

# StrongDM Privacy Policy

Last revised and effective as of: November 19, 2024

This privacy policy ("Privacy Policy") relates to information collected online and offline by StrongDM, Inc. ("StrongDM," "we," "us," and/or "our"), including through your use of the StrongDM website at [www.strongdm.com](http://www.strongdm.com), and any subdomains, services and information available thereon (together with associated and successor websites, services, and information available thereon or any part thereof, the "Site"). You may also provide information to us when you meet us in person, such as at business conferences or when you are involved in networking activities and we may collect information about you in connection with developing our business (collectively, "Networking Activities"), and this Privacy Policy relates to such information as well.

You should carefully read this Privacy Policy. By using the Site, you are signifying your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, you may not use the Site. Where applicable, we indicate whether and why you must provide us with your personal information, as well as the consequences of failing to do so. If you do not provide personal information when requested, you may not be able to benefit from our SaaS or Networking Activities if that information is necessary to provide you with them or if we are legally required to collect it.

To the extent that the Site is available to, or we collect information in connection with Networking Activities from individuals located in the European Economic Area or the United Kingdom, this Privacy Policy sets out our practices and obligations under the General Data Protection Regulation 2016/679 and the UK Data Protection Act 2018 (together, the "GDPR"). If an organization with which you are associated (an "Organization") becomes a client of StrongDM's business, we may receive personal information about you in connection with our provision of our business services to your Organization. To the extent we process (as defined below) that personal information solely in order to provide the business services, including our SaaS services, to your Organization, under the GDPR, to the extent applicable, we will act as a processor (as defined in the GDPR) on behalf of your Organization in respect of that personal information; this Privacy Policy will not apply to the processing of that personal information and your Organization will act as a controller (as defined in the GDPR), in respect of that personal information and is responsible for obtaining all necessary consents and providing you with all requisite information as required by applicable law. To the extent we process your personal information for any other lawful business purpose of ours, under the GDPR, to the extent applicable, we will act as a controller of such personal information and this Privacy Policy will apply to the processing of such personal information.

As used in this Privacy Policy, the terms "using" and "processing" information include using cookies on a computer, subjecting the information to statistical or other analysis and using or

handling information in any way, including but not limited to collecting, storing, evaluating, modifying, deleting, using, combining or disclosing.

This Privacy Policy serves to notify you of the following:

What information about me is collected?

Where and when is information collected?

What does StrongDM do with the information it collects?

When does StrongDM disclose the information to third parties?

Could my information be transferred to other countries?

For how long is my personal information kept?

What choices do I have regarding my personal information?

How will I know if there are changes to this Privacy Policy?

Whom do I contact if I have any privacy questions?

Privacy Notice for California Residents

## **WHAT INFORMATION ABOUT ME IS COLLECTED?**

### **Personal information**

Personal information is information that identifies you or can be used to identify or contact you. Such information may include your first name, last name, title, company name, workplace address, email address, telephone number(s), and internet protocol address. Personal information amounts to 'personal data' for the purposes of and as defined in the GDPR. All references to personal information shall be deemed to include 'personal data' as defined and used in the GDPR (to the extent applicable).

## **WHERE AND WHEN IS INFORMATION COLLECTED?**

We will collect personal information that you submit to us. We may also receive information about you from third parties providing us with analytics, lead generation, or other services. We may also collect personal information about you that is publicly available from sources such as LinkedIn.

### **While you use the Site**

We may obtain your personal information from you if you identify yourself to us through email or comments or if you engage in a "chat" on the Site. When you communicate with us online (i.e., through a "chat"), third party vendors receive and store these communications on our behalf.

### **Cookies**

We may collect information passively using "cookies". "Cookies" are small text files that can be placed on your computer or mobile device in order to identify your web browser and the activities of your computer on the site and other websites. Cookies can be used to personalize your experience or to assist you, and to allow us to monitor how you are using the Site to improve your experience. In addition to cookies that we may place on your computer or mobile device, cookies might also be placed on your computer or mobile device by third parties that

we use to display or serve advertisements for our products and services or to collect non-personal information in order to provide advertising-related services to us. In the course of serving advertisements, such third parties could place or recognize unique cookies on your browser.

You do not have to accept cookies to use the Site. Although most browsers are initially set to accept cookies, you may reset your browser to notify you when you receive a cookie or to reject cookies generally. Most browsers offer instructions on how to do so in the “Help” section of the toolbar. However, if you reject cookies, certain features or resources of the Site may not work properly or at all and you may experience some loss of convenience. For the avoidance of doubt, the Site may use third-party service platforms (including to help analyze how users use the Site). These third-party service platforms may place cookies on your computer or mobile device. If you would like to disable “third party” cookies, you may be able to turn them off by going to the third party’s website.

#### Log Files

We also collect information through our Internet log files, which record data such as user IP addresses, other addressing information, the date and time of your request, browser types, screen resolution, domain names, and other anonymous statistical data involving the use of the Site. This information may be used to analyze trends, to administer the Site, to monitor the use of the Site, and to gather general demographic information. We may link this information to personal information for these and other purposes such as personalizing your experience on the Site and evaluating the Site in general.

#### **WHAT DOES STRONGDM DO WITH THE INFORMATION IT COLLECTS?**

We will only use your personal information to the extent that the law allows us to do so.

Pursuant to the GDPR, legal bases for our processing your personal information may include (without limitation):

- (a) where you have given consent to the processing, which consent may be withdrawn at any time without affecting the lawfulness of processing based on consent prior to withdrawal;
- (b) where it is necessary to perform the contract we have entered into or are about to enter into with you (whether in relation to the provision of the Site or otherwise);
- (c) where we have a legal obligation to do so. For example, we may process your personal information to comply with tax, labor and accounting obligations; and/or
- (c) where it is necessary for the purposes of our legitimate interests (or those of a third party) in providing the Site, engaging in Networking Activities, for product development and internal analytics purposes, and your interests or fundamental rights and freedoms do not override those legitimate interests.

We use the information collected to provide the Site to you, to engage in Networking Activities, to help us understand who uses the Site, for internal operations such as operating

and improving the Site, and, unless you “opt out”, so that we can contact you about products and services that may be of interest to you.

We may use the information collected to provide, maintain, improve, and enhance the Site. We may also use the information collected to generate anonymized or aggregate data for any lawful purpose.

We may use the information collected to process your job application.

We may send you electronic newsletters and contact you about the Site, Networking Activities, products, services, information and news that may be of interest to you. If you no longer desire to receive these communications, we will provide you with the option to change your preferences in each communication we send to you. You may also inform us by email to [dpo@strongdm.com](mailto:dpo@strongdm.com).

If you identify yourself to us by sending us an e-mail with questions or comments, we may use your information (including personal information) to respond to your questions or comments, and we may file your questions or comments (with your information) for future reference. We may also use the information gathered to perform statistical analysis of user behavior or to evaluate and improve the Site. We may link some of this information to personal information for internal purposes or to improve your experience with the Site.

We may also use the information we collect for other purposes for which we provide specific notice at the time the information is collected.

### **WHEN IS YOUR INFORMATION DISCLOSED TO THIRD PARTIES?**

Generally, information gathered from you through the Site or in connection with Networking Activities is disclosed to these types of third parties and as otherwise detailed in this Policy, or with authorization from you.

#### **Legal Disclosure**

We may disclose your information (including personal information) if we believe in good faith that we are required to do so in order to comply with an applicable statute, regulation, rule or law, a subpoena, a search warrant, a court or regulatory order, lawful requests by public authorities, including to meet national security or law enforcement requirements, or other valid legal process. We may disclose personal information in special circumstances when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating a contract with us, to meet contractual obligations, to protect our rights or our property, to detect fraud, or to protect the safety and/or security of our users, the Site or the general public.

#### **Third Parties We Use**

We may provide to third parties non-personal information, including where such information is combined with similar information of other users of the Site. For example, we might inform third parties regarding the number of unique users who use the Site, the demographic

breakdown of our users of the Site. In addition to the above, when users use our Site, third parties (including without limitation analytics and other service providers) may directly collect personal information and non-personal information about our users' online activities over time and across different websites. The third parties to which we may provide or who may independently directly collect personally identifiable and non-personal information may include providers of services (including vendors and website tracking services), analytics service providers, merchants, affiliates and other actual or potential commercial partners, and other similar parties. Please note in particular that the Site may use Google Analytics, including its data reporting features. Information collected by Google Analytics includes but is not limited to web metrics. For information on how Google Analytics collects and processes data, please see the site "How Google uses data when you use our partners' sites or apps", currently located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). For information on opting out of Google Analytics, we encourage you to visit Google's website, including its list of currently available opt-out options.

#### Contractors

We may employ independent contractors, vendors and suppliers (collectively, "Outside Contractors") to provide specific services and products related to the Site, such as hosting and maintaining the Site, and developing applications for the Site, and related to our Networking Activities. In the course of providing products or services to us, these Outside Contractors may have access to your information collected through the Site, including your personal information. We use reasonable efforts to ensure that these Outside Contractors are capable of (1) protecting the privacy of your personal information consistent with this Privacy Policy, and (2) not using or disclosing your personal information for any purpose other than providing us with the products or services for which we contracted or as required by law.

#### Sale of Business

We reserve the right to transfer information to a third party (i) in connection with a sale, merger or other transfer of all or substantially all of the assets of StrongDM, or that portion of StrongDM to which the Site relates, (ii) in connection with a strategic investment by a third party in StrongDM, or (iii) in the event that we discontinue our business or file a petition or have filed against us a petition in bankruptcy, reorganization or similar proceeding, provided that the third party agrees to adhere to the terms of this Privacy Policy.

#### Consent

We may also disclose your information with your permission.

#### **COULD MY INFORMATION BE TRANSFERRED TO OTHER COUNTRIES?**

Your personal information collected on the Site may be transferred from time to time to our personnel, or to third parties, located throughout the world, and the Site may be viewed and hosted anywhere in the world, including countries that may not have laws of general applicability regulating the use and transfer of such information. By using the Site and

submitting such information on it, or engaging in Networking Activities with us, you voluntarily consent to the trans-border transfer and hosting of such information. Without limitation of the foregoing, you hereby expressly grant consent to StrongDM to: (a) process and disclose such information in accordance with this Privacy Policy; (b) transfer such information throughout the world, including to the United States or other countries that do not ensure adequate protection for personal information (as determined by the European Commission and the UK Government); and (c) disclose such information to comply with lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also transfer personal information from the European Economic Area to the USA and other third countries based on European Commission-approved or UK Government-approved Standard Contractual Clauses, or otherwise in accordance with applicable data protection laws. If you are from a jurisdiction with laws or regulations governing personal data collection, use, and disclosure that differ from those of the United States, please be advised that all aspects of the information collected and processed under this Privacy Policy are governed by the internal laws of the United States and the State of Delaware, USA, regardless of your location. For more information about the tools that we use to transfer personal information, please contact us at [dpo@strongdm.com](mailto:dpo@strongdm.com)

#### **HOW LONG WILL STRONGDM KEEP MY INFORMATION?**

We will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of that information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### **WHAT CHOICES DO I HAVE REGARDING MY PERSONAL INFORMATION?**

We generally use personal information as described in this Privacy Policy or as authorized by you or as otherwise disclosed at the time we request such information from you. You generally must “opt in” and give us permission to use your personal information for any other purpose. You may also change your preference and “opt out” of receiving certain marketing communications from us by following the directions provided in association with the communication or such other directions we may provide or by contacting [dpo@strongdm.com](mailto:dpo@strongdm.com). Under certain circumstances and in compliance with the GDPR, you may have the right to: Request access to your personal information (commonly known as ‘subject access request’). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it; Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;

Request erasure of your personal information. This enables you to ask us to delete or remove your personal information where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove all of your personal information in certain circumstances;

Object to processing of your personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground;

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information, for example, if you want us to establish its accuracy or the reason for processing it;

Request the transfer of your personal information to another party; and

Lodge a complaint with the relevant supervisory authority (as defined in the GDPR). If you have any complaints about the way we process your personal information, please do contact us. Alternatively, you may lodge a complaint with the supervisory authority which is established in your country.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please visit

<https://www.strongdm.com/privacy/requests>. You may also contact [dpo@strongdm.com](mailto:dpo@strongdm.com).

Such updates, corrections, changes and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion. To protect your privacy and security, we may take reasonable steps (such as requesting a unique password) to verify your identity before granting you profile access or making corrections. You are responsible for maintaining the secrecy of your unique password and account information at all times. You should be aware that it may not be technologically possible to remove each and every record of the information you have provided to us from our system. The need to back up our systems to protect information from inadvertent loss means that a copy of your personal information may exist in a non-erasable form that will be difficult or impossible for us to locate. After receiving your request, we will use commercially reasonable efforts to update, correct, change, or delete, as appropriate, all personal information stored in databases we actively use and other readily searchable media as appropriate, as soon as and to the extent reasonably practicable.

#### **HOW WILL I KNOW IF THERE ARE ANY CHANGES TO THIS PRIVACY POLICY?**

We may revise this Privacy Policy from time to time. We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or disclose personal information previously

collected from you through the Site, we will notify you through the Site by email, or other communication.

### WHOM DO I CONTACT IF I HAVE ANY PRIVACY QUESTIONS?

If you have any questions, comments, or concerns about our processing activities, please email us at [dpo@strongdm.com](mailto:dpo@strongdm.com) or get in touch with us using the contact details below:

StrongDM, Inc.  
ATTN: Data Protection Officer  
500 Westover Dr #18269  
Sanford, NC 27330-8941

### PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Last revised and effective as of: 2024-11-15

Privacy Notice for California Residents: This Privacy Notice for California Residents shall apply to California residents from whom we collect Personal Information as a business under the CCPA.

#### Personal Information Collection, Disclosure, and Sale

For the purposes of this Privacy Notice for California Residents, "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, or as otherwise defined by the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (California Civil Code §§ 1798.100 to 1798.199) and its implementing regulations, as amended or superseded from time to time ("CCPA").

Personal Information does not include information that is:

- Lawfully made available from government records.
- Deidentified or aggregated.
- Otherwise excluded from the scope of the CCPA.

The chart below provides the categories of Personal Information and Sensitive Personal Information (as defined by the CCPA) we have collected, disclosed for a business purpose, or sold or "shared" (for cross-context behavioral advertising purposes) in the preceding twelve months since this notice was last updated. The examples of Personal Information and Sensitive Personal Information provided for each category reflect each category's statutory definition and may not reflect all of the specific types of Personal Information and Sensitive Personal Information associated with each category.

Category	We Collected	We Disclosed	We Sold / Shared
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<p>A. Identifiers</p> <p>Examples: Name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, and other similar identifiers.</p>	Yes	Yes	No
<p>B. Categories of Personal Information in Cal. Civ. Code Section 1798.80(e)</p> <p>Examples: Name, signature, address, and telephone number.</p>	Yes	Yes	No
<p>C. Characteristics of Protected Classifications under California or Federal Law</p> <p>Examples: Race or color, ancestry or national origin, religion or creed, age (over 40), mental or physical disability, sex (including gender and pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity or expression, medical condition, genetic information, marital status, military and veteran status.</p>	No	N/A	N/A

D. Commercial Information Examples: Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes	Yes	No
E. Biometric Information Examples: Physiological, biological, or behavioral characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.	No	N/A	N/A

<p>F. Internet or Other Electronic Network Activity Information</p> <p>Examples: Browsing history, search history, and information regarding a consumer's interaction with an internet website, application or advertisement.</p>	Yes	Yes	No
<p>G. Geolocation Data</p> <p>Example: Precise physical location.</p>	No	N/A	N/A
<p>H. Sensory Information</p> <p>Examples: Audio, electronic, visual, thermal, olfactory, or similar information.</p>	No	N/A	N/A
<p>I. Professional or Employment-Related Information</p> <p>Examples: Job application or resume information, past and current job history, and job performance information.</p>	Yes	Yes	No

<p>J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99)</p> <p>Examples: Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution.</p>	No	N/A	N/A
<p>K. Inferences Drawn from Personal Information</p> <p>Examples: Consumer profiles reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	No	N/A	N/A
<p>L. Sensitive Personal Information (Identifiers)</p> <p>Examples: A consumer's social security, driver's license, state identification card, or passport number.</p>	No	N/A	N/A

<p>M. Sensitive Personal Information (Log-In)</p> <p>Examples: Account log-in.</p>	Yes	Yes	No
<p>N. Sensitive Personal Information (Precise Geolocation)</p> <p>Geolocation data used to locate a consumer within a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet.</p>	No	N/A	N/A
<p>O. Sensitive Personal Information (Group Membership)</p> <p>Examples: Racial or ethnic origin, religious or philosophical beliefs, or union membership.</p>	No	N/A	N/A
<p>P. Sensitive Personal Information (Contents of Communications)</p> <p>Examples: The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.</p>	No	N/A	N/A

Q. Sensitive Personal Information (Genetic Data)	No	N/A	N/A
R. Sensitive Personal Information (Identifying Biometric Information)	No	N/A	N/A
S. Sensitive Personal Information (Personal Information Collected and Analyzed Concerning a Consumer's Health)	No	N/A	N/A
T. Sensitive Personal Information (Personal Information Collected and Analyzed Concerning a Consumer's Sex Life or Sexual Orientation)	No	N/A	N/A

#### Use of Personal Information

We collect your Personal Information for the following specific business and commercial purposes:

- Providing the Site. Providing, maintaining, improving, and enhancing our Site.
- Communicating. Communicating with you, providing you with updates and other information relating to our services and products, providing information that you request, responding to comments and questions, and otherwise providing customer support.
- Marketing. Marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable, or otherwise of interest to you.
- Personalization. Personalizing your experience on our services, such as presenting tailored content and recommendations.
- Anonymization and Aggregation. Generating anonymized or aggregated data for any lawful purposes.
- Job Applications. Processing your job application.
- Safety Issues. Responding to trust and safety issues that may arise.

- Compliance. For compliance purposes, including enforcing our Terms of Use or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
- Auditing Interactions. Auditing related to your interaction with our services and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with other standards.
- Fraud and Incident Prevention. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging. Debugging to identify and repair errors that impair existing intended functionality.
- Transient Use. Short-term, transient use.
- Contracting Vendors. Contracting with vendors and service providers to perform services on our behalf or on their behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services on behalf of the business or service provider.
- Research. Undertaking internal research for technological development and demonstration.
- Improving Our Services. Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.
- Enabling Transactions. Otherwise enabling or effecting, directly or indirectly, a commercial transaction.
- Notified Purpose. For other purposes for which we provide specific notice at the time the information is collected.

#### Collection of Personal Information

We collect Personal Information from the following categories of sources:

- You/Your Devices: You or your devices directly.
- Affiliates.
- Analytics Providers.
- Partners: Business partners.
- Public: Publicly accessible sources.

#### Disclosure of Personal Information

In the preceding twelve months since this notice was last updated, we disclosed Personal Information to the following categories of third parties for the purposes of providing the site, communicating, marketing, personalization, sending messages, deidentification and aggregation, job applications, safety issues, compliance, auditing interactions, fraud and

incident prevention, debugging, transient use, contracting vendors, research, improving our services, enabling transactions, and for any notified purpose:

- Analytics Providers.
  - Personal Information we disclosed: Identifiers, Categories of Personal Information in Cal. Civ. Code Section 1798.80(e), Commercial Information, Internet or Other Electronic Network Activity Information, Professional or Employment-Related Information, and Sensitive Personal Information (Log-In)
- Vendors: Vendors and service providers.
  - Personal Information we disclosed: Identifiers, Categories of Personal Information in Cal. Civ. Code Section 1798.80(e), Commercial Information, Internet or Other Electronic Network Activity Information, Professional or Employment-Related Information, and Sensitive Personal Information (Log-In)
- Third Parties as Legally Required: Third parties as required by law and similar disclosures.
  - Personal Information we disclosed: Identifiers, Categories of Personal Information in Cal. Civ. Code Section 1798.80(e), Commercial Information, Internet or Other Electronic Network Activity Information, Professional or Employment-Related Information, and Sensitive Personal Information (Log-In)
- Third Parties in Merger/Acquisition: Third parties in connection with a merger, sale, or asset transfer.
  - Personal Information we disclosed: Identifiers, Categories of Personal Information in Cal. Civ. Code Section 1798.80(e), Commercial Information, Internet or Other Electronic Network Activity Information, Professional or Employment-Related Information, and Sensitive Personal Information (Log-In)
- Third Parties with Consent: Other third parties for whom we have obtained your permission to disclose your Personal Information.
  - Personal Information we disclosed: Identifiers, Categories of Personal Information in Cal. Civ. Code Section 1798.80(e), Commercial Information, Internet or Other Electronic Network Activity Information, Professional or Employment-Related Information, and Sensitive Personal Information (Log-In)

### California Residents' Rights and Choices

The CCPA provides California residents with specific rights regarding their consumer information. This section of the Privacy Notice for California Residents describes your CCPA rights (to the extent applicable to you) and explains how to exercise those rights.

**Right to Know and Access.** You may submit a verifiable request for information regarding the: (1) categories of Personal Information collected, sold, or disclosed by us; (2) purposes for which categories of Personal Information are collected or sold by us; (3) categories of sources from which we collect Personal Information; (4) categories of third parties to whom we disclosed or sold Personal Information; and (5) specific pieces of Personal Information we have collected about you during the past twelve months.

**Right to Delete.** Subject to certain exceptions, you may submit a verifiable request that we delete Personal Information about you that we have collected from you.



**Right to Correct.** You may submit a verifiable request that we correct inaccurate Personal Information that we maintain about you.

**Verification.** Requests for access to, deletion, or correction of Personal Information are subject to our ability to reasonably verify your identity in light of the information requested and pursuant to relevant CCPA requirements, limitations, and regulations. To verify your access, deletion, or correction request, please follow the instructions provided in our response to your request.

**Right to Opt Out.** In some circumstances, you may opt out of the sale or sharing (for cross-context behavioral advertising purposes) of your Personal Information. We do not sell or share (for cross-context behavioral advertising purposes) your Personal Information.

**Right to Limit Use and Disclosure of Sensitive Personal Information.** In some circumstances, you may limit our use and disclosure of your Sensitive Personal Information. We do not use or disclose your Sensitive Personal Information for purposes other than the limited purposes permitted by the CCPA.

**Right of No Retaliation.** You have the right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations, including if you are an employee, applicant, or independent contractor of our business.

**Submit Requests.** To exercise your rights under the CCPA, visit <https://www.strongdm.com/privacy/requests> and follow the instructions there. You may also send an email to [dpo@strongdm.com](mailto:dpo@strongdm.com).

**Authorizing an Agent.** If you are acting as an authorized agent to make a request to know, delete, correct, or opt out on behalf of a California resident, visit <https://www.strongdm.com/privacy/requests> and follow the instructions there, including uploading a written authorization signed by the resident. You send an email to [dpo@strongdm.com](mailto:dpo@strongdm.com) and attach a written authorization signed by the resident.

#### Opt-Out Preference Signals

You may also opt out of the sale or sharing (for cross-context behavioral advertising purposes) of your Personal Information by turning on the Global Privacy Control ("GPC") in participating browser systems. You will need to turn the GPC on for each browser you use. To learn more about the GPC, visit the Global Privacy Control [website](#).

#### Minors

We do not knowingly sell or share (for cross-context behavioral advertising purposes) Personal Information of consumers under 16 years of age.

**BY USING THE SITE, YOU SIGNIFY YOUR ACCEPTANCE OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, YOU SHOULD NOT USE THE SITE. CONTINUED**

**USE OF THE SITE, FOLLOWING THE POSTING OF CHANGES TO THIS PRIVACY POLICY THAT DO NOT SIGNIFICANTLY AFFECT THE USE OR DISCLOSURE OF YOUR PERSONAL INFORMATION, MEANS THAT YOU ACCEPT THOSE CHANGES.**