

Cydecor Group (CG)

Cydecor Website Privacy Policy

Revision Log

The released version of this policy will be maintained both in physical and electronic form for use and review by all Personnel associated with the Cydecor managed information systems.

Date	Revision #	Author	Description of Change
11/03/20025	1.0	M. Kasten	Approved and posted.

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Applicable Frameworks and Regulations

Select all the applicable security frameworks related to this policy.

CG HR	CG IT	NIST 800-171	ISO 27001	CMMC 2.0	GDPR	CCPA	SOC2	CMMI	CIS
X	X				X	X			

Roles and Responsibilities

Personnel roles to be recipients of this policy.

Role	Description
Executive Leadership	Approve and support the policy
CIO	Develop the policy and direct its adoption corporate wide
CISO	Maintain the policy and enforce compliance
All Employees	Comply with policy and report exceptions or non-compliances to supervisor.

1.0 OVERVIEW

This Privacy Policy explains Cydecor's commitment to protecting the privacy and security of personal data of website visitors and users. This Privacy Policy outlines how we collect, use, disclose, and safeguard your information in accordance with applicable federal laws, including the Privacy Act of 1974, DFARS 252.204-7012, CCPA, GDPR, and other DoD and GSA requirements.

2.0 PURPOSE

The purpose of this policy is to ensure legal compliance, transparency and trust, risk mitigation and compliance with 3rd-party platform requirements.

3.0 SCOPE

This policy applies to any website visitors including employees, customers and the general public and other users who may access our Cydecor public website. Policy guidelines also reflect applicable federal laws, Executive Orders, directives, regulations, policies, and standards.

4.0 PRIVACY FOR WEBSITE VISITORS

This section applies to personal information that we collect and process through our website and in the usual course of our business, such as in connection with our sales and marketing activities, recruitment, talent acquisition and events.

5.0 INFORMATION WE COLLECT

The personal information that we collect falls into the following categories:

5.1 *Information You Give Us*

You may provide us information directly in the following ways:

- By contacting us directly through a webform, email, social media message, or otherwise.
- By attending our events or other business interactions and providing your contact details.
- By voluntarily providing us your information.

The categories of information include:

- Identifiers such as real name, address, email address, job title, company, or phone number.
- Your public profile on social media accounts - depending on your privacy setting for your social media account, this includes your profile picture, social media handle, number of followers, bio, if you're verified and your location by city and country.
- Employment information and job history for individuals who apply for a role with us.
- Internet or other electronic network activity information, such as interactions with our Cydecor APIs, and communications and responses with our Team Members through our services.

5.2 *Information We Automatically Collect*

Like many website operators, we collect information that your browser sends whenever you visit our websites or services. We use Google Analytics to help us understand how visitors interact with our site. Upon initial contact with our website, users are presented with cookie and privacy options required by law. You are able to Opt-Out of tracking and data collection.

The categories of information include:

- **Device information:** We collect information about the device and applications you use to access the services, such as your IP address, and other information about your system and connection.
- **Log data:** Our web servers keep log files that record data each time a device accesses those servers, and those log files contain data about the nature of each access, including originating IP addresses. We may also access metadata and other information associated with files that you voluntarily upload into our services.
- **Product usage data:** We collect usage data about you whenever you interact with our services, which may include the dates and times you access the services and your browsing activities (such as what portions of the services are used). We also collect information regarding the performance of the services.

This data is collected through cookies and similar technologies and is used to analyze trends, administer the site, track users' movements around the site, and gather demographic information. The information collected is anonymized and aggregated whenever possible but may include identifiable data such as your IP address. We do not associate this information with you or your computer, unless you specifically ask us to troubleshoot any technical or security issues you have with using our websites or services, or we need to investigate a violation of our Terms.

6.0 HOW WE USE/SHARE PERSONAL INFORMATION

We may use the personal information you opt-in to allow us to collect for a range of reasons, including:

- To share your cookie data with third-party marketing platforms (e.g. Google Ads, Facebook Ads, HotJar) to provide tailored advertising on our websites and other websites that you may visit.
- To market our products and/or services to you.
- To analyze Websites usage and improve the services offered.
- For market research, project planning, troubleshooting problems.
- For detecting and protecting against error, fraud or other criminal activity.
- To enforce compliance with our Terms and applicable law.
- To provide our services as the service provider or processor for our customers.
- For detecting and protecting against error, fraud or other criminal activity.

6.1 *Affiliates and Service Providers*

If you choose to allow us, we may share your information with our third-party service providers and any subcontractors as required to offer you our products and services. These service providers are under a duty of confidentiality.

6.2 *Third Party Marketing and Advertising Organizations*

If you choose to allow us, we may share your information with third party marketing and advertising partners, such as Google, Facebook, Instagram, and YouTube to provide tailored advertising on our websites and other websites that you may visit.

6.3 *Third Party Links and Websites*

Our websites may contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any data to these websites.

6.4 *Social Media*

Our websites may include social media buttons or widgets ("social media elements"). These social media elements may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media elements are governed by the privacy policy of the social media company providing the feature and/or widget.

7.0 DISCLOSURES REQUIRED BY LAW

We may be required to disclose your data in response to lawful requests by public authorities, or to meet law enforcement requirements. We may be under a duty to disclose or share your personal data in order to comply with any legal obligation, to enforce or apply our Terms and other agreements, to protect our rights, property, or safety, or the protect the rights, property, or safety of others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

7.1 *Aggregate and De-Identified Information*

We reserve the right to share aggregate or de-identified information about its users with third parties for marketing, advertising, research, product development or similar purposes.

7.2 *Legal Bases for Processing (EEA and UK Individuals)*

If you are from the European Economic Area or the United Kingdom, our legal bases for collecting and using your Personal Information is as follows:

- Due our legitimate business interests. For example, fraud prevention, maintaining the security of our network and services, direct marketing to you, and improvement of our services
- Compliance with a mandatory legal obligation. We may also collect your Personal Information to record your requests to exercise your rights and to verify your identity for such requests.
- Consent you provide where we do not rely on another legal basis. Consent may be withdrawn at any time.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please email us at privacy@cydecor.com with any privacy questions or concerns.

8.0 GENERAL PRIVACY CHOICES

8.1 *Exercising Your Privacy Rights*

We have listed the privacy rights for several jurisdictions below, but we understand you may have additional rights in your jurisdiction. You may contact us directly at any time about exercising your data protection rights. We will consider your request in accordance with applicable laws and may remove or update your information within a reasonable time and (where applicable) after providing notice to the Customer of your request. We may ask you to verify your identity in order to help us respond efficiently to your request.

8.2 *Children's Privacy*

Our websites are not directed at individuals under the age of 16. We do not knowingly collect personal information from children under 16. If you become aware that a child has provided us with personal information, please contact us using the contact details provided in the "Contact Information" section below.

If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information.

8.3 *Do Not Track*

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. We do not recognize or respond to browser-initiated DNT signals, as the Internet industry is currently still working toward defining exactly what DNT means, what it means to comply with DNT, and a common approach to responding to DNT.

8.4 *Cookie Policy*

To make our websites and services work properly, and to provide tailored advertising, we sometimes place small data files called cookies on your device. A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, shopping cart, or other preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

9.0 CALIFORNIA RESIDENTS PRIVACY CHOICES

9.1 *Third Party Marketing*

California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your Personal Information to third parties for the third parties' direct marketing purposes. To make such a request, please contact us using the contact details provided in the "Contact Information" section below.

9.2 *California Consumer Privacy Act*

If you are a California consumer, you have the following rights beginning on January 1, 2020:

- The right to know what Personal Information is being collected about you.
- The right to know whether your Personal Information is sold or disclosed and to whom.
- The right to say no to the sale of Personal Information.
- The right to access your Personal Information.
- The right, in certain circumstances, to delete the information you have provided to us.
- The right to equal service and price, even if you exercise your privacy rights, unless the difference in service or price is reasonably related to the value your personal information provides to our business.

9.3 *Requests for Deletion and Information*

In certain circumstances, California consumers have the right to request that we delete their information. In addition, California consumers have the right to request, up to twice in a 12-month period, that a business that collects Personal Information about the consumer disclose to the consumer the information listed below for the preceding 12 months. We have the right to request verification of your identity for all requests for information.

The categories of personal information we have collected.

- The categories of sources from which the personal information was collected.
- The business or commercial purpose for collecting, selling, or sharing personal information.
- The categories of third parties with whom we share personal information.
- The categories of personal information sold and the categories of third parties to whom it was sold.
- The categories of personal information disclosed for a business purpose.
- The specific pieces of personal information we have collected.

To exercise your rights under the CCPA, please contact us using the contact details provided in the "Contact Information" section below.

9.4 *Do Not Sell My Personal Information.*

California consumers have the right to opt out of the sale of the consumer's personal information. To make such a request, please email us at privacy@cydecor.com.

10.0 UK AND EEA RESIDENTS PRIVACY RIGHTS

If you are from the European Economic Area or United Kingdom, you have the right, under certain circumstances, to:

- Access your Personal Information
- Correct inaccurate Personal Information
- Request erasure of your Personal Information without undue delay
- Request the restricted processing of your Personal Information
- Request portability of the Personal Information that you have given us; and
- To object to the processing of your Personal Information, including the ability to object to automated processing and/or profiling.

If you are from the European Economic Area or United Kingdom, you also have the right to lodge a complaint with a supervisory authority, under certain circumstances.

You may contact us using the contact details provided in the "Contact Information" section below for more information, or to exercise your rights.

10.1 *International Transfers*

Any data that you provide to us may be accessed, shared or processed by our offices, located in the United States, and service providers located in the United States, if such data transfer is necessary for the specific purpose for which you submitted your data (such as the provision of goods or services under a written contract). This may entail a transfer of your Personal Information across international borders, including, but not limited to, transfers from within the European Economic Area (the "EEA") or the United Kingdom to the United States. The data protections standards may differ and be lower than the standards enforced in your jurisdiction. We maintain appropriate safeguards as required by applicable law for any Personal Information transferred internationally, and as required by applicable law, will seek your consent prior to such transfers.

If you are a Customer and wish to upload the personal information of individuals residing in the European Economic Area or the United Kingdom, please contact us for a copy of our Data Processing Addendum using the contact details provided in the "Contact Information" section below.

11.0 DATA SECURITY PROTECTIONS

We take appropriate and reasonable technical and organizational measures to protect personal information from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the personal information.

11.1 Data Retention

For Customers, we retain the information we receive for as long as you use the services or as necessary to fulfill the purposes for which it was collected, provide our services, resolve disputes, establish legal defenses, enforce our agreements, and comply with applicable laws.

11.2 Data Change of Control

Personal information may be transferred to a third party as a result of a sale, acquisition, merger, reorganization or other change in control. If we sell, merge or transfer any part of the business, part of the sale may include your Personal Information.

12.0 POLICY CHANGES & IMPLEMENTATION

This policy is reviewed and updated annually. We may change this privacy policy at any time and from time to time. The most recent version of the privacy policy is reflected by the date located at the top of this privacy policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version of this privacy policy or other notice on the Websites. This policy is implemented under the supervision of the organization's appointed Data Protection Officer (DPO). The DPO works closely with the organization to ensure that privacy principles and required privacy controls are implemented and maintained on an ongoing basis. The DPO negotiates a budget for privacy operations and implementation with CIO/CISO annually.

We encourage you to review this privacy policy often to stay informed of changes that may affect you. Our electronically or otherwise properly stored copies of this privacy policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this privacy policy that was in effect on each respective date you visited the Websites.

13.0 CONTACT INFORMATION

If you have any questions or comments, or if you have a concern about the way in which we have handled any privacy matter, please email us at privacy@cydecor.com with any privacy questions or concerns.