

Privacy Policy

ScaleUP Security Inc.

ScaleUP Security Inc. ("ScaleUP Security", "we", "us" or "our") is a cybersecurity and compliance consulting company. We help startups and growing SaaS businesses achieve, maintain and grow security certifications and compliance programs such as SOC 2, ISO 27001, PCI DSS, GDPR and similar frameworks. We have prepared this Privacy Policy ("Policy") to summarize our online data protection practices. This Policy explains why we gather information, what types of information we collect, and how we use it.

We collect personal information when:

- you visit our website at www.scaleupsec.com;
- you contact ScaleUP Security by any means, such as sending an email, filling in a contact form, or booking a consultation;
- you apply for a job posted on our website.

This Policy explains how the information you provide through our website is used, how you, as a data subject, can control the use of your personal data, and how to communicate with us on this subject if needed. It also explains our use of cookies.

- We kindly recommend that you read this Policy before you start using our website. Your data will be processed only in the ways described in this Policy.
- Our website is not intended to be used by children under the age of 16, and we do not knowingly collect the personal data of children in this age group.
- This Policy is an inherent part of our website's Terms of Service. It may be updated at any time, so you should reread it and check for updates periodically.
- If you have any questions or comments about this Policy, please contact us at info@scaleupsec.com.

WHAT IS THE RELATION OF SCALEUP SECURITY TO YOUR DATA?

- Under the EU General Data Protection Regulation ("GDPR"), ScaleUP Security has the right to process and control the personal data transmitted through our website or gathered by other means. As a controller, we determine the means by which, and the purposes for which, your personal information is held and used.
- For certain recruitment activities, ScaleUP Security may rely on third-party service providers. When you submit an online application for a vacancy posted on the website, you agree to submit your data, CV and contact details, including any other information you upload. By completing a recruitment form, you agree that your data will be collected and processed by us. We are the data controller with the right to process your data when you upload your details.

WHAT TYPES OF DATA ABOUT YOU DO WE COLLECT?

We collect only the information necessary to allow you to use the website or to contact us, and we use it only to the extent described in this Policy.

Information you provide to us

If you contact us by email or through a contact form, you provide personal data such as your name, phone number, email address, the content of your communication, and data associated with it. When you apply for a vacancy posted on our website, you provide your full name, email and phone number, your location, and any other information contained in or attached to your CV. You may also provide us with other personal data, such as the details of candidates you wish to recommend for a position.

Periodically, ScaleUP Security may receive personal information from third parties. This is possible, for example, where your data (such as a CV) is published on job-search websites that grant them the right to use and transmit your data to third parties, or where someone recommends you as a potential employee. We strongly recommend that you review the privacy policy of any such website before providing your data to it.

Information we obtain when you use and visit our website

When you visit our website, the following information about you may be collected:

- Information about the devices you use to browse the website, such as the operating system version or the hardware model.
- Information about your visit and your use of our website, including your IP address, your approximate geographic location, the type and version of your browser, the paths you take to navigate the website, the pages you view, and the referral source.
- Your cookies. For more information about the cookies used on this website and how you can avoid them, see the "WHAT ARE COOKIES AND HOW DO WE USE THEM?" section below.

WHY DO WE PROCESS YOUR PERSONAL INFORMATION?

We process your data only where we have a legal basis to do so. The legal basis depends on the reasons for which we collected your personal data and on the need to use it. Your personal data may be processed for the following purposes:

- you have agreed to a request on our website to use your personal data;
- processing is necessary for our legitimate business interests;
- processing is necessary to comply with a legal obligation.

More specifically, the personal data you submit through this website, and the personal information we collect from you, from public sources or from third parties, will be used on the following legal grounds.

Communications — based on ScaleUP Security's legitimate business interest, Art. 6(1)(f) GDPR:

If you have contacted us through our website, your data may be processed to enable us to answer your questions and to arrange a call, meeting, video conference or other communication. Please note that such

communications may be recorded and stored by a ScaleUP Security representative in our corporate systems.

Marketing and public relations — based on your consent, Art. 6(1)(a) GDPR:

As a visitor to our website who uses cookies, your personal data may be processed so that we can carry out marketing research, analyze the characteristics of our website visitors, assess the impact of our marketing communications, adjust them to the trends we identify, and plan future marketing strategies based on their effectiveness, including targeting our advertising and preparing analytical reports. If you subscribe to our communications, the data you provide may be used to send you promotional materials, announcements about updates to our services, notifications and newsletters by email.

Recruitment:

- a) Based on your consent, Art. 6(1)(a) GDPR: if you are a potential employee who has sent us your data, your personal data may be processed to assist us in considering you for current or future employment. We may use your data to enable you to submit your resume and apply for jobs online.
- b) Based on our legitimate interest, Art. 6(1)(f) GDPR: in certain cases (and only at the request of our clients), your CV may be shown to a potential or current client to confirm the level of skills of the candidate providing services. To fulfil compliance obligations, a client may need to verify your background more precisely before granting access to protected data and facilities. In such cases, we may request the following information from you:
 1. Criminal record
 2. Tax number
 3. Work permit
 4. Citizenship
 5. Any additional background checks required by particular clients, so that you, as an employee, can be granted access to the clients' premises and systems.

Business relations— based on ScaleUP Security's legitimate interest, Art. 6(1)(f) GDPR:

As a representative of a current or potential client, business partner or vendor, your personal data may be processed for the following purposes:

- obtaining approvals;
- promoting our new products, work and services;
- confirming the level of our work and services;
- sending you invitations to meetings and events that we organize;
- signing and documenting contracts, invoices, acts or other contractual documents;
- complying with economic sanctions and export-control screening, fraud prevention and anti-money-laundering requirements, regulators' requirements, and other requirements relating to anti-corruption and industry standards.

Corporate and investor relations — based on ScaleUP Security's compliance obligations, Art. 6(1)(c) GDPR:

As a current or potential officer or director of ScaleUP Security, your personal information may be processed to:

- organize your participation in corporate meetings, business trips and events;
- maintain our corporate records and make mandatory public disclosures and reports;
- represent the company and its management during a sale process and perform other legal obligations;
- respond to auditors' requests;
- pay your remuneration and cover related expenses.

This information may be shared by us, and partly provided to banks, notaries, payroll agencies or legal advisers, in order to open a corporate bank account or other types of accounts.

As a current or potential affiliate of ScaleUP Security, your personal data may be collected to:

- respond to auditors' requests and perform other legal obligations, including anti-money-laundering requirements and disclosure of beneficiaries;
- organize your participation in corporate meetings and events;
- provide you with our reports and meeting materials;
- support you in exercising your rights.

Security — based on ScaleUP Security's legitimate interest, Art. 6(1)(f) GDPR:

As a visitor to this website, your personal data may be processed to keep the website secure, prevent fraud, protect the rights and interests of ScaleUP Security and third parties, and protect intellectual property rights. As a visitor to our office, your data may be processed to ensure the security of our premises and to prevent and detect any crime, incident, accident or misconduct.

HOW MAY WE USE YOUR PERSONAL DATA?

Your data may be used by us through:

- collecting, recording, structuring and organizing;
- adapting or altering;
- storing, retrieving and using;
- consulting, aligning or combining;
- erasing or destroying.

As an international company, your data may be disclosed by transmission or dissemination, or otherwise made available. Your data may be transferred between ScaleUP Security offices and service providers only to the extent permitted by applicable data protection laws. It may be processed within and outside the

European Economic Area, depending on why we need to process it. Such transfer and processing are permitted only where necessary for the purposes stated in this Policy and within our legitimate interests.

Your data may be disclosed to some of our clients for business-engagement purposes, in order to confirm the skills of our team members, as well as to auditors and other external service providers, in order to perform our contractual obligations. Your personal information may also be disclosed:

- to the extent that we are required to do so by applicable law;
- in connection with any prospective or ongoing legal proceedings;
- to establish or defend our legal rights, including providing information to others for the purposes of fraud prevention and credit-risk reduction.

HOW CAN YOU CONTROL YOUR DATA?

As a data subject, you have the right to:

- ask whether your personal data is stored by us and, if so, what type of information it is, why we hold it and how we use it;
- request access to your data, so that you can receive a copy of the personal information we hold about you and verify that we are lawfully processing it;
- request that we correct the personal information we hold about you, so that any inaccurate or incomplete information can be fixed;
- request that your personal data be deleted where there is no good reason for us to continue holding it, or where you have exercised your right to object to processing (see below);
- object to the processing of your personal information where we rely on a legitimate interest (ours or a third party's) and something about your particular situation makes you want to object, as well as where your data is processed for direct-marketing purposes;
- request that we restrict the processing of your personal data, for example so that we suspend processing while we verify whether we need to continue holding it;
- request the transfer of your personal data to you or to another party in a structured, commonly used electronic format;
- withdraw your consent to the transfer, collection or processing of your personal information for a specific purpose at any time. Once we receive notice that you wish to withdraw your consent, we will no longer process your data, unless we have another lawful basis to do so. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal.

If you wish to discuss or exercise any of these rights, please contact us at info@scaleupsec.com. We aim to respond to your request within one month.

We may need to request specific information from you to help us confirm your identity before granting access to your data or allowing you to exercise your other rights. This security measure ensures that your data is not disclosed to anyone who has no right to receive it.

Please exercise your rights reasonably; misuse of these rights may result in liability.

HOW IS YOUR DATA RETAINED?

We take appropriate technical and organizational security measures to protect the personal information that we process, store or transmit. Your data is protected against accidental or unlawful destruction, access or alteration, unauthorized or unlawful disclosure, and loss. Your data is stored securely on our systems.

We will not retain your data for longer than is necessary for the purpose for which it is processed. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal information, the purposes for which we process it and whether we can achieve those purposes by other means, and the periods for which we may need to retain the data to meet our legal obligations or to deal with complaints and queries, or to protect our legal rights in the event of a claim. When we no longer need your personal data, we will securely erase it.

Please note that the following information will be retained to the extent that we are required to do so by law, and where it is relevant to any prospective or ongoing legal proceedings:

- documents;
- electronic documents containing personal data.

This is done to establish, exercise or defend our legal rights, including providing information to others for the purposes of fraud prevention and credit-risk reduction.

WHAT ARE COOKIES AND HOW DO WE USE THEM?

When you visit the ScaleUP Security website, we may place cookies and similar technologies (collectively, "Cookies") on your device or browser to analyze user activity, personalize your experience, understand usage patterns, and improve and secure the website. Cookies are small text files. They do not typically contain information that can identify you personally, but the personal data we store about you may be linked to information obtained from cookies. Our website uses the following types of cookies:

- Analytical cookies and similar cookies help us improve our website and collect information anonymously about how visitors use the website and its features. Examples include SID, PHPSESSID, wp-settings-X and wp-settings-time-X.
- Functional cookies are essential to allow you to move around the website and use its features fully. They enable you to view and use the website properly and give you access to secured areas of the website.
- Third-party cookies help third parties manage and track the effectiveness of their websites, advertisements and visitor numbers. Information about third-party cookies is available on the relevant third party's website.

Based on their validity, the Cookies on our website may be persistent or session cookies. A persistent cookie is stored by your web browser and remains valid until its set expiry date, unless you delete it

beforehand. A session cookie expires at the end of your session, when you close your browser. If you would like more information about the types of Cookies we use, please contact us.

You can adjust your browser settings to delete some or all cookies from our website or third-party cookies, or to prevent websites from setting cookies. If you block our website from using cookies, you may find that some functions are unavailable or that certain parts of the website do not load.

YOUR PRIVACY RIGHTS IN CANADA (PIPEDA)

ScaleUP Security Inc. is a Canadian company, and our handling of personal information is also governed by Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA") and, where applicable, substantially similar provincial privacy legislation. In accordance with these laws:

- we collect, use and disclose personal information only for purposes that a reasonable person would consider appropriate in the circumstances, and we identify those purposes at or before the time of collection;
- we obtain your consent to the collection, use and disclosure of your personal information, except where the law permits or requires otherwise. Consent may be express or implied, depending on the sensitivity of the information and the circumstances;
- you may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice;
- you have the right to access the personal information we hold about you and to request correction of inaccurate or incomplete information;
- we limit collection to what is necessary for the identified purposes, and we retain personal information only as long as necessary to fulfil those purposes or as required by law;
- we protect personal information with security safeguards appropriate to its sensitivity.

To exercise these rights, or to ask a question or make a complaint about how we handle your personal information, contact us at info@scaleupsec.com. If you are not satisfied with our response, you have the right to make a complaint to the Office of the Privacy Commissioner of Canada (www.priv.gc.ca) or to your applicable provincial privacy regulator.

YOUR PRIVACY RIGHTS IN CALIFORNIA (CCPA/CPRA)

If you are a California resident, the California Consumer Privacy Act, as amended by the California Privacy Rights Act ("CCPA"), provides you with additional rights regarding your personal information. In the preceding 12 months, we may have collected the categories of personal information described in this Policy — such as identifiers, contact details, internet or other electronic network activity, and professional or employment-related information — for the business and commercial purposes described above. **We do not sell your personal information, and we do not share it for cross-context behavioral advertising, as those terms are defined under the CCPA.**

Subject to certain exceptions, California residents have the right to:

- Know and access — request that we disclose the categories and specific pieces of personal information we have collected about you, the sources of that information, the purposes for collecting it, and the categories of third parties with whom we share it;
- Delete — request that we delete personal information we have collected from you;
- Correct — request that we correct inaccurate personal information we hold about you;
- Opt out — opt out of the "sale" or "sharing" of your personal information (as noted above, we do not sell or share personal information as those terms are defined under the CCPA);
- Non-discrimination — not receive discriminatory treatment for exercising any of your CCPA rights.

To exercise any of these rights, contact us at info@scaleupsec.com. We will verify your request by matching the information you provide with the information we hold about you. You may use an authorized agent to submit a request on your behalf, subject to verification, and we will respond within the timeframes required by law.

DO YOU HAVE ANY QUESTIONS?

If you have any questions about this Privacy Policy, please contact us at any time at info@scaleupsec.com.