



Effective Date: October 12, 2023

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Our Commitment to Privacy

We, at SCATR, Corp. (“SCATR” or “we,” “us,” “our”) are committed to protecting the privacy of our business partners who are licensed to use our software (the “Software”) on their internal network (“you” or “Client”) and our Clients' end users who have access to any of the data resources monitored by our Software (“End Users”). Our Software provides an interoperable, scalable, software as a service license product for securing and obfuscating communications between endpoints that are transmitting data packets across networks. Software implements management and transmission control technology, which utilizes multiple layer protocols to enable security and obfuscated communications. The Software does not grant us access Client or End User data at any time, but rather further enhances security through packet fragmentation, encryption, and randomization for transmission.

SCATR respects and is committed to protecting the privacy of individuals. This Privacy Policy (“Policy”) describes SCATR’s personal data processing, including in connection with the SCATR products. Additional license terms, terms of use, contracts, agreements, and privacy statements may also apply to particular SCATR products. If there are contradictions between this Policy and the more specific information for particular SCATR products, the more specific information shall prevail to the extent permitted under applicable United States law.

Information We May Collect

SCATR collects two types of information when you or your End Users are using our Software or Website:

Personal Information

The first type of information is information that identifies an individual or may, with reasonable effort, identify an individual (“Personal Information”), which includes the following:



Client's Information. We may collect contact information (including Personal Information) from you when you visit the Website, subscribe to our newsletter, respond to a survey, or fill out a form.

Feedback. When you allow us (or our trusted third-party service providers) to receive your End Users' feedback and rating concerning Software ("Feedback"), we may gather Personal Information, which may include the following: email address of the End User, End User's full name, End User's IP address, and the End User's email. In addition, we may collect Personal Information your End User voluntarily shares with us when he/she sends us Feedback (e.g., identifying content, images, etc.).

End Users' Information: To provide our Software as a Service ("SaaS") products, we will collect Personal Information about your End Users, including their account details, IP addresses, MAC addresses, user agent, identifiers issued by Client, path of files, and file names. Under certain applicable privacy laws, some of this metadata may be considered Personal Information.

In the 12 preceding months, we have collected the following categories of Personal Information (as this term is defined under U.S. Applicable Laws):

Category	Personal Information Collected	Categories of Service Providers to Whom Personal Information was Disclosed
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	SCATR does not disclose Personal Information for Services Providers or other third parties.
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	SCATR does not disclose Personal Information for Services Providers or other third parties.

In addition, in the past 12 months, SCATR has not collected Sensitive Personal Information (as this term is defined under Applicable U.S. Laws):

Non-identifiable Information

The second type of information is non-identifiable information about you or your End Users, which may be made available or gathered via your use of the Software ("Non-Personal



Information”). We are not aware of the identity of the user from which the Non-Personal Information was collected. Non-Personal Information that is being collected may include usernames, directory names, server names, share names, file names, configurations, logs related to Software and Client (e.g., event logs), browsing events, and technical information transmitted by your device or your End Users’ devices, including certain software and hardware information (e.g., the type of browser and operating system the device uses, language preference, access time and the domain name from which you or your End Users are linked to the Software; etc.).

In addition, when you allow us (or our trusted third-party service providers) to receive your End Users’ Feedback with regard to Software, we may gather Non-Personal Information which may include the following: Feedback rating, Feedback tags, Feedback text, browser type and language, operating system, viewport of the screen, page URL on which the Feedback has been given, the screenshot of the screen on which Feedback was provided (with all textual strings redacted), and our clients.

We are not aware of the identity of the Client or End User from which the Non-Personal Information was collected.

Please note that when the Software is deployed by our Clients, the Software analyzes data pertaining to the Clients’ systems and IT infrastructure. This data does not include Personal Information. Moreover, we do not have access to any data the Clients transport by using the Software. The Clients maintain sole ownership of this data and determine their own policies regarding the storage, access, deletion, sharing, and retention of this data. This data is hosted and stored only on the Clients’ servers (not on SCATR’s servers).

Information Collected Automatically

SCATR may also automatically collect certain information about you when you access or use the Website ("Usage Information"), including IP address, device identifier, browser type, operating system, information about your use of the Website, and data regarding network connected hardware (e.g., computer or mobile device).

The methods that may be used on the Website to collect Usage Information include:

- *Log Information:* Log information is data about your use of the Website, such as IP address, browser type, internet Website provider, referring/exit pages, operating system, date/time stamps, and related data, and may be stored in log files.
- *Information Collected by Cookies:* Cookies are text files placed on your computer to



collect standard Internet log information and visitor behavior information. When you visit the Website, we may collect information from you automatically through cookies or similar technology.

SCATR uses cookies in various ways to ensure the Website works correctly, improve your experience with the Website, and understand how you use the Website. Specifically, SCATR uses the following cookies:

- *Functional Cookies.* These cookies are essential for accessing and using the Website. These cookies do not gather information about you that could be used for marketing purposes and do not remember where you have been on the Internet. These cookies cannot be disabled because they are essential to ensure the Website operates correctly.

You may refuse to accept browser cookies by activating the appropriate settings on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting to refuse cookies, our system will issue cookies when you direct your browser to our Website.

The information we collect automatically does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

Purposes of Processing Personal Information

The information we collect, which may include your Personal Information, is used for legitimate business purposes only to the extent required or otherwise reasonably necessary for one or more of our functions or activities while maintaining your right to privacy. Such legitimate business purposes include:

- Setting up your account and providing our services to you and your End Users;
- Identifying and authenticating End Users' access to the Software;
- Obtaining End Users' Feedback with regard to the Software;
- Improving our Software;
- If we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets;



- Supporting and troubleshooting our Software and responding to queries; and
- For other purposes for which we obtain your consent.

We may disclose Personal Information that we collect or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates;
- To contractors, Service Providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and secure and use it only for the purposes for which we disclose it to them;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SCATR's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.
- To fulfill the purpose for which you provide it;
- To fulfill a legal request pursuant to a subpoena from a U.S. government agency, Federal Court, or State Court;
- For any other purpose disclosed by us when you provide the information or
- With your consent.

In addition, we may use and/or disclose Personal Information, or any information you submitted to us, if we have a good faith belief that use and/or disclosure of such information is helpful or reasonably necessary to:

- Comply with any applicable law, court/tribunal order, regulation, or legal process, including alternative dispute resolution process or U.S. governmental request;
- Enforce our policies, including investigations of potential violations thereof;
- Investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud, or security issues;
- To establish or exercise our rights to defend against legal claims;
- Lessen or prevent harm or serious threat to the rights, property life, health, or safety of us, our users, yourself, or any third party;
- Locating a person reported as missing; or
- For the purpose of collaborating with law enforcement agencies or in case, we find it necessary to enforce intellectual property or other legal rights.

Third-Party Websites

Our Websites may provide links to third-party websites outside our control and not covered by this Policy. SCATR is not liable for any information, content, products, services, software, or other materials on or through a third-party website. The use of an external website or any information or other content found on external websites is subject to and governed by the terms and conditions of such website.



Disclosure of Personal Data and International Data Transfers

SCATR is based in the U.S., and the information SCATR collects is governed by U.S. law. If you are accessing the Website from outside of the U.S., please be aware that information collected through the Website may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Website or provision of any information, therefore, constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information, including Personal Information, in the U.S., as outlined in this Privacy Policy. SCATR does not transfer Personal Information outside of the U.S.

SCATR is committed to complying with applicable data privacy laws. SCATR is not, nor intends to be, governed by or otherwise subject to the General Data Protection Regulation. However, to the extent we receive Personal Information from a resident of the European Union, we will comply with the requirements of the General Data Protection Regulation.

The Clients may use the Software as a secure mechanism to transport data to and from systems in different jurisdictions, including those outside of the U.S. SCATR does not have access to, nor control over, these data transfers. The Clients maintain sole ownership of this data; therefore, the Clients are responsible for implementing the appropriate safeguards to ensure any data transfers comply with applicable laws.

Children's Privacy

The Software is not designated to End Users under the age of majority (as determined under the applicable laws where the individual resides; "Age of Majority"). If we become aware that End Users under the Age of Majority have shared any information, we will discard such information. If you have any reason to believe that a minor has shared any information with us, please contact us as set forth below.

Our Websites do not target and are not intended to attract children or minors under the age of 16. SCATR does not knowingly solicit personal data from children or minors under the age of 16 or send them requests for personal data. If you believe we have collected personal data from a person under 16 years old without the consent of their parent or legal guardian, please let us know immediately by contacting us as indicated in this Policy and providing sufficient information so we can act appropriately.



Privacy Rights

Applicable U.S. Laws provide consumers with specific rights regarding their Personal Information.

- *Right of Access.* You have the right to request that we disclose certain information about our collection and use of your personal information over the past 12 months.
- *Right to Correct.* You have the right to request that we correct the inaccurate personal information we maintain about you.
- *Right to Delete.* You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.

We do not sell (as this term is defined under Applicable U.S. Laws) or share (as this term is defined under the California Privacy Rights and Enforcement Act of 2020) any Personal Information.

We do not use or disclose Sensitive Personal Information (as this term is defined under Applicable U.S. Laws).

We will not discriminate against you for exercising any of your privacy rights. Unless permitted by Applicable U.S. Laws, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits or imposing penalties.
- Provide you with a different level or quality of goods or services.
- Suggest that you receive a different price or rate for goods or services or a different level or quality of goods or services.
- Discriminate in making employment decisions.

This list may not be exhaustive, and your local laws may confer additional privacy rights. If you are a resident in the European Economic Area, you may have the following rights:

- *Right to Access.* This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- *Right to Correct.* This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- *Right to Erasure.* This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully



- exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.
- *Object to processing* of your personal information where we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling, legitimate grounds to process your information, which overrides your rights and freedoms.
- *Request Restriction of Processing*. This enables you to ask us to suspend the processing of your personal information in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful, but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise, or defend legal claims. You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- *Data Portability*. Commonly used, machine-readable format. Note that this right only applies to automated information you initially provided consent for us to use or where we used the information to perform a contract with you.
- *Right to Withdraw Consent*. Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing before you withdraw your consent. If you withdraw your consent, we may be unable to provide you with certain products or services. We will advise you if this is the case when you withdraw your consent.
- *Right to Appeal*. You may have the right to appeal a decision we make regarding exercising your privacy rights.
- *Lodge a Complaint*. You may have the right to lodge a complaint with your national Data Protection Authority or equivalent regulatory body.
- *Not to be Subjected to Automated Decision-Making*. Automated decisions are decisions made automatically based on computer determinations (using software algorithms) without human review. You will not be subject to decisions that significantly impact you based solely on automated decision-making unless we have notified you and have a lawful basis for such processing.



Exercise Your Privacy Rights

If you wish to exercise any of your rights with respect to the personal information we process, please email us at: privacy@scatr.it

We will address your request within 45 days. If we require more time, we will inform you of the reason and extension period in writing within the first 45 days period. Any disclosures we provide will cover only the 12 months preceding the request. If reasonably possible, we will provide your Personal Information in a format that is readily useable and should allow you to transmit the information without hindrance.

To appeal a decision regarding a consumer rights request, you may send an email to privacy@scatr.it stating the reasons for your appeal. We cannot guarantee specific outcomes regarding appeal requests. You will receive a response to your appeal request within 45 days.

If you are a Virginia Resident and your appeal is denied, you may lodge a complaint with the state Attorney General through the contact information available below:

- <https://www.oag.state.va.us/contact-us/contact-info>, or
- <https://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint>.

Security of Personal Data

SCATR safeguards the security of personal data with industry-standard physical, technical, and organizational measures. We review and adjust these safeguards regularly in response to advances in technology. SCATR secures Personal Data in controlled servers with limited access.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to the Website.

Any transmission of Personal Information is at your own risk. Further, you acknowledge that (i) there are security and privacy limitations of the Internet that are beyond our control; (ii) the security, integrity, and privacy of any and all information and data exchanged between you and the Website cannot be guaranteed; and (iii) any such information and data may be viewed or tampered with in transit by a third party, despite best efforts.

Retention of Personal Data

SCATR will retain your personal data as needed to fulfill the purpose(s) for which it was collected, including complying with our legal obligations, resolving disputes, and enforcing our agreements. For SCATR, the criteria used to determine the retention period for specific



categories of personal data varies and is based on what is required to deliver that product or service.

How to Contact Us

If you have any questions about this Privacy Policy or the way in which your information is used, please contact our Data Privacy Officer at privacy@scatr.it or via U.S. mail at

SCATR Corp
ATTN: Data Privacy Officer
26391 Curtiss Wright Parkway
Cleveland, OH 44143

Changes to Our Privacy Policy

We may revise this Privacy Policy from time to time in our sole discretion, and the most current version will always be posted on the website.

Your continued use of the Software, following the notification of such amendments, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.