

## Beyond Risk's Privacy Notice

**Last Updated/Effective Date:** [11/1/2023]

Beyond Risk Management, Inc. and its affiliates and subsidiaries (“**Beyond Risk**” “**we,**” “**us,**” or “**our**”) respect your privacy. This Privacy Notice describes the processing of Personal Information (defined below) that is provided, collected, or shared on the sites, applications, social media pages, or other platforms that link to this Privacy Notice (collectively, the “**Site**”). It also describes your choices about the collection, sharing, and use of your Personal Information.

We may modify this Privacy Notice at any time. All changes will be effective immediately upon posting to the Site. Material changes will be conspicuously posted on the Site or otherwise communicated to you.

### 1. Personal Information We Collect

We may collect a range of Personal Information. “Personal Information” means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you.

The types of Personal Information we collect may include:

- **Contact Information** – If you submit an inquiry, register for an account, or provide information on our Site, we may collect your contact information. This may include your name, address, email address, demographic information, and phone number.
- **Commercial information** – This includes information about purchases, information about subscriptions, solutions, and services you have shown interest in, payment processing information, and other commercial information
- **Location Data** – While navigating our Site your mobile device or browser may share your location data, both through WiFi and GPS. We will collect this information based on the settings of your phone and browser.
- **Usage Information** – When you use our Site, our servers may automatically record information, including your Internet Protocol address (IP Address), browser type, referring URLs (e.g., the site you visited before coming to our Site), domain names associated with your internet service provider, information on your interaction with the Site, and other such information.
- **Professional or Employment-related Information** – If you apply for employment, we will collect your employment and work history, as well as other Personal Information related to your potential employment. This may include your education and employment history, address and contact information, demographic information, and any other information included in your resume or application.
- **Communication Information** – We may collect the contents of your communications with us, whether via e-mail, chat functionality, social media, telephone or otherwise, and inferences we may make from other personal information we collect. Where permitted by applicable law, we may collect and maintain records of calls and chats with our agents, representatives, or employees via message, chat, post, or similar functionality.

### 2. How We Collect Your Personal Information

- **We May Collect Your Personal Information Directly From You** – For example, if you choose to contact us or request or purchase solutions, services, or information from us.

- **We May Also Collect Personal Information From Third Parties** – For example, we may work with business partners, subcontractors, advertising networks, analytics providers, and search information providers, who may provide us with Personal Information about you.
- **Through Online Tracking Technologies** – We and our service providers may use cookies and similar technologies such as pixels, web beacons, and local storage to collect usage and browser information about how you use the Site. We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of the Site, to enhance your experience through personalization, and to help us better understand the features of the Site that you and other users are most interested in.

### 3. How We Use Personal Information

To the extent permitted by applicable law, we may use Personal Information to:

- operate the Site and provide support to our business functions;
- fulfill customer requests, such as to create an account or complete customer purchases;
- protect against criminal activity, claims and other liabilities;
- send you information about our company, solutions, services, and promotions;
- respond to reviews, comments, or other feedback provided to us;
- support and personalize the Site and our advertising efforts;
- protect the security and integrity of the Site;
- provide customer support;
- the extent required for benchmarking, data analysis, audits, developing new solutions and services, enhancing the Site, facilitating product, software and applications development, improving the Site or our services, conducting research, analysis, studies or surveys, identifying usage trends, as well as for other analytics purposes;
- meet our contractual requirements;
- comply with applicable legal or regulatory requirements and our policies;
- market, advertise, and provide the Site and our services; and
- the extent necessary for any other lawful purpose for which the Personal Information is collected.

If you are applying for a position with us, we use your Personal Information for the following purposes. Please note that this Notice does not form part of any contract of employment offered to job applicants hired by Beyond Risk.

- **To Manage the Application Process.** We use your Personal Information to process your job application, to verify the information you have provided in your application, to communicate with you regarding your application, to answer your questions regarding the application process and to confirm your eligibility for a position. We may also save your information for future job openings within Beyond Risk.
- **To Manage the Hiring Process.** We may use your Personal Information in the hiring process to conduct interviews. We may also use your Personal Information to perform background and reference checks, with your consent, if you are offered a position.
- **Recruiting.** We may use Personal Information to communicate with you regarding the recruiting process, to learn where you heard about Beyond Risk, and to evaluate and improve our recruiting process.
- **To Communicate with You.** We may use your Personal Information to provide information to you, to respond to your questions, or to notify you of any changes or updates.

#### 4. Sharing of Personal Information

We may share your Personal Information in the following circumstances:

- **To Affiliates and Subsidiaries** - We may disclose your information to the Beyond Risk family of companies for their and our business purposes and for marketing purposes, including to provide you information about solutions and services we think may interest you.
- **To Business Partners** – We may share Personal Information with our trusted business partners. For example, we may share your Personal Information with a company when we co-sponsor a promotion or service. These partners may use your Personal Information to, among other things, send you information or contact you about their solutions and services.
- **For Legal Obligation or Safety Reasons** – When we have a good faith belief that access, use, preservation or disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of the Terms of Use, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Beyond Risk, its users, or the public against harm.
- **In the Case of a Merger or Sale** – If and when we are involved in a merger, acquisition, or any form of transfer or sale of some or all of its business, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding. Personal Information may be transferred along with the business. Where legally required we will give you prior notice and if you have a legal right to do so, an opportunity to object to this transfer.
- **To Service Providers** – When we hire a service provider to help operate the Site or our business, we may give access to Personal Information as necessary to perform the service for Beyond Risk. This may include service providers that operate our Site, send our communications, or run our promotions.

#### 5. Cookies and Other Tracking Technologies

We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of the Site, to enhance your experience through personalization, and to help us better understand the features of the Site that you and other users are most interested in.

*Cookies.* We collect certain data from cookies, which are pieces of data stored directly on the computer or mobile device that you are using. Cookies allow us to collect data such as browser type, time spent on the Site, pages visited, referring URL, language preferences, and other aggregated traffic data. We use the data for security purposes, to facilitate navigation, to display data more effectively, to collect statistical data, to personalize your experience while using the Site and to recognize your computer to assist your use of the Site. We also gather statistical data about use of the Site to continually improve design and functionality, understand how it is used and assist us with resolving questions.

*Pixel Tags and Other Similar Technologies.* We collect data from pixel tags (also known as web beacons and clear GIFs), which are used to, among other things, track the actions of users of the Sites, measure the success of our marketing campaigns, and compile statistics about usage of the Site.

*Through Analytics* We use analytics services, including Google Analytics, to assist us with analyzing our website traffic through cookies and similar technologies. To learn more about how Google uses data, visit [Google's Privacy Policy](#) and Google's page on "[How Google uses data when you use our partners' sites or apps.](#)" You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser

you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

*Refusing cookies and similar technologies.* Depending on your location, you may have the ability to adjust your preferences in a variety of ways. For example, you may be presented with a notice upon your first visit to the Site asking you to choose your preferences. Additionally, most browsers provide you with the ability to block, delete, or disable cookies, and your mobile device may allow you to disable transmission of unique identifiers and location data. If you choose to reject cookies or block device identifiers, some features of the Site may not be available, or some functionality may be limited or unavailable. Please review the help pages of your browser or mobile device for assistance with changing your settings.

Some of our service providers or plug-ins may use cookies or other methods to gather information regarding your use of the Site and may combine the information in these cookies with any Personal Information about you that they may have. The use of such tracking information by a third party depends on the privacy notice of that third party. We do not respond to Do Not Track (“DNT”) signals sent to us by your browser at this time. To learn more about how DNT works, please visit <http://allaboutdnt.com/>.

## **6. How Long Do We Keep Your Personal Information**

We will retain your Personal Information for as long as necessary to fulfill the purposes for which it has been collected, as described in the “How We Use Personal Information” section above. If you are a California resident, please see the section below titled Notice to California Residents for additional information about how long we retain your Personal Information.

## **7. How We Protect Your Personal Information**

We use our commercially reasonable efforts to protect the confidentiality and security of Personal Information we process. However, despite these efforts to store Personal Information in a secure operating environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems. Further, while we attempt to ensure the integrity and security of Personal Information, we cannot guarantee that our security measures will prevent third parties such as hackers from illegally obtaining access to Personal Information.

## **8. Your Choices and Controls**

Depending on where you live, you may have the following rights with respect to your Personal Information:

- Access: You may have the right to know what Personal Information we have collected about you and to access such data.
- Data portability: You may have the right to receive a copy of your information in a portable and readily usable format.
- Deletion: You may have the right to delete your Personal Information that we have obtained, subject to certain exceptions.
- Correction: You may have the right to correct inaccuracies in your Personal Information.
- Opt out of certain processing: You may have the right to opt out of the processing of your information for purposes of (i) targeted advertising, (ii), the sale of your Personal Information; or

(iii) profiling in furtherance of decisions that produce legal or similarly significant effect concerning you

To exercise any of these rights available to you, see Section 12 below.

To opt out of marketing emails, please email us at [privacy@beyonrisk.com](mailto:privacy@beyonrisk.com) or by following the instructions included in the email or text correspondence. Please note that, even if you unsubscribe from certain correspondence, we may still need to contact you with important transactional or administrative information, as permitted by law. Additionally, if you withdraw your consent or object to processing of your Personal Information, or if you choose not to provide certain Personal Information, we may be unable to provide some or all of our services to you.

## **9. International Use of the Site**

This Site is hosted in the United States. If you are visiting this Site from outside of the United States, please note that by providing your Personal Information it is being transferred to, stored, collected, or processed in the United States, where our data center and servers are located and operated.

## **10. Children’s Privacy**

We do not knowingly collect or solicit any Personal Information from children under the age of 16. In the event that we learn that we have collected Personal Information from a child, we will promptly take steps to delete that information. If you are a parent or legal guardian and think your child has given us their Personal Information, you can email us at [privacy@beyonrisk.com](mailto:privacy@beyonrisk.com) or contact us using the information listed in Section 13.

## **11. Links to Third-Party Websites**

We are not responsible for the practices employed by any websites or services linked to or from the Site, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be subject to the applicable third party’s Privacy Notice.

## **12. Notice to California Residents**

This Section applies to our collection and use of Personal Information if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act (“CCPA”), where “Personal Information” has the definition set forth in the CCPA.

This Section describes (1) the categories of Personal Information collected and disclosed by us, (2) your privacy rights under the CCPA, and (3) how to exercise your rights.

Beyond Risk makes the following disclosures regarding the Personal Information Beyond Risk has collected within the 12-month period preceding the Effective Date of this Privacy Policy:

### **Sources of Personal Information**

We collect Personal Information from the categories of sources detailed in Section 2 above: (i) directly from you; (ii) data collected automatically through tracking technologies; and (iii) third parties.

Use of Personal Information

We collect Personal Information for the business and commercial purposes detailed in Section 3 above.  
Disclosure of Personal Information

The categories of third parties to which we disclose personal information for a business or commercial purpose or to whom we sell or share personal information are summarized in the chart below. We do not knowingly sell or share the personal information of minors under the age of 16.

<b>Categories of CA Personal Information We Collect</b>	<b>Categories of Third Parties to Which We Disclose Personal Information for a Business or Commercial Purpose</b>	<b>Categories of Third Parties to Which We May Sell or Share Personal Information</b>
Identifiers	<ul style="list-style-type: none"> <li>• Within Beyond Risk</li> <li>• Service providers</li> <li>• Business partners</li> <li>• For legal, security, and safety purposes</li> </ul>	Analytics Providers
Personal information, as defined in the California customer records law	<ul style="list-style-type: none"> <li>• Within Beyond Risk</li> <li>• Service providers</li> <li>• Business partners</li> <li>• For legal, security, and safety purposes</li> </ul>	We do not sell or share this category of Personal Information.
Internet or other similar network activity	<ul style="list-style-type: none"> <li>• Within Beyond Risk</li> <li>• Service providers</li> <li>• Business partners</li> <li>• For legal, security, and safety purposes</li> </ul>	Analytics Providers
Geolocation data	<ul style="list-style-type: none"> <li>• Within Beyond Risk</li> <li>• Service providers</li> <li>• Business partners</li> <li>• For legal, security, and safety purposes</li> </ul>	Analytics Providers
Inferences drawn from other personal information	<ul style="list-style-type: none"> <li>• Within Beyond Risk</li> <li>• Service providers</li> <li>• Business partners</li> <li>• For legal, security, and safety purposes</li> </ul>	We do not sell or share this category of Personal Information.

Professional or employment-related information	<ul style="list-style-type: none"> <li>• Within Beyond Risk</li> <li>• Service providers</li> <li>• Business partners</li> <li>• For legal, security, and safety purposes</li> </ul>	We do not sell or share this category of Personal Information.
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We will retain each category of your personal information for as long as necessary to fulfill the purposes described in the “How We Use Personal Information” section above, unless otherwise required by applicable laws. Criteria we will use to determine how long we will retain your information include whether: we need your information to provide you with products or services you have requested; we continue to have a relationship with you; you have requested information, products, or services from us; we have a legal right or obligation to continue to retain your information; we have an obligation to a third party that involves your information; our retention or recordkeeping policies and obligations dictate that we retain your information; we have an interest in providing you with information about our products or services; and we have another business purpose for retaining your information.

If you are a resident of California, you may have the following rights:

Privacy Right	Description
<b>Notice</b>	The right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.
<b>Access</b>	The right to know what Personal Information we have collected about you, including (a) the categories of Personal Information; (b) the categories of sources from which the Personal Information was collected; (c) the business or commercial purpose for collecting, selling, or sharing Personal Information; (d) the categories of third parties to whom the business discloses Personal Information; and (e) the specific pieces of Personal Information we have collected about you.
<b>Data Portability</b>	You may have the right to receive a copy of your information in a portable and readily usable format.
<b>Deletion</b>	The right to have your personal information deleted. Note, however, that we may not always be able to comply with your request to delete for specific legal reasons which will be notified to you, if applicable, at the time of your request
<b>Correction</b>	You have the right to request that we correct any incorrect personal information that we collect or retain about you, subject to certain exceptions.
<b>Automated Decision Making</b>	You may have the right to request information about the logic involved in automated decision-making and a description of the likely outcome of processes, and the right to opt out. We do not currently engage in any automated decision making practices.
<b>To Opt Out of Sales or Sharing of Personal Information</b>	As indicated in the above chart, we may sell or share certain categories of your Personal Information. To the extent we sell and/or share your Personal Information, you have the right to opt out of the sale and sharing of your Personal Information; you can do so <a href="#">here</a> . You can also click on the “Do Not Sell or Share My Personal Information” link at the bottom of the Site to learn more about exercising this right.

	You may also opt out by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC). We honor Opt-Out Preference Signals, including GPC. If you choose to use an Opt-Out Preference Signal, you will need to turn it on for each supported browser or browser extension you use.
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Only you, or an authorized agent that you authorize to act on your behalf, may make a request related to your Personal Information. You may also make a request on behalf of your minor child.

You may only make a request for access or data portability twice within a 12-month period. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

*Other California Privacy Rights.* Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of personal information to third parties for the third parties' direct marketing purposes, if any. To make such a request, please contact us using the information in the Contact Us section below. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

### **13. Exercising your Individual Privacy Rights**

You will not be discriminated against in any way by virtue of your exercise of the rights listed in this Privacy Notice which means we will not deny goods or services to you, provide different prices or rates for goods or services to you, or provide a different level or quality of goods or services to you.

To exercise any of the privacy rights afforded to you under applicable data protection law, please submit a request to us by one of the following methods:

- Calling us toll free at 833-596-1569
- E-mailing us at [privacy@beyonrisk.com](mailto:privacy@beyonrisk.com)
- Submitting a request through our web form.

*Verification:* We must verify your identity before fulfilling your requests. If we cannot initially verify your identity, we may request additional information to complete the verification process. We will only use Personal Information provided in a request to verify the requestor's identity. If you are an authorized agent making a request on behalf of a California consumer, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney.

We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

We will deliver our written response by mail or electronically, at your option.



We do not charge a fee to process or respond to your 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 cannot respond to your request or provide you with Personal Information if we cannot verify your identity and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us.

We may deny certain requests, or only fulfill some in part, as permitted or required by law. For example, if you request to delete Personal Information, we may retain Personal Information that we need to retain for legal purposes

This Privacy Notice is available to consumers with disabilities. To access this Privacy Notice in an alternative downloadable format, please [click here](#).

*Appeals:* If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you will be notified of our appeal process in our response to your request.

#### **14. Changes to this Privacy Notice**

Please note that we may modify or update this Privacy Notice from time to time, so please review it periodically. We may provide you with an updated Privacy Notice if material changes are made. Unless otherwise indicated, any changes to this Privacy Notice will apply immediately upon posting to the Site.

#### **15. Contact Us**

If you have any questions about our practices or this Privacy Notice, please contact us at [privacy@beyondrisk.com](mailto:privacy@beyondrisk.com). You may also write to us at:

3101 N Central Ave  
Suite 400  
Phoenix, AZ 85012  
Attention: General Counsel