal purposes to improve our Services and to conduct internal research and development activities. Anonymized Personal Data does not allow for identification of an individual user either on a stand alone basis or through the combination with other data elements.

If you have provided consent for us to use your Personal Data in accordance with this Privacy Policy, you have the right to withdraw your consent at any time, but this will not affect any prior use or processing of this information.

How we disclose your information

We may disclose your Personal Data to third party service providers we work with in order to provide our services to you and other customers, such as hosting, maintenance, backup, storage, analysis and other services. Third party service providers may need to access or use information about you in connection with the Services being provided. If a service provider needs to access information about you to perform services on our behalf, they do so under our instruction which includes the protection of security and confidentiality procedures.

We may disclose your Personal Data when we are required to comply with a valid legal request to access, preserve or disclose information. In specific cases and as may be required by law, we may share information about you with a third party if we believe that sharing is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request.

We may use your Personal Data to protect our customers or the public from harm or illegal activities, or respond to an emergency which we believe in good faith requires us to disclose information about you in order to assist in preventing the death or serious bodily injury of any person.

We may use your Personal Data to protect our legitimate business interests and legal rights. We may use information about you in connection with legal claims, compliance, regulatory, law enforcement and audit functions, and disclosures in connection with the acquisition, merger or sale of a business. We enforce our agreements, policies and terms of service, protect the security or integrity of our Services.

How we protect your information

We have implemented security protections and measures designed to protect your Personal Data. Our security policies have been implemented internally and with third party service providers in connection with providing our Services. We will protect your information in accordance with this Privacy Policy and take any appropriate measure to protect your information. There is no guarantee that your Personal Data will not be accessed by unauthorized users as a result of a breach or other security incident that may impact our hosting or another third party provider.

How we store your information

We will store your Personal Data as necessary in order for us to provide our Services to you in accordance with any business agreement or contract. We will continue to store your information until it becomes necessary for us to delete this information or upon a request from you to delete your Personal Data from our systems. We may be required to store your information for legal, tax or regulatory requirements including compliance with federal, state and local laws. We will update our data retention policy as necessary to ensure it remains current.

Privacy rights you have

The privacy rights you have over your Personal Data may be governed by specific jurisdictions, but generally will include the following rights:

1. You have the right to access your Personal Data stored by us at any time and for any reason
2. You have the right to request that we delete all of your Personal Data from our records provided we are not obligated to retain all or part of your Personal Data for legal or regulatory requirements
3. You have the right to withdraw your consent any time and for any reason related to the collection and use of your Personal Data
4. You have the right to request that we correct any inaccurate information related to your Personal Data
5. You have the right to request that we provide you with your Personal Data
6. You have the right to opt out of any marketing communications related to our Services by us or third party service providers

You can exercise your privacy rights by contacting us at privacy@paladincloud.io. We will make every effort to promptly reply to and fulfill your request.

How we protect children's privacy

We do not offer our Services for use by children and, therefore, we do not knowingly collect Personal Data from or about children under the age of eighteen (18) years old. If you are under the age of eighteen (18), do not provide any Personal Data to us without involvement of a parent or a legal guardian. In the event that we become aware that you provide Personal Data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@paladincloud.io.

California Residents

If you are a California resident, the California Consumer Privacy Act ("CCPA") requires us to provide you with information related to each category of "Personal Information" that is based on CCPA's definition that we may use or collect. In addition, we must provide you with the categories of Third Parties to which we may disclose Personal Information for legitimate business purposes including the sharing of Personal Information for "cross-context behavioral advertising," and/or to "sell" such Personal Information. According to the CCPA, the term "sharing" means the targeting of advertising to a consumer based on that consumer's Personal Information obtained from the consumer's activity across websites, and "selling" is defined by the CCPA as the disclosure of Personal Information to Third Parties in exchange for monetary or other valuable consideration.

Our Privacy Policy includes what information we collect, how we use the information we collect, how the information we collect is disclosed, how we protect your information and how the information is stored.

Please note the following information required by CCPA:

Personal Information categories	Third Party categories we sell or share Personal Information
Device identifiers and usage information	None
Email address	None

Your rights for selling or sharing

You have the right to opt out of any selling or sharing of your Personal Information for marketing or advertising purposes by emailing us at privacy@paladincloud.io.

California disclosure: Shine the Light law

If you are a California resident, California's "Shine the Light" law gives you rights under certain circumstances to opt out of the disclosure of specific categories of Personal Information, as defined in the Shine the Light law, with Third Parties for marketing and advertising purposes. You may request additional information regarding California's Shine the Light law by emailing us at privacy@paladincloud.io.

Contact our Privacy Team

If you have any questions regarding our Privacy Policy, or if you wish to exercise your rights, please contact us at privacy@paladincloud.io.