

PRIVACY POLICY

Statement of Privacy and Responsibility

Carson & SAINT Corporations are committed to ensuring maximum Privacy and Information Security standards.

You will share information with us when you visit our website and use our services. We want to be up front with you regarding the information we collect, how we use it, how we share it, and the controls we give you to access, update, and delete your information. We also want to provide it in a way that is easy to understand. Legal and regulatory requirements are important, but our goal is to minimize any “legalese” that may be confusing. You can also contact privacy@carsoninc.com at any time.

If you are a resident of the European Economic Area, there is information included in our Privacy Policy that is specific to you. We have an entire section related to the General Data Protection Regulation (“GDPR”) at the end of our Privacy Policy. We do not collect Personally Identifiable Information (“PII”) on our website unless you provide it voluntarily. PII is information that we can use to identify you as an individual and may include your name, address, company email, telephone number and any other information that is connected with you personally.

If you are ever asked to provide PII or other confidential information to someone claiming to represent Carson & SAINT Corporations, please notify privacy@carsoninc.com.

If you believe you have discovered a security vulnerability at SAINT or with one of our products or services, please click here: privacy@carsoninc.com.

We are committed to safeguarding the information in our custody and under our control. Our compliance program is dynamic and proactive allowing us to stay abreast of the latest changes and enhancements to the ever-evolving global compliance landscape. We have implemented practical and sound administrative, technical and physical safeguards in an effort to protect against unauthorized access, use, modification and disclosure of this information. This is a responsibility that we take seriously, and we have strong internal controls around change management and employee accountability.

To further demonstrate the priority that SAINT gives to our compliance environment, we have a dedicated Data Protection/ Privacy and Compliance Officer with over 20 years’ experience whose primary function is oversight of our operational risk environment. They serve as our designated Data Protection Officer for the General Data Protection Regulation (“GDPR”). Our hosted product environment resides within a highly secure Web Services environment and they adhere to the strictest compliance standards. They are GDPR, ISO, PCI DSS and SOC-compliant and While we do not accept any online payments or otherwise collect payment information, we believe this proactive compliance indicates the strength of our hosting provider’s information security framework.

Carson and SAINT Security and the EU General Data Protection Regulation (GDPR)

Both Carson and Associates corporation and SAINT Security, corporation. has taken all measures to ensure compliance with the EU General Data Protection Regulation (GDPR) and will continue to monitor the international landscape for recommendations as to enhancements in conjunction with the enforcement of GDPR as of May 25, 2018.

SAINT Security—Privacy Policy

Carson & SAINT Corporations (“**C&S**”, “**Carson & Saint**”, “**Carson**”, “**SAINT**,” “**we**,” “**us**,” or “**our**”) is committed to protecting your applications from vulnerabilities. We have prepared this Privacy Policy to describe our protocol around the collection, use, and disclosure of data related to both Carson and SAINT Products and Offerings (the “**Service**”) or related products and offerings. This Policy is incorporated into and an inherent component of our Terms of Service which can be found in the above EULA. The use of the collected information will be limited to the purpose of providing the Service for which you have engaged us.

Our Privacy Policy is subject to change due to modifications with regulatory agencies, best practices, or enhancements to the compliance and control environment. If we should ever make a substantial change to the way we use your Application Data or Personal Data, we will notify you by sending you an e-mail to the last e-mail address you provided to us and/or by prominently posting notice of the changes on our website. Any material changes to this Privacy Policy will be effective as of the date and time they are updated on our Website. These changes will be effective immediately for new users of our Website or Service. Continued use of our Website, Service, or related products, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

Information About Our Website

When you visit our website at www.carson-saint.com (the “Website”), we collect your Internet Protocol (“IP”) address as well as other related information such as page requests, browser type, referring and exit pages, the files viewed on our site (for example, HTML pages, graphics, or other), operating system and average time spent on our Website. We use this information to help us understand our Website activity, and to monitor and improve our Website.

Do-Not-Track

There are different ways you can prevent tracking of your online activity. One of them is setting a preference in your browser that alerts websites you visit that you do not want them to collect certain information about you. This is referred to as a Do-Not-Track (“DNT”) signal. SAINT’s website may not recognize or react in response to DNT signals from Web browsers as, currently, there is no universally accepted standard for what a company should do when a DNT signal is detected. At such time as a standard is established, we will assess how to best respond to the signals.

Other Links

Our Website may contain links to other websites that we do not own or operate. We provide these links as a convenience to you, for informational purposes only. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy statements, notices and terms of use. We do not have any control over these websites, and therefore we have no responsibility or liability for the manner in which they operate their sites nor what they may collect, use, disclose, secure or otherwise do with personal information. If you choose to click on these links, you will leave our site and be redirected to another site. During this process, a third party may collect Personal or Anonymous Data from you and Carson & SAINT are not responsible for their use of your data. If you are in the European Union and have concerns about your data, you will need to contact the Privacy department of the third party or their designated Data Protection Officer.

Links to our Website may be featured or referenced on other websites that are not under our control and therefore we have no responsibility or liability for the manner in which they operate their sites. Be sure to understand the privacy policies and terms of service of any site you visit. If you believe another entity has posted a link to Carson or SAINT Corporations that is misleading or that compromises the integrity of Carson or SAINT Corporations, please

contact privacy@carsoninc.com. Such notifications will be kept in strict confidence.

Social Media

Our website includes social media features, such as Twitter, LinkedIn, Google Circles, etc. If you access these sites, they may collect your IP address, the page on which you are visiting our site, and they may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it and not by Carson or SAINT Corporations.

Collection and Use of Information

By submitting Application, Personal or other data or information (the "Data"), or making it available to Carson & SAINT, you agree to the terms of this Privacy Policy and you expressly consent to the processing of your Data in accordance with it.

When you provide us with Data, it is primarily used to respond to requests or to allow us to provide better service to you. Once you become a customer of Carson & SAINT, we may send you a welcome e-mail, administrative e-mail notifications such as security or support and maintenance advisories; send promotional communications, request participation in a survey, send upgrades and special offers related to our Service and for other Contrast-specific purposes. We may contact you by telephone for the purpose of verifying information, reviewing potential vulnerabilities or to solicit feedback.

As we provide web application security services and products, our software is embedded into our clients' web applications to monitor for vulnerabilities and prevent attacks. For the purposes of performing the web application security services on behalf of our clients, we may collect and use Data through our clients' web applications. We do not collect or use personal information through your web applications for any purpose other than to provide the Service to which you have subscribed; this includes providing support and answering questions that you may have about the Service.

"Application Data" means data about the performance of your application, system data (such as

version data, names of plug-ins, etc.) about the environment in which your application is operating, data about transactions in your application (“Transaction Data”), stack traces and extracts of source code for certain classes of errors, and other similar data related to your application.

Any Application Data we collect is used to notify you of vulnerabilities and attacks and to share application performance information with you. We may also aggregate Application Data across multiple accounts and use this data to create and publish industry benchmarks or comparative application performance metrics. By default, we obfuscate any Individual Transaction Data that we collect. You expressly consent to the sharing of your Application Data as described in this Policy.

Choices Regarding Your Information

We offer you choices regarding the collection, use, and sharing of your information. We may, from time to time, send e-mails regarding scheduled maintenance, or that promote the purchase of our Products or Service, etc. You may “opt out” of further communications by following the unsubscribe instructions embedded in the email or by contacting privacy@carsoninc.com. Should you decide to opt-out of receiving future communications, we will advise third-parties with whom we may be associated related to the servicing of your account to ensure you do not receive further communications from them. Regardless of whether you “opt out” or not, we may, but are not obligated to, send you emails and/ or notices related to updates to our Privacy Policy or Terms of Service.

When we delete account information, it will be deleted from the active database, but may remain in our archives. We will otherwise retain your information for as long as your account is active or as needed to provide you with the Service to which you have subscribed. It will also be retained as is necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

We will not disclose, sell or otherwise transfer personal information without your prior consent except as otherwise set out herein or, if applicable, in your Agreement or Contract for Service with us.

We may transfer or disclose personal information as follows:

- In connection with our Website or the Service, we may transfer (or otherwise make available) personal information to third parties who provide services on our behalf. The information is limited to what they need to perform their designated functions, and they are not authorized to use or disclose personal information for their own marketing or other purposes. That condition is, and will continue to be, included in all Agreements that we have with any service provider or third party.
- If Carson & SAINT is involved in a merger, sale or acquisition, we may transfer personal information in connection with the transaction. We will make every effort to notify you in advance of any such merger, sale or acquisition as well as any significant corporate reorganization or change in control.
- Carson & SAINT may be required to provide personal information responsive to requests from a governmental, law enforcement or regulatory agency. We will only disclose personal information in response to:
 - A subpoena, warrant or other process issued by a court of competent jurisdiction;

- A legal process having the same impact as a court-issued request for information where, if by refusing to do so, we would be in breach of local law and/ or where we or our officers executives or employees would be subject to liability for failing to honor such legal process;
- A situation where such disclosure is necessary for us to enforce our legal rights pursuant to the laws of the jurisdiction from which such information was gathered; or
- Lessening a serious and/ or imminent threat of bodily harm.

Where a disclosure of your information is required under such circumstances, we will promptly notify you, whenever possible, prior to complying with such requirements (to the extent we are not prohibited from doing so). To this end, it is important that you maintain current information with us at all times.

Please note:

- You do not have to register in order to browse our Website. However, if you are interested in a Product Demo, a Free Trial or downloading a whitepaper, for example, you will need to provide a name, company email address and a phone number. We use this information to communicate with you and otherwise administer your use of our Service for a trial period.
- Carson and SAINT do not collect any Personally Identifiable Information (“PII”) unless you provide it voluntarily. We do not collect any financial information online. All Orders are placed and managed directly with a Client Manager.
- Our Website includes a “Careers” link. If you apply for a job with us, you may provide certain personal information about yourself (cover letter, resume, references, eligibility, or other employment-related information). We use this information for the purpose of processing and responding to your application for current and future career opportunities. If you are a resident of the European Economic Area, please see the GDPR Section below.
- Our Website includes a “Contact Us” page. If you use this form, you may provide certain personal information about yourself (name, company email, phone number, company name, the number of employees at your company, your industry, your job function and the location of your company) plus the content of any message you choose to send. We use this information to contact you and will only do so for legitimate business purposes.
- If you subscribe to our Blog notifications, we collect your name, email address and company name. If you post comments on our blog, the information contained in your posting will be stored on our servers and other users will be able to see it. To request removal of your personal information from our blog or community forum, please contact sales@carsoninc.com.
- From time to time, Carson & SAINT may conduct surveys, the results of which drive improved customer service and/ or products. If you choose to participate in one of our surveys, we may collect information such as your name, company email, company phone number, company name, etc.
- If you contact us otherwise to ask a question, provide feedback, file a complaint, etc. you may be asked for information that identifies you (such as your name, company affiliation, email address and/ or a telephone number) along with additional information we may

need to promptly and accurately respond. We may retain this information to assist you in the future and to improve our customer service, service offerings, and our Website.

- We also collect other types of Data such as operating system and version, information about your application and operating environment, and other requested information if you contact us via e-mail regarding support for the Service.

The Children's Online Privacy Protection Act ("COPPA")

Carson & SAINT will never intentionally collect data from children who are 13 years of age or younger. If a parent, guardian or other individual suspects that a child 13 or younger has provided data to Carson & SAINT, that individual should immediately report such information to privacy@carsoninc.com. Carson & SAINT will only retain the data for as long as it is necessary to delete the information using every reasonable measure to protect against its unauthorized access or use or to comply with legal or regulatory requirements.

Your California Privacy Rights

Pursuant to California Civil Code Section 1798.83, residents of the State of California have the right to request certain information relating to third parties to which the company has disclosed certain categories of personal information during the preceding year for the third parties' direct marketing purposes. Alternatively, the law provides that a company that has a privacy policy that provides consumers choice regarding sharing personal information with third parties for those third parties' direct marketing purposes, as Carson & SAINT does, may instead provide information on how to exercise that choice. If you would like to opt-out of this type of sharing with third parties, please email us at sales@carsoninc.com with "Opt Out" as your subject line.

The General Data Protection Regulation ("GDPR")

What is GDPR?

GDPR addresses the technological changes in the global business environment over the past two decades and seeks to harmonize the approach to data protection across the European Economic Area by establishing a single set of rules and associated penalties for non-compliance. The regulation was adopted on 27 April 2016 and becomes enforceable on 25 May 2018. The GDPR will replace the Data Protection Directive, a 20-year old law with similar requirements to the GDPR, but varying interpretation and application among member states of the European Economic Area, and a lack of enforcement powers. GDPR has a global reach, however, as it even applies to companies who are outside the area that control or process the data of EU subjects, making the GDPR the first global privacy standard.

Carson & SAINT has put processes in place to ensure GDPR compliance and to meet our obligations to our customers and employees. We have appointed a Data Protection Officer to oversee compliance, conducted a full Data Protection Impact Assessment (DPIA), and tuned our current incident response and breach notification policy and process to align with the requirements of the GDPR. We have also implemented business processes to deal with privacy-related requests outside the Carson & SAINT platform and to ensure any requests from your employees directed to us, are made known to you in a timely manner, if applicable.

Lawful Basis for Processing

The GDPR defines 6 lawful bases for processing:

1. **Consent:** an individual has given clear consent for the processing of their personal

data for a specific purpose.

2. **Contract:** processing is necessary for a contract that a company has with an individual, or because they have asked a company to take specific steps before entering into a contract.
3. **Legal obligation:** the processing is necessary for a company to comply with the law (not including contractual obligations).
4. **Vital interests:** the processing is necessary to protect someone's life.
5. **Public task:** the processing is necessary for a company to perform a task in the public interest or for a company's official functions, and the task or function has a clear basis in law.
6. **Legitimate interests:** the processing is necessary for a company's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Carson & SAINT processes all data based on Legitimate Interests

Carson & SAINT Products and Services

Carson & SAINT collects limited Corporate and Personal Data. The data we collect can be categorized as:

- data that we control for purposes of Corporate Business to Business marketing efforts,
- data we may collect from your browsing on our public website, and
- data collected from your Company's indication of interest in our product or your application as a part of our security services.

We believe a very important piece of our continued compliance with privacy best practices, as well as compliance with the GDPR, is to ensure that we hold our vendors and sub-processors accountable for their security and privacy commitments. Carson & SAINT has a robust Third-Party Vendor Management program, and we frequently assess all third parties for continued compliance with their security, privacy and confidentiality commitments.

Cookies: As mentioned in our overarching Privacy Policy, our Website uses a technology called "cookies". If you decide not to accept cookies from our Website, certain features may not function as designed. You may also remove cookies.

Do-Not-Track: There are different ways you can prevent tracking of your online activity. One of them is setting a preference in your browser that alerts websites you visit that you do not want them to collect certain information about you. This is referred to as a Do-Not-Track ("DNT") signal. Carson & SAINT's website may not recognize or react in response to DNT signals from Web browsers as, currently, there is no universally accepted standard for what a company should do when a DNT signal is detected. At such time as a standard is established, we will assess how to best respond to the signals.

Notice to End Users

Where our Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to your organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

Even if the Services are not currently administered to you by an organization, if you use an email address provided by an organization (such as your work email address) to access the Services, then the owner of the domain associated with your email address (e.g. your employer) may assert administrative control over your account and use of the Services at a later date. Please contact your organization or refer to your administrator's organizational policies for more information.

Subject Access Requests

A subject access request is a written request for personal information/ personal data held about you by us. You have the right to see what personal information we hold about you. You are entitled to be given a description of the information, what we use it for, who we might pass it on to, and any information we might have about the source of the information. However, this right is subject to certain exemptions or restrictions that are set out in the GDPR.

Data Protection Officer and Subject Access Requests

To make a Subject Access Request, email **GDPR@carsoninc.com** or write:

Sharon Landesberg, Data Protection Officer
Carson and SAINT
4410 Prince Road
Rockville, MD 20853

The GDPR requires that we provide you with the following information:

Company Name: Carson & SAINT Corporation
Address: 4410 Prince Road, Rockville, MD 20853
Phone: (001) 800.596.2006

Data Protection Officer:

Name: Sharon Landesberg
Email: landesbergs@carsoninc.com
GDPR@carsoninc.com
Phone: (001) 800.596.2006