

# Free Exposure Risk Summary PRIVACY POLICY

At the Constella Intelligence Group, we take your privacy seriously and are committed to the fundamental right to the protection of your personal data.

This Privacy Policy explains how we collect, share, use, and protect your Personal Data when you request the **FREE EXPOSURE RISK SUMMARY** (the “**EXPOSURE SUMMARY**”) and is intended to inform you of your rights.

## 1. Identification of the Joint-Controllers

Two companies belonging to the Constella Intelligence Group, **4IQ INC** and **ALTO SOCIAL ANALYTICS, S.L.**, are the Joint-Controllers of the processing of your personal data to provide you with the Exposure Summary. Both companies will jointly referred to as “**Constella**”.

We inform you that Constella has a Data Protection Officer, who is at your disposal for any doubts or queries you may have in relation to this matter, and whom you may contact in the email [privacy@constellaintelligence.com](mailto:privacy@constellaintelligence.com).

## 2. What information will we collect from you?

There are different ways to collect personal data:

### a) The data you provide directly to us.

We collect information about you when you decide to request the Exposure Summary via the contact form we make available to you. To provide you with the Exposure Report, you will have to provide us with the following information: (i) your name; (ii) your surname; (iii) your corporate email address and (iv) your company.

If you wish to expand the accuracy and scope of the Exposure Summary, you may request a Comprehensive Exposure Risk Report (“Comprehensive Report”). For that purpose, you may also voluntarily provide us with the following information: (i) your address and (ii) your personal email address(es). When discussing the Comprehensive Report with you, we reserve the right to request that you show us further proof identity.

All the fields marked with an asterisk (\*) in the forms provided will be mandatory: the omission of any of them could lead to the impossibility of us being able to provide the services requested.

You must provide truthful information, and you are forbidden to impersonate anyone or to use an alias. When you click the “I accept” (or equivalent) button incorporated in the forms, you declare that the information and data you have provided are accurate and truthful.

### b) Data obtained indirectly.

Constella may collect additional data about you through the use of the software for which you are requesting the demonstration. In any case, such data will be related to security exposures or breaches, social media, and publicly available information, to which your information may have been exposed. This will allow us to inform you of the data that may have been compromised, so that you can act accordingly.

### **3. What is the source of your data?**

All data processed have been freely provided by you or collected through the software on which you are requesting the demonstration.

### **4. How will we use your personal information and what services will we provide you?**

Constella acts as the joint-controller of the personal data for the following purposes:

- **Based on the management of the contractual or precontractual relationship:**
  - a) To manage the acquisition of the products that we offer on our Exposure Summary and to attend to any type of derived incident or request, as well as carry out any management related to the shipment or after-sales service.
  - b) To provide you with the services you have requested and to attend to your requests for information, as well as to facilitate the exercise of your rights.
- **Based on the existence of a legitimate interest of Constella:**
  - a) To send you promotions and discounts for future bookings/purchases.
  - b) To keep you informed about the products and services of Constella, as well as to send you news, events and other activities that we carry out in Constella, by conventional and/or electronic means (e-mails, SMS, ...), related to the products or services that we carry out and that may be of your interest.
  - c) To carry out periodic reviews of our services and carry out satisfaction surveys in order to evaluate and improve the quality of the service we provide.
- **On the basis of the explicit, free and unequivocal consent that you give us at the time of collecting your data:**
  - a) To provide you with a more detailed report upon your express request and your voluntary submission of additional data.
- **For any other business purpose stated when collecting your Personal Data, or as otherwise set forth in applicable data privacy laws such as the**

## **European General Data Protection Regulation (“GDPR”) or the California Consumer Privacy Act (“CCPA”).**

### **5. Data transfers and international transfers.**

All transfers of personal data that we carry out are necessary for the fulfilment of the above-mentioned purposes, or are made to fulfil a legal obligation:

- a) To public administrations and the administration of justice, and to law enforcement agencies in compliance with the legal obligations applicable to us.
- b) Companies providing IT services, tools or IT infrastructure on which the services provided by Constella are based, such as hosting providers, CRMs, emailing service companies, etc.
- c) To other companies of the Constella Group, to the extent necessary for any of the purposes set out above.

In this regard, we inform you that any transfer will be made considering all the necessary legal safeguards. We also guarantee that we sign specific contracts with all our service providers as established by the regulations.

Furthermore, Constella guarantees that the necessary safeguards are in place to ensure that the data can be transferred securely, either because the provider offers adequate guarantees, though, among others, the signing of Standard Contractual Clauses of the European Commission, or any of the exceptions contained in the regulations.

### **6. Exercising your rights.**

- **California Resident Rights**

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at [privacy@constellaintelligence.com](mailto:privacy@constellaintelligence.com).

Please follow the instructions and requirements described below and on our websites when submitting your requests. Requests that fail to comply with any of these instructions and requirements may result in delayed or no response.

To exercise the rights described below as a California resident, you must send us a request (1) that provides sufficient information (including, without limitation, email verification) to allow us to verify that (i) you are the person about whom we have collected Personal Data, (ii) you, as the requester, are the same person as the data subject for whose information you’re requesting (or such person’s parent/guardian), (2)

that describes your request in sufficient detail to allow us to understand, evaluate and respond to it, (3) that declares, under the penalty of perjury, that you're exercising your rights under the CCPA as a California resident solely for lawful purposes, and (4) in a way that does not and would not unduly burden or otherwise abuse our data request system and/or our Services. Each request that meets all of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will use commercially reasonable efforts to determine whether a request may be for harmful, fraudulent, deceptive, threatening, harassing, defamatory, obscene, or otherwise objectionable purposes, and we reserve the right not to respond to such request. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request emailing us at: [privacy@constellaintelligence.com](mailto:privacy@constellaintelligence.com).

You may also authorize an agent (an "Authorized Agent") to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

#### Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response to a Valid Request, we will provide you with the following information:

- The categories of Personal Data that you requested and we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that you explicitly requested and we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

#### Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a

transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

#### Personal Data Sales Opt-Out and Opt-In

We will not sell your Personal Data, and have not done so over the last 12 months. To our knowledge, we do not sell the Personal Data of minors under 16 years of age.

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

- **Other State Law Privacy Rights**

#### California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at [privacy@constellaintelligence.com](mailto:privacy@constellaintelligence.com).

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time. To find out more about "Do Not Track," you can visit [www.allaboutdnt.com](http://www.allaboutdnt.com).

#### Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. We do not engage in such "sale" of your Personal Data covered by this Online Privacy Policy. If you have any questions regarding your sale opt-out right as a Nevada resident, please contact us at [privacy@constellaintelligence.com](mailto:privacy@constellaintelligence.com) with the subject line "Nevada Do Not Sell Request" and provide us with your name and the email address associated with your account.

- **European Union Data Subject Rights**

We inform you that you will be able to exercise the following rights:

1. **Rights of access** to your personal data to know which ones are being processed and the processing operations carried out with them.
2. **Right to rectify** any inaccurate personal data.
3. **Right to delete** your personal data, where possible.
4. **Right to request limitation of the processing** of your personal data when the accuracy, legality or necessity of the data processing is in doubt, in which case, we may retain the data for exercise or defence of claims.

5. **Right to object to the processing** of your personal data when the legal basis that enables us to process them is the legitimate interest.
6. **The right to the portability of your data**, when the legal basis that enables us to process them is the existence of a contractual relationship or your consent.
7. **Right to revoke the consent** granted to Constella.

**You can exercise your rights at any time and for free in the following ways:**

1. By sending an e-mail to [privacy@constellaintelligence.com](mailto:privacy@constellaintelligence.com) indicating the right you wish to exercise and your identification data.
2. By sending a written request to any of the postal addresses listed at the beginning of this privacy policy, indicating the right you wish to exercise and your personal data.
3. In addition, when you receive any communication from us, by clicking on the unsubscribe section that will contain that communication, you can unsubscribe from all previously accepted commercial communications.

4IQ INC, (“**4IQ**”) is located at C/Acanto 22, 13th floor, 28045, Madrid (Spain). ALTO SOCIAL ANALYTICS, S.L, (“**ALTO**”) is a located at Avenida De Europa, 24, 28108, Alcobendas, Madrid Spain.

We also inform you that you have the right to file a complaint at the Spanish Data Protection Agency, Spanish Data Protection Authority, if you believe that we have breached the applicable data protection legislation regarding the processing of your personal data.

In addition, we inform you that you can sign up for the Robinson List at [www.listarobinson.es](http://www.listarobinson.es): the advertising exclusion system managed by the Spanish Association for the Digital economy (ADIGITAL), where you can register in order to show your opposition to your data being used for the purpose of sending you commercial communications.

## **7. Retention periods and Cookies.**

We will only keep your data for as long as necessary to provide you with these services. Any of the data you provide us through the channels will be blocked as long as they are no longer necessary to manage the service and will only be available if there is a legal obligation (derived from a request from the appropriate authorities) and when you exercise your rights.

## **8. Security and confidentiality.**

We are dedicated to the security of your information. To prevent unauthorized access or unauthorized disclosure of personal data, we have undertaken appropriate technical

and physical measures and management processes to safeguard and secure the information we collect from you.

## **9. Minors**

Minors under 18 years of age may not use the services available through the Exposure Summary.

## **10. Update of the privacy policy**

We do our best to keep our privacy policy fully updated. If we make changes, they will be clearly identifiable in a conspicuous manner.

This privacy policy has been reviewed and published as of September 9<sup>th</sup>, 2021.