

PRIVACY POLICY

Statement of Privacy and Responsibility

At Carson and SAINT Corporations (“Carson & SAINT”), we recognize the importance of protecting your personal information. We are committed to upholding the highest standards of privacy and information security. This Privacy Policy outlines the practices of Carson & SAINT regarding the collection, use, and protection of information obtained through websites we operate (“Site”), as well as the handling of human resources data related to Carson & SAINT employees.

The terms “you” and “your” refer to any individual who accesses or uses our Site, or who is employed by Carson & SAINT. By accessing or using our Site, you acknowledge that you have read, understood, and agree to the terms of this Privacy Policy.

When you visit our Site or use our services, you may share information with us. We are committed to being transparent about the data we collect, how we use it, with whom we may share it, and the options available to you for accessing, updating, or deleting your information. While we take our legal and regulatory obligations seriously, we also strive to communicate our practices clearly and avoid unnecessary legal jargon.

We do not collect Personally Identifiable Information (“PII”) through our Site unless you provide it voluntarily. PII includes any data that could be used to identify you individually, such as your name, address, company email, phone number, or any other information linked to you personally.

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 Site, and
- data collected from your Company’s indication of interest in our product or your application as a part of our security services.

We are committed to safeguarding the information in our custody and under our control. Our information security program is designed to be proactive, dynamic, and responsive to the ever-evolving global compliance landscape. We implement robust administrative, technical, and physical safeguards to protect against unauthorized access, use, alteration, or disclosure of your data. Internal controls, employee accountability, and structured change management processes form an integral part of this commitment.

Our hosted product environments operate within highly secure web services infrastructures that comply with leading industry standards, including **GDPR, PCI DSS, and SOC 2**. Although we do not collect or process payment data through our Site, our proactive alignment with these standards underscores our commitment to a secure and resilient technology environment.

If you are a resident of the **European Economic Area (EEA)**, specific rights and protections afforded by the **General Data Protection Regulation (GDPR)** apply to you. We have a dedicated section of this Privacy Policy that explains your rights under the GDPR and outlines how we process your personal data in accordance with applicable EU law. Carson & SAINT

has taken all appropriate technical and organizational measures to comply with the GDPR since its enforcement on May 25, 2018, and we continue to monitor international developments at https://ec.europa.eu/info/law/law-topic/data-protection_en to ensure our compliance efforts remain current and effective.

If you believe you have discovered a security vulnerability in our systems, products, or services, or if you are ever asked to provide sensitive information by someone claiming to represent Carson & SAINT and you doubt its legitimacy, or if you have any questions, concerns or requests regarding our privacy practices, we encourage you to notify us promptly at privacy@carsoninc.com so that we can take appropriate corrective action.

Carson & SAINT Product and Services Privacy Policy

Carson & SAINT 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 & 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 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 Site. Any material changes to this Privacy Policy will be effective as of the date and time they are updated on our Site. These changes will be effective immediately for new users of our Site or Service. Continued use of our Site, 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 Site

When you visit our Site at www.carson-saint.com (the “Site”), 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 Site. We use this information to help us understand our Site activity, and to monitor and improve our Site.

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. Product’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.

Cookies

Our Site uses a technology called “cookies”. If you decide not to accept cookies from our Site, certain features may not function as designed. You may also remove cookies.

Other Links

Our Site 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 Site 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 & SAINT that is misleading or that compromises the integrity of Carson & SAINT, please Contact privacy@carsoninc.com. Such notifications will be kept in strict confidence.

Social Media

Our Site 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 Site. Your interactions with these features are governed by the privacy policy of the company providing it and not by Carson & SAINT.

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 Site 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 Site. 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 or Product for a trial period.
- Carson & 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 Site 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 Site 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 Site.

- 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 Carson & SAINT 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")

The General Data Protection Regulation ("GDPR") is a comprehensive data protection law enacted by the European Union to address evolving technological, legal, and societal changes affecting the collection, use, and safeguarding of personal data. Officially adopted on April 27, 2016, and enforceable as of May 25, 2018, the GDPR replaces the earlier Data Protection Directive. Unlike its predecessor, GDPR introduces a harmonized framework for data protection across the European Economic Area (EEA), backed by clearly defined regulatory authority and significant penalties for non-compliance.

Importantly, GDPR applies not only to organizations operating within the EEA but also to those located outside the region that offer goods or services to, or monitor the behavior of, individuals within the EEA. As such, GDPR has established itself as a global benchmark for privacy and data protection standards.

Carson & SAINT Compliance with GDPR

Carson & SAINT has implemented internal processes, controls, and technical safeguards to ensure full compliance with the requirements of the GDPR.

How We Use Your Data

We use your personal data to:

- Provide and manage our services
- Respond to inquiries and customer support requests
- Improve our Site and services

- Send you administrative or marketing communications (with your consent, where required)
- Comply with legal or regulatory obligations

Legal Basis for Processing

Carson & SAINT processes personal data under the legal bases of consent, contractual necessity, and legitimate interests in accordance with Article 6 of the GDPR.

Carson & SAINT primarily relies on **Legitimate Interests** as the legal basis for processing data in the context of service delivery, product evaluation, internal analytics, and business communications, in accordance with the GDPR.

Data Subject Rights

As a resident of the European Economic Area, you have the right to access, correct, or delete your personal data, and to object to or restrict processing. You also have the right to file a complaint with your local data protection authority.

International Data Transfers

We may transfer your data outside the EEA. In such cases, we ensure appropriate safeguards are in place, such as EU-approved Standard Contractual Clauses.

Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes outlined in this policy, or as required by applicable law.

Third Party

We believe a very important part 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 assess all third parties for compliance with their security, privacy and confidentiality commitments.

Quebec Privacy Rights (Law 25)

Quebec's Law 25 is a privacy modernization law that strengthens the protection of personal information and enhances the rights of individuals regarding how their data is collected, used, disclosed, stored, and transferred. Law 25 imposes additional privacy obligations on organizations doing business in Quebec, including increased transparency, accountability, security safeguards, and requirements for managing privacy incidents and cross-border data transfers.

Carson & SAINT Compliance with Quebec Privacy Rights (Law 25)

Carson & SAINT recognizes the privacy rights of individuals residing in the Province of Quebec under the Act Respecting the Protection of Personal Information in the Private Sector, as amended by Law 25.

For individuals whose personal information is collected, used, disclosed, or retained by Carson & SAINT, we are committed to ensuring that personal information is handled in a transparent, secure, and responsible manner.

In accordance with Law 25:

- Carson & SAINT has designated a person responsible for the protection of personal information who oversees our privacy management program and compliance activities.
- We collect, use, and disclose personal information only for purposes that a reasonable person would consider appropriate in the circumstances and only to the extent necessary to fulfill those purposes.
- Individuals may request access to their personal information, request corrections to inaccurate or incomplete information, or withdraw consent to the collection, use, or disclosure of personal information where permitted by law.
- Where personal information is transferred outside Quebec, Carson & SAINT will take reasonable measures to ensure that the information receives a level of protection comparable to that required under applicable Canadian privacy laws.
- Carson & SAINT maintains administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, use, disclosure, alteration, or destruction.
- In the event of a confidentiality incident involving personal information that presents a risk of serious injury, Carson & SAINT will comply with applicable notification and reporting obligations under Quebec law.

Requests regarding personal information or privacy rights under Quebec law may be directed to our Privacy & Data Controller at privacy@carsoninc.com.

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.

Privacy & Data Controller and Subject Access Requests

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

Sharon Landesberg
Privacy & Data Controller
Carson and SAINT
4410 Prince Road
Rockville, MD 20853

The GDPR and Quebec Law 25 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

Privacy & Data Controller:

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