

# Privacy Notice

Last Updated: August 2023

## 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”) describe in this Privacy Notice (the “Notice,” “Privacy Notice”) our processing practices with respect to personal data (“Information”) collected by us (i) through an Arctic Wolf website (“Website”) that links to this Privacy Notice, including <https://arcticwolf.com> and <https://community.arcticwolf.com>, (ii) in connection with our events, (iii) as part of our sales and marketing activities, and (iv) your participation on the optional customer community forum. Visiting our Website and taking steps that include providing personal data are voluntary.

## Terms of Use

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

## About This Privacy Notice

This Privacy Notice and any other documents referred to in this Privacy Notice 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 Notice will be made by updating this page. If the Privacy Notice 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 partner(s), subject to the permissions you provide to them regarding your Information;

- you provide Information as part of your participation in the Pack Rewards Program;
- you consent to the recording of our calls with you; 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, (x) the nature of your request, (xi) Social Security Number/Social Insurance Number (to the extent you participate in the Pack Rewards Program); voice recording. You may choose not to provide Information to us but doing so may limit our ability to communicate with you or fulfill your requests. The term “partner” is used in this Privacy Notice in the popular sense as referring to a person or entity that has entered into a collaborative relationship with us and does not imply the existence of a legal partnership.

### *Information We Collect Automatically*

Arctic Wolf, its affiliates, partners, and third party service providers 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.

### *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.

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 Notice.

## **How We Use the Information**

We, or our selected third party service providers, and partners, 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;
- keep you up to date on latest product and service announcements, updates, special offers or other information we think you would like to hear about either from us, through our marketing agencies or from our partners;
- 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 experiences (collectively, “*System Metrics Data*”);
- update and expand our records with new Information to identify potential customers;
- deliver required tax forms to you as part of your participation in Arctic Wolf programs;
- training purposes for our employees; 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 may be used to tailor our messages to you. We use cookies and other similar tracking technologies when you use our Website, subject to your opt-in or opt-out selections at the time you visit the Website, to enable some of this personalization. If you wish to discontinue receipt of any interest-based advertising that you previously consented to receive, you can submit a request at [Data Protection](#).

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 submitting a request at [Data Protection](#). 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.

## 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, issuance of

tax forms, 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, Australia, United Kingdom, Europe, or other 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; and
- **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.

## 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 request not to be sent information, products, or services by clicking on the “Unsubscribe” link in emails sent by us or by selecting the Cookies that are deployed when you visit the Website.

Upon your 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 submit a request at [Data Protection](#).

To request to withdraw any consent you previously provided to us for the processing of your Information submit a request at [Data Protection](#).

## Your Rights

Applicable law may give you rights to request to access, correct, or delete your Information. In certain circumstances, you may have the right to restrict access to your Information and object to your Information being used in a specific manner, or a right to data portability. Such requests can be made by submitting a request at [Data Protection](#). Note that there are limitations to these rights and there may be circumstances where we are not required or able to comply with your request. You may also have a right to lodge a complaint with a supervisory authority.

In addition, if you are a California resident (“resident” as used in this paragraph relates only to natural persons) you may request (i) a list of categories of personal information disclosed to third parties during the immediately preceding calendar year for those third parties’ own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please submit a request at [Data Protection](#) and specify in the “Request Details” you are making a “California Shine the Light” request. We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.

## Security

Arctic Wolf maintains 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 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](#).

## Location of Data

Arctic Wolf is headquartered in the United States. We have entities, operations and service providers in the United States, Canada, United Kingdom, Germany, and Australia, and other locations 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 administrative, physical, and technical safeguards to protect the Information for instance by entering into agreements such as standard contractual clauses approved by an applicable regulator. See European Privacy Supplement 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 such policies before you submit any information to these websites.

## Data Privacy Framework – EU, United Kingdom (UK), and Switzerland

Arctic Wolf complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Arctic Wolf has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Arctic Wolf has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

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.

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 Notice should submit a request at [Data Protection](#) 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-data-privacy-framework>

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 Notice 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 Notice. 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 at [Data Protection](#) 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 submit a request at [Data Protection](#), 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 went into effect on January 1, 2020, as supplemented by the California Privacy Rights Act which went into effect on January 1, 2023 (collectively, the “CCPA”). CCPA 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 notice applies to Information Arctic Wolf collects in its role as a business. If you would like more information about how your 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 Privacy Notice 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 notice shall have the same meaning as in the Privacy Notice.

As set forth in this supplemental privacy notice, Arctic Wolf collects Information from you for the purposes described herein. As described in this supplemental privacy notice, 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 your Information with Third Parties as the term is defined under the CCPA.

#### ***Additional Disclosures:***

Arctic Wolf engages certain 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 in the 12 months prior to this Privacy Notice’s last update:

|   |     |
|---|-----|
| A. Identifiers (names, email addresses, phone numbers, mailing address, IP address)   | YES |
| D. Commercial Information (Solution information)  | YES |
| F. Internet or Other Electronic Network Activity Information (IP address, device identifier, information provided in URL string, internet service provider, browser used, operating system and other device identifications and configurations, locale and language preference) | YES |
| I. Professional or employment-related information.  | YES |

***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 correction of Information collected;
- The right to limitation of use of Information collected; and
- The right not to be discriminated against for exercising certain rights under California law.

To exercise these rights, please submit a request at [Data Protection](#) or you may also call (888) 286-6726. Please be as specific as possible in relation to the Information for which you are requesting action. 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.

**European Privacy Supplement**

Arctic Wolf as a data controller provides these additional and different disclosures about its data processing practices to data subjects in the EEA, Switzerland, and the UK (EEA+). If you are



accessing the website from within the EEA+, this European Privacy Supplement applies to you in addition to the Privacy Notice.

### Legal Bases for the Processing.

We process your personal data on several different legal bases, as follows:

- Based on necessity to perform contracts with you (see Article 6(1)(b) of the GDPR): When you access, use or register for services, you form a contract with Arctic Wolf based on the applicable terms of use or terms of service. We need to process your personal data to discharge our obligations in any such contract, fulfill your requests and orders, answer questions and requests from you, and provide tailored customer support and search results to you.
- Based on compliance with legal obligations (see Article 6(1)(c) of the GDPR): We may need to process your personal data to comply with relevant laws, regulatory requirements and to respond to lawful requests, court orders, and legal process.
- Based on our legitimate interests (see Article 6(1)(f) of the GDPR): We process your personal data to send you invitations to relevant Arctic Wolf offerings (unless you have opted out or opted in, as legally required), newsletters (unless you have opted out or opted in, as legally required), invitations to relevant surveys (unless you have opted out or opted in, as legally required), understand which products and services may be relevant to you, and to improve our products, services and business practices.

Personal data we collect, as defined in the applicable General Data Protection Regulation, may be stored and processed in the United States or any other country in which we or our affiliates or service providers operate in, including but not limited to the UK, Canada, and Australia. To the extent you are not acting in the data transfer we transfer personal data out of the EEA+ to countries that do not benefit from an adequacy decision based on mechanisms such as approved Standard Contractual Clauses and other contractual measures to ensure that adequate safeguards are in place with respect to the data.

## **South African Privacy Supplement**

### Accessing Information and requesting corrections:

If at any time you want to (i) know exactly what Information or other personal information we hold about you, (ii) request deletion of any Information or other personal information we hold about you, or (iii) opt-out or object to our use or collection of your Information, please contact us at [Data Protection](#) or you may also call +1 (888) 286-6726.

If at any time you wish to change any Information or other personal information we hold about you because it is inaccurate or out of date, please contact us at [Data Protection](#) or you may also call +1 (888) 286-6726 and we will amend this record.

### Complaints:

Should you have any concerns or complaints about how we handle your Information, please contact us at [Data Protection](#) or you may also call +1 (888) 286-6726 and we will amend this record.

We will investigate your complaint and will use reasonable endeavors to respond to you in writing within a reasonable time of receiving your complaint. If we fail to respond to your complaint within a reasonable time of receiving it in writing or if you are dissatisfied with the

response that you receive from us, you may have the right to make a complaint to the Information Regulator. Details of how to contact the Information Regulator are located at: <https://inforegulator.org.za/complaints/>.

## **Australia and New Zealand Privacy Supplement**

### *Accessing Information and requesting corrections:*

If at any time you want to know exactly what Information or other personal information we hold about you, please contact us at [Data Protection](#) or you may also call +1 (888) 286-6726. Our file of your Information and any other personal information (if applicable) will usually be made available to you within forty-five (45) days of receiving your request and in any event within a reasonable time.

If at any time you wish to change any Information or other personal information we hold about you because it is inaccurate or out of date, please contact us at [Data Protection](#) or you may also call +1 (888) 286-6726 and we will amend this record.

### *Complaints:*

Should you have any concerns or complaints about how we handle your Information, please contact our Data Protection Officer:

Adam Marre  
Chief Information Security Officer  
P.O. Box 46390  
Eden Prairie, MN 55344 USA

We will investigate your complaint and will use reasonable endeavors to respond to you in writing within a reasonable time of receiving your complaint. If we fail to respond to your complaint within a reasonable time of receiving it in writing or if you are dissatisfied with the response that you receive from us, you may have the right to make a complaint to the Office of the Australian Information Commissioner (OAIC) or the New Zealand Privacy Commissioner. Details of how to contact the OAIC are located at: <https://www.oaic.gov.au/about-us/contact-us> or the New Zealand Commissioner at <https://www.privacy.org.nz/about-us/contact-us/#:~:text=If%20you%20have%20a%20preferred,we%20can%20do%20to%20help.>

## **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 notice can be directed by mail to the address below, or by submitting a request at [Data Protection](#).

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

Attn: Legal Department  
P.O. Box 46390  
Eden Prairie, MN 55344 U.S.A.

Pursuant to Article 27 of the UK GDPR, Arctic Wolf Networks, Inc. has appointed EDPO UK Ltd as its GDPR representative in the UK. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

- by using EDPO's online request form: <https://edpo.com/uk-gdpr-data-request/>
- by writing to EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom

Pursuant to Article 27 of the EEA GDPR, Arctic Wolf Networks, Inc. has appointed IITR Cert GmbH as its GDPR representative in the EEA. You can contact IITR Cert GmbH regarding matters pertaining to the EEA GDPR:

- by writing to IITR Cert GmbH, Dr. Sebastian Kraska, Data Protection Representative, Eschenrieder Str 62c, 82194 Groebenzell, Germany
- by email to [email@iitr.de](mailto:email@iitr.de)