

## **root9B Privacy Policy**

root9B LLC is a Colorado Limited Liability Corporation. We care deeply about your privacy and security and appreciate your decision to trust us with helping to protect your IT assets from theft, disruption, and unauthorized access.

This Privacy Notice is designed to inform you about how your information is collected, managed, and used to:

- o Safeguard your devices and networks as well as to protect your data;
- o Personalize and manage our relationship with you;
- o Investigate, respond, and manage security related incidents and events;
- o Improve security related products and services; and
- o Predict future security threats and vulnerabilities.

root9B would like to help you understand how your data is processed, why it takes data to protect data, and our commitment to using the personal data we collect for the purposes discussed in this Notice. Every time you add a device to a network, provision a new user, change network permissions, and make other changes to a network, you are exposed to significant risk from hackers, spammers, malware, spyware, and other forms of unauthorized access to your data and systems. To defend against these threats and the thousands of new threats that emerge each day, root9B may:

- Analyze data sent from our product that is deployed in your network for risks, threats, vulnerabilities, suspicious activity, and attacks;
- Maintain contact and dialog with you;
- Share anonymized data with threat intelligence networks to improve our products, services, and overall internet security; and
- Adapt responses to new threats based on intelligence collected from our products deployed within your network.

An overview of our privacy practices is set forth below. Please feel free to contact us if you have any questions.

### **Scope**

This Privacy Notice applies to information we obtain from individuals interacting with root9B and our websites, products, services, and applications. This Notice does not apply to information we obtain in our capacity as an employer; employment related data is covered under separate policies and/or notices.

### **Notice**

We provide access to our Privacy Notice by:

- Linking to it throughout our websites;
- Referencing it in our End User License Agreements; and
- Incorporating it into our contracts, agreements, and other documents as necessary or appropriate.

## **The Information We Collect**

root9B may collect personal information (i.e., information that identifies an individual either alone or in combination with other data). root9B may also collect non-personal information that does not, on its own, identify an individual person. When non-personal information is combined with other information so that it does identify an individual person, we treat that combination as personal information.

root9B obtains information when you or someone acting on your behalf provides it to us. We also collect information when you obtain or use root9B products or services or when you use a device with root9B products or services installed. root9B may also obtain information, including personal information, from third parties, such as our partners and advertisers.

The following are examples of the types of personal information that may be collected directly from you (or someone acting on your behalf):

- Contact information (including name, email address, social media ID/handle, mailing address, telephone, and fax number);
- Payment information (including payment card and bank account information);
- Shipping, billing, and other information provided in connection with the purchase or delivery of root9B products and services;
- Information about transactions with us (such as purchase history) and use of our products and services;
- Information provided by you through root9B-related communication channels such as forums, technical support, and customer service;
- Username, password, credential hashes and other information used to verify identity; and
- Photographs, images, biometrics, and related hash values.

The following are examples of the types of information that may be collected by root9B from your web browser or from interactions with our products and services:

- Details about your computers, devices, applications, network credentials, and networks (including IP address, browser characteristics, device ID and characteristics, operating system, system language, and preferences);
- Activities on our websites and usage patterns of products and services (including referring URLs, dates and times of website visits, and

- clickstream data such as information commonly recorded in web server logs);
- Details about Internet or network usage (including URLs or domain names of websites you visit, information about applications that attempt to access your network, use of credentials across your network, or traffic data);
  - Other information used in the operation of our products and services (including information regarding the number of checked, suspicious, infected, or unwanted files or emails; number of actual infections, number and type of potentially compromised credentials, topology of networked systems, etc.); and
  - Information that may be included in a virus or malware sample or a file submitted by you to root9B for review.

## **IP Addresses**

An Internet Protocol address (IP address) is a numerical label assigned to each device (e.g., computer, printer, mobile phone, server) participating in a computer network that uses the Internet Protocol for communication. It is how devices find each other on a network.

While it is possible that IP addresses can be associated with a single individual's device, they most often are associated with a group of systems, one system shared by many users, or a gateway into a group of systems or devices. For instance, IP addresses included in an email communication are typically associated with the respective email service provider and not with an individual user's device.

root9B security products and services use IP addresses as one identifier of your information, your devices, and your data. For example, we may detect that a system or a group of systems associated with a particular IP address has been compromised, potentially compromised, hold weak credentials, and/or is sending malware to other users.

The use of IP addresses and other machine data is necessary to keep security protections current, relevant, and effective as cyber threats and attacks evolve over time.

## **Cookies**

root9B uses "cookies" to remember user preferences and to maximize the performance of our websites and services. Additionally, cookies help us to identify returning users so, for example, we don't need to ask them to enter their email address and password on every visit.

Please note the information gathered by cookies is necessary to provide some root9B services, including certain subscriptions. We cannot provide such

services to users who do not give their consent to the data processing carried out through cookies or whose browsers are set to reject all cookies. For example, when you purchase a subscription to an online technology, a cookie is set that identifies the software, version, and when it expires. We use this information to alert you that a newer version is available or if your subscription is going to expire.

Cookies may also be used to control the type and frequency of ads, promotions, or other marketing messages the customer views. These ads may be placed by root9B or third-party advertising companies which are our vendors. root9B may use “web beacons” (small transparent image files) to count visitors to our sites and analyze how visitors use our sites. The information collected is generally anonymized and is not used to identify any particular user.

root9B also maintains log files of the traffic on our sites. For example, our servers may automatically record the information you or your browser send when you visit a website. These log files may include information such as your requests, IP address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your system.

## **Use of the Information we collect**

root9B uses the information we collect in ways that serve your security needs and privacy preferences, including to:

- Provide threat prediction and protection products and services;
- Provide security advisories, information, and product updates;
- Conduct research and analysis (for example, market and consumer research, security research and analysis, and trend analysis);
- Analyze users’ behavior when using root9B products and services to customize preferences;
- Establish and manage root9B accounts;
- Collect and process payments and complete transactions;
- Provide customer support, manage subscriptions, and respond to requests, questions and comments;
- Communicate about, and administer participation in, special events, programs, surveys, contests, sweepstakes, and other offers and promotions;
- Enable posting on our blogs and other communications;
- Customize, measure, and improve our websites, products, services, and advertising;
- Analyze and develop new products, services, and websites;
- Perform accounting, auditing, billing, reconciliation, and collection activities;

- Prevent, detect, identify, investigate, respond, and protect against potential or actual claims, liabilities, prohibited behavior, and criminal activity;
- Comply with and enforce applicable legal requirements, agreements, and policies; and
- Perform other activities consistent with this Notice.

## **Products and Services Data Processing**

If you install or use one of our products or services, software may operate on your computer system to perform specific security and privacy tasks including:

- SPAM protection;
- Credential Strength Management
- Network Defense; or
- Data Encryption.

## **Product Updating and Reporting**

Our products and services may also process certain data to provide updates and reports. These update functions may check your system to see whether files relating to the services need to be refreshed or modernized. For example, products and services may transmit report files to root9B. These files contain information, including number and type of weak credentials, potentially compromised credentials, and pathways of system access. The purpose of these reports is to analyze the frequency of particular vulnerability patterns or the prevalence of threats. root9b also uses the information to adapt the product to conform to user preferences based on actual use.

## **Information We Share**

We may share information, including personal information, with:

Other members of the root9B family of companies for the purposes described in this Privacy Notice, such as to: (i) provide services and joint content (e.g., registration, sales, and customer support); (ii) help detect and prevent potentially illegal acts and violations of our policies; and (iii) guide our decisions about our products, services, and communications;

- Authorized service providers and partners who perform services for us (including data storage, sales, marketing, fraud investigations, and bill collection) based on our instructions. These third parties may only use or disclose personal information obtained from root9B to perform services on our behalf or comply with legal obligations;

- Third parties with your consent. For example, co-marketing with a business partner or sharing limited information as necessary with researchers and analysts; and
- Other business entities legally related to root9B, LLC, such as our parent company, root9B Technologies, Inc., or any third party that may take over all or part of root9B's functions in the future.

We may also disclose personal information: (i) if we are required to do so by law or legal process; (ii) in response to requests by government agencies, such as law enforcement authorities or other authorized third-parties; (iii) as may be required for purposes of national security; (iv) when we believe disclosure is necessary and appropriate to prevent physical, mental, financial, or other harm, injury, or loss; or (v) in connection with an investigation of suspected or actual illegal or inappropriate activity or exposure to liability.

root9B family companies may share personal information with each other and use it in a manner that is consistent with this Privacy Notice. We may also combine it with other information to provide and improve our products, services, content, and advertising.

When we share personal information with a third party, they must contractually agree to comply with privacy and security standards at least as stringent as root9B's when we are handling similar data. When you provide data directly to the third party, the processing is based on their standards (which may not be the same as root9B's) and your own independent relationship with that provider.

## **Your California Privacy Rights - Shine the Light Law**

root9B does not share your personal information with non-affiliated third parties for their own marketing use without your permission.

## **Security**

We use administrative, organizational, technical, and physical safeguards to protect the personal information we collect and process. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, and availability. We regularly test our website, data centers, systems, and other assets for security vulnerabilities.

root9B handles payment card transactions via a partnership with Fast Spring. Read more about Fast Spring's data security compliance and payment processing compliance with Payment Card Industry's Data Security Standards (PCI-DSS) at [www.fastspring.com](http://www.fastspring.com).

## **How you can manage and control your information**

We offer certain choices about how we communicate with our users and what personal information we obtain about them. Many root9B products allow users to make choices about the personal information collected.

- You may choose not to receive marketing communications from us by clicking on the unsubscribe link or other instructions in our marketing emails, visiting the root9B web site, or contacting us as specified in the “How to Contact Us” section below.
- Many root9B products contain settings that allow users or administrators to control how the products collect information. Please refer to the relevant product manual or contact us through the appropriate technical support channel for assistance.

If you choose to no longer receive marketing information, root9B may still communicate with you regarding such things as security updates, product functionality, responses to service requests, or other transactional, non-marketing/administrative related purposes.

### **How you can access and correct inaccuracies**

You can access and correct the personal information in your profile by visiting <http://support.root9b.com/> Alternatively, you may request reasonable access to your personal information by contacting us as indicated below.

### **Data Retention**

root9B will keep your personal information for as long as you are a registered subscriber or user of our products and, thereafter, for no longer than is required by law or root9B’s records retention policy, or as reasonably necessary for internal reporting and reconciliation purposes, or to provide you with feedback or information you might request, unless otherwise agreed between you and root9B. In certain circumstances, we may be required to retain data we have about you (such as for tax, litigation (threatened, anticipated, or actual), or other business purposes, or if required by law enforcement).

### **Storage of the Information We Collect From You**

The information we collect may be stored and processed in servers in the United States and wherever root9B and our service providers have facilities around the globe.

### **Children’s Privacy**

root9B’s websites, products and services are not directed to children under the age of 13. root9B does not knowingly collect personal information from children under the age of 13 without parental consent.

## **Data Transfer**

We may transfer the information, including personal information, we obtain to countries other than the country in which the information originally was collected. Those countries may not have as comprehensive data protection laws as the country from which root9B initially obtained the information. When we transfer the information to other countries, we will protect that information as described in this Privacy Notice.

## **Updating the Privacy Notice**

We may update this Notice at any time by posting additions or modifications on this web page. If at any point we decide to use personal information in a manner materially different from that stated at the time it was collected, we will notify users by email, via a prominent notice on our website, or other such means. Your continued use of our websites, products or services after the revised Notice has become effective means that you have read, understood and agreed to the current version of this Notice.

## **Links to Third Party Websites or Services**

Our websites and products may contain features or links to third party websites, products or services for your convenience and information. These linked websites, products or services may have their own privacy policies or notices, which we strongly suggest you review before providing them with information. Any information you provide on third party websites, products or services is provided directly to the operators of such websites, products or services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through our websites or products. We are not responsible for the content or privacy and security practices and policies of third party websites, products or services to which links or access are provided through our websites or products.

## **Your Agreement to our Privacy Notice**

You expressly consent to root9B's processing of information as described in this Privacy Notice when you:

- Visit and/or provide information to us through our websites;
- Buy, license, and use our products or services and accept the End- User License Agreement and Privacy Notice; or
- Sign a contract with root9B to purchase, subscribe to or license our products and services.

In addition, by using and interacting with root9B products, services, or websites, you affirmatively consent to our collection and processing of personal



information: (a) to provide the intended functionality of a product or service; (b) by automated means, such as cookies or web beacons; and (c) in accordance with this Privacy Notice. You also consent to the storage and transfer of the information to locations wherever root9B and our service providers have facilities, including the United States.

In certain circumstances, where the information of third parties is collected by us by virtue of the third-party's interaction with you (such as the information of those individuals who send communications to your computer), we rely on you to provide the relevant third parties with appropriate notice and to obtain any requisite consent.

## **Contact Us**

If you have questions or concerns regarding this Privacy Notice, or would like to update information we have about you or your preferences, please contact us by:

Emailing the Privacy Program Office of root9B, Inc. at [privacy\\_program\\_office@root9B.com](mailto:privacy_program_office@root9B.com)

Writing to us at:

Privacy Program Office – root9B, LLC  
102 N Cascade Ave  
Suite 220  
Colorado Springs, CO 80903

If you do not receive a prompt response, please contact the Consumer Privacy Response Team of root9B, LLC by emailing: [consumer\\_privacy\\_response\\_team@root9b.com](mailto:consumer_privacy_response_team@root9b.com) or by writing to:

Consumer Privacy Response Team – root9B, LLC  
102 N Cascade Ave  
Suite 220  
Colorado Springs, CO 80903