

This 'Privacy Policy' ("**Privacy Policy**") describes how and why we collect, use, process, store, share and protect your personal information. Your privacy is very important to us, and we are committed to processing personal information lawfully, fairly, transparently and securely.

01. Who are we?

Cyferd Inc. ("**we**", "**our**", "**us**", or "**Cyferd**") is committed to protecting your personal information when you use Cyferd services, Cyferd products, Cyferd software, websites, applications, platforms, communications, or associated services.

We want our services to be safe, secure and trusted environments for our customers, users, partners and visitors worldwide.

This Privacy Policy relates to our use of any personal information you provide to us, including via telephone, email, online forms, websites, applications, events, support requests, correspondence, social media interactions, or any other communications with Cyferd.

As Cyferd operates globally, this Privacy Policy is intended to align with internationally recognised privacy and data protection standards, including the UK General Data Protection Regulation ("**UK GDPR**"), EU General Data Protection Regulation ("**EU GDPR**"), UK Data Protection Act 2018, applicable United States privacy legislation, and other applicable international privacy laws where relevant.

If you have any questions regarding this Privacy Policy or how we process your personal information, please do not hesitate to contact us using the details provided at the end of this document.

02. This Privacy Policy explains the following:

- What information Cyferd may collect about you and on what basis;
- How Cyferd uses personal information;
- When Cyferd may contact you;
- Whether Cyferd shares your information with third parties;
- How Cyferd protects your information;
- How long Cyferd retains your information;
- Your rights regarding your personal information;
- International transfers of personal information;
- The use of cookies and analytics technologies on Cyferd websites.

Cyferd is committed to safeguarding your personal information. Whenever you provide such information, we will process your information in accordance with applicable data protection and privacy laws. Where applicable, we maintain records of our processing activities and implement appropriate technical and organisational measures designed to ensure compliance with applicable privacy legislation.

Cyferd websites may contain hyperlinks to websites owned and operated by third parties. These third-party websites operate under their own privacy policies and cookie policies. We encourage you to review those policies separately as Cyferd is not responsible for the privacy practices or content of third-party websites.

03. What information will Cyferd collect about me?

When you participate in, access, register for, purchase, subscribe to, or otherwise use any Cyferd services, activities, events, online content, software platforms, communications, support services or websites, we may collect personal information about you.

This may include information such as:

- Name;
- Job title;
- Company name;
- Email address;
- Postal address;
- Telephone or mobile number;
- Account credentials;
- Communications preferences;
- IP address and device information;
- Usage activity and interaction data;
- Event registrations and attendance information;
- Marketing preferences; and
- Any other information you voluntarily provide to us.

By submitting your details, you enable Cyferd (and where applicable, its authorised service providers and contractors) to provide you with the services, activities, products, software, communications, or online content you request.

In some circumstances, we may need to collect additional personal information where necessary for security, compliance, contractual, legal, recruitment, or operational purposes. Where we collect additional categories of information, we will explain why we require the information and how it will be used.

Cyferd also uses cookies and similar technologies and may collect IP addresses and technical usage information from visitors to Cyferd websites and platforms. Further information is available within our separate Cookie Policy.

We will only collect, use, store and process personal information where we are legally permitted to do so.

Cyferd will ensure that personal information is:

- Processed lawfully, fairly and transparently;
- Collected for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary;
- Kept accurate and up to date where reasonably possible;
- Retained only for as long as necessary; and
- Processed securely using appropriate technical and organisational security measures.

04. What lawful bases does Cyferd rely upon?

Cyferd may rely upon one or more lawful bases for processing personal information depending on the circumstances:

Contractual necessity:

We may process personal information where necessary:

- To take steps requested prior to entering into a contract;
- To provide services and fulfil contractual obligations;
- To manage customer and supplier relationships; or
- To deliver and support Cyferd products, platforms and services.

Legitimate interests:

We may process personal information where it is reasonably necessary for our legitimate business interests, including:

- Delivering and improving our products and services;
- Maintaining the security and integrity of our systems and platforms;
- Providing customer support;
- Managing communications and business relationships;
- Conducting analytics and service optimisation;
- Conducting business development and B2B marketing activities; or
- Preventing fraud, misuse or unauthorised access.

Where we rely on legitimate interests, we ensure that our interests are balanced against your rights and freedoms.

Consent:

In some circumstances, we may rely on your consent to process personal information, including for certain marketing communications or optional analytics technologies.

Where we rely on consent, you have the right to withdraw your consent at any time.

Legal obligations:

We may process personal information where necessary to comply with legal, regulatory, contractual or compliance obligations.

05. How will Cyferd use the information it collects about me?

Cyferd may use personal information for a number of purposes including:

- Providing our products, software, platforms, services and support;
- Responding to enquiries, requests and correspondence;
- Service administration purposes;
- Managing customer accounts and relationships;
- Sending operational communications and service notifications;
- Providing information about products, services, events or content;

- Managing registrations for events, webinars or demonstrations;
- Improving and developing Cyferd products and services;
- Monitoring and securing Cyferd systems, platforms and websites;
- Analysing website usage, engagement and service performance;
- Personalising website and platform experiences where appropriate;
- Preventing fraud, misuse or unauthorised activity; and
- Complying with legal and regulatory obligations.

Cyferd may also use aggregated and anonymised information for analytics, research, operational improvement and strategic development purposes.

06. Artificial Intelligence and automated processing

Cyferd may utilise AI-enabled technologies, intelligent automation and machine-assisted analytical tools within its platforms and services.

However:

- Cyferd does not use customer personal information to train public AI models;
- AI-generated outputs are subject to human review and oversight;
- Cyferd does not currently make solely automated decisions which produce legal or similarly significant effects on individuals;
- Appropriate safeguards are implemented to support the secure and responsible use of AI technologies.

Where the nature of AI-related processing materially changes, Cyferd may update this Privacy Policy accordingly.

07. When will Cyferd contact me?

Cyferd may contact you:

- In relation to services, products, software or content you have requested or signed up for;
- In relation to correspondence, enquiries, complaints or support requests;
- In relation to events, webinars or demonstrations you have registered for;
- To provide service updates, security notifications or operational communications;
- To invite participation in surveys or feedback activities; or
- For marketing purposes, where permitted by law or where you have provided consent.

Where required by applicable law, you will be provided with options to manage your communication preferences or unsubscribe from marketing communications.

08. Will Cyferd share my personal information with anyone else?

Cyferd will keep your information confidential except where disclosure is required or permitted by law or where necessary for legitimate business operations.

We may share personal information with carefully selected third-party service providers and infrastructure providers who support the delivery of our services and operations, including:

- GoDaddy (website hosting);
- Amazon Web Services (“**AWS**”) (cloud infrastructure and hosted systems);
- Google Analytics;
- LeadInfo;
- Zoho;
- Professional advisers, auditors and compliance providers; or
- Regulatory authorities or law enforcement agencies where legally required.

Third-party providers are required to process personal information securely, confidentially and only in accordance with Cyferd’s instructions and applicable laws.

Cyferd does not sell personal information to third parties.

09. International transfers of personal information

As a global organisation, Cyferd may transfer personal information internationally.

Where personal information is transferred outside the UK, EEA or other jurisdictions with transfer restrictions, Cyferd implements appropriate safeguards designed to protect personal information, including where applicable:

- Standard Contractual Clauses (“**SCCs**”);
- UK International Data Transfer Agreements (“**IDTAs**”);
- Adequacy decisions;
- Equivalent lawful transfer mechanisms.

10. Offensive or inappropriate content on Cyferd websites

If you post or send offensive, inappropriate, unlawful or objectionable content on or through Cyferd websites, platforms or services, or otherwise engage in disruptive or unlawful behaviour, Cyferd may use relevant information to prevent, investigate or respond to such activity.

Where Cyferd reasonably believes that laws or regulations may have been breached, we may disclose relevant information to appropriate authorities or third parties where legally permitted or required.

11. What if I am under 18 years of age?

Cyferd’s services are not directed toward individuals under the age of 18.

We do not knowingly collect personal information from individuals under 18 without appropriate parental or legal guardian consent.

If we become aware that personal information relating to a child has been collected unlawfully, we will take reasonable steps to delete such information.

12. How long will Cyferd keep my personal information?

Cyferd will retain personal information only for as long as reasonably necessary for the purposes for which it was collected, including legal, regulatory, contractual, operational and security purposes.

Retention periods may vary depending on the type of information and the purpose for which it was collected.

Typical retention periods may include:

- General enquiries and communications: up to 24 months;
- Marketing contacts: until unsubscribe or 24 months inactivity;
- Customer contractual records: duration of the relationship plus up to 6 years;
- Recruitment records: up to 12 months;
- Security and audit logs: up to 12 months; and
- Backup archives: rolling retention periods.

Where longer retention periods are required or permitted by law, regulation, dispute resolution, litigation or legitimate business purposes, information may be retained for longer where appropriate.

13. Can I find out what personal information Cyferd holds about me?

Subject to applicable laws, you may have rights regarding your personal information including the right to:

- Request access to personal information;
- Request correction of inaccurate information;
- Request deletion of personal information;
- Restrict or object to processing;
- Withdraw consent;
- Request portability of personal information;
- Object to direct marketing communications;
- Lodge a complaint with an applicable supervisory authority.

Requests regarding personal information should be directed to the contact details provided at the end of this Privacy Policy.

14. What if I am accessing Cyferd websites outside the UK or United States?

Cyferd operates globally and personal information may be processed in multiple jurisdictions depending on the nature of the services being provided.

Regardless of where personal information is processed, Cyferd applies appropriate safeguards and security measures designed to protect personal information in accordance with applicable privacy laws and internationally recognised privacy principles.

15. Changes to Cyferd's Privacy Policy

This Privacy Policy may be updated periodically to reflect changes in legal requirements, technologies, business operations or services.

The date of the most recent revision will appear at the end of this document.

Where material changes are made, Cyferd may provide additional notice through its websites, platforms or communications where appropriate.

16. How do we secure your personal data?

Cyferd places significant importance on the security of personal information and implements appropriate technical and organisational measures designed to protect personal information against unauthorised access, disclosure, loss, misuse or alteration.

Such measures may include:

- Encryption;
- Secure cloud infrastructure;
- Access controls and role-based permissions;
- Multi-factor authentication;
- Security monitoring and logging;
- Vulnerability management;
- Secure development practices; and
- Routine security reviews and testing.

17. Your rights, including your right to object and withdraw consent

Where applicable under relevant privacy laws, you may have rights relating to your personal information including:

- The right to be informed;
- The right of access;
- The right to rectification;
- The right to erasure;
- The right to restrict processing;
- The right to data portability;
- The right to object;
- Rights relating to automated decision-making; and
- The right to withdraw consent.

You may also have the right to lodge a complaint with your local supervisory authority or data protection regulator.

For users located in the United Kingdom, complaints may be submitted to:

Information Commissioner's Office (ICO): www.ico.org.uk

18. Contacting Cyferd about this Privacy Policy

If you have any questions, concerns or requests regarding this Privacy Policy or Cyferd's processing of personal information, please contact:

Cyferd Inc.
Attn: Data Protection Officer

Email: info@cyferd.com
Website: www.cyferd.com

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