

C2SEC, INC. PRIVACY POLICY

Last Revised: August 27, 2021

This privacy policy (“Policy”) applies to the services (the “Services”) owned and operated by C2SEC, Inc. (“C2SEC,” “we,” or “us”), including but not limited to the C2SEC website located at www.c2sec.com (the “Site”), and the iRisk™ SaaS service (the “Services”). The Policy is designed to inform you how we collect and use personal information (as defined below) so you can make an informed decision about using our Services. Please read this Policy before using our Services or submitting any personal information to us. In addition, we encourage you to review our privacy policy whenever you access our Services to determine if any changes have been made and to make sure that you understand how any personal information you provide will be used.

WHAT IS PERSONAL INFORMATION?

As used herein, the term “personal information” generally means information that specifically identifies an individual (such as user’s name, address, telephone number, e-mail address, credit card number, etc.) or that is associated with an identifiable person (such as demographic information or information about a person’s activities when such information is linked to personally identifying information). Personal information does not include “aggregate” information, which is data we collect about the use of the Services or categories of the Services’ users, from which any and all personal information has been removed. For example, information that a particular percentage of the Services’ registered users identify themselves as male or female is aggregate information. We collect aggregate data for a number of purposes, including to help us better understand trends and user needs so that we can improve our products and services. This Policy in no way limits or restricts our collection of aggregate information.

WHAT PERSONAL INFORMATION DO WE COLLECT?

We do not collect any personal information from mere visitors of the Site.

If you register to access the Services or certain other features of the Services, we will collect your name and e-mail address. While you may be asked for payment information (such as credit card or financial account numbers, if applicable), this information is not provided to us—it is provided by direct link to a third-party payment processing company, which means we never receive that information. End users may provide us personal information directly or indirectly by registering for or otherwise using the Services.

WHAT OTHER INFORMATION DO WE COLLECT?

When you use the Service, some information is also automatically collected through the use of log files, such as your device's Internet Protocol (IP) address, your device's operating system, the browser type, the address of a referring web site, and your activity while using the Service. We use this information for purposes such as analyzing trends, administering the Service, improving customer service, diagnosing problems with our servers, tracking user movement, and gathering broad demographic information for aggregate use.

We may also automatically collect certain information through the use of "cookies." Cookies are small data files that are stored on a user's hard drive at the request of a website to enable the site to recognize users who have previously visited them and retain certain information such as customer preferences and history. If we combine cookies with or link them to any of the personally identifying information, we would treat this information as personal information. If you wish to block, erase, or be warned of cookies, please refer to your browser instructions or help screen to learn about these functions. However, if your browser is set not to accept cookies or if a user rejects a cookie, you may not be able to access certain Service features.

We also use Google Analytics. Google Analytics is a web analytics tool that helps website owners understand how visitors engage with their website. Like many services, Google Analytics uses first-party cookies to track visitor interactions as in our case, where they are used to collect information about how visitors use our Sites. We then use the information to compile reports and to help us improve our Services. We also may use other Google Analytics tools, such as Demographics and Interest Reporting, which enable us to learn more about the characteristics and interests of the users who use our Services, and Remarketing with Google Analytics, which enables us to provide relevant advertising on different websites and online services. Google Analytics collects information anonymously. It reports website trends without identifying individual visitors. You can opt out of Google analytics without affecting how you visit our Sites – for more information on opting out of being tracked by Google Analytics across websites you use, visit this [Google page](#) .

COLLECTION OF CHILDREN'S PERSONAL INFORMATION

The Service is not intended to be used by minors. Only adults may submit personally identifying information. Pursuant to the Children's Online Privacy Act (COPPA) and the EU General Data Protection Regulation (GDPR), we do not knowingly contact or collect personal information from children under the age of thirteen 13.

In the event that we are notified or become aware that the Service has been used by a child under the age of 13 to store information of that child without parental consent, we shall be and are authorized to delete, in its entirety, any of the information stored by the child under the age of 13. The Company also reserves the right to revoke any license to use a copy of the Service which is being used or has been used by a child under the age of 13.

USAGE AND DISCLOSURE

We do not use information about you except as necessary to provide the Services and to send you the communications referenced in this Policy. Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the purposes described in this Policy.

We may use your personal information to periodically send you e-mails. The e-mail address you provide may be used to send you information and updates pertaining to the Services, and, if you do not “opt out,” to send you occasional company news, updates, or related product or service information.

In the event that we engage or partner with third party vendors, consultants or other service providers in connection with the operation of our business (“Service Providers”), we may share personal information with such Service Providers who need access to such information to carry out their work for us, with legal basis required by the jurisdiction that applied and your consent.

We may use your personal information to process transactions. Electronic transactions are processed by third party processors whose own privacy policies control the handling of your personally identifying information.

We also may disclose personal information when we are required to, or when we believe it is appropriate to: comply with the law (e.g., a lawful subpoena, warrant or court order); enforce or apply this privacy policy or our other policies or agreements; to initiate a charge for amounts owed to us; protect our or our customers’ rights, property or safety; to protect our customers from fraudulent, abusive, or unlawful use of our Services. We may also disclose personal information if we believe that an emergency involving the danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of such personal information.

Information about our customers, including personal information, may be disclosed in compliance with laws that applied as part of any merger, acquisition, debt financing, or sale of C2SEC assets, as well as in the event of an insolvency, bankruptcy or receivership in which personally identifiable information could be transferred to third parties as one of the business assets of the C2SEC.

LEGAL BASES FOR PROCESSING (FOR EEA USERS)

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g., your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

WHAT STEPS DO WE TAKE TO PROTECT YOUR INFORMATION ONLINE?

We endeavor to secure your personal information from unauthorized access, use, or disclosure by maintaining physical, electronic and managerial safeguards to protect the information we collect through the Service. Credit card information is encrypted during transmission and payment processing is performed by a PCI compliant third-party processor; we do not process or retain such information. Other account information is accessible online only through the use of a secure password and data fields calling for personally identifying information are encrypted when in storage and in transmission. Please be aware, however, that despite our efforts, no security measures are perfect or impenetrable. To protect the confidentiality of your personal information, you must keep your password confidential and not disclose it to any other person. You are responsible for all uses of the Service by any person using your password. Please advise us immediately by e-mailing us at the e-mail address listed at the end of this Policy if you believe your password has been misused. Please also note that e-mail is not secure, and you should not send any confidential or sensitive information to us via an unsecured email account.

YOUR RIGHTS TO ACCESS AND CONTROL YOUR INFORMATION

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests. You may contact us as provided in the Contact Us section below to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, for example, by installing third-party apps, you will need to contact those third-party service providers directly to have your information deleted

or otherwise restricted. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

Access and update your information: Our Services and related documentation give you the ability to access and update certain information about you from within the Service. You can update your profile information within your profile settings.

Delete your account: If you no longer wish to use our Services, you or your administrator may be able to contact support@c2sec.com to request your account be deleted.

Delete your information: Our Services give you the ability to delete certain information about you from within the Service. For example, you can remove certain profile information within your profile settings. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

Request that we stop using your information: In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable). If you object to information about you being shared with a third-party integration, please disable the integration or contact your administrator to do so.

Data portability: Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information and the information you create.

HOW CAN YOU CORRECT AND UPDATE YOUR PERSONAL INFORMATION OR OBTAIN ADDITIONAL INFORMATION?

If you have any questions or comments about this Policy or the practices relating to this Service, or you wish to verify, correct or delete any personal information we have collected, please contact us using the information provided below. You can correct certain information by logging into your

account and changing the information, and you may also delete certain information by closing your account. However, please note that in certain circumstances, we may not, or may not be able to, remove or change certain information, even in the event an account is closed. For example, we may retain certain information, such as credit card verification for legally permissible periods.

C2SEC, Inc.

Subject: Privacy Policy

support@c2sec.com

CALIFORNIA ONLINE PRIVACY PROTECTION ACT COMPLIANCE
EUROPEAN UNION'S GENERAL DATA PROTECTION REGULATION (GDPR)
COMPLIANCE

Because we value your privacy, we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act and GDPR. We therefore will not distribute your personal information to outside parties without your consent and lawful basis.

All users of our Services may make any changes to their personal information by following the instructions in the previous section.