

# SIGMA 7 PARAGON

## RISK ENGINEERING

### PRIVACY POLICY

v1.1, last updated 5 May 2023

IMPORTANT: PLEASE READ THIS PRIVACY POLICY AS IT APPLIES TO ANY PERSONAL DATA YOU PROVIDE US OR THAT WE COLLECT ABOUT YOU THAT IS NECESSARY TO (1) PROVIDE A FUNCTIONING WEBSITE, (2) RESPOND TO YOUR INQUIRIES ABOUT OUR PRODUCTS OR SERVICES ('SERVICES'), (3) PROVIDE YOU WITH ACCESS TO OUR SERVICES, OR (4) RESPOND TO YOUR APPLICATION FOR EMPLOYMENT. FOR EXAMPLE, THIS POLICY APPLIES IF YOU ACCESS THE WEBSITE AT [WWW.PARAGONCONSULTS.COM](http://WWW.PARAGONCONSULTS.COM) OR ANY OTHER WEBSITE OWNED, OPERATED OR PROVIDED BY PARAGON RISK ENGINEERING GROUP, INC. AND ITS SUBSIDIARIES ('WEBSITE' AND 'COMPANY', 'US', 'WE' RESPECTIVELY).

WE DO NOT MARKET TO OR ENTER INTO CONTRACTS WITH CHILDREN NOR DO WE COLLECT PERSONAL DATA FROM ANY PERSON UNDER 18 YEARS OF AGE. PLEASE DO NOT ACCESS OR USE THE WEBSITE OR SERVICES IF YOU ARE UNDER 18 YEARS OF AGE.

### This Policy

This Policy sets out what personal data we might collect, how we process and protect that data, the lawful grounds for that processing, and your related rights. We always seek to comply with the data protection laws applicable to our processing of personal data.

'Personal Data' is a defined term in the European Union ('EU'), United Kingdom ('UK'), and the privacy laws of other jurisdictions. We also use it here to cover 'personally identifiable information' or 'personal information' as defined in the laws of the United States ('US') federal government and its states, as well as other similar legal definitions of this type of data. Essentially 'personal data' means any information relating to an identified or identifiable natural person, namely one who can be identified, directly or indirectly from that information alone or in conjunction with other information. This Policy and our processes are based upon General Data Protection Regulation ('GDPR') principles, as it is the world-standard for data protection laws, inspiring legal developments around the world, and we operate in many jurisdictions.

**Note for California Residents:** This Policy describes how we process your personal data and your rights and choices over our processing. Please see the Section below titled **Your Rights Under California Law** for specific details on your rights under California law. The California Consumer Privacy Act of 2018, Cal. Civil Code §1798.100 et seq. and its implementing regulations ('CCPA') may apply directly to our processing of Personal Data.

**Note for Residents of the European Economic Area, Switzerland and the United Kingdom:** The EU General Data Protection Regulation 2016/679 ('EU GDPR') may apply and the UK Data Protection Act 2018, the UK e-Privacy Regulations ('PECR'), and the UK-adopted version of the EU GDPR ('UK GDPR') may apply directly to all our processing. Please see the section below titled 'Your Rights Under GDPR' for specific details on your rights under applicable law. We use 'GDPR' to refer to either the EU or UK version as they're almost identical.

As data protection laws and practice are constantly developing, we will update this policy from time to time, which we'll do by posting a new policy on the Website that takes effect from the date stated. It is your responsibility to return to the Website from time to time and check for changes.

As defined in the GDPR, we are the 'controller' of Account, Marketing, Improvement, Cookie-Related Data and Recruitment Data as we determine the purposes (the 'why') and the essential means (the 'how') of the collection and processing. We are the 'processor' of

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Service Data as the customer remains the 'controller' of Service Data and we only process Service Data to fulfil our contract with the customer and on their instructions.

### How We Collect and Use Your Personal Data

We collect or are provided personal data in the normal course of business. Provision of personal data to us is never a requirement, however if you do not provide us with the personal data necessary for us to carry out an action at your request or under a contract with or relating to you, for example to respond to your query or provide Services to you, we may not be able to respond to your query or provide Services to you.

Some privacy laws such as the CCPA require that we disclose this data by certain category types collected in the past 12 months. The table below lists those types. For the sake of clarity, we do not collect information in these categories: Protected Classification Characteristics Data, Sensitive Personal Data, Biometric Information or Sensory Data.

We use personal data in the normal course of our business, including to provide, secure, manage and improve our Services and to meet any binding contractual or legal obligations. Some privacy laws such as GDPR require that we disclose to you the purpose and lawful basis for collecting this data and we do so in the table below. In most cases, the lawful ground (or legal basis) for our processing will be that the processing is necessary: (i) for our legitimate interests in carrying out our business, including to maintain, improve and market our products and services, provided those interests are not outweighed by your rights and interests ('**Legitimate Interests**'), (ii) to perform a contract with you ('**Contract**'), or (iii) to comply with our legal obligations ('**Legal Obligation**').

Where processing is based on your consent ('**Consent**'), we will identify the processing purposes and provide you with relevant information to make the processing fair and transparent when we ask for your consent. When you provide us with personal data about yourself or another person, for example a colleague or a contact, you are confirming to us that you have their consent or are otherwise authorised to provide us with that information and that any personal data you give us is accurate and up-to-date.

Most privacy laws require that we disclose to you whether we sell or share your data with third parties and allow you to opt out of this practice, if and when we do. We will not give, sell or rent your personal data to third parties so they can market their services to you. We also do not accept advertising from third parties on the Website. However, we may share personal data in the limited circumstances described below or to comply with a law, order or request of a competent legal or regulatory authority or if we enter negotiations with a third party for the sale or purchase of all or part of our business. When we share your personal data, we have written contracts in place incorporating relevant wording to safeguard that personal data and comply with applicable laws, and we will only share such data as is necessary for the purpose in question.

This is an aggregated overview of the information required by GDPR, the CCPA and other US privacy laws for the five general types of personal data we collect:

**1. Service Data:** We may receive personal data from our customers when using our Services, such as names of team members or data entered into the Services such as an email address, username and password.

<b>Data Categories</b>	<b>Business or commercial purpose for Data Collection</b>	<b>Lawful Basis for Processing or Sharing</b>	<b>If Shared, Category of Third-Party Recipients and Purpose for Sharing</b>
Identifiers, CA Customer Records	To respond to enquiries about the	Legitimate Interests or Contract	Shared with affiliates, Third-Party

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Statute Personal Information, Commercial Information	Services, to provide Services, to provide advice and support.		Service Providers, and web hosting providers as part of Service delivery
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**2. Marketing Data:** You may provide us with your details such as name and email address when you ask about our Services (through the Website, by email or otherwise) and we may otherwise lawfully obtain contact details of potential customers for our Services for our marketing purposes, for example from publicly available business contact information or your business website.

Data Categories	Business or commercial purpose for Data Collection	Lawful Basis for Processing or Sharing	If Shared, Category of Third-Party Recipients and Purpose for Sharing
Identifiers, CA Customer Records Statute Personal Information, Commercial Information	To market our Services to you by email or through social media and networking sites—if we do so, we will provide you with an easy and free way to opt-out of receiving such communications in the future.	Legitimate Interests or Consent	Shared with affiliates, social media companies, and consultants to market our services to you

**3. Improvement Data:** When you visit the Website, we may collect information about your visit such as your IP address and the pages you visited and when you use our Services we may collect information on how you use those Services.

Data Categories	Business or commercial purpose for Data Collection	Lawful Basis for Processing or Sharing	If Shared, Category of Third-Party Recipients and Purpose for Sharing
Identifiers, Internet or Similar Network Activity, Geolocation Data	To analyse and improve the Website or the Services, for example for technical or security purposes and to improve the customer experience.	Legitimate Interests, Contract or Consent	Shared with analytics providers, website designers, and consultants for operational requirements, security and business continuity purposes.

**4. Technology Collected Data:** You may provide us with internet activity such as online identifiers (including name, IP address or email address) browsing history, geolocation data, or other commercial information that is collected by cookies as further described in our **Cookie Declaration Policy**

Data Categories	Business or commercial	Lawful Basis for Processing or Sharing	If Shared, Category of Third-Party Recipients and
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	<b>purpose for Data Collection</b>		<b>Purpose for Sharing</b>
Identifiers, Internet or Similar Network Activity, Geolocation Data	To personalize content, to provide social media features and to analyze our Website traffic as further described in our <b>Cookie Declaration Policy</b> .	Legitimate Interests or Consent; however where applicable law requires your consent to use certain cookies, we will ask for your Consent having provided you with relevant information as set forth in our <b>Cookie Declaration Policy</b> .	Shared with analytics providers, website designers, and consultants as described in our Cookie Declaration Policy. If required by your place of residence, our Cookiebot consent tracker will allow you to indicate your intent to opt out of sharing.

**5. Recruiting Data:** You may provide us with your CV and other personal data when you apply for a position, including authorizing access to education records, professional or other employment history data.

<b>Data Categories</b>	<b>Business or commercial purpose for Data Collection</b>	<b>Lawful Basis for Processing or Sharing</b>	<b>If Shared, Category of Third-Party Recipients and Purpose for Sharing</b>
Identifiers, CA Customer Records Statute Personal Information, Professional or employment related information, Non-public Education Information	To manage our recruitment activities	Processing and Sharing: Legitimate Interests	Shared with our affiliates, cloud storage providers and consultants to assist our recruiting activities

### Special Categories and Protected Classifications of Personal Data

Except for the circumstances when you provide educational information as part of Recruitment Data, we do not otherwise ask for 'special categories of personal data' as referred to by GDPR or 'protected classifications characteristics' as often referred to by California or other US laws. This includes information about your health, political opinions, racial origins, gender identity, health-related information, or sexual life, biometric information, or personal data relating to criminal convictions and offences - and we would ask you not to send any to us or upload any into the Services.

However, if at any time you choose to transmit such personal data over our Website or Services for any reason, or you provide us such personal data to us as part of Recruitment Data, you must have full authority or consent to do so and you agree that it will be dealt with according to this Privacy Policy, including possible transfer to our offices or the third parties, inside or outside the UK or EEA, as described in this policy.

### Financial Data

We do not collect or process any bank or debit or credit card data through our websites or Services.

### Electronic Direct Marketing

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Where we carry out electronic direct marketing – including phone calls, automated phone calls, emails, SMS and IM – we will comply with applicable laws. This means, for example that we will, where required, check national do-not-call registers and obtain your prior specific and informed consent, particularly where you are acting as a consumer.

### **Visiting Our Website From Outside The United States**

If you are visiting the Website from outside of the United States, please be aware that our servers are either located in the United States or, if located in other countries, may be accessed from the United States. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country, but please be assured that we take steps to protect your privacy. By using any portion of the Website, you are consenting to the transfer of your personal data to our facilities in the United States and those third parties with whom we share it as described in this Privacy Policy. To govern transfers of personal information from the EU/EEA to recipients outside the EU/EEA, we have entered into standard contractual clauses adopted by the European Commission (“Data Transfer Agreement”) between the companies in the Company Group. We are happy to provide you with a copy of the Data Transfer Agreement upon request.

### **International Transfers**

Our starting position is always to keep personal data within the UK or European Economic Area (**‘EEA’**) where the UK GDPR or EU GDPR applies respectively. However, in order to carry out the above purposes, we may use third parties and their facilities outside the EEA. In all such cases we will ensure that appropriate security measures are in place to protect your personal data and a valid legal basis for the transfer applies.

### **Cookies**

Our Website uses cookies and/or similar technologies. Please review our **Cookie Declaration**, which is part of (and incorporated into) this Privacy Policy for more information, including on how to refuse or selectively accept cookies and/or similar technologies.

### **Retention**

As a default position, we will only retain personal data for any statutory retention period, then a reasonable period (if any) necessary for the above purposes. This is subject, for example, to any valid opt-out or withdrawal of consent where processing is based on consent, or other valid exercise of your data subject rights.

### **Security**

The security of data is very important to our business. In accordance with our legal obligations, we take appropriate technical and organisational measures to protect your personal data and keep those measures under review. However, we can only be responsible for systems that we control, and we would note that the internet itself is not inherently a secure environment.

### **Anonymised data**

We may create anonymised data from personal data, and any anonymisation would be carried out in accordance with applicable law as well as relevant guidelines from regulators such as the UK Information Commissioner (**‘UK ICO’**). Anonymisation may, for example, be achieved by aggregating data to the point that no individual can be identified such as aggregating website use statistics to see which web content is working well and which could be improved. Anonymised data does not allow for the identification of any individual person

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and, as it is no longer personal data, neither data protection laws nor this Privacy Policy would apply to such data.

### Third Party Services

If you access the services of another provider through our websites or services, for example through a link on the Website, your use of those services is entirely at your risk and governed by the terms and privacy policy of that third party provider. If we resell a service delivered or provided by a third party ('**Third Party Service**'), including any software that is delivered or owned by a third party ('**Third Party Software**'), it is that third party's separate privacy policy that will apply to your personal data and your use of the Third Party Service and Third Party Software. Your use of a Third Party Service is not covered by this Privacy Policy. Please therefore review the privacy policy for any Third Party Service and Third Party Software before using it.

### Your Rights Under GDPR

Under the UK and EU GDPRs, you have the following rights (some of which may be subject to conditions set out in the relevant GDPR):

- to know if we process any personal data about you and, if we do, with certain limitations, to a copy of that personal data,
- to ask us to remove or correct any of that personal data that is inaccurate,
- to object to certain processing,
- to withdraw any consent you may have given us for any processing of your personal data,
- to ask us to restrict processing certain of your personal data,
- to ask us to erase your personal data, and
- to 'port' certain of your personal data to you or another provider, provided in each case that we have such data and certain conditions are met.

You have the right, at any time, to object to the processing of your personal data for direct marketing.

To exercise any of these rights, please see the Section titled **Contact Us** below.

### Your Rights under California Law

The CCPA provides California residents with specific rights regarding their personal data. This section describes your CCPA rights and explains how to exercise those rights.

You have the right to request that we disclose certain information to you about our collection and use of your personal data over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you, at your request:

- The categories of personal data we collected about you.
- The categories of sources for the personal data we collected about you.
- Our business or commercial purpose for collecting or selling that personal data.
- The categories of third parties with whom we sold or shared that personal data.
- The specific pieces of personal data we collected about you (also called a data portability request).
- The personal data categories disclosed for a business purpose that each category of recipient obtained.
- If we sold or disclosed your personal data for a business purpose, identifying the personal data categories that each category of recipient purchased.

You have the right to request that we delete your personal data that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable



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consumer request, we will delete (and direct our service providers to delete) your personal data from our records, unless an exception applies.

You have the right to correct inaccurate personal data that we maintain about you. Please keep your personal data on file with the Company up to date and inform us of any significant changes to it.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal data to third parties for their direct marketing purposes.

To exercise any of these rights, please see the Section titled **Contact Us** below.

### **Your Rights under Other US States**

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information.

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights, please see the Section titled **Contact Us** below.

### **'Do Not Track'**

The Website uses technologies that respond to 'Do-Not-Track' signals communicated by your internet browser.

### **Contact Us**

If you've any question you can always contact us at the address above or by email to the privacy team at our parent company, RiskSigma7 Group Holdings, LLC, at [privacy@s7risk.com](mailto:privacy@s7risk.com). You have the right, at all times, to notify a complaint to any regulator such as the UK Information Commissioner. We always welcome the opportunity to discuss and resolve any complaint with you first.

You can also reach us by telephone at +1 (413) 459-4887.

You can also reach us by mail at: RiskSigma7 Group Holdings, LLC, 7180 Opal Road, Warrenton, VA 20186.

If you want to appeal any decision made with regard to your personal data, you can notify us at any of the above contact points.

We will send an initial acknowledgement within ten (10) business days upon our receipt of your request, at which point we may ask you to provide additional information. We will typically complete your request within forty-five (45) days of its receipt. If we require more time (up to 45 days), we will inform you of the reason and extension period in writing.

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If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons why we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal data that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We will not discriminate against you for exercising any of your rights set forth above.