

CODE SIREN, LLC

POLYNOM™ SOFTWARE PRIVACY POLICY

Effective Date: July 17, 2023

This Code Siren, LLC (“Code Siren” or the “Company” or “we” or “us” or “our”) privacy policy (the “Privacy Policy”) is designed to help you and your enterprise understand what information we collect, including information that directly or indirectly identifies an individual (“personal information”), an entity (“enterprise”), and how we use or share that information when using the product (hereinafter, “Polynom”).

For self-hosted products, please see the first section of this Privacy Policy. For all other Code Siren products, Polynom services, and interactions, please see the remainder of the policy starting with the “Privacy Policy Scope.”

Polynom Self-Hosted (On-Premises) Products

This is the only section of the Privacy Policy that applies to end users of our self-hosted (on-premises) products. With self-hosted products, the Customer (defined below) who purchases the Polynom product also controls end-user data processing. If the Customer permits, Code Siren can collect limited service and usage data like error and diagnostics information, security alerts, and log file reports associated with device identifiers. We refer to this information as “telemetry data,” it does not include any end-user personal identifiers or message contents.

- We might use telemetry data to protect and improve the self-hosted products, such as maintaining security and preventing abuse.
- To the extent that our processing of telemetry data from self-hosted products is subject to the EU’s General Data Protection Regulation (the “GDPR”), the legal bases for such processing include GDPR Article 6(1)(b) (processing necessary for the performance of a contract) and GDPR Article 6(1)(f) (processing necessary for the legitimate interests pursued by the controller of the data or by a third party).

We may share telemetry data collected through our self-hosted products in limited ways to support the product and comply with the law, as follows:

- With service providers, subcontractors, partners, vendors, consultants, and others that help us provide the self-hosted products and are not permitted to use the information collected on our behalf except to help us conduct and improve our business;
- To respond or comply with, in our sole discretion, a court order, subpoena, law enforcement, another government request, or other legal process (with or without notice to you, at our discretion) under applicable law;
- With buyers, successors, or others in connection with a potential or actual merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our business or assets;
- To (i) satisfy any applicable law or regulation, (ii) investigate and defend ourselves against any third-party claims or allegations, or (iii) protect against harm to the rights, property or safety of us or third parties (including financial loss, or in connection with preventing fraud or illegal activity, and/or to enforce our other agreements with you); and
- With our Customer’s consent or at the Customer’s direction.

If you would like to learn more about our self-hosted product practices, you can contact us at info@codesiren.com. If you are a Customer purchasing a self-hosted product, you can see the sections relating to Customers below to learn how we process your personal information collected through our business interactions.

Privacy Policy Scope

The remainder of this Privacy Policy applies to:

- Polynom community members and contributors
- Visitors to codesiren.com, polynom.app, and other Code Siren Websites (collectively, the “Websites”)
- Code Siren, LLC Customers
- End users of affiliate hosting partner’s cloud products and services (collectively, the “Services”)

Please read this Privacy Policy carefully. Our different practices for each of these groups are described below. Accessing or using any part of Code Siren’s website or the Polynom.app website, you acknowledge that you have been informed of our practices about your personal information and other data. If you do not agree to this Privacy Policy, please immediately cease using Polynom application and shut down your account.

Customer Control of Services Data

To provide the Services, Polynom is utilized by an organization (either an employer or another entity or person) (each, a “Customer”) under a contract that governs the delivery, access, and use of the Services. When you are an end user of our Services, the Customer has authorized you to access the Services. The Customer owns and controls the messages, files, or other content submitted to the Services, including your personal information (the “Customer Data”) and your account with the Services and any associated Customer Data you provide. In these cases, Polynom acts as a data processor (or service provider) within the meaning of applicable privacy laws, and the processing of Customer Data is governed by any data processing agreement between Polynom and the Customer in addition to this Privacy Policy. The Customer also controls and manages any third-party party services they use with the Services. The Customer controls the processing of Customer Data through the Services. Please get in touch with the Customer if you have any questions related to such Customer’s specific settings and privacy practices in relation to the Services.

1. Contact Us

Please get in touch with us at compliance@codesiren.com if you have any complaints, questions, comments, or concerns with respect to your privacy or this policy.

If you believe that any account credentials for the Services have been compromised, be sure to get in touch with us immediately at compliance@codesiren.com.

2. Information Code Siren Collects and How We Use It

We collect information that you provide and information that we receive automatically. As described below, our information practices vary depending on whether you act as a visitor to our Websites, a Polynom Customer, an end user of our Services, or a Polynom community member or contributor.

Please be aware that some of the information described below is required to offer the Websites and Services, and if this information is not provided, we may not be able to provide the Websites and Services. We may use the

information we collect for any lawful purpose, including the purposes specifically described below. We may also use information aggregated or de-identified so that it cannot reasonably be associated with a specific person for any business purpose.

Information Collected About Website Visitors:

If you are a visitor to the Code Siren Website, we collect some information about you as described below. We may also combine the information Code Siren collects about you with information we obtain from third parties.

Information You Provide to Code Siren:

Code Siren collects the minimal personal information you provide when you send Code Siren a message through a Code Siren Website, register for or create an account with Polynom.app, or request more information about our products. This information may include your name, email address, phone number, other contact details, and other information you can provide us.

- Code Siren uses this information primarily to communicate with you about Code Siren and Polynom software and to respond to your requests. For instance, we use your contact information to respond to your questions, send you information that may interest you, communicate about account-related matters, and resolve technical issues you may encounter. We may also use your information to give you access to demonstrations and educational materials.
- Code Siren may also use your information to improve Code Siren-related software and Polynom functionality and/or market to you.
- To the extent that our processing of the information you provide is subject to the EU GDPR or the UK's Data Protection Act of 2018, the legal basis for this processing includes GDPR 6(1)(b) (processing necessary for the performance of a contract) and GDPR Article 6(1)(f) (processing necessary for the legitimate interests pursued by the controller of the data or by a third party).

Technical Information We Collect Automatically:

When you use or visit the Websites, we may send cookies to your computer or device to uniquely identify your browser, computer, or device. Please see our Cookies Policy for more information about our collection and use of cookies. We may use cookies (and similar technologies) to collect other technical information when you use or visit the Websites, such as Internet Protocol (IP) address, location, browser type and settings, date and time the Websites were used, the web page that you were visiting before accessing our Websites, information about your activities on the Websites, external links and the features or content which you accessed from our Websites. When you access the Websites with a device (including a mobile device), we may also collect and store a unique identifier associated with your device and additional information about the device, including user settings, location, operating system, and crash settings.

- We use this technical information for various purposes, including to protect from potential security attacks and abuse. We may also use this information to verify accounts and activity and to detect, investigate, prevent, and respond to potential or actual security incidents and other malicious, deceptive, fraudulent, or illegal activity. We also use technical information to help us improve performance and content, measure traffic, and measure usage trends. Additionally, we use this information to drive engagement with our Websites and Services and to market our Websites and Services.
- To the extent that our processing of technical information is subject to the GDPR, the legal basis for such processing is GDPR Article 6(1)(f) (processing necessary for the legitimate interests pursued by the controller of the data or by a third party).

Information Collected About Customers:

As described below, we collect information from our Customers, such as administrative users of our Services and individuals who purchase our Services on behalf of their employer. We may also combine the information we collect about our Customers with information we obtain from third parties.

Information You Provide to Us:

We collect personal information that you provide when you register for or create an account with our Services or request more information about our Services. We may also collect Customer information through helpdesk systems, forums, web input forms, surveys, and ticketing tools. This information may include your name, email address, phone number, other contact details, and other information you choose to provide. It can also include business information like billing details (such as payment information and billing addresses) and your organization's name, phone number, domain, email address, and physical address.

- We use this information primarily to communicate with you about the Services and respond to your requests. For instance, we use your contact information to respond to your questions, inform you about changes to the Services and any Code Siren events, provide you access to demo and educational materials, communicate about account-related matters, and resolve technical issues you may encounter.
- We may also use the information you provide to improve our Services, market to you, and offer you information and updates on our products or Services that may interest you.
- To the extent that our processing of service and usage information is subject to the GDPR Article 6(1)(b) (processing necessary for the performance of a contract) and GDPR Article 6(1)(f) (processing necessary for the legitimate interests pursued by the controller of the data or by a third party).

Technical Information We Collect Automatically:

When you use or visit the Websites, we may send cookies to your computer or device to uniquely identify your browser, computer, or device. Please see our Cookies Policy for more information about our collection and use of cookies. We may use cookies (and similar technologies) to collect other technical information when you use or visit the Websites, such as Internet Protocol (IP) address, location, browser type and settings, date and time the Websites were used, the web page that you were visiting before accessing our Websites, information about your activities on the Websites, external links and the features or content which you accessed from our Websites. When you access the Websites with a device (including a mobile device), we may also collect and store a unique identifier associated with your device and additional information about the device, including user settings, location, operating system, and crash settings.

- We use this technical information for various purposes, including to protect from potential security attacks and abuse. We may also use this information to verify accounts and activity and to detect, investigate, prevent, and respond to potential or actual security incidents and other malicious, deceptive, fraudulent, or illegal activity. We also use technical information to help us improve performance and content, measure traffic, and measure usage trends. Additionally, we use this information to drive engagement with our Websites and Services and to market our Websites and Services.
- To the extent that our processing of technical information is subject to the GDPR Article 6(1)(f) (processing necessary for the legitimate interests pursued by the controller of the data or by a third party)

Information Collected from Code Siren Services:

If you are an end user of the Services we provide to our Customers, we may collect information related to your use of our Services, as described below.

Service and Usage Information:

When end users use our Services, we collect information that is generated that provides context about the way end users use the Services, such as team and channel memberships, system preferences, features they use, content and links they interact with, the types of files shared and what third party services are used (if any).

- We use this service and usage information to provide the Services to our Customers. For instance, this may include improving the Services and personalizing end users' experiences with Services. We may also use this information to research and analyze the usage and performance of Services to make the Services more useful, more performant, and more intuitive.
- To the extent that our processing of service and usage information is subject to the GDPR, the legal basis for such processing include GDPR Article 6(1)(b) (processing necessary for the performance of a contract) and GDPR Article 6(1)(f) (processing necessary for the legitimate interests pursued by the controller of the data or by a third party).

Log and Device Information:

Each time end users access and use the Code Siren Website or download the Polynom software; we may also record log files, such as Internet Protocol (IP) address, location, browser type and settings, date, and time. When end users access the Service with a device (including a mobile device), we may also collect and store a unique identifier associated with an end user's device and additional information about the device accessing the Services, including user settings, location, the operating system of the device, and crash settings.

- We may use this log and device information to provide Services to our Customers. As part of providing our Services, we use this information to protect from potential security attacks and abuse, to verify accounts and activity, to improve our Services, to detect, investigate, prevent, and respond to potential or actual security incidents, and to monitor and protect against other malicious, deceptive, fraudulent, or illegal activity.
- To the extent that our processing of log and device information is subject to the GDPR, the legal basis for such processing include GDPR Article 6(1)(b) (processing necessary for the performance of a contract) and GDPR Article 6(1)(f) (processing necessary for the legitimate interests pursued by the controller of the data or by a third party).

Information from Community Members and Contributors:

If you participate in the Polynom.app forum, a Polynom community-related site, or other similar Websites, we may collect information as described below. We may also combine the information we collect about you with information we obtain from third parties.

Information You Provide to Us:

When you participate in the Polynom forum or Polynom community-related site or are a contributor to Code Siren, we collect personal information that you provide to us, such as when you register for or create an account, request more information about our Websites or Services, or contribute to our projects. This information may include your name, email address, physical address, phone number, and other information you choose to provide.

- We use this information primarily to provide the Websites and Services to you. We may also use your contact information to respond to your questions, inform you about changes to the Services and Code Siren events, communicate about your contributions, solicit feedback, send you information about Websites and Services that may interest you, and resolve technical issues you encounter. If you have contributed to our projects, we may use your physical address to send you certain mailings, e.g., "thank you" gifts.

- To the extent that our processing of such information is subject to the GDPR 6(1)(b) (processing necessary for the performance of a contract) and GDPR Article 6(1)(f) (processing necessary for the legitimate interests pursued by the controller of the data or by a third party).

Technical Information We Collect Automatically:

When you participate in the Polynom forum or Polynom-related community Websites, we may send cookies to your computer or device to uniquely identify your browser, computer, or device. We may use cookies (and similar technologies) to collect other technical information when you use or visit the Websites and Services, such as Internet Protocol (IP) address, location, browser type and settings, date and time the Websites and Services were used, the web page that you were visiting before accessing our Websites and Services, information about your activities on the Websites and Services, external links and the features or content which you accessed from our Websites or Services. When you access the Websites or Services with a device (including a mobile device), we may also collect and store a unique identifier associated with your device and additional information about the device, including user settings, location, operating system, and crash settings.

- We use this technical information for various purposes, including to protect from potential security attacks and abuse. We may also use this information to verify accounts and activity and to detect, investigate, prevent, and respond to potential or actual security incidents and other malicious, deceptive, fraudulent, or illegal activity. We also use technical information to help us improve performance and content, measure traffic, and measure usage trends. Additionally, we use this information to market, promote, and drive engagement with our Websites and to market our Services.
- To the extent that our processing of technical information is subject to the GDPR, the legal basis for such processing is GDPR Article 6(1)(f) (processing necessary for the legitimate interests pursued by the controller of the data or by a third party).

Information Shared with Third Parties and For What Purposes

Code Siren does not sell, trade, or otherwise transfer the information described above to unaffiliated third parties for monetary consideration. We may share information about Website visitors, Customers, end users of the Services, and our community members and contributors with other entities for specific purposes. This sharing may include the following:

- With service providers, subcontractors, partners, vendors, consultants, and others that help us with any of the purposes in this Privacy Policy, including performing services on our behalf, such as processing payments, sending emails, providing back-office services, or measuring site traffic. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.
- With our affiliates, parent companies, subsidiaries, and other related companies, all for the purposes in this Privacy Policy;
- To respond or comply with, in our sole discretion, a court order, subpoena, law enforcement, another government request, or other legal process (with or without notice to you, in our discretion) under applicable law;
- With potential buyers, successors, or others in connection with a potential or actual merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our business or assets;
- To (i) satisfy any applicable law or regulation, (ii) enforce this Privacy Policy, including the investigation of potential violations thereof, (iii) investigate and defend ourselves against any third-party claims or allegations, or (iv) protect against harm to the rights, property or safety of us, the Websites, the Services, other users of the Services, or third parties (including financial loss, or in connection with preventing fraud or illegal activity, and/or to enforce our other agreements with you); and

- With your consent, our Customer’s consent, or as otherwise disclosed during data collection or sharing.

We may share information that has been de-identified or aggregated without limitation.

How Code Siren Protects Information

Code Siren has implemented various security measures to protect the personal information we collect from loss, misuse, and unauthorized access or disclosure. These steps consider the sensitivity of the information we collect, process, and store and the current state of technology. Given the nature of communications and information processing technology, we cannot guarantee that the information Code Siren collects will be safe.

Cookies and Similar Technologies

Code Siren uses cookies and similar technologies in our Code Siren and Polynom Websites to help us collect other information. For more details about how we use these technologies, and your opt-out controls and other options, please visit our Cookies Policy.

Digital Advertising and Analytics

Code Siren’s Websites do not collect, use, or share information for advertising. However, with the Code Siren and Polynom.app Websites, we may partner with ad networks and other ad-serving providers (“Advertising Providers”) that serve ads on behalf of us and others on non-affiliated platforms. Some ads may be personalized, meaning they are intended to be relevant to you based on information Advertising Providers collect about your use of the Websites and other Websites or apps over time, including information about relationships among different browsers and devices. This type of advertising is known as interest-based advertising.

If you want to opt-out of sharing activity based on your cookie identifiers, turn on a Global Privacy Control in your web browser or browser extension. Please see the California Privacy Protection Agency’s website at <https://oag.ca.gov/privacy/ccpa> for more information on valid Global Privacy Controls. If you would like to opt-out of sharing activity based on other identifiers (like email address or phone number), contact us at compliance@codesiren.com.

Code Siren may also work with third parties that collect data about your use of the Websites and other Websites or apps over time for non-advertising purposes.

Legal Bases for Processing in the EU

If you are a European resident in the European Economic Area and the GDPR is applicable as per Article 3 of the GDPR, then references to “personal information” in this Privacy Policy are equivalent to “personal data” governed by the EU and the GDPR.

As described above, we rely on various legal basis to process the personal information we collect. Our legal basis for processing this information depends on the personal information and the specific context in which we process it. We will normally collect personal information only where we need the personal information to perform a contract (e.g., to provide access to the Polynom software), where the processing is in our legitimate interests and not

overridden by your data protection interests or fundamental rights and freedoms, or where we have your consent. Sometimes, we may also have a legal obligation to process personal information.

International Data Transfers and Storage

For us to operate and provide our services globally, the personal information you provide or that we collect may be transferred or accessed in various countries, including the United States of America. If you are located in Switzerland, the European Economic Area, or the United Kingdom, please note that we may transfer information, including personal information, to a country and jurisdiction that offers a level of protection that may be less protective of your personal information than the jurisdiction you typically reside in.

Suppose personal information is transferred outside of Switzerland, the European Economic Area, or the United Kingdom to a country not subject to an adequate decision by relevant regulators or considered adequate as determined by applicable laws. In that case, we will protect the personal information (e.g., by implementing data transfer mechanisms as available under applicable laws).

Additionally, while Code Siren remains self-certified under the EU-U.S. Privacy Shield and Swiss – U.S. Privacy Shield, we do not rely on these frameworks to transfer personal information.

To learn more about the Privacy Shield Program, please see <https://www.privacyshield.gov/ps/program-overview>.

Retention of Personal Information

In some cases, Code Siren retains the personal information we collect for as long as the Company needs to provide our Polynom and Code Siren services or as required to comply with our legal obligations. After such time, we will delete, de-identify, or aggregate this information within 60 days unless otherwise required by law.

Suppose you have an Enterprise account on Polynom.app or one of Code Siren’s Websites. In that case, we will retain your information for as long as your account is active or as needed to perform our contractual obligations, provide our site or service to you, comply with legal obligations, resolve disputes, preserve legal rights, or enforce our agreements. Code Siren will delete, de-identify, or aggregate this information to the extent possible once it is no longer necessary to fulfill the purposes for which it was collected and processed.

Depending on the Services plan, Customers may be able to customize their retention settings for end-user information to be different from Code Siren’s standard data retention practices. Customers may also apply different settings to messages, files, or other types of Customer Data. Deleting Customer Data and other use of the Services by Customer may result in the deletion and/or de-identification of certain personal information and other information.

European Privacy Rights

Individuals in the European Union, European Economic Area, or the United Kingdom may have certain rights concerning personal information processed through the Websites and Services. If your personal information was submitted to us by an Enterprise or your account is controlled by a Customer, please contact the applicable Customer directly to learn about your rights. Otherwise, please contact compliance@codesiren.com with a request for the following:

Subject to certain exceptions and limitations, you may have the right:

- to request information regarding the processing of your personal information by Code Siren;
- to obtain the rectification of any inaccurate personal information stored by Code Siren or completion of such information;
- to obtain the erasure of your personal information stored by Code Siren;
- to obtain the restriction of processing of your personal information from Code Siren;
- to receive the personal information that you have provided to Code Siren in a structured, commonly used, and machine-readable format or to demand transmission to another controller;
- to withdraw your consent once given to Code Siren at any time.

In addition to the above-listed rights, you may also have the right to complain to your local data protection authority. Further information about how to contact your local data protection authority is available at: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

The provision of personal information is neither a statutory nor contractual requirement nor a requirement to enter into a contract. You are not obliged to provide personal information. There are no consequences resulting from failure to provide such information. Code Siren does not process personal information for automated decision-making.

California Privacy Rights

If you are a California resident who is a Polynom Customer, a visitor to our Websites, a Polynom community member or a Code Siren contributor, or another business contact of Code Siren (collectively, our “Enterprise Contacts”), this section provides additional details about the personal information Code Siren collects about California consumers and the rights afforded to them under the California Consumer Privacy Act or “CCPA,” as amended by the California Privacy Rights Act or “CPRA.”

This section does not cover personal information processed to provide services because Code Siren processes such information on behalf of our Customers as a “service provider” or “processor.” To learn more about the rights available to you as an end user of the services under state privacy laws, like the CPRA, please visit the above Customers’ privacy policies.

Personal Information Code Siren Collects and Disclose

In the past 12 months, Code Siren may collect and disclose the categories of personal information about Code Siren Customers listed below.

- Personal online identifiers (such as first and last name, email address, or unique online identifiers);
- Record-keeping information (such as financial information for payment purposes);
- Commercial or transactions information (such as records of products or services obtained or considered);
- Internet or other electronic network activity information (such as interactions with Code Siren’s Websites, emails, applications, and/or advertisements);
- Professional or employment-related information;
- Sensitive personal information (such as billing information or account log-in information for Enterprise accounts);
- Inferences are drawn from the above information about your predicted characteristics and preferences; and
- Other information about you that is linked to the personal information above.

Categories of Sources:

Code Siren collects this personal information from the following categories of sources:

- You, when you provide it to us directly or by using our Websites or Services;
- Others at your organization, in connection with the business relationship between Code Siren and your organization;
- Service providers;
- Affiliates not under the Code Siren or Polynom brand;
- Commercial data resellers; and
- Event organizers of events you register to attend.

Why Code Siren Collects, Uses, and Shares Personal Information. Code Siren collects, uses, and discloses personal information about our Enterprise Contacts for Code Siren’s business and commercial purposes described in the “Information Code Siren Collects and How We Use It” and the “Information Code Siren Shares with Third Parties and For What Purposes” sections of this Privacy Policy above.

Recipients of Personal Information. Code Siren may disclose each category of personal information we collect about our Enterprise Contacts to the categories of third parties described in the “Information Code Siren Shares with Third Parties and For What Purposes” section of this Privacy Policy above.

While Code Siren does not sell the personal information we collect about our Customers, Code Siren may share such personal information for interest-based advertising purposes (also known as “cross-context behavioral advertising”) by allowing third-party advertising providers to collect data on our Websites as described above under “Digital Advertising and Analytics” section of this Privacy Policy.

Your Rights Regarding Personal Information. California residents who are our Enterprise Contacts have certain rights with respect to the personal information collected by businesses like Code Siren. If you are a California resident who is our Enterprise Contact, you may exercise the following rights regarding your personal information, subject to certain exceptions and limitations:

- The right to know the categories and specific pieces of personal information Code Siren collects, uses, discloses, and shares about you, the categories of sources from which we collected your personal information, our purposes for collecting or sharing your personal information, the categories of your personal information that we have either shared or disclosed for a business purpose, and the categories of third parties to which we have disclosed personal information;
- The right to request that we delete the personal information Code Siren has collected from you.
- The right to request that we correct the inaccurate personal information Code Siren maintains about you.
- The right to opt out of Code Siren sharing your personal information for interest-based advertising. You can opt out of sharing the personal information above in this Privacy Policy’s “Digital Advertising and Analytics” section through the Digital Advertising Alliance Webchoices, and ad tracking tools.
- The right not to receive discriminatory treatment for exercising the privacy rights conferred by the CPRA.

While the CPRA provides an opt-out opportunity for certain uses or disclosures of “sensitive personal information” (as defined under the CPRA), Code Siren uses and discloses such information only for purposes permitted by the CPRA that do not require an opt-out opportunity.

To exercise any of the above rights, please email compliance@codesiren.com.

Verification Process and Required Information

Note that we may need to request additional information from you to verify your identity or understand the scope of your request, although you will not be required to create an account with us to submit a request or have it fulfilled. We will require you to provide, at a minimum, your name, business email address, and business phone number. We will verify your request using the information associated with your account, including your email address. Government identification may be required.

Authorized Agent

You may designate an authorized agent to make a CPRA request on your behalf by submitting a written, signed permission to compliance@codesiren.com

Minors

We do not knowingly sell or share the personal information of minors under 18 years of age.

Third-Party Links and Tools

This Privacy Policy does not apply to third-party Websites, services, integrations, or applications, even if accessible through our Websites and/or Services. This Privacy Policy only applies to our Websites and Services, so when you follow links to other Websites, you should read those separate and independent privacy policies to learn about their data practices. We have no responsibility or liability for the content and activities of these linked Websites or any third-party Websites, services, integrations, or applications.

The Websites and/or Services may include integrated tools or “plug-ins,” such as AI or social networking tools offered by third parties. Use these tools to share personal information or interact with these features on the Code Siren website or Polynom software. Those third parties may collect information about you and may use and share such information in accordance with their privacy policies and, as applicable, your account settings.

Your interactions with third-party companies and using their features are governed by their privacy policies. We encourage you to carefully read the privacy policies of any accounts you create and use.

Your Choices

To opt out of our email marketing, you can use the link at the bottom of each marketing message. If you opt out of our email marketing, we will still send you messages about our transactions and relationship, such as order confirmations.

For choices with respect to third-party interest-based advertising activities, please see the “Digital Advertising and Analytics” section above.

For choices we offer to California residents who are our Customers or other Enterprise Contacts, please see the “California Privacy Rights” section above.

Updating Your Information

When you have an Enterprise account with Code Siren using Polynom software, you may review, change, or update your contact information by logging into your account.

Changes to our Privacy Policy

If we decide to change our Privacy Policy, we will post those changes on this page. We encourage you to visit this page periodically to learn of any updates. Your continued use of the Websites and Services after an updated Privacy Policy is posted constitutes your consent to the revised Privacy Policy.

EU – U.S. and Swiss Privacy Shield

Code Siren’s Obligations to You Under the Privacy Shield

Code Siren has subscribed to the EU – U.S. Privacy Shield Framework and Swiss – U.S. Privacy Shield Framework (collectively, “Privacy Shield”) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, the United Kingdom and/or Switzerland as applicable to the United States. Code Siren has certified that it adheres to the Privacy Shield Principles of the Department of Commerce.

If there are any conflicts between the terms in this Privacy Policy and the Privacy Shield, the Privacy Shield shall govern.

Privacy Shield Principles

Code Siren has certified that it adheres to the following Privacy Shield Principles of (1) Notice; (2) Choice; (3) Accountability for Onward Transfer; (4) Security; (5) Data Integrity and Purpose Limitation; (6) Access; and (7) Recourse, Enforcement and Liability with respect to any personal information received from citizens of the European Union and Switzerland.

(1) Notice, (2) Choice, and (3) Accountability for Onward Transfer of Personal information

Code Siren is required to take certain steps when transferring personal information received from the European Union and Switzerland to third parties (such as including necessary contractual provisions in our third-party contracts). Code Siren may be potentially liable in cases of onward transfer of EU and Swiss individuals’ data received pursuant to the Privacy Shield to third parties. We collect and process data in accordance with this Privacy Policy. Please see the “Information Code Siren Collects and How We Use It” section for further details of the types of data we collect from you and the purposes for which we collect it.

(4) Security

Code Siren takes reasonable and appropriate administrative and technical security measures to protect personal information's confidentiality, integrity, and availability. Code Siren takes reasonable steps to protect personal information from loss, misuse, unauthorized access, disclosure, alteration, and destruction.

(5) Data Integrity and Purpose Limitation

Code Siren only collects personal information relevant to providing Code Siren Websites and Polynom software to you or as otherwise notified. We take reasonable steps to ensure that Code Siren only receives necessary personal information and that the personal information received by Code Siren is accurate, complete, and current.

(6) Access

Code Siren's Privacy Policy explains how you may request access to review, correct, or delete the personal information Code Siren maintains about you. We may limit or deny access to personal information where providing such access is unreasonably burdensome, expensive under the circumstances, or as otherwise permitted by the Privacy Shield Principles or law.

(7) Recourse, Enforcement, and Liability

In compliance with the Privacy Shield Principles, Code Siren commits to resolving complaints about your privacy and our collection or use of your personal information without charge. European Union and Swiss individuals with inquiries or complaints regarding this Privacy Policy should first contact us at:

compliance@codesiren.com

Code Siren has also committed to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) by complying with the advice given by such authorities about human resources data transferred from the EU in the context of the employment relationship with Code Siren. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, you have available to you, your national European Data Protection Board (EDPA), to file complaints about your information in Code Siren's custody. Please contact the EU DPAs for more information or to file a complaint. To find your national EDPA, please refer to this website: https://edpb.europa.eu/about-edpb/about-edpb/members_en. The services of EU DPAs are provided at no cost.

In certain circumstances, the Privacy Shield Principles provide the right to invoke binding arbitration to resolve complaints not resolved by other means, as described in Annex I to the Privacy Shield Principles.

Code Siren is subject to the investigatory and enforcement powers of the Federal Trade Commission in the case of any failure to comply with the Privacy Shield.