

Effective Date: May 27, 2024

## **PRIVACY POLICY**

Transparency, control, and accountability are the core principles that influence Magnet Forensics Inc.'s (“**MFI**”) and its affiliates’ (collectively, “**Magnet Forensics**”) approach to personal information. From time to time, the nature of our business dictates that we may collect personal information from our customers and partners. Because we are committed to protecting your privacy rights and the information you provide to us, we have developed this Privacy Policy (“**Policy**”). This Policy sets forth how Magnet Forensics collects, uses, and discloses personal information through our products and services, including our website (<https://www.magnetforensics.com/>), email, and any offerings where we may collect personal information, either online or offline (together, our “**Services**”).

Please read this Policy and our [Terms and Conditions](#) (“**Terms**”) carefully before using our Services. By using our Services or otherwise providing personal information to us, you acknowledge and agree to our Terms and consent to our collection, use, and disclosure practices as described in this Policy. If you do not agree, please discontinue use of our Services.

### **I. Personal Information We Collect**

“**Personal information**” (or “personal data”) generally means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly with you or your household. Personal information does not include data that is publicly available, de-identified, or aggregated. We may combine your personal information with data we obtain from our Services, other users, or other parties. We reserve the right to convert, or permit others to convert, your personal information into deidentified, anonymized, aggregated, or pseudonymized data, as permitted by law.

What personal information we collect may differ depending on how you interact with us and the functionalities you use, but our primary reason for collecting personal information is to provide Services to our customers.

We may collect the following categories of personal information:

<b>CATEGORY OF PERSONAL INFORMATION</b>	<b>EXAMPLES</b>	<b>PURPOSE(S) FOR COLLECTION</b>
Contact Information and Identifiers	Real name, account name, username, unique personal identifier, online identifier, IP address, email address, phone	To allow you to participate in the features we offer

	<p>number, or other similar identifiers</p>	<p>To maintain your accounts with us</p> <p>To communicate with you, including about our products, updates to our terms and policies, and to obtain your feedback</p> <p>To send you marketing materials and advertisements</p> <p>To recognize you when you use our Services</p> <p>To show you relevant ads while you browse the internet or use social media</p> <p>To send you relevant coupons, discounts, or promotions</p> <p>Auditing, research and analysis, to maintain and improve our Services, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p> <p>For potential litigation and other legal or regulatory requirements</p>
<p>Commercial Information</p>	<p>Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<p>To allow you to participate in the features we offer</p> <p>To provide you with appropriate products and recommendations</p> <p>To help you find relevant products more quickly</p> <p>To tailor our communications to you</p>

		<p>To provide customer service and support</p> <p>To send you relevant coupons, discounts, or promotions</p> <p>To improve our Services, and our products, marketing and advertising</p> <p>Auditing, research and analysis, to maintain and improve our Services, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>
<p>Demographic Information</p>	<p>Age and birth date</p>	<p>To allow you to participate in the features we offer</p> <p>To send you relevant marketing materials and advertisements</p> <p>To tailor our communications to you</p> <p>To improve our Services, and our products, marketing and advertising</p> <p>Auditing, research and analysis, to maintain and improve our Services, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p> <p>For potential litigation and other legal and regulatory requirements</p>

<p>Internet or Other Electronic Network Activity Information</p>	<p>Internet or other similar activity, browsing history, search history, information on a consumer's interaction with a website, application logs, device data and registration, social media account information</p>	<p>To allow you to participate in the features we offer</p> <p>To provide you with appropriate products and recommendations</p> <p>To help you find relevant products more quickly</p> <p>To tailor our communications to you</p> <p>To provide customer service and support</p> <p>To send you relevant coupons, discounts, or promotions</p> <p>To improve our Services and our products, marketing, and advertising</p> <p>Auditing, research and analysis, to maintain and improve our Services, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>
<p>Geolocation Data</p>	<p>Your physical location based on information you provide directly or inferred from your IP address</p>	<p>To allow you to participate in the features we offer</p> <p>To send you relevant coupons, discounts, or promotions</p> <p>Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes</p>

<p>Audiovisual Information</p>	<p>Audio recordings of customer care calls, video, or similar information</p>	<p>To provide you with customer service</p> <p>To improve our products and Services</p> <p>For litigation and other legal and regulatory requirements</p>
<p>Communications with Us</p>	<p>The contents of your communications with us via phone, email, text message, chat, or other means (such as survey responses, product reviews, and comments on our blog and social media pages)</p>	<p>To communicate with you about our products and Services, your orders, and to provide customer service and support</p> <p>To improve our websites, apps, products, and marketing</p> <p>To allow you to participate in our promotions, sweepstakes, contests, and loyalty programs</p> <p>To detect and prevent fraud against you and/or us</p> <p>For litigation and other legal and regulatory requirements</p>
<p>Inferences About You from Any Other Category of Information We Collect</p>	<p>Information reflecting your preferences, characteristics, trends, or attitudes</p>	<p>To provide you with appropriate products and recommendations</p> <p>To improve our Services, and our products, marketing and advertising</p> <p>To provide you with a better website or app experience</p> <p>Auditing, research and analysis, to maintain and improve our Services,</p>

		<p>and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>
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We may also obtain personal information about you from other sources, including our vendors, subsidiaries, and affiliates. In some circumstances, we may obtain personal information about you from other parties, including business partners, resellers, and data brokers, some of which may sell the information to us. To understand your rights and choices regarding personal information collected by other companies, please consult the privacy policies of the businesses that you interact with.

## **II. Sources From Which We Collect Personal Information**

Generally, we may collect the categories of personal information described above from the following categories of sources:

- directly from you, when you:
  - visit our offices or contact us;
  - request information about our Services;
  - purchase and use our Services;
  - respond to surveys, request whitepapers/newsletters/access to blogs; and
  - attend Magnet Forensics' events and/or Magnet Forensics' booth at tradeshows.
- through the use of tracking technologies on our online Services
- other companies we do business with, which may include your employer
- service providers that help us to run our business
- advertising networks
- social networks
- internet service providers
- data analytics providers
- third-party data suppliers
- other third parties, including your personal contacts or customers
- derived from other information we collect or otherwise created by us

## **III. Why We Disclose Personal Information**

We may disclose your personal information for any purposes not inconsistent with this Policy, our written statements at the point of collection, or applicable law. In general, we may disclose personal information as follows:

- Within our group of companies including with our affiliates, subsidiaries, locations, etc.
- With our agents, vendors, consultants, and other business providers for them to provide their services to us. For example, we may disclose your personal information to provide and improve customer service, operate and improve our business and our Services, help run our promotions, process payments, perform auditing and quality control, communicate with you, and otherwise operate our business.
- With our advertising partners for the purposes of ad targeting, remarketing, and customized advertising content.
- As necessary, for the following purposes: (a) to comply with any legal process; (b) to respond to requests from public and government authorities; (c) to enforce our Terms; (d) to protect our operations and our rights, privacy, safety, or property, and/or that of you or others; and (e) to allow us to pursue available remedies or limit the damages that we may sustain.
- With our insurers and professional advisers for the purposes of managing risks, obtaining professional advice, exercising or defending against legal claims, etc.
- With other businesses in connection with or during negotiations of any reorganization, acquisition, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding).

#### **IV. Cookies and Tracking Technologies**

We may use cookies and other tracking technologies (such as web beacons and pixels) to collect and store information about your interactions with our website, including information about your browsing behavior. Our website also supports third-party tracking technologies through which our service providers and third parties, such as advertising partners, can collect and use information regarding your interactions with our websites as further detailed below.

Cookies are small files that a website transfers to your device through a web browser that enable the website's or a third party's systems to recognize your device and capture and remember certain information. Web beacons and pixels are tiny graphics embedded invisibly on a webpage or in an email that may be used to deliver or communicate with cookies, to count users who have visited certain pages and to understand usage patterns. In general, we may use cookies and other tracking technologies as follows:

- Where necessary to run our websites
- To optimize the functionality of our websites

- For analytics purposes
- For purposes of ad targeting and marketing
- To determine if our email messages have been opened and acted upon

Cookies vary in how long they last. “Session cookies” terminate shortly after you terminate your internet session. “Persistent cookies” are stored on your device until a set expiration date. We may use both session cookies and persistent cookies on our websites.

In certain instances, we may record and analyze activity on our sites through session replay technologies to help us understand and analyze how visitors use our sites and Services, and how to improve them. These technologies may collect the following types of information, among others: IP address; screen size; device type (unique device identifiers); browser information; geographic location; and preferred language.

If you do not want to have cookies placed on your device, you should set your browser to refuse cookies before accessing our websites. Please review your browser’s Help menu for instructions or visit <https://cookiepedia.co.uk/> for more information about cookies. Additional options for opting out of interest-based advertising can be found [here](#).

Please [see our Cookie Policy](#) for more information about the cookies we may use.

## **V. Analytics Services**

We may use Google Analytics (<https://marketingplatform.google.com/about/analytics/>), Mouseflow (<https://mouseflow.com>), or other providers for analytics services. We may also implement Google Analytics Advertising Features such as Google Dynamic Remarketing with analytics and interest-based ads. These tools may collect the following types of information, among others: IP address; screen size; device type (unique device identifiers); browser information; geographic location; mouse movements, including scrolling, hovering, and clicks; and preferred language. For more information on how Google Analytics uses data collected through our Services, visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners). To opt out of Google Analytics cookies, visit <https://tools.google.com/dlpage/gaoptout> or download the Google Analytics Opt-Out Browser Add-On. To opt out of Mouseflow, visit <https://mouseflow.com/opt-out/>.

## **VI. Do Not Track Signals**

Our website does not respond to “Do Not Track” signals sent by browsers, mobile devices, or other mechanisms.

## **VII. Targeted Advertising, Sales, and Sharing of Personal Information**



Although we do not sell personal information in exchange for money, some of the ways in which we share personal information for targeted advertising may be considered “sales” or “sharing” under US state privacy laws. Listed below are the categories of personal information we share for purposes of targeted/cross-context behavioral advertising or otherwise “sell” for non-monetary consideration:

- Identifiers
- Personal records
- Commercial information
- Internet or other electronic network activity information
- Geolocation data
- Inferences

The types of third parties to which personal information is sold or shared are third-party advertisers, partner businesses, and some analytics vendors. The purposes for which we sell/share this information include showing you relevant ads while you browse the internet or use social media, certain types of analytics, and similar purposes. We do not have actual knowledge that we sell or share the personal information of consumers under sixteen (16) years of age. If you would like to opt out, please see the information below for your state of residence.

### **VIII. Storage Location of the Personal Information We Collect**

Your personal data is processed, hosted, and/or stored by us in Ontario, Canada. For certain business practices, third-party providers may have access to your data. These third-party providers are typically vendors of cloud services or other IT hosting services located in Canada or USA. We also may provide your personal data to such third-party providers or our partners as part of the sales cycle. This can include both pre-sales activities such as lead generation and activities related to processing orders. When using third-party providers and partners, as required by applicable law, Magnet Forensics will enter into a data processing agreement to safeguard your privacy rights. When third-party providers and partners are located outside the EU, Magnet Forensics ensures legal grounds for such international transfers by relying on cross-border transfer agreements or using the EU Model Clauses.

### **IX. How Long We Store the Data We Collect**

Depending on the purposes for collection, your personal information may be retained for as long as one of the following apply:

- Retention is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the personal information;
- Retention is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the personal information was collected;
- Retention is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your personal information by applicable laws or regulations.

Where personal information is used for more than one purpose, it will be retained at least as long as the latest period provides. Under some circumstances, we may maintain personal information indefinitely according to legal or regulatory requirements, including applicable legal holds, or for data backup or recovery purposes.

## **X. California Privacy Rights**

Under the California Consumer Privacy Act (“**CCPA**”) and its regulations, California residents have the following rights. Please note that the disclosures within this Privacy Policy are not intended to apply to employees or job applicants. If you are a California employee, please see our employee privacy notice for more information. If you are a California job applicant, you can [find applicable disclosures here](#).

**Right to Know.** You have the right to know what personal information we have collected about you, which includes:

- The categories of personal information we have collected about you, including:
  - The categories of sources from which we collected your personal information
  - The business or commercial purposes for our collecting, selling, or sharing personal information
  - The categories of recipients to which we disclose personal information
  - The categories of personal information that we sold, and for each category identified, the categories of third parties to which we sold that particular category of personal information

- The categories of personal information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of personal information
- The specific pieces of personal information we have collected about you.

**Right to Correct.** If you believe personal information we maintain about you is inaccurate, you have the right to request we correct that personal information.

**Right to Delete.** You have the right to request that we delete personal information we collected from you, subject to certain exceptions. Where we use deidentification to satisfy a deletion request, we commit to maintaining and using the information in deidentified form and will not attempt to reidentify the information.

**Right to Opt-Out of Sales and Sharing of Personal Information.** We do not sell your data, but you may request that we do not share your personal information for cross-context behavioral advertising. To opt-out, please email [dpo@magnetforensics.com](mailto:dpo@magnetforensics.com).

**Right to Non-Discrimination for the Exercise of Your Privacy Rights.** If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us.

**Submitting CCPA Rights Requests.** The rights described above are subject to certain exemptions and exceptions as well as certain steps that must be taken to verify your identity. To submit a privacy rights request, please call us toll-free at 1-844-638-7884 or email us at [dpo@magnetforensics.com](mailto:dpo@magnetforensics.com). Please note that if you submit a request to know, request to delete, or request to correct, you will be asked to provide two-to-three (2-3) pieces of personal information that we will match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed. An authorized agent may submit a request on your behalf using the webform or toll-free number listed above.

## **California Shine the Light**

We do not share personal information with third parties or affiliates for those parties own direct marketing. If you have questions about how we comply with California's Shine the Light law, please contact us at [dpo@magnetforensics.com](mailto:dpo@magnetforensics.com).

## **XI. International Data Transfers**

If you are using our Services from outside the United States, please be aware that information we obtain about you will be processed in the United States or in other jurisdictions and may be accessed by the courts, law enforcement, and national security authorities in those jurisdictions. By using our Service, you acknowledge and consent to the international transfer and processing of your personal information as described in this

Privacy Policy. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States or other countries may be different from the laws in your country of residence.

## **XII. Privacy Rights for Residents of Canada**

If you would like to submit a request to access, correct, erase, or obtain a copy of personal information we maintain about you, or if you would like to receive written information about our policies and practices regarding service providers outside of Canada, please email us at [dpo@magnetforensics.com](mailto:dpo@magnetforensics.com). We may require specific information from you to help us verify your identity prior to processing your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to any legal restrictions on disclosing this information.

## **XIII. Supplemental Disclosures for Persons in the EU, EEA, and UK**

As a supplement to the information provided throughout this Policy, we provide the following information for persons in the European Union (“**EU**”), the European Economic Area (“**EEA**”), and the United Kingdom (“**UK**”).

Magnet Forensics, Inc. is the data controller for personal information collected through our Services.

Personal data of German data subjects collected for purposes of: (i) administering an employment relationship; (ii) facilitating the sale, license, and/or support of our products; or (iii) marketing and/or demand generation of our products and services, is subject to the joint controllership of Magnet Forensics Inc. and Magnet Forensics GmbH, as set out in an Agreement pursuant to Article 26(1) of the GDPR.

**Our Legal Bases for Personal Information.** Your personal information is processed under the following legal bases:

- The processing is **necessary for us to provide you with our Services**. When you make a purchase, transact business with us, or contact us with an inquiry, we require certain pieces of personal information to be able to provide our Services to you or perform our contractual obligations to you.
- We have a **legal obligation** to process your personal information, such as compliance with applicable laws, regulations, or court orders.
- We process personal information to achieve our **legitimate interests** of providing, improving and personalizing the experiences of users of our Services. We also process personal information to help ensure the security and integrity of our Services. When we rely on our legitimate interests, we take into account the effects

that these actions might have on you. If you have questions about our decisions regarding our legitimate interests, you may contact us.

- You have **consented to** our processing of your personal information. For example, we may rely on consent to use non-essential cookies to provide you with marketing communications or if we need to collect sensitive personal information from you. When you consent, you may change your mind and withdraw your consent at any time by emailing us at [dpo@magnetforensics.com](mailto:dpo@magnetforensics.com).

**Your Privacy Rights.** You have the right to access, correct, erase, and obtain a copy of personal information we maintain about you. You also have the right to object to or restrict our processing of your personal information. You may submit these requests by emailing us at [dpo@magnetforensics.com](mailto:dpo@magnetforensics.com). We may require specific information from you to help us verify your identity prior to processing your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to any legal restrictions on disclosing this information.

**Submitting a Complaint.** If you are not satisfied with how we manage your personal information, you may contact us or submit a complaint to your local data protection authority. If you reside in the EU or EEA, you can find information about your data protection authority [here](#). If you reside in the UK, you may file complaints with the Information Commissioner's Office [here](#).

#### **XIV. Links to Other Sites**

The Services may include links to websites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other websites. We encourage you to be aware when you leave our Service and to read the privacy statements of each and every website you visit. This Policy applies only to information collected by our Services.

#### **XV. Security**

The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. While we attempt to protect the information in our possession, no security system is perfect, and we cannot promise that information about you will remain secure in all circumstances.

#### **XVI. Services Not for Children**

Our Services are not intended for children, and we do not knowingly collect personal information from anyone under the age of majority in their jurisdiction. If we become aware that we have collected personal information from a child, we will delete it in accordance with applicable law.

## **XVII. Changes to this Privacy Policy**

We may update this Privacy Policy to reflect changes to our information practices. If we make any changes, we will update the effective date. Changes are effective when they are posted. We encourage you to periodically review this page for the latest information on our privacy practices.

## **XVIII. Contact Information**

If you have any questions, you may contact us by email at [dpo@magnetforensics.com](mailto:dpo@magnetforensics.com).