

# Privacy Policy

Last Updated: 11/02/2020

## Purpose

**Arctic Wolf Networks, Inc.** (“AWN,” “Arctic Wolf”) is a corporation located at 8939 Columbine Road, Suite 150, Eden Prairie, MN 55347. Arctic Wolf and its affiliates (“we,” “us,” “our”) are committed to protecting the privacy of your personal data defined herein (the “Information”). This Privacy Policy (the “policy,” “Privacy Policy”) applies to Information collected by us (i) through an Arctic Wolf website, including [www.arcticwolf.com](http://www.arcticwolf.com), (ii) in connection with our events, and (iii) as part of our sales and marketing activities.

## Terms of Use

If you have any dispute over the privacy of your information, the dispute is subject to this Privacy Policy and our [Terms of Use](#), including limitation of liability, user disputes and release, and application of California law.

## About This Privacy Policy

This Privacy Policy and any other documents referred to in this Privacy Policy describe what Information we collect and how we use that Information, as well as your choices regarding use, access, and collection of such Information.

Changes we make to this Privacy Policy will be made by updating this page. If the Privacy Policy is updated, we will place the modified version here along with an updated revision date. By continuing to use our Website, attending our events, or providing your Information for sales and marketing purposes after such revisions are in effect, you accept and agree to the revisions.

## Information We Collect

### *Information You Provide to Us*

We collect Information directly from you when:

- you fill out and submit web forms on our Website;
- you use interactive features on our Website;
- you participate in our surveys;
- you register for or attend a sponsored event;
- you request a demo or free trial of any of our products and services;
- you participate in promotional events, drawings, and/or give-aways;
- you engage with sales representatives, including on phone calls;
- you post on Arctic Wolf message boards, chat features, or blogs;
- you visit our offices and register as a visitor;
- you provide Information to our authorized partner(s); or
- you report a problem.

The Information you may provide includes (i) your name, (ii) telephone number, (iii) email address, (iv) title, (v) company, (vi) country, (vii) state, (viii) department or job role, (ix) information concerning your company or business, and (x) the nature of your request. We do not collect nor process special categories of personal data. You may choose not to provide Information to us but doing so may limit our ability to communicate with you or fulfill your requests.

### *Information We Collect Automatically*

Arctic Wolf, its affiliates, and authorized third parties may use information-gathering technologies to automatically collect Information as you navigate our Website.

These technologies include:

- **Cookies.** For more information about our use of cookie technology please read the [Arctic Wolf Cookie Policy](#).
- **Web Beacons.** We may use web beacons or transparent GIF files to enable our service providers to recognize a cookie in your browser. This will help us manage and measure our online advertising and analyze traffic. The cookie can be placed either by us or by our service providers.
- **Similar Technologies.** For the same purposes as cookies and web beacons, we use other technologies, such as tags, scripts, HTML5 local storage, and local shared objects.
- **Do Not Track.** Due to the lack of a common industry or legal standard for interpreting Do Not Track (DNT) signals, Arctic Wolf does not respond to browser DNT signals. Arctic Wolf will continue to monitor developments around DNT browser technology and the implementation of a standard in order to enhance our privacy program in relation to this technology.

When you navigate our Website, we collect log files which include timestamps of your visit, your IP address, internet service provider, browser used, operating system and other device identifications and configurations, locale and language preferences, visited URLs, referring and exit pages, and what you search for. The data that we collect by using these technologies is anonymous and not personally identifiable.

### *Information We Collect From Third Parties*

We receive Information from third parties, such as our partners, social media platforms, joint marketing partners, event sponsors, referral or commercial lead sources, and other data providers. In certain circumstances, we will send you an email letting you know we have received your Information, the source of the Information, a link to this Privacy Statement, and instructions on how to unsubscribe, if desired.

Information we receive from these sources includes (i) your name, (ii) telephone number, (iii) email address, (iv) title, (v) company, (vi) country, (vii) state, (viii) department or job role, (ix) information concerning your company or business, and (x) the nature of your request.

We may combine this Information with Information we receive about you from other means and use it as described in this Privacy Policy.

### *How We Use the Information*

We, or our selected third parties, may use the Information to contact you by email or phone to:

- provide you with information about our products and services that may interest you;
- respond to your inquiries;
- invite you to our events;
- evaluate the frequency, duration and patterns of usage of our Website to understand and improve our Website user experience;
- update and expand our records with new Information to identify potential customers; and
- register you as a visitor to our offices and manage non-disclosures you may be required to sign for security reasons to ensure protection of our facilities and confidential information.

Your previous browsing activity and other Information we hold about you will be used to tailor our messages to you. We use cookies and other similar tracking technologies when you use our Website to enable some of this personalization. If you wish to opt out of interest-based advertising, you can email us at [dataprotection@arcticwolf.com](mailto:dataprotection@arcticwolf.com).

If you do not want us to use your Information in this way, or to pass your details onward to third parties for marketing purposes, you can unsubscribe from such emails using the link provided in the emails, by speaking with your Arctic Wolf contact, or by emailing us at [dataprotection@arcticwolf.com](mailto:dataprotection@arcticwolf.com). Once you have unsubscribed from our emails, you will no longer receive future electronic communications from us unless you explicitly submit a form via our Website requesting a communication.

We may use the collected Information about you for the following purposes:

- To obtain any required consent;
- To respond to any problem that you reported to us;
- To respond to any request that you send to us;
- To notify you when we are legally required to do so;
- To provide you with information, products, or services that you requested from us;
- To provide you with a demo of any of our products or services when requested;
- To send you an invoice if you are an attendee at an event organized or sponsored by us;
- To notify you about changes to our Website;
- To identify areas for improvement, and improve our Website;
- To measure the effectiveness of our Website and marketing efforts; and
- To diagnose and resolve technical problems with our Website.

## How We Share Your Information

We may share Information as necessary to operate our business and only in the manner described below.

We may share or disclose Information in the following ways:

- **When changing our business structure**  
In the event of a proposed or completed merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of our assets, similar transactions or proceedings, or steps in contemplation of such activities, Information held by us may be among the assets transferred to the buyer or acquirer;

- When conducting our business operations**

We may use third party service providers to provide services on our behalf, including billing, payment processing, customer support, data analysis, advertising, and undertaking improvements to our products and services. Our service providers are only provided with information they need to perform their designated functions and are not authorized to use or disclose Information for their own marketing or other purposes. Our service providers may be located in the U.S., Canada or other foreign jurisdictions;
- To conduct our joint sales or product promotion activities**

We may engage in joint sales or product promotions with select business partners and share your Information with those partners for purposes of participating in sales activities, marketing our products and services, and attending, hosting or sponsoring sales events;
- To comply with laws**

We and our affiliates or service providers in the U.S. or other jurisdictions may disclose Information to comply with applicable legal or regulatory requirements (which may include lawful access by U.S. or foreign courts, law enforcement or other government authorities) and to respond to lawful requests by public authorities, including to meet national security, law enforcement requirements, court orders and legal processes;
- To protect rights and safety**

To protect and defend the brand, rights, property and safety of Arctic Wolf Networks, Inc. and its affiliates, Arctic Wolf customers, including enforcing contracts or policies, or in connection with investigating and preventing fraud; and
- With your consent**

Except as described above, we will provide you with notice when your Information will be shared with third parties, and you can choose not to share the Information.

## How Long We Keep Your Information

Your Information will be stored for only as long as necessary for the purposes set out above, thus the retention period for your Information will vary depending on your interactions with us (for example, where you have made a request to us via our Website, we will keep a record of your request for the period necessary to ensure the adequate provision of services to you). We will keep a record of your request for as long as necessary to protect us from a legal claim.

To determine the appropriate retention period for your Information, we consider the sensitivity of the Information, the potential risk of harm from unauthorized use or disclosure of your Information, the purpose(s) for which we process your Information, whether we can achieve those purposes through other means, and the applicable legal requirements. The process to maintain Information in our environment is covered in our Data Retention Policy.

## Your Choices

The browser and/or mobile devices you use may provide you with the ability to control cookies and other types of local data storage and allow you to control whether location or other

data is shared. Arctic Wolf does not control these choices or default settings, which are offered by the producers of your browser and/or mobile devices.

Please review the Arctic Wolf Cookie Policy regarding your choices to use cookies. You may withdraw your consent to be sent information, products, or services by clicking on the “Unsubscribe” link in emails sent by us. Once you have unsubscribed from our emails, you will no longer receive future electronic communications from us unless you explicitly submit a form via our Website requesting a communication. We may retain your email address. Retaining your email address with an “unsubscribed” flag will ensure that any future marketing campaigns will not include your email address.

Upon reasonable request, we will provide you with information about whether we hold any of your Information with regards to your usage of our Website. To request this information please contact us at [dataprotection@arcticwolf.com](mailto:dataprotection@arcticwolf.com).

You may withdraw any consent you previously provided to us for the processing of your Information by contacting us at [dataprotection@arcticwolf.com](mailto:dataprotection@arcticwolf.com). As required by applicable law, we will apply your preferences going forward, within a reasonable amount of time. Even where you withdraw your consent, we may still process your Information for limited purposes. For example, to give effect to your request or to safeguard our business. In some circumstances, withdrawing your consent to our use or disclosure of your Information will mean that you cannot use some of our products or services.

## Your Rights

Subject to applicable law, you can request to access, correct, or delete your Information. In certain circumstances, you have the right to restrict access to your Information and object to your Information being used in a specific manner. Such requests can be made by contacting us at [dataprotection@arcticwolf.com](mailto:dataprotection@arcticwolf.com). We will respond within a reasonable timeframe but not later than any response time(s) required under applicable laws. However, please note that there are limitations to these rights and there may be circumstances where we are not able to comply with your request.

## Security

The security of your Information is important to us. Arctic Wolf maintains appropriate administrative, physical, and technical safeguards to help protect the confidentiality and integrity of Information that is submitted via our Website both during transmission and once it is received. However, there is no absolute assurance that data will be protected from unknown types of threats and vulnerabilities. You should note that by submitting data through our Website, your Information will be transferred through third-party infrastructures which are not under our control. We will strive to use appropriate tools and procedures to protect your Information, however we cannot guarantee its absolute security. To learn more about our security practices, refer to [Information Security Overview](#).

## Children’s Information

Our Website does not intentionally collect any Information from children under the age of thirteen (13). If you are under the age of thirteen (13), then do not submit any personal information on our Website. If you learn that a child under the age of thirteen (13) has provided us with Information, please contact us at [dataprotection@arcticwolf.com](mailto:dataprotection@arcticwolf.com), and we will use appropriate tools, procedures, and commercially reasonable efforts to delete that Information.

## Location of Data

Arctic Wolf is headquartered in the United States. We have entities, operations and service providers in the United States and throughout the world. We and our service providers may transfer your Information to, or access it from, countries other than the one in which you are located. These countries may have data protection laws different from those of the country which you are located. We will maintain appropriate administrative, physical, and technical safeguards to ensure an adequate level of protection of the Information for instance by entering into the appropriate back-to-back agreements and, if required, standard contractual clauses or an alternative mechanism for the transfer of data as approved by the European Commission (Art. 46 GDPR) or other applicable regulator. Also please see EU-US Privacy Shield and Swiss-US Privacy Shield below for additional information.

## Third-Party Links

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these third parties. Please check these policies before you submit any information to these websites.

## EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield

Arctic Wolf complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Arctic Wolf has certified to the Department of Commerce that it adheres to these Privacy Shield Principles. Arctic Wolf may process some personal data from individuals or companies via other compliance mechanisms, including data processing agreements based on the EU Standard Contractual Clauses. To learn more about the Privacy Shield program and view our certification, visit the U.S. Department of Commerce's Privacy Shield site at [Privacy Shield](#).

Arctic Wolf is responsible for the processing of the personal data it receives under each Privacy Shield Framework and subsequently transfers to a third party acting as an agent on its behalf. Arctic Wolf complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, Switzerland and United Kingdom, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, Arctic Wolf is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, we are required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the Privacy Shield Principles, Arctic Wolf commits to resolve complaints about our collection or use of your personal data. EU, Swiss, and UK individuals with inquiries or complaints regarding our Privacy Statement should first contact Arctic Wolf at [dataprotection@arcticwolf.com](mailto:dataprotection@arcticwolf.com) or you may also call (888) 286-6726.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://www.jamsadr.com/eu-us-privacy-shield>.

Under certain conditions, more fully described on the Privacy Shield website, you may be entitled to invoke binding arbitration by going to [Submitting a Complaint](#) on the Privacy Shield website when other dispute resolution procedures have been exhausted.

## Supplemental Privacy Policy Terms

### Canada

#### Access to Information

- **Consent**

By using our Website, attending our events, or otherwise interact with us, you consent to the collection, use and disclosure of your Information in accordance with the terms of and for the purposes set out in this Privacy Policy. Arctic Wolf may seek consent to use and disclose Information after it has been collected in those cases where we wish to use the Information for a new or different purpose, where consent as not already been obtained for such use or disclosure.

If you submit personal information about an individual (i.e., your employees, personnel, account administrators, authorized resources, etc.) in connection with access to our Website, attendance at our events, or otherwise interact with us, you represent that you have obtained the requisite consent and/or provided appropriate notifications, as required under applicable privacy laws, including such consent and/or notifications as may be required for the transfer of personal information outside of Canada.

- **Privacy Rights**

Subject to limited exceptions under applicable law, you may have the right to access, update and correct inaccuracies on your Information or withdraw your consent to our further collection, use and disclosure of your Information. To exercise these rights, please submit a request by emailing [dataprotection@arcticwolf.com](mailto:dataprotection@arcticwolf.com) or you may also call (888) 286-6726. Please be as specific as possible in relation to the Information you wish to access. Once Arctic Wolf receives your request, Arctic Wolf will review it, determine whether Arctic Wolf can verify your identity, and process the request accordingly. If Arctic Wolf needs additional information to verify your identity, Arctic Wolf will let you know.

If you have any questions or complaints about our handling of your Information including personal information, or rights with respect to the foregoing, please contact us at [dataprotection@arcticwolf.com](mailto:dataprotection@arcticwolf.com), and we will address your complaint, and otherwise further advise you of any rights you may have to complain to the relevant privacy commissioner(s).

## California Consumer Privacy Act

The California Consumer Privacy Act (“CCPA”), which is effective as of January 1, 2020, regulates how Arctic Wolf handles personal information of California residents and gives California residents certain rights with respect to their personal information.

Arctic Wolf is both a “business” and a “service provider” under the CCPA. The following supplemental privacy policy applies to information Arctic Wolf collects in its role as a business. If you would like more information about how your personal information is processed by such other companies, including companies that engage Arctic Wolf as a service provider, please contact those companies directly.

This provision is effective as of January 1, 2020, shall apply only to residents of California, and may be subject to change. The general privacy policy shall continue to apply to the extent that it applies to you as a resident of California; however, if you are a resident of California, Arctic Wolf also is required to disclose certain uses and disclosures in a certain format, as well as to inform you of certain rights you may have. Any capitalized terms used in this supplemental privacy policy shall have the same meaning as in the general privacy policy.

As set forth in this Privacy Policy, Arctic Wolf collects the Information from you for the purposes described herein. As described in this Privacy Policy, Arctic Wolf collects the Information from a variety of sources, including directly from you, from your devices through use and access to our Website, and/or from other third party service providers.

Arctic Wolf may share personal information with Third Parties as the term is defined under the CCPA.

### Additional Disclosures:

Arctic Wolf engages certain trusted third parties to perform functions and provide services to us, including auditing, marketing, hosting and maintenance, error monitoring, debugging, performance monitoring, and other short term uses. We may share your Information with these third parties, but only to the extent necessary to perform these functions and provide such services. We require these third parties to maintain the privacy and security of the Information they process on our behalf.

Arctic Wolf has disclosed the following categories of personal information for business purposes and valuable consideration in the 12 months prior to this Privacy Policy’s last update:

Identifiers (names, email addresses, phone numbers, mailing address)	YES
Commercial Information (Solution information)	YES
Geolocation Data	NO

### ***Do Not Sell My Personal Information:***

Arctic Wolf does not sell, as defined under the CCPA, personal information of any individual, including personal information of minors under 16 years of age.

### Your Rights:

You may have certain rights with respect to your Information, including:

- The right to access, including the right to know the categories and specific pieces of Information Arctic Wolf collects;
- The right to deletion of your Information, subject to certain limitations under applicable law;
- The right to request disclosure of Information collected;
- The right to disclosure of Information disclosed for valuable consideration; and
- The right not to be discriminated against for exercising certain rights under California law.

To exercise these rights, please submit a request by emailing [dataprotection@arcticwolf.com](mailto:dataprotection@arcticwolf.com) or you may also call (888) 286-6726. Please be as specific as possible in relation to the Information you wish to access. Once Arctic Wolf receives your request, Arctic Wolf will review it, determine whether Arctic Wolf can verify your identity, and process the request accordingly. If Arctic Wolf needs additional information to verify your identity, Arctic Wolf will let you know. Arctic Wolf will respond to your request within 45 days of receipt or notify you if Arctic Wolf requires additional time.

If you would prefer, you may designate an authorized agent to make a request on your behalf.

### **Data Protection Officer and Contact Details**

Arctic Wolf's Data Protection Officer and Information Security Officer are the responsible data protection officers for Arctic Wolf Networks, Inc. and its affiliates.

Questions regarding this policy can be directed by mail to the address below, or by emailing [dataprotection@arcticwolf.com](mailto:dataprotection@arcticwolf.com)

#### **Arctic Wolf Networks, Inc.**

Attn: Information Security and Data Protection Officer  
P.O. Box 46390  
Eden Prairie, MN 55344 U.S.A.