

Privacy and Cookie Policy

Introduction

This privacy and cookie policy (“**Policy**”) describes how BlueFort Security Ltd (“**Company**,” “**we**,” and “**our**”) collect, use and share personal data when using our services and this website: bluefort.com (the “**Site**”). Please read the following information carefully to understand our views and practices regarding your personal data and how we will treat it.

Particularly Important Information

Who we are: For the purpose of applicable data protection legislation, the data controller of your personal data is **BlueFort Security Ltd** of 7/8 Eghams Court, Boston Drive, Bourne End, Buckinghamshire, SL8 5YS46.

Must Read Sections: We draw your attention to the sections entitled “**International Data Transfer**” and “**Your Rights**”.

Changes to this Policy: We will post any modifications or changes to the Policy on our Site. We reserve the right to modify the Policy at any time, so we encourage you to review it frequently. If we make any material changes to the Policy, we will notify you via email and/or post a notice on our Site prior to such changes taking effect.

1. Purposes of Processing

What is personal data? We collect information about you in a range of forms, including personal data. As used in this Policy, “Personal Data” is as defined in the UK Data Protection Act 1998/the European Data Protection Directive 95/46/EC/General Data Protection Regulation 2018 and any successor legislation, this includes any information which, either alone or in combination with other information we hold about you, identifies you as an individual, including, for example, your name, postal address, email address and telephone number.

Why do we need your personal data? We will only collect and/or process your Personal Data in accordance with applicable data protection and privacy laws and will adhere to this Policy. We need certain Personal Data to provide you with access to our services and may use your Personal Data in accordance with this Policy. You may have been asked to tick to agree to provide certain information to access our services. This consent will provide us with the legal basis to process your Personal Data. As we explained at the point where your consent was provided, you maintain the right to withdraw such consent at any time. There may also be instances where you have provided your information which may have been used to advance product or service orders. In such cases, BlueFort has a legitimate business interest to process your Personal Data.

2. Collecting Your Personal Data

We collect information about you in the following ways:

Information You Give Us. This includes:

- the personal data you provide to us i.e. names, postal addresses, email addresses, telephone numbers and job titles;
- the personal data you provide when you report a technical issue or when we provide you with customer support;
- the personal data you provide when you place an order; and
- the personal data you provide when you correspond with us by phone, email or otherwise.

Information from Social Networking Sites. Our Site includes interfaces that allow you to connect with social networking sites (each a “SNS”). If you connect to a SNS through our Site,

you authorise us to access, use and store the information that you agreed the SNS could provide to us based on your settings on that SNS. We will access, use and store that information in accordance with this Policy. You can revoke our access to the information you provide in this way at any time by amending the appropriate settings from within your account settings on the applicable SNS.

Information We Get from Others. We may also get information about you from other sources, for example, if you have agreed to share information with one of our preferred partners or from ZoomInfo. Information can be located on our Site.

Information Automatically Collected. We may automatically log information about you and your computer or mobile device when you access our Site. For example, when visiting our Site, we may identify an initial public IP address to identify where you are located. We may also log your computer or mobile device operating system name and version, browser type, browser language, screen resolution, the website you visited before browsing to our Site, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Site. We collect this information about you using cookies. Please refer to the sections on cookies below.

3. Cookies

What are cookies? We may collect information using “cookies.” Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

Cookies we use

Our site uses the following types of cookies for the purposes set out below:

Essential Cookies: These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. For example, they allow you to access the content of the pages you request more quickly. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.

Analytics and Performance Cookies: These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered does not identify any individual visitor. The information is aggregated and anonymous. It includes the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information and to monitor the level of activity on our Site.

Social Media Cookies: These cookies are used when you share information using a social media sharing button or you link your account or engage with our content on or through a social networking website such as LinkedIn, Twitter or Google+. The social network will record that you have done this.

Disabling cookies: You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser. Many browsers are set to accept cookies until you change your settings.

4. Using Your Personal Data

We may use your personal data as follows:

- to operate, maintain, and improve our Site, products, and services;
- to deliver the services you request, manage your account, including to communicate with you regarding your account;

- to respond to your comments and questions and to provide a technical support service;
- to send information including technical notices, updates, security alerts, and support and administrative messages;
- with your consent, to send you marketing e-mails about upcoming promotions, newsletters, new products, services, webinars, training seminars and other news, including information about products and services offered by us and our affiliates. You may opt-out of receiving such information at any time. Please note, even if you opt out of receiving marketing emails, we may still send you non-marketing emails. Non-marketing emails include emails about your account with us and our business dealings with you;
- to include your information in our CRM database as a customer, lead or important contact;
- to link or combine user information with other personal data;
- as we believe necessary or appropriate (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others; and
- as described in the “Sharing of your Personal Data” section below.

5. Sharing Your Personal Data

We may share your personal data as follows:

- **Third Parties Designated by You.** We may share your personal data with third parties where you have provided your consent to do so.
- **Our Third-Party Service Providers.** We may share your personal data with our third-party service providers such as vendors, only if you have shown interest in one of our products or solutions. These third parties are only permitted to use your personal data to the extent necessary to enable them to provide their services to us. They are required to follow our express instructions and to comply with appropriate security measures to protect your personal data.
- **Corporate Restructuring.** We may share personal data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- **Other Disclosures.** We may share personal data as we believe necessary or appropriate:
 - (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.
- We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include:
 - (i) Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io.”

6. Anonymous Data

When we use the term “anonymous data,” we are referring to data and information that does not permit you to be identified or identifiable, either alone or when combined with any other information available to a third party. We may create anonymous data from the personal data we receive about you and other individuals whose personal data we collect. Anonymous data might include analytics information and information collected by us using cookies. We make personal

data into anonymous data by excluding information (such as your name) that makes the data personally identifiable to you.

7. Third Party Sites

Our Site may contain links to third party websites and features. This Policy does not cover the privacy practices of such third parties. These third parties have their own privacy policies and we do not accept any responsibility or liability for their websites, features or policies. Please read their privacy policies before you submit any data to them. For example, we may link to social media pages through widgets on our Site or we may provide links to industry reports.

8. International Data Transfer

Your information, including personal data that we collect from you, may be transferred to, stored at and processed by us and our affiliates and other third parties outside the country in which you reside, including, but not limited to the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By using our Site, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.

9. Security

We seek to use reasonable organisational, technical and administrative measures to protect personal data within our organisation. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us using the details on our Site.

10. Retention

We will only retain your personal data as long reasonably required for you to use the Site and our services unless a longer retention period is required or permitted by law (for example for regulatory purposes).

11. Your Rights

- **Opt-out.** You may contact us anytime to opt-out of: (a) direct marketing communications; (b) any new processing of your personal data that we may carry out beyond the original purpose; and/or (c) the transfer of your personal data outside the EEA.
 - You may request what information BlueFort has about you at any time by contacting us directly.
 - You can also contact us to update or correct any inaccuracies in your personal data.
- Your personal data is portable i.e. you to have the flexibility to move your data to other service providers as you wish.
- **Erase and forget.** In certain situations, for example when the information we hold about you is no longer relevant or is incorrect, you can request that we erase your data.

If you wish to exercise any of these rights, please contact us using the details in Section 13 below. In your request, please make clear: (a) **what personal data is concerned**; and (b) **which of the above rights** you would like to enforce. For your protection, we may only implement requests with respect to the personal data associated with the email address that you use to send us your request. We may need to verify your identity before requests are authorised. We will try to comply with your request as soon as reasonably practicable and in any event, within one month of your request. Please note that we may need to retain certain information for recordkeeping purposes, legal purposes and/or to complete any transactions that you began prior to requesting such change or deletion.

12. Complaints

We are committed to resolve any complaints about our collection or use of your personal data. If you would like to make a complaint regarding this Policy or our practices in relation to your personal data, please contact us at info@bluefort.com. We will reply to your complaint as soon as we can. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority, which for the UK, is the Information Commissioner's Office.

13. Contact Information

We welcome your comments or questions about this Policy. You may contact us in writing at info@bluefort.com.

14. Employee Personal Data

BlueFort commits to cooperate with the panel established by the EU data protection authorities (DPAs) and comply with the advice given by the panel with regard to human resources data transferred from the EU in the context of the employment relationship. Please contact us to be directed to the relevant DPA contacts.