

SIEMonster Privacy Policy

Introduction

SIEMonster, Inc. (“**SIEMonster**”) provides software and services for managing security information and events, including software for its customers’ on-premises installation and online application services. Most of our customers are business entities or other organizations. SIEMonster’s main office is in San Francisco, California and it offers its services to customers worldwide.

This Privacy Policy describes our policies for personal data that we collect and use for our own general business purposes.

We also have personal data in our possession that our customers have collected and asked us to process for them as part of our services. We use this customer-controlled data only as permitted by our customers in our agreements with them and not for our own general business purposes. We have included information below to describe our commitments to you if we have access to your data in our role as a service provider, but you should review the privacy policy of our customer that controls your personal data to understand its privacy practices.

How to Contact Us

Email: privacy@siemonster.com or via mail: SIEMonster, Inc. – 101 California Street, Suite 2710, San Francisco, California 94111.

Please contact us if you have any questions about the information in this Privacy Policy or our handling of your personal data, or would like to access, correct, delete, restrict the use of, or take other action with regard to your personal data. We ask, however, that if we are in possession of your data solely as a service provider for our customer you first contact our customer with your request.

Changes to Privacy Policy

We may change this Privacy Policy from time to time. We will manage your personal data in accordance with the Privacy Policy version that was published on the date that we collected the data about you. If we change this Privacy Policy we will make prior versions available on our site or other location described in the revised Privacy Policy.

Definitions

These words have special meanings in this Privacy Policy:

- **account user** means an individual who interacts with us as a representative of our customer;
- **customer** means the business or other organization that establishes an account with us or our reseller for the use of our services;
- **services** means our online application services for managing security information and events and customer support;
- **"site"** or **"website"** refers to www.siemonster.com and any other website where this Privacy Policy is posted;

- **"visitor"** means an individual who visits our website or social media pages, interacts with our social media posts, visits our offices, interacts with us at a trade show or other industry event, or communicates with us in some other way other than as an account user;
- **"we"**, **"our"** and **"us"** refer to SIEMonster;
- **"you"** and **"your"** refer to visitors, account users, or the individuals whose personal data is controlled by our customer and provided to us for processing as part of our services.

Data Collection Purposes

We collect personal data for our business purposes:

- to operate our website;
- to improve our website and product offerings;
- to market our services;
- to manage our relationship with our customers and provide customer support;
- to provide our services to our customers; and
- to manage our vendors.

We may allow third party advertisers, such as Google Ads to collect personal data on our site for the purpose of selling targeted advertisement services. See **Advertising Ecosystem** and **How to Opt Out of Online Data Collection** below.

Data Collection Methods

Automated data collection on our website and online services platform

When you visit our site or online services platform, our servers capture data that may be used to identify you or your device, such as your IP address, device identifier, and information about your device such as the operating system, time zone setting, language setting, browser settings, and browser plug ins. Our servers also capture information about your visit to our site or services platform, such as the time and duration of your visit on each page on the site, and your navigation path on the site or services platform (i.e., what you click on).

We and our third-party analytics providers may place a cookie on your browser so that we may identify you as a return visitor if you visit our site more than once. Please see **How to Opt Out of Online Data Collection** below for information on how to block cookies.

Data provided by advertisers

If you arrive at our site by clicking on a link that is part of an advertisement on another site (including an advertisement on a social media platform), the advertising service will identify the link, enabling us to associate you with the advertising parameters we provided to the advertising service. For example, we may ask an advertising service to target our ad to individuals that the ad service has identified as having a high interest in open source security solutions. If you arrive at our site by means of the link in that ad, we will be able to identify you as having a high interest in social media. Advertising services are

responsible for the collection, use and disclosure of the data they provide to us in accordance with their published privacy policies. See the section below captioned **Advertising Ecosystem** and **How to Opt Out of Online Data Collection**.

Data provided by you as part of your communications with us

We collect personal data that you submit to us as part of a communication with us as a visitor or account user, such as via chat on our site, email, submission of a web form, telephone, or in person (such as at a meeting, trade show or other event). For example, you may communicate with us as a visitor to obtain more information about our services, or as an account user to request technical support. The communication may include information that can be used to identify you such as your name, job title, job function, the organization you represent, email address, phone number as well as information about your interest in our company or our services. We do not solicit information from you as part of these communications other than information that is useful to us in light of the purposes described above, but if you choose to volunteer more personal information than we ask for we will collect that as part of the communication.

Data provided by you or your organization to establish and maintain the SIEMonster account

Our customers are required to name billing, administrative, technical and other types of service and account users who have authority to use our services and manage the customer's account. We collect the name and business contact information of these account representatives, and will require each individual account representative to establish their own set of account credentials (user name and password). If the customer wishes to integrate our services with other online services, we will require the customer to provide the account credentials used by their representatives on those platforms.

If you use a personal payment card or other financial account to make payment arrangements, then we may collect information relevant to the processing of the payment transaction.

Resellers

We have relationships with other companies that allow them to resell our products and services. They may collect personal data of the type described above using the methods described above and provide that data to us. We will treat personal information we receive from our resellers the same as the personal information we collect directly.

Combinations of data collected using different methods

We may use service providers such as Google Analytics or Salesforce to help us associate the personal data we capture about you as part of visitor interactions with personal data we collect about you as an account user.

Data We Collect On Our Customer's Behalf

Currently we use personal data we collect on a customer's behalf as part of providing our online services only to provide services to that customer and to meet related internal administrative and legal requirements. However, provided our customers give us permission, and assure us that they have

complied with applicable laws for disclosures, notices and consents, we may in the future use data we collect as part of providing services to our customers to create and offer information products and services. We will not use your personal data in this way unless we have a legal basis to do so and we or our customers have complied with all notice and consent requirements under applicable law.

DATA USE

Visitors: We use data collected about visitors:

- to operate our website – web servers, by their nature, must capture your IP address and information about your browser and device to display our site to you;
- to develop our website and help us develop of product offerings – we use the information to help us understand what part of our website and products offerings is of interest to different kinds of visitors and how visitors navigate our site and services interfaces so that we can modify and improve our site content, services interfaces, and other marketing materials to be more appealing to prospective customers; we may also use the information about your site visits and other visitor interactions to help us measure interest in our services or various features of our services;
- to measure the success of our advertising efforts – we use visitor information to verify whether the ad services we purchase from third parties are actually resulting in visits to our site or other visitor interactions;
- to show you personalized content when you return to our site, based on our understanding of the information that may be of greatest interest to you;
- to communicate with you as part of our marketing efforts – if you provide us with contact information we may use it to send you communications about our company, our products or services, or related topics that we think you may find of interest;
- to register you for webinars, office visits, or other online or offline events that we host;

Account Users: we use data collected about accounts users (alone or as combined with data collected as part of an account user’s visits (such as pre-login activity on the Site):

- to provide our online services – we use login credentials to authenticate individuals as authorized users of our online services, and we use the data collected by automated means on our online service platform to provide the functionality of our service;
- we use contact information and other personal data to send invoices and other account communications, to authenticate individuals who request information or support on the customer’s behalf, and to administer the customer’s account, such as to complete purchase transactions;

- to review compliance with usage terms in our services agreements; for example if the customer's use of our services is limited to a certain number of individuals we may use personal data to help us monitor compliance with the usage restrictions;
- to help us develop our service offerings – we use information about your use of our services to measure interest in various features and plan enhancements or new features, and to improve user experience;
- to communicate with you as part of our marketing efforts – we use contact information and information about your use of our services to send you communications about our products or services, or related topics that we think you may find of interest

Data Integrity

We process personal information only for the purposes for which it was collected and in accordance with this Privacy Policy. We regularly review our data collection, storage, and processing practices to ensure that we only collect, store, and process the minimum personal information needed for the purpose collected. We take reasonable steps to ensure that the personal information that we process is accurate, complete, and current, but we depend on our account users to update their personal data as necessary.

Requests to access, amend, delete or restrict the use of your personal data

Please send us a request at privacy@siemonster.com if you would like to know what personal data we have about you, or would like us to correct inaccurate data, delete your personal data, or restrict the use of your personal data. We commit to responding to your request promptly and honoring your reasonable requests. We will comply with all applicable legal requirements related to your requests, but please note that we are not required by law to delete or restrict the use of your data in a way that prevents us from complying with our legal obligations to our customer or that interferes with our reasonable record keeping as necessary to demonstrate compliance with our contracts and applicable law.

Additional Information for California Visitors, Account Users

In addition to our commitments stated above, if our collection of personal information about you for our business purposes is covered by the California Consumer Privacy Act you have the have certain rights under that law.

You may request disclosure of the following specific information:

- the categories of personal information as well as the specific pieces of personal information that we have collected about you for our business purposes over the prior 12 months;
- the categories of sources from which we have collected that personal information,
- our purpose(s) for collecting that personal information,

- the categories of third parties with whom we have shared the personal information, such as our service providers, and
- whether we have sold the personal information to third parties or disclosed the information to third parties for a business purpose, and if so the categories of personal information and third parties.

In addition, you have the right to ask SIEMonster to delete your personal information. We will comply with your deletion request and require our service providers to do the same, unless we plan to retain the personal information on a legally permitted basis and we give you notice of this fact and the legal basis on which we rely.

You may make a request by calling our toll-free number [insert toll free number] or submitting the request to privacy@siemonster.com or by sending an email or physical mail request to the addresses above.

Before responding to your request we may ask you to provide information needed to verify that you are the consumer (or have authorization from the consumer) whose personal information is covered by the request.

We may not discriminate against you because you make a request described in this Section by denying you our services or providing a different quality or price for our services, unless the different service or price is reasonably related to the value provided to you by your data.

Service Provider Data

Our customers who use our online application services will use our service to collect data that is useful for controlling security risk, including personal data such as IP addresses and device information. Our customers are responsible for making appropriate cookie disclosures and enabling any required cookie opt-out process.

Some of our customers are subject to special data privacy laws, such as the General Data Protection Regulation adopted by the European Union in May 2018 (the “GDPR”). We make appropriate contractual commitments to our customers in support of their obligations under the GDPR or other data privacy and protection laws applicable to them

Please contact us at the address above if you have questions or concerns regarding our processing of the data described in this Section. We ask, however, that your first contact our customer if you have a request to access, block, erase or take other action with respect to data that we have solely as a data processor for our customer.

Disclosure

We have not sold or leased personal data, and will not sell or lease your personal data unless you give us your consent to do so. The California Consumer Privacy Act includes a definition of “sale” that may include permitting third party advertisers to collect data about our Site visitor for use as part of their

advertising services generally. We may permit advertisers, such as Google Ads to collect data on our site by means of advertising cookies. See the section below captioned **Advertising Ecosystem** and **How to Opt Out of Online Data Collection**.

We will not disclose your personal data to third parties except as follows:

Legal Reasons

When we believe release is appropriate to comply with the law, to enforce our terms of use and other rights, or to protect the rights and safety of others.

This may include exchanging information with government regulatory or law enforcement agencies, or with other companies and organizations for fraud protection and legal compliance.

Sale of Business

As part of a sale of a sales of business assets where the purchaser needs the personal data to use the assets.

We may in the future sell all or part of our assets or be involved in a merger. We may provide the company that is seeking to acquire our business with access to personal data as part of their evaluation of our business, but will require them to maintain the personal data in confidence and use it only to evaluate our business. If we complete a transaction, it is customary to transfer personal data that is related to the purchased business assets to the purchaser.

Service Providers

We use the services of companies like the ones listed below to collect data on our behalf or to help us analyze, store, manage and otherwise process your personal data. Each of these companies commits in its contract with us to use the personal data only according to our contract with them or our other instructions as necessary to support our business. They are not authorized to use your personal data for any other purpose. They are not authorized to disclose your personal data to others except with our permission, and only if they require the others to comply with the same restrictions that apply to them.

Amazon Web Services
Microsoft Azure
Salesforce, Pardot
Google Analytics
Mail Chimp

Advertising Ecosystem

We use online advertising services that enable a practice referred to as “online behavioral advertising.” These services aggregate data about an individual’s behavior on many different sites and online services, and use that data to sell targeted advertising services. For example, we permit Google’s advertising services to collect data about your behavior on the SIEMonster Site, as do many other website operators

who use Google's ad services. Google combines the data about an individual that it collects from different sources, and uses this aggregate data to sell advertising services that target the display of ads to web users who meet certain behavioral criteria. Google does not disclose this aggregate data to SIEMonster, but we are able to infer that users who interact with our ad meet the advertising criteria we provided. Google collects this data using cookies, web server logs (its own and its advertising customers), clear gifs and other online data collection techniques. See Online Data Collection Techniques and How to Opt Out of Online Data Collection.

Online Data Collection Techniques

A cookie is a unique alphanumeric identifier that is placed by a web server on the web visitor's browser. Cookies are used to analyse visitors' use of the website. For example, a website operator can use the cookie to identify the number of unique visitors to the site, whether or not those visitors are repeat visitors, and information about the visitor's activity on the site, device and device settings. A tracking pixel, also known as a web bug or web beacon, is a small graphic (usually 1 pixel x 1 pixel) invisible to the eye, that is embedded in web content or email. When content that has an embedded web beacon is viewed, the browser will request content from a web server, which in turn will set a cookie.

How To Opt Out Of Online Data Collection

You can manage your cookie preferences at any time using our cookie management tool [here](#).

You can also manage browser cookies through your browser settings. The 'Help' feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, how to disable cookies, and when cookies will expire. If you disable all cookies on your browser, neither we nor third parties will transfer cookies to your browser. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some features and services may not work.

Our web server does not recognize or respond to any "do not track" setting you may have in your browser.

The third parties who we may permit to collect data on our site have features that allow you to block their data collection via cookies. See their privacy policies and cookie policies:

Google Ads: <https://policies.google.com/technologies/ads?hl=en&gl=us&hl=en>

Communications Policy

If you do not wish to receive our email or other communications, please send your request to privacy@siemonster.com. Please note that it may take up to ten days to remove your contact information from our marketing communications lists, so you may receive correspondence from us for a short time after you make your request.

Children

Children are not permitted to use our site or services. We do not knowingly collect personal information from anyone under 16. If you are under 16, do not use or provide any information on our Sites unless you have involved your parent or guardian. If we discover that we have information about a child we will delete that information. If you are the parent or guardian of a child and you believe we have personal data about the child without your consent, please contact us at the address appearing at the top of this page and we will delete that information.

Security

SIEMonster protects personal data from unauthorized use, disclosure, corruption and destruction using appropriate technical and organizational measures.

Data Retention

We will retain your personal data only for as long as reasonably necessary to fulfill the purpose for which it was collected, and to comply with our legal obligations. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

International Transfers

We will comply with laws applicable to the transfer of personal data across international borders. We provide appropriate contractual commitments to our customers in the European Union that require protections around transfer of personal data to the United States.