Privacy Policy

This Privacy Policy applies to IcePanel Technologies ("IcePanel") services available through www.icepanel.io and the proprietary IcePanel platform (the "Service"). It describes our company's policies and procedures on the collection, use and disclosure of your personal information when you use the IcePanel Service. By accessing or using the Service, you agree to this Privacy Policy. Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our Terms of Service. In this Privacy Policy, "Personal Information" means any information relating to an identified or identifiable natural person.

Information we collect:
Information you provide: When you use our Services, we collect some Personal Information, such as your name, title, email address, job role, machine info, browser info, IP address. In general, your name and some other information you choose to provide on the Service will be viewable and discoverable by other users.

Content: You also provide information in Content you post to the Service. In general, the Content you provide will be viewable and discoverable by other users. IcePanel can, but has no obligation, to monitor the Content you post on the Service. Geo-Location Information: Content that you upload or share on the Service may contain recorded location information. Location data may be used in conjunction with personally identifiable information.

Analytics: When you access the Service on our website, we may collect information (using third party services) using logging and cookies which can sometimes be correlated with Personal Information. We use this information to monitor and analyse use and interest in the Service. Please see the chart below for a list of IcePanel Subprocessors, which is subject to updating from time to time in IcePanel's sole discretion.
Cookie Information: IcePanel may use cookies and similar technologies in our Website and Services that help us collect Other Information. The Website and Services may also include cookies and similar tracking technologies of third parties, which may collect Other Information about you via the Website and Services and across other websites and online services.

How we use information:
IcePanel uses information that it collects for the purpose of fulfilling our contractual obligations to you, in furtherance of our legitimate interests in operating our Services, Website and business and/or where you have consented to such usage. More specifically, IcePanel uses Personal Information:

- To provide, update, maintain and protect our Service, Website and business. This includes use of Personal Information to support delivery of the Service, prevent or address service errors, security or technical issues, analyze and monitor usage, trends and other activities or at an Authorized User's request. We may use your email address, Slack, or phone number to send you Service-related notices (including any notices required by law, in lieu of communication by postal mail). If you correspond with us by email, we may retain the content of your email messages, your email address and our responses.
- As required by applicable law, legal process or regulation.
- To communicate with you by responding to your requests, comments and questions. If you contact us, we may use your Personal Information to respond.
- To send emails and other communications including but not limited to Slack. We may send you service, technical and other administrative emails, messages and other types of communications. We may also contact you to inform you about changes in our Services, our Services offerings, and important Service -related notices, such as security and fraud notices. These communications are considered part of the Service and you may not opt out of them.

- For billing, account management and other administrative matters. IcePanel may need to contact you for invoicing, account management and similar reasons and we use account data to administer accounts and keep track of billing and payments.
- To investigate and help prevent security issues and abuse.
- For marketing purposes. We may also use your contact information to send you marketing messages. If you are in the EEA we will only to do if you have opted in to receive such communications. If you don't want to receive these messages, you can opt out by following the instructions in the message.

How we share your information:
Your Use: In general, the information and Content you provide will be viewable and discoverable by other users who use the Service where applicable, when content has been shared by you with them.

Service Providers, Business Partners and Others: We may from time to time use the services of affiliates, subsidiaries and unrelated service providers in the operation of the Service, and may disclose personal information to them in the course of our use of their services. For example, we may use the services of third-party hosting companies to host the operation of the Website. This may involve the hosting of data, including personal information, on servers operated by those hosting companies. We encourage you to review these other privacy statements. We ensure that we have appropriate safeguards in place if we transfer Personal Information originating to other countries.

Compliance with Laws and Law Enforcement Requests; Protection of IcePanel Rights: IcePanel may disclose your personal information if required to do so by law or subpoena or if we believe that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect IcePanel rights or property.

Non-Personally Identifiable Information: We may disclose your non-private, aggregated, or otherwise non-personally identifiable information, such as anonymous usage data, platform types, etc., with interested third parties to help them understand the usage patterns for certain Service.

How we protect your information:
The security of your information is important to us. IcePanel uses trusted third party services for data security, system security, back-ups, and disaster recovery.

No method of electronic transmission or storage is 100% secure, however. Therefore, we cannot guarantee its absolute security. In the event that personal information is compromised as a result of a breach of security, IcePanel will promptly notify those persons whose personal information has been compromised, in accordance with the notification procedures set forth in this Privacy Policy, or as otherwise required by applicable law.

International data transfer:
We may be collecting and using information from you (the *'data subject'*) if you visit, access, and/or use our Service, and if you reside in the EEA. The GDPR provides certain rights to EEA residents including the right to request access to, obtain, correct, amend, delete, or limit the use of your personal data. Any terms defined in the GDPR have the same meaning when used in this Section of the Privacy Policy. This Section of our Privacy Policy applies specifically to users or visitors who are EEA residents. In the event of any inconsistency between our Privacy Policy and this Section 8, this Section shall control in connection with the privacy rights of EEA residents, solely and exclusively. Notwithstanding the foregoing and for the sake of clarification, this Privacy Policy shall be read as a whole and shall be applicable to EEA residents and users of our Service.

A) GDPR Principles. Where the GDPR applies, the legal bases we rely upon include:
   - The right to be informed. You have the right to be provided with clear, transparent, and easily understandable information about how we use your Personal Information, Access

Credentials and your rights. Our Privacy Policy sets out how we use your Personal Information, Access Credentials and your rights in connection with them.

- The right of access. You have the right to obtain access to your Access Credentials (if we process it). This will allow you to verify that we are using your Personal Information in compliance with applicable law. If you wish to access the Access Credentials we hold about you in this way, please use the contact information referenced below to get in touch with us.
- The right to rectification. You are entitled to have your Personal Information corrected to update your Access Credentials if it is inaccurate or incomplete. You can request that we rectify any errors in the information that we hold by contacting us using our contact details below.
- The right to erasure. This is also known as *'the right to be forgotten'* and, essentially, it means that you have the right to request the deletion or removal of certain of the information that we hold about you by sending your request to us using our contact details below. We will only retain your Access Credentials for the duration and for as long as it is required to satisfy our intended purposes, in compliance with applicable law. So unless we have explicitly stated in this Privacy Policy, the Access Credentials stored by us will be deleted as soon as it is no longer required for its intended purpose and its does not conflict with any statutory storage obligations. If it is not deleted for other necessities and legally permissible purposes, its processing is restricted. This means that data is blocked and not processed for other purposes and applies, for example, to data retained for legal, statutory, commercial, or tax purposes.
- The right to restrict processing. You have rights to restrict, (i.e *'block'* or *'suppress'* further use of your Personal Information). When processing is restricted, we can still store your Access Credentials, and Personal Information such as your name, email, and address, but will not use it further.
- The right to data portability. You have the right to obtain a copy of your Access Credentials in an accessible, human-readable, and transferrable format so that you can re-use it for your own purposes across different service providers. This is not a general right however and there are exceptions. To learn more about your rights to data portability, you may contact us using our contact details below.
- The right to withdraw consent. We will retain Personal Information such as your name, email, and address. However, if you have given your consent to anything we do with your information (i.e. we rely on consent as a legal basis for processing your information), you have the right to withdraw that consent at any time. You can withdraw your consent by contacting us.
- The right to object to direct advertising. You have the right to object to certain types of processing of your Access Credentials (if we process it), including processing for direct marketing purposes and profiling. You can object by deactivating your cookie and tracking settings on your web browser. Deactivating these cookies, however, may restrict your use or access to the functionality of the Services. In addition to the information provided to you in Section 2 of this Privacy Policy, and to learn more about how to object to the use of cookies and trackers, and opting out of our direct marketing, you may visit http://www.aboutads.info/choices/ (the United States and Canada), http://www.youronlinechoices.com/ (EU Website).
- The right to lodge a complaint. If your request or concern in connection with your Personal Information and Access Credentials is not satisfactorily resolved by us, you have the right to lodge a complaint about the way we handle or process your information with the national data protection authority.
- Disclosure to third parties. As an EEA resident, if your Personal Information and/or Access Credentials is disclosed to third parties (for instance, contract processors) as part of our processing, transmitted to them, or access to the Personal Information and/or Access

Credentials is otherwise granted, this transaction shall only be done for lawful purposes(for instance, to fulfill our contractual obligations with our third-party payment providers, and only if you have provided your consent, and it fulfills our legitimate interests, such interests which we have outlined in this Privacy Policy.

B) Data Transfers. As referenced above, we store Personal Information such as your name, email, and address. However, your Personal Information will not be subject to transfer.

C) Exercising your Rights to your Personal Information as an EEA resident. To exercise these rights to Personal Information and Access Credentials under this Privacy Policy as an EEA resident, you may contact us using the contact details we have provided below. We may ask for further information to clarify your identity and location. If you are a customer or employee of one of our service provider customers, please contact the service provider that you interact with directly, as in that circumstance we will be acting as a data processor, not a data controller.

Subprocessors. To support Provider in delivering the Services, Provider engages third-party service providers as sub-processors. This Section identifies our sub-processors, describes where they are located, lists what services they provide to us, and identifies the type of personal information processed. Our business needs may change from time to time and Provider will periodically update this page to provide notice of additions and removals to our list of sub-processors.

Name of subprocessor	**Purpose of processing**	**Categories of personal data**	**Third countries personal data is transferred to**	**Retention schedule**
Datadog	Security thread detection	Identifier, name, work email, job role, country, city, region, machine info, browser info, IP address	United States	15 months
DocuSign	Invoices, legal contracts	Name, work email, job role, business address, business tax identifier, business phone number, signatures	United States	Indefinitely
Google Cloud	App functionality, customer support, user analytics, data storage, backup storage	Identifier, name, work email, job role, IP address	United States	End of customer relationship or 12 months for backups
Google Workspace	Invoices, receipts, customer support, legal contracts, user analytics	Name, email, job, role, country, city, business address, business tax identifier, business phone number, signatures	United States	End of customer relationship or indefinitely for invoices, receipts, legal contracts
Linear	Request tracking, customer support	Identifier, name, work email	United States	End of customer relationship

Missive	Customer support	Identifier, name, work email, job role	United States	End of customer relationship
Mixpanel	User analytics, customer support	Identifier, name, work email, job role, country, city, region	United States	End of customer relationship
Notion	Customer feedback, pilot tracking	Identifier, name, work email, job role	United States	End of customer relationship
Pipedrive	Relationship management, customer support	Identifier, name, work email, job role, business phone number	United States	End of customer relationship
Resend	Transactional and marketing communication	Identifier, name, work email, job role	United States	End of customer relationship
Sentry	Error tracking, customer support	Identifier, name, work email, job role, machine info, browser info, IP address	United States	End of customer relationship
Slack	Customer support, user analytics	Identifier, name, work email, job role, machine info, browser info	United States	End of customer relationship
Stripe	Payment processing, subscription management, invoices, receipts, financial reporting	Identifier, name, work email, business address, business tax identifier, business phone number, card information	United States	End of customer relationship or indefinitely for invoices, receipts
Xero	Invoices, receipts, financial reporting	Name, work email, job role, business address, business tax identifier, business phone number	United States	Indefinitely

CALIFORNIA PRIVACY RIGHTS This section provides additional details about the Personal Information we collect about California consumers and the rights afforded to them under the *California Consumer Privacy Act* (the "**CCPA**"). For more details about the Personal Information Provider has collected over the last 12 months, please see the section "Information you provide us" above. We collect this Personal Information for commercial purposes described above. Provider does not sell (as that term is defined in the CCPA) the Personal Information we collect. Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of Personal Information and

Access Credentials we collect (including how we use and disclose these Personal Information and Access Credentials), to delete their Personal Information and Access Credentials, to opt-out of any "sales" or "sharing" of Personal Information and Access Credentials that may be occurring, and to not be discriminated against for exercising these rights.
California consumers may make a request pursuant to their rights under the CCPA by contacting us at the contact information below. We will verify your request using the information associated with your account, if available, including your email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

Data retention:
IcePanel may retain Personal Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy and to improve the Service. This may include keeping your Personal Information after you have deactivated your account for the period of time needed for IcePanel to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

Links to other web sites:
We are not responsible for the practices employed by websites linked to or from the Service, nor the information or content contained therein. Please remember that when you use a link to go from the Service to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including those that have a link on our website, is subject to that website's own rules and policies.

Your rights
Under certain circumstances, you have rights under data protection laws in relation to your personal information. If you wish to any of rights under applicable data protection laws, please contact us using the contact details below. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes to our privacy policy:
If we make a material change our Privacy Policy, we will post those changes on this page to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it. Changes to this Privacy Policy are effective when they are posted on this page.

Our EU Representative:
Under Article 27 of the GDPR, we have appointed an EU Representative to act as our data protection agent. Data protection requests can be made at https://icepaneltechnologiesinc.gdprlocal.com/eu. Our nominated EU Representative is Instant EU GDPR Representative Ltd and can be contacted using the details below.

Adam Brogden, contact@gdprlocal.com, Tel +35315549700

INSTANT EU GDPR REPRESENTATIVE LTD, Office 2, 12A Lower Main Street, Lucan Co., Dublin, K78 X5P8, Ireland

Our UK Representative:
Under Article 27 of the UK Data Privacy Act, we have appointed a UK Representative to act as our data protection agent. Data protection requests can be made at https://icepaneltechnologiesinc.gdprlocal.com/uk. Our nominated UK Representative is GDPR Local Ltd and can be contacted using the details below.

Adam Brogden, contact@gdprlocal.com, Tel +44 1772 217800

Contacting IcePanel:
Please also feel free to contact IcePanel if you have any questions about this Privacy Policy or IcePanel practices, or if you are seeking to exercise any of your statutory rights. You may contact us our Privacy Officer Victor Leach, at support@icepanel.io.

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