

Ironclad, Inc. (“Ironclad” “We”, “Us”) is sensitive to your concerns about how we use the personal information we collect from you through Ironclad’s website (the “Site”) and other plug-ins exchanging information with Ironclad (“Applications”). (The Site and Applications are sometimes collectively referred to as “Online Services” for simplicity.) This Privacy Policy covers Ironclad’s treatment of the Personally Identifiable Information we collect when you use the Online Services. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information. By using Ironclad Online Services, you accept the terms of this Privacy Policy. If you have questions or concerns about the Privacy Policy, please contact Customer Care at [support@ironcladhq.com](mailto:support@ironcladhq.com).

For purposes of data protection laws, Ironclad Inc., 71 Stevenson St #600, San Francisco, CA 94105, is the entity responsible for your information.

## What information do we collect?

### Information You Provide to Us

Ironclad requires each customer to provide us with personal information (collectively “Personally Identifiable Information”) to access and use Ironclad products and services. Personally Identifiable Information is captured when a visitor accesses Online Services, or speaks on the phone with or emails an Ironclad employee, and willingly discloses that information. This disclosure may occur when a visitor registers with an Online Service, engages in transactions, contacts customer service, or participates in contests, promotions, surveys, forums, content submissions, requests for suggestions, or other aspects of services offered by Ironclad.

Personally Identifiable Information includes: (i) “Contact Data” (such as your name, address, city, state, zip code, phone number, and email address); (ii) “Financial Data” (such as your credit card number, expiration date, and verification code or bank account information); (iii) “Demographic Data” (such as your zip code and sex).

*Calls/Electronic Communications.* In the regular course of our business, Ironclad may monitor and record phone conversations or email communications between you and Ironclad employees for training and quality assurance purposes. We may receive a confirmation when you open or click on content in an email from us, which helps us make our communications to you more useful and interesting.

*Surveys, Sweepstakes, and Contests.* We may provide you the opportunity to participate in surveys on our site, to measure customer satisfaction. If you participate, we may request certain personally identifiable information from you. Participation in these surveys, sweepstakes, or contests is completely voluntary and you therefore have a choice whether or not to disclose this information. The requested information typically includes name, email address, and mailing address.

*Testimonials and Reviews.* We may display personal testimonials of satisfied customers. We will ask for your specific consent as part of the survey. If you wish to update or delete your testimonial, you can contact us at [support@ironcladhq.com](mailto:support@ironcladhq.com). We may also display customer reviews. If you provide a review that we display and wish to update or delete it, you can also contact us at [support@ironcladhq.com](mailto:support@ironcladhq.com).

### Information We Collect Automatically.

*Traffic Data.* Ironclad or its third-party service providers may collect a variety of visitor data such as IP addresses, browser settings, internet service provider (ISP) information, referring/exit pages, operating systems, date/time stamps, and clickstream data (collectively “Visitor Data”). The Ironclad internal servers and software automatically recognize Visitor Data. The Site may use Visitor Data to compile traffic data about the types of visitors who use the Site at specific intervals (collectively “Traffic Data”).

We may use Traffic Data to analyze Site traffic. We may also use Traffic Data to diagnose problems with our server, administer our Site, or display content according to your preferences. Visitor Data and Traffic Data may also be disclosed to business partners, affiliates, or advertisers on an aggregated and anonymous basis.

*Cookies.* Ironclad may use the standard cookie feature of major browser applications and third-party providers, including Google Analytics features (Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration and

Google Analytics Demographics and Interest Reporting), or employ internally developed cookies, clear GIFs, pixel tags, tracking codes, and other technologies that allow Ironclad to store a small piece of data on a visitor's computer, or any other device a visitor uses to access Online Services, about his or her visit to the Site or use of Applications. You can remove persistent cookies by following directions provided in your Internet browser's "help" directory. If you reject cookies, you may still use our site, but your ability to use some areas of our site will be limited.

*Location Information.* When you use the Online Services, we may collect general location information (such as general location inferred from an IP address).

**Information from Other Sources.** We may collect information about you from third parties, such as marketing partners and researchers. Our customers may give us information about you, such as your Contact Data, in order to facilitate contracting through our Online Services. We may combine this information with information we collect from you and use it as described in this Privacy Policy.

## How do we use the information we collect?

We use information we collect from the Online Services to: provide you with the Online Services; communicate with you; process your orders; manage and remember your preferences and customize the Online Services; analyze and improve the Online Services or any other products and Online Services we provide; improve our advertising and marketing; verify your identity; facilitate your transactions with our third-party marketing partners; inform you of offers and discounts; comply with our legal obligations or as permitted by law; protect the safety and/or integrity of our users, employees, third parties, members of the public, and/or the Online Services; and prevent fraud and enforce our legal terms.

We may combine information that we collect from you through the Online Service with information that we obtain from other sources. We may also aggregate and/or de-identify information collected through the Online Services. We may use de-identified or aggregated data for any purpose, including without limitation for research and marketing purposes.

## How do we disclose the information we receive?

Except as disclosed here, we do not rent, sell, or disclose your personal information to third parties. We disclose customer information as follows:

- **Order Processing.** Ironclad, sometimes with the assistance of a third party or Ironclad subsidiary, may use your Personally Identifiable Information to process your payment through merchant account services, and to generate the products and services you order. Your Contact Data may be used to follow up with you on transactions you initiate through Online Services, respond to inquiries made through Online Services, inform you of changes to Online Services, and send you additional information about Ironclad and its products and services.
- **Third Party Marketing.** Unless specifically authorized by you, we do not provide Personally Identifiable Information to third parties for marketing purposes. If you express interest in a third party offer or purchase a package that includes a third party offer, we may provide your Personally Identifiable Information to that third party solely in connection with the offer you have selected.
- **Required by Law.** We may also disclose your personal information: as required by law, such as in response to a subpoena or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a legal request.
- **Visitor Demographics.** Contact Data and Traffic Data are used to gather general statistics about our customers and visitors. We may use Demographic Data to generate collective information about our users, but not in a way that identifies any user specifically. For example, we may inform third parties about the number of registered users and unique visitors, and the pages most frequently browsed.
- **Service Providers.** We may disclose your Personally Identifiable Information to companies that provide support services to us (such as a printer or email service provider), or help us market our products and services. These companies may need information about you in order to perform their functions.

- **Blogs and Forums.** The Site may include a publicly accessible blog and interactive forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. You should use caution when deciding whether to disclose your personal information in these areas of the site. To request removal of your personal information from our community forums, contact us at [support@ironcladhq.com](mailto:support@ironcladhq.com). In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.
- **Other Transfers.** We may disclose Personally Identifiable Information and other data to businesses controlling, controlled by, or under common control with Ironclad. If Ironclad is merged, acquired, or sold, or if some or all of our assets or equity are transferred, we may disclose or transfer Personally Identifiable Information and other data in connection with the associated transactions.
- **Bankruptcy.** In the event of an Ironclad bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your personal information is treated, transferred, or used. If such an event occurs, your Personally Identifiable Information may be treated like any other Ironclad asset and sold, transferred, or disclosed to third parties, or used in ways not contemplated or permitted under this Privacy Policy. In this case, you will be notified via email and/or a prominent notice on our site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.
- **Consent.** In addition to the disclosures described in this Policy, we may disclose information about you whenever you consent to or direct such disclosure.

## **Analytics & Advertising**

**Analytics.** We may use third-party web analytics services on the Online Services, such as those of Google Analytics. These service providers use the sort of technology described in the "Information We Collect Automatically" section above to help us analyze how users use the Online Services, including by noting the third-party website from which you arrive. The information collected by the technology will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Service. We also use Google Analytics for certain purposes related to advertising, as described in the following section. To prevent Google Analytics from using your information for analytics, you may install the [Google Analytics Opt-Out Browser Add-on](#).

**Advertising.** Our partners and affiliates, including Google Analytics (Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics and Interest Reporting), may use cookies and web beacons to collect information about your activities on this and other websites to provide you targeted advertising based upon your interests. This means that these partners and affiliates may show our ads on sites across the Internet based upon your previous visits to our site. Together with our partners and affiliates, we may use these cookies and web beacons to report how your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to your visits to our site.

The use of tracking technologies by our service providers, technology partners or other third party assets (such as social media links) on the site is not covered by our Privacy Policy. We do not have access or control over these technologies.

If you would like to learn more or opt out of receiving online display advertising tailored to your interests, please visit the Networking Advertising Initiative at [www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) or the Digital Advertising Alliance at <http://aboutads.info/choices>. Please note this does not opt you out of being served advertising. You will continue to receive generic ads. If you delete your cookies, use a different browser, or buy a new computer, you will need to renew your online display advertising opt-out choice. To opt out of Google Analytics for Display Advertising or customize Google Display Network ads, you can visit the [Google Ads Settings page](#).

**Do Not Track.** We do not recognize or respond to browser-initiated Do Not Track signals, as the Internet industry is currently still working on Do Not Track standards, implementations, and solutions.

## **Data we process on behalf of our customers**

We receive information from and on behalf of our customers when they use our Online Services. Because of the nature of the services, this information may contain any type of personal identifiable information, including Contact Data, Financial Data, Demographic Data, and Legal Data (such as social security numbers, company information, trade secrets, inventions, and idea submissions and other sensitive information necessary to generate legal documents). We process such data only in accordance with our customers' instructions. For such data, the customer is the "data controller" (for purposes of GDPR) or the "business" (for purposes of the CCPA) and is responsible for most aspects of the processing of the personal information. If you have any questions or concerns about how your personal information is processed in these cases, including how to exercise your rights as a data subject, please contact the customer. If we receive any rights requests concerning instances where we act as data processor, we will forward your query on to the relevant customer.

We may also collect the information of third party individuals on behalf of our customers. For example, our customers may use our service to collect counterparty information to populate a contract. Ironclad primarily uses this information for the purpose of administering and improving its services for our customers. Where the third party individual chooses to create an Ironclad account with us, however, we will process their information in accordance with this Privacy Policy.

## Third-Party Websites

Ironclad may maintain links to other websites and other websites may maintain links to the Online Services. This Privacy Policy applies only to ironcladapp.com and not to other websites accessible from Ironclad or that you use to access Ironclad, each of which may have privacy policies materially different from this Privacy Policy. If you visit other websites, Ironclad is not responsible for the privacy practices or content of those sites. It is your responsibility to review the privacy policies of non-Ironclad websites to confirm that you understand and agree with them.

## Your Options

You may choose not to provide Ironclad with Personally Identifiable Information or you may turn off cookies in your browser by changing its settings. If you make these decisions, you may continue to use the Online Services and browse its pages. However, Ironclad cannot process orders without Personally Identifiable Information.

**User and Authorized Contact Access to Order Information.** Ironclad will give you, or anyone listed as an authorized contact for your account, information about your order. This may include information about the nature and status of your order, information you provided to process your order, payment information, and contact information. If you want someone to have access to your order, you must list them as an authorized contact or they may not obtain information.

**Deleting Your Information.** If you no longer desire our services, or if you want to remove your Personally Identifiable Information from our Site, you may terminate your account by contacting [support@ironcladhq.com](mailto:support@ironcladhq.com).

**Opting Out of Marketing.** We send promotional emails and newsletters from time to time to users who have registered on the site and to those who have opted in to receive such emails. You can opt-out of promotional communications by following the unsubscribe instructions in any communication or by emailing us at [support@ironcladhq.com](mailto:support@ironcladhq.com). Generally, you may not opt-out of service-related or transactional communications, which are not promotional. If you do not wish to receive service-related communications, however, you may terminate your account by contacting [support@ironcladhq.com](mailto:support@ironcladhq.com).

## Data Retention

At minimum, we will retain your information for as long as needed to provide you services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Ironclad may maintain some or all of this data in its archives even after it has been removed from the Site.

## Data Security

We strive to make certain that our servers and connections incorporate the latest encryption and security devices. We have implemented physical, electronic, and managerial procedures to safeguard and secure the information we collect. Credit card and

personal information are transmitted by secure servers (SSL). In the event that we mail you documents, documents are delivered to you via UPS or similar overnight delivery services, the United States Postal Service, or email. Unfortunately, no data transmission is guaranteed to be 100% secure and we therefore cannot guarantee the security of information you transmit to or from the Site, Applications, or through the use of our services, and you provide this information at your own risk. ACCORDINGLY, WE DISCLAIM LIABILITY FOR THE THEFT, LOSS, OR INTERCEPTION OF, OR UNAUTHORIZED ACCESS OR DAMAGE TO, YOUR DATA OR COMMUNICATIONS BY USING THE SITE, APPLICATIONS, AND OUR SERVICES. YOU ACKNOWLEDGE THAT YOU UNDERSTAND AND ASSUME THESE RISKS.

IF YOU BELIEVE YOUR PRIVACY HAS BEEN BREACHED THROUGH USE OF OUR WEBSITE, APPLICATIONS, OR OTHER SERVICES PLEASE CONTACT US IMMEDIATELY AT [support@ironcladhq.com](mailto:support@ironcladhq.com).

## EEA, Switzerland, and UK Individuals

**Legal Bases for Use of Your Information.** Our legal grounds for processing your information are as follows:

- To honor our contractual commitments to you: Much of our processing of personal data is to meet our contractual obligations to our users, or to take steps at users' requests in anticipation of entering into a contract with them. For example, we handle personal data on this basis to allow you to sign up for our Online Services.
- Consent: Where required by law, and in some other cases, we handle personal data on the basis of your implied or express consent.
- Legitimate interests: In many cases, we handle personal data on the ground that it furthers our legitimate interests in commercial activities in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals. This includes: operating our business and the Online Services; providing security for our websites, products, software, or applications; marketing; receiving payments; preventing fraud; and knowing the customer to whom we are providing the Online Services.
- Legal compliance: We need to use and disclose personal data in certain ways to comply with our legal obligations (such as our obligation to disclose data to tax authorities).

**Data Subject Rights.** Residents of the European Economic Area ("EEA"), Switzerland, and the UK can exercise certain data subject rights available to them under applicable data protection laws. Where such rights apply, we will comply with requests to exercise these rights in accordance with applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate interests or to comply with a legal obligation. If these rights apply to you, they may permit you to request that we:

- provide access to and/or a copy of certain information we hold about you
- prevent the processing of your information for direct-marketing purposes (including any direct marketing processing based on profiling)
- update information which is out of date or incorrect
- delete certain information which we are holding about you
- restrict the way that we process and disclose certain of your information
- transfer your information to a third party provider of services
- revoke your consent for the processing of your information

For more information on how to exercise these rights, please contact us using the information in the "Contact Us" section below. If applicable, you may make a complaint to the data protection supervisory authority in the country where you are based. Alternatively, you may seek a remedy through local courts if you believe your rights have been breached.

In instances where we process personal information on behalf of our customer, rights requests should be directed to the relevant

customer. Any request sent directly to us that pertains to information collected on behalf of a customer will be forwarded on to that customer.

**International Data Transfers.** Information submitted to Ironclad will be transferred to, processed, and stored in the United States, or for certain customers, the European Union or Japan. If you post or transfer any information to or through the Online Services, you are agreeing to such information, including Personally Identifiable Information, being hosted and accessed in the United States, the European Union, and Japan. Please note that the privacy laws of the United States, the European Union, and Japan may be different from those in the place where you are a resident.

Where required, we will use appropriate safeguards for transferring data outside of the EEA, Switzerland, and the UK. This includes signing Standard Contractual Clauses that govern the transfers of such data, which may be used in conjunction with additional safeguards. For more information about these transfer mechanisms, please contact us as detailed in the "Contact us" section below.

## Supplemental Privacy Notice for California Residents

This Supplemental Privacy Notice supplements the information in our Privacy Policy above, and except as provided herein, applies solely to California residents. It applies to personal information we collect on or through the Online Services and through other means (such as information collected offline, in person, and over the telephone). It does not apply to personal information we collect from our employees and job applicants in their capacity as employees and job applicants. It also does not apply to personal information we process as a service provider.

### Summary of Information We Collect

If you are a California resident, California law requires us to provide you with some additional information regarding how we collect, use, and disclose your "personal information" and "sensitive personal information" (as defined in the California Consumer Privacy Act ("CCPA")).

Throughout our Privacy Policy, we describe the specific pieces of personal information and sensitive personal information we collect, the sources of that information, and how we disclose it. Under the CCPA, we also have to provide you with the "categories" of personal information we collect and disclose for "business purposes" (as those terms are defined by applicable law). Those categories are identifiers (such as name, address, email address, phone number, other account information, and cookies); commercial information (such as transaction data); financial data (such as credit card and other financial account information); internet or other network or device activity (such as IP address or service usage); geolocation information (general location); inference data about you; sensory information (such as audio recordings if you call customer service); professional or employment related data; education data; insurance (including health insurance) information; medical information; physical characteristics or description; legally protected classifications (such as gender); other information that identifies or can be reasonably associated with you. The categories of sensitive personal information are account log-in, financial account information, and password or other credentials allowing access to your account.

We collect the categories of personal information identified above from the following sources: (1) directly from you; (2) through your use of the Online Services; (3) affiliates; and (4) third parties such as social networks and other Ironclad users.

We or our service providers may collect and disclose the above categories of information for the purposes described in our Privacy Policy. This includes the following business or commercial purposes (as those terms are defined in applicable law):

- Our or our service provider's operational purposes;
- Auditing consumer interactions on our site;
- Detecting, protecting against, and prosecuting security incidents and fraudulent or illegal activity;
- Bug detection and error reporting;
- Customizing content that we or our service providers display on the Online Services;
- Providing the Online Services (e.g., account servicing and maintenance, order processing and fulfillment, customer service,

advertising and marketing, analytics, and communication about the Online Services);

- Improving the Online Services and developing new services (e.g., by conducting research to develop new products or features);
- Other uses that advance our commercial or economic interests, such as third party advertising and communicating with you about relevant offers from third party partners;
- Other uses about which we notify you.

We may also use the above categories of personal information for compliance with applicable laws and regulations, and we may combine the information we collect ("aggregate") or remove pieces of information ("de-identify") to limit or prevent identification of any particular user or device.

We describe our information disclosure practices in our Privacy Policy. We may disclose certain categories of personal information with third parties (as defined by the CCPA) for the business purposes described above. For example, we may disclose identifiers and other information that identifies or can reasonably be associated with you with counterparties to your agreements. We may disclose identifiers with our marketing partners, and we may also disclose any of the categories described above with our subsidiaries and affiliates. If you connect your account with social media services or interact with social media plugins or links on the Online Service, we may disclose identifiers, commercial information, internet or other network or device activity, or general location with those social media services.

### **Consumer Rights**

If you are a California resident, you may have certain rights. California law may permit you to request that we:

- Provide you the categories of personal information we have collected or disclosed about you; the categories of sources of such information; the business or commercial purpose for "collecting," "selling," or "sharing" your personal information; the categories of third parties to whom we disclose or "sell," or with whom we "share," personal information; and the categories of personal information we "sell."
- Provide access to and/or a copy of certain information we hold about you.
- Delete certain information we have about you.
- Correct inaccurate personal information that we maintain about you.

You may have the right to receive information about the financial incentives that we offer to you (if any). You also have the right to not be discriminated against (as provided for in applicable law) for exercising certain of your rights. Certain information may be exempt from such requests under applicable law. We need certain types of information so that we can provide the Online Services to you. If you ask us to delete it, you may no longer be able to access or use the Online Services.

In instances where we process personal information on behalf of our customer, rights requests should be directed to the relevant customer. Any request sent directly to us that pertains to information collected on behalf of a customer will be forwarded on to that customer.

If you would like to exercise any of these rights, you can submit a request at [legal@ironcladhq.com](mailto:legal@ironcladhq.com), call (855) 999-4766, or submit this [form](#). You will be required to verify your identity before we fulfill your request. To do so, you will need to provide information to match with our existing records to verify your identity, depending on the nature of the request and the sensitivity of the information sought. You can also designate an authorized agent to make a request on your behalf. To do so, you must provide us with written authorization or a power of attorney, signed by you, for the agent to act on your behalf. You will still need to verify your identity directly with us.

### **"Sale" of Personal Information**

California residents may opt out of the "sale" of their personal information. The CCPA broadly defines "sale" in a way that may include allowing third parties to receive certain information such as cookie identifiers, IP addresses and/or browsing behavior to add to a profile about your device, browser or you. Such profiles may enable delivery of interest-based advertising by such third parties within their platform or on other sites.

Depending on how you use the Service, we may disclose the following categories of information for such interest-based advertising, which may be considered a "sale" as defined by the CCPA: identifiers (such as IP address, device identifiers, and cookies) and internet and device activity. To opt out of such "sales," please submit a request to [legal@ironcladhq.com](mailto:legal@ironcladhq.com) or submit this [form](#).

### **"Sharing" of Personal Information**

California residents may opt out of the "sharing" of their personal information. The CCPA defines "sharing" as the targeting of advertising to a consumer based on that consumer's personal information obtained from the consumer's activity across websites. We "share" information for these purposes to provide more relevant and tailored advertising to you regarding our Services. As part of this advertising, we may "share" identifiers (such as IP address, device identifiers, and cookies) and internet and device activity with advertising platforms and advertising networks. To opt out of such "sharing," please submit a request to [legal@ironcladhq.com](mailto:legal@ironcladhq.com) or submit this [form](#).

### **Global Privacy Control**

Please note that we also respond to and abide by opt-out preference signals sent through the Global Privacy Control. Any opt out preferences you have exercised through these methods will only apply to the specific device/browser on which you made them. For more information on how to use the Global Privacy Control, see [www.globalprivacycontrol.org](http://www.globalprivacycontrol.org).

Before making this statement, you'll need to be sure you honor the GPC.

The regulations (but not the statute) require this statement, and they're not final yet, so could omit this section for the time being (assuming you don't honor the GPC)

### **Children Under 16**

We do not knowingly "sell" or "share" the personal information of children under 16.

### **Sensitive Personal Information**

The CCPA also allows you to limit the use or disclosure of your "sensitive personal information" (as defined in the CCPA) if your sensitive personal information is used for certain purposes. Please note that we do not use or disclose sensitive personal information other than for purposes for which you cannot opt out under the CCPA.

### **Retention of Your Personal Information**

Please see the "Data Retention" section above.

### **California Shine the Light**

We do not disclose personal information to third parties for their direct marketing purposes.

## **Children's Privacy**

The Online Services are not directed to children under the age of 13. We do not knowingly collect personal information (as that term is defined in the Children's Online Privacy Protection Act (COPPA)) from children under 13. If we discover that an individual under 13 has provided us with personal information, we will delete the personal information to the extent required by COPPA.

We do not knowingly process data of EU residents under the age of 16 without parental consent. If we become aware that we have collected data from an EU resident under the age of 16 without parental consent, we will take reasonable steps to delete it as soon as possible.

## **Changes to this Policy**

We may update this privacy policy to reflect changes to our information practices. If we make any material changes a notice may be posted on this page along with the updated Privacy Policy prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## Contact Us

If you have any questions or concerns regarding our Privacy Policy, please contact us at [legal@ironcladhq.com](mailto:legal@ironcladhq.com).