



Huntress Labs Incorporated
6996 Columbia Gateway Dr, Ste 101
Columbia, MD 21046

Huntress Labs Incorporated Privacy Policy

Last Updated March 11, 2024

Huntress Labs Incorporated and its affiliates and subsidiaries (collectively, “Huntress”, “we” or “us” or “our”) take your privacy and security very seriously and recognize the importance of transparency. By using or accessing our Websites or Services, defined below, you agree to this privacy policy (“Privacy Policy” or “Policy”). Please read this Privacy Policy carefully, as it contains important information on who we are and how and why we collect, store, use, and share your Personal Data. “Personal Data” means information that identifies or relates to an identifiable individual or is linked or reasonably linkable to an individual.

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Scope of this Privacy Policy

This Privacy Policy applies to information collected by:

- A Huntress website that links to this Privacy Policy, such as www.huntress.com, www.curricula.com, or www.huntress.io, and any subdomains (“Websites”);
- The Huntress cybersecurity products and services in the Huntress Managed Security Platform, such as Huntress Managed EDR, Huntress MDR for Microsoft 365, and Huntress Security Awareness Training (collectively, “Services”), unless otherwise indicated; and

- Huntress as part of our sales or marketing efforts, whether online, email, phone, trade shows, webinars, trainings, business events, or other means

As it relates to the provision of our Services, we process Personal Data on behalf of and under the instruction of our respective business customers pursuant to our contracts or terms of service, and in accordance with our [Data Processing Addendum](#), available at www.huntress.com/legal. With respect to Personal Data collected or used by our Services, (i) Huntress is a data processor or subprocessor under the EU General Data Protection Regulation, UK General Data Protection Regulation, and Swiss Data Protection Act (collectively, “European Data Protection Laws”) and a service provider under the California Consumer Privacy Act (“CCPA”) and other similar state or international data privacy laws, and (ii) our business customers are the data controllers under European Data Protection Laws. Huntress’ customers are responsible for disclosing to their customers and/or end users their rights with respect to their Personal Data and other information regarding the collection and use of that Personal Data, in accordance with the European Data Protection Laws, CCPA, and other laws requiring such disclosures. If you have questions about how your data is being accessed or used by your organization, please refer to your organization's privacy policy and direct your inquiries to your organization's system administrator.

This Privacy Policy does not apply to the Personal Data that we collect and process about job applicants, employees, and contractors; different privacy notices apply to that data. Please visit www.huntress.com/legal for more information.

What Personal Data We Collect And How It Is Collected

The Personal Data we collect about you depends on the nature of our relationship, such as whether it is gathered through our Websites, Services, or marketing activities. We collect most of this Personal Data directly from you—through your interactions with us or the Websites and the setup and use of the Services. Huntress also collects Personal Data through its normal business operations and in the administration of customer relationships. Personal Data may be collected as follows:

- **Account and Services Information.** We collect information from you to create an account to use our Services. Such information may include your name, email address, phone number, and password, among other items. We collect feedback you provide to us through the Services, and we collect data about how you use and interact with features in the Services.
- **Data you Give Us.** In order to enjoy the full functionality of the Websites or Services or to conduct business with us, you may be prompted to provide us with certain Personal Data. Such information may include your name, email address, phone number, and title, among other items, and is generally submitted:
 - By filling in forms (for example, a “Contact Us” form) on our Websites, at a trade show, or anywhere else we conduct business
 - By downloading or accessing the Services
 - By downloading documentation from our Services or Websites
 - By subscribing to newsletters or other communications
 - By using a chatbot
 - By corresponding with us by phone, e-mail, or otherwise using our contact details
- **Customer Support and Service.** When customers contact us for support or other customer service requests, we maintain support tickets and other records related to the requests. We may also collect call recordings related to support and customer service-related calls. If you use the

chatbot feature on our Website or in our Services, we collect data that you choose to provide in your communications with the chatbot. This information can include your name, email address, phone number, account name or number, IP address, and the like.

- **Business Contact and Customer Relationship Management.** We collect and maintain information about our customers, including that gathered by our communications or on social networks, which may include company name, business contact name and title, phone number, email, and other contact details. We may also collect billing address, financial account, credit card information, order details, subscription and license information, and usage details. In addition, we collect user credential and profile data (name, contact, authorized users).
- **Cookies.** We use cookies, and similar technologies such as pixel tags, web beacons (referred to together as “cookies”) to provide functionality and recognize you across different Websites and Services and devices. For more information on our use of cookies, please see our Cookie Policy <https://www.huntress.com/cookies>.
- **Usage Information.** We collect information about customers’ usage of our Websites and Services as needed to provide and support the Websites and Services. Some features of the Services require you to input the data, install software on your endpoint devices, or create a connection to your systems. The Services collect data from your environment to provide your requested Services. When you visit our Websites or Services, our server automatically collects certain browser or device-generated information, which may in some cases constitute Personal Data, including but not limited to:
 - Your domain
 - Your connection type
 - Your device information and settings
 - Your IP address or other geolocation information
 - Your MAC address
 - Your browser type
 - Your operating system
 - Your page visits
 - Your interactions with the Websites and Services
 - The date, time, and duration of your visit
 - Information from third parties
 - Other information about your computer or device
 - Internet traffic
 - URL requests
 - Ports and Protocols used
- **Applications and Files.** The Services may collect information on the existence, characteristics, and behavior of applications, processes, or files on your device. Depending on the Services you subscribe to, a determination on the security status of your applications, processes, or files may be collected from other security applications or services (such as an antivirus service), including whether such activity could be categorized as bad, good, suspicious, or unknown. Additionally, if Huntress suspects that an application, process, or file is potentially malicious, we may collect copies of it for purposes of providing the Services and for malware research and analysis.
- **Services Collection.** We may collect information about you when you or your administrator of the Services sets up the Services (such as installing endpoint detection) or establishes a

connection to a non-Huntress service (such as an email service). For example, you may connect Microsoft 365 to our Services to monitor and protect your Microsoft 365 environment. We may receive your name, email address, username, IP Address, and other data relating to your Microsoft 365 activity to identify malicious or suspicious behavior. The information we receive when you link or integrate our Services with another service depends on the settings, permissions, and privacy policy controlled by that connected service.

- **Third-Party Sources.** We may collect Personal Data from third-party services, social media platforms, public databases, joint marketing and advertising partners, event sponsors, referrals, or our business or channel partners. We may combine this information with information we collected by other means described above to improve our records, create more personalized advertising, and suggest services that may be of interest to you.

How and Why We Use Your Personal Data

Under various data protection laws, we can only use your Personal Data if we have a proper reason for doing so, such as:

- Where you have given consent
- For the performance of our contract with you or your organization or to take steps at your request before entering into a contract
- For our legitimate interests or those of a third party
- To comply with our legal and regulatory obligations

We may use your Personal Data in the performance of our contract with you or your organization or to take steps at your request before entering into a contract, including for the following purposes:

- Provide products and Services to you
- Update our customer records
- Ensuring business policies are adhered to, e.g., policies covering security and internet use
- Ensuring the confidentiality of commercially sensitive information
- Preventing unauthorized access and modifications to systems
- Protecting the security of systems and data used to provide the Services
- Communications about your use of the Services
- Provide troubleshooting and technical support
- Respond to your inquiries, provide customer support, and fulfill orders and requests
- Process payments
- Communications with you not related to marketing, including about changes to our terms or policies or changes to the products or other important notices (other than those addressed above)

We may use your Personal Data for a legitimate interest, including for the following purposes:

- Operational reasons, such as improving efficiency, training and quality control
- Statistical analysis to help us manage our business, e.g., in relation to providing and developing cybersecurity services and training, and for other research and analytical purposes

- Statistical analysis to better understand how you use and access the Websites and Services, in order to administer, monitor, and improve our Websites and Services
- Personalizing experiences on our Websites and Services to tailor content we may display or send, including to offer location customization and personalized help and instructions
- Sharing your Personal Data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring
- We may also use your Personal Data for our legitimate interests and/or with your consent, where required, for advertising and marketing, including to promote our services on our website or third-party websites, perform an analysis to understand why we won or lost a sales opportunity, direct marketing, and remarketing purposes, including sending you information we think may be of interest to you

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

We may use your Personal Data for our legal and regulatory obligations, including for the following purposes:

- To prevent and detect fraud against you or Huntress
- To prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party
- To prevent or take action regarding violations of this Privacy Policy and the applicable terms of use
- To enforce legal rights or defend or undertake legal proceedings
- Ensuring the confidentiality of commercially sensitive information
- Preventing unauthorized access and modifications to systems
- Protecting the security of systems and data used to provide the Services
- Protection of the Services and business operations

Anonymous, Aggregated, or De-Identified Data

Huntress may create anonymous, aggregated, or de-identified data from your Personal Data and other individuals whose Personal Data we collect. We make Personal Data into anonymous, aggregated, or de-identified data by removing or not utilizing information that makes the data personally identifiable to you. We may use this anonymous, aggregated, or de-identified data for research or analytics and we may share it with third parties for our lawful business purposes, including to provide the Service, analyze and improve the Service, analyze and report on security risks, and promote our business. For example, in order to promote awareness, detection, and prevention of Internet security risks, Huntress may create and share anonymous, aggregated, or de-identified information (related to, *e.g.*, potential or actual security incidents, malware, security threat data, diagnostic and usage related data, effectiveness of security awareness training, contextual data, threat detections, and indicators of compromise) with research organizations and other security software vendors and professionals via publications, blog posts, or social media, and provided no customer identifying information is shared without written permission of that customer. Huntress may also make use of statistics derived from the information

processed to track and publish reports on security risk trends.

Who We Share Your Personal Data With

Huntress may share Personal Data with our subsidiaries or affiliates as part of our business operations and administration of our Websites and Services. Personal Data may be held at our offices and those of our subsidiaries or affiliates, representatives, and agents. We may also appoint third-party service providers, or subprocessors, (who will operate under our instructions) to assist us. As such, we may disclose your Personal Data as follows:

- **To Customers.** If you use, access or communicate with us about our Services on behalf of your company (our customer), we may share Personal Data about your access, and your communications or requests, with the relevant customer
- **To Services Providers.** To third-party service providers who perform functions on our behalf that we use to help deliver our Websites and Services to you, such as payment service providers, data warehouses, data analytics, and communication delivery companies
- **For Legal Processes.** To law enforcement agencies, courts, tribunals, and regulatory bodies to comply with our legal and regulatory obligations, such as to respond to a subpoena, pursue or investigate violations of Huntress contracts or this Policy, to respond to claims asserted against us, or as evidence in litigation in which we are involved. Additionally, we may share with authorities in an on-going investigation or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, and situations involving potential threats to the safety of a person or property of a third party
- **Advertising and Marketing.** To third-party business partners, co-sponsors of marketing events, and service providers we engage to provide advertising, campaign management, direct marketing, marketing analytics, improve sales performance (e.g., collecting feedback from prospective customers or performing a win-loss analysis), and related services to us (with your consent, where required by law)
- **Business Transfers.** As part of any merger, sale, and transfer of our assets, acquisition, or restructuring of all or part of our business, bankruptcy, or similar event, including related to due diligence conducted prior to such event where permitted by law
- **Advisors.** To our professional advisors (such as lawyers, auditors, and other advisors), in which case the recipient of the information will be bound by confidentiality obligation

Please note the above list is not exhaustive but gives a flavor of the third parties with whom we may share your Personal Data. For more detail about our service providers, including with whom, why, and where Personal Data is stored, transmitted, or processed, please see our [Subprocessors List](http://www.huntress.com/legal), available at www.huntress.com/legal.

We only allow our service providers to handle your Personal Data if we are satisfied they take appropriate measures to protect your Personal Data. We also impose contractual obligations on service providers to ensure they can only use your Personal Data to provide services to us and to you.

International Transfers of Personal Data

Your Personal Data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your

country, and in some cases, may not be as protective. Specifically, our servers, service providers, and subprocessors are primarily located in the United States, and we may process your information in jurisdictions where our affiliates/partners and service providers, or subprocessors, are located. See our Subprocessor List, available at www.huntress.com/legal, for more details. However, we have taken appropriate safeguards to require that your Personal Data will remain protected in accordance with this Privacy Policy. These safeguards include ensuring we have data protection agreements between us and our service providers and subprocessors to whom we transfer the Personal Data, which require these companies to protect Personal Data they process from the European Economic Area (“EEA”), United Kingdom (“UK”), or Switzerland in accordance with applicable data protection law. Huntress offers a [Data Processing Addendum](#), available at www.huntress.com/legal, with European Commission approved Standard Contractual Clauses, to meet the adequacy and security requirements for our customers located in or that operate in the EEA, UK, or Switzerland, and other international transfers of Personal Data with similar privacy regulations.

Keeping Your Personal Data Secure

We have appropriate security measures in place to prevent Personal Data from being accidentally lost, used or accessed in an unauthorized way. We limit access to your Personal Data to those who have a genuine business need to access it. Those processing your Personal Data will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Huntress is committed to protecting the security of the information it collects and processes. The information is stored on computer servers with limited and controlled access. Huntress operates secure data networks protected by industry-standard firewall and password protection systems. Huntress uses a wide range of security technologies and procedures to protect information from threats such as unauthorized access, use, or disclosure. Our security policies are periodically reviewed and enhanced as necessary, your data is encrypted at rest and in transit, and only authorized individuals have access to the data that we process.

More information about our Security practices can be found in our [Security Addendum](#), available at www.huntress.com/legal.

How Long Your Personal Data Will Be Kept

We will only retain your Personal Data for as long as necessary to fulfill the purposes for which it was collected, or as necessary to comply with our business requirements and necessary laws; to comply with any legal, accounting or reporting obligations; to resolve disputes; to protect our assets; to efficiently run our business; and to enforce our agreements. To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we collect or process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements. Following the end of the relevant retention period, we will delete or anonymise your Personal Data.

Your Rights

You have the following rights, which you can exercise free of charge:

- **Access.** The right to be provided with a copy of your Personal Data (the right of access)
- **Rectification.** The right to require us to correct any mistakes in your Personal Data

- **Erasure** (also known as the right to be forgotten). The right to require us to delete your Personal Data—in certain situations
- **Restriction of processing.** The right to require us to restrict processing of your Personal Data—in certain circumstances, *e.g.*, if you contest the accuracy of the data
- **Data portability.** The right to receive the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
- **To object.** At any time to your Personal Data being processed for direct marketing. In certain other situations, you may object to our continued processing of your Personal Data, *e.g.*, processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defense of legal claims
- **Not to be subject to automated individual decision-making.** The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
- **Right to withdraw consents.** If you have provided us with a consent to use your Personal Data you have a right to withdraw that consent easily at any time. Withdrawing a consent will not affect the lawfulness of our use of your Personal Data in reliance on that consent before it was withdrawn

If you would like to exercise any of those rights, please:

- Contact Huntress Privacy as identified below in the “How to Contact Us” section
- Provide enough information to identify yourself (*e.g.*, your full name, email address(es), and company name) and any additional identity information we may reasonably request from you
- Let us know what right you want to exercise and the information to which your request relates

We will comply with any request within the time required by the relevant legal authority.

If you contact us regarding Personal Data related to our Services for which we are a data processor, we will attempt to refer your request to the relevant organization (*e.g.*, your employer, our customer) who is the data controller for your Personal Data. You may also reach out to that organization directly.

Whether or not we are required to fulfill any request you make will depend on a number of factors (*e.g.*, why and how we are processing your Personal Data). If we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions.

"Do Not Track" Requests

Our Websites and Services do not respond to Do Not Track requests or headers from some or all browsers. To learn more about the use of cookies or other technologies to deliver more relevant advertising and your choices about not having this information used by certain service providers, please click (<http://www.aboutads.info/choices/>) (for users in the United States) or (<http://youronlinechoices.eu/>) (for users in the European Union).

External Links

Our Websites or Services may contain links to third-party websites or resources or contain third-party advertisements. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the terms of use and privacy policies of those third-party websites. We are not responsible for the information practices of such websites.

Children's Privacy

Our Websites and Services do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. In fact, as currently operated, persons under the age of 18 may not use the Websites or Services. By providing information to Huntress, you represent that you are 18 years of age or older. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers.

Additional Information for EEA/UK/Swiss Residents

If you are a data subject located in the EEA the UK, or Switzerland you have the rights under the European Data Protection Laws (as applicable) in respect of your Personal Data as noted in the “Your Rights” section above.

You also have the right to lodge a complaint with:

- For users in the European Economic Area – the contact information for the data protection regulator in your place of residence can be found here:
https://edpb.europa.eu/about-edpb/board/members_en
- For users in the UK – the contact information for the UK data protection regulator is below:

The Information Commissioner’s Office
Water Lane, Wycliffe House
Wilmslow - Cheshire SK9 5AF
Tel. +44 303 123 1113
Website: <https://ico.org.uk/make-a-complaint/>
- For users in Switzerland – the contact information for the Swiss data protection regulator can be found here: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>

If you have any questions about our Privacy Policy or practices, you may contact us. In provision of the Websites and Services provided by Huntress, we are represented in the EU and the UK by the DPO Centre Ltd:

For Individuals in the EU, please contact our EU Representative at:
eurep@huntresslabs.com

Alternatively, they can be reached by mail:
The DPO Centre Europe Ltd
Alexandra House
3 Ballsbridge Park, Dublin, D04C 7H2
+353 1 631 9460

For Individuals in the UK, please contact our UK Representative at:

ukrep@huntresslabs.com

Alternatively, they can be reached by mail:

The DPO Centre Ltd
50 Liverpool Street
London, EC2M 7PY
+44 (0) 203 797 6340

Additional Information for California Residents

This section provides additional details about the Personal Data, or “personal information,” we collect 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”, to the extent such information is not exempt from the CCPA.

California law requires that we detail the categories of personal information that we collect and disclose for certain “business purposes,” such as to service providers that assist us with securing our Websites and Services or marketing our products, and to such other entities as described in earlier sections of Privacy Policy. In addition to the information provided above, we may collect the following categories of personal information from you, your employer, data analytics providers, and third-party services providers for our business purposes:

- **Identifiers.** Such as direct identifiers, such as name, alias user ID, username, account number; email address, phone number, address and other contact information; IP address and other online identifiers; other government identifiers; and other similar identifiers
- **Customer Records.** Such as personal information, such as name, account name, user ID, contact information, employment information, account number, and financial or payment information, that individuals provide us in order to purchase or obtain our products and Services. For example, this may include account registration information, or information collected when an individual purchases or orders our products and Services, or enters into an agreement with us related to our products and Services
- **Commercial information.** Such as records of personal property, products or Services purchased, obtained, or considered, or other purchasing or use histories or tendencies
- **Usage Details.** Such as browsing history, clickstream data, geolocation data, search history, access logs and other usage data and information regarding an individual’s interaction with our Websites, mobile apps, and other Services, and our marketing emails and online ads
- **Professional Information.** Includes professional and employment-related information such as business contact information and professional memberships
- **Audio and Visual Data.** Such as photographs and images (e.g., that you provide us or post to your profile) and call recordings (e.g., of customer support calls)
- **Inferences.** Such as inferences drawn from other personal information that we collect to create a profile reflecting an individual’s preferences, characteristics, predispositions, behavior, attitudes, abilities, or aptitudes. For example, we may analyze personal information in order to identify the offers and information that may be most relevant to customers, so that we can better reach them with relevant offers and ads

We collect this information for the business and commercial purposes described in the “How and Why We Process Your Personal Data” section above. We share this information as described in the “Who We Share Your Personal Data With” section above. The CCPA defines “sell” broadly to include disclosing or making available personal information to a third party in order to receive certain benefits or services from them. While we do not “sell” personal information to third parties in exchange for monetary compensation, we may make personal information available, which may be defined as a sale by the CCPA; this is common practice among companies that operate online, such as sharing with third party advertisers for purposes of targeting advertisements on Huntress and non-Huntress websites, applications, and services. As defined by the CCPA, we may “sell” usage details and identifiers to third party advertising networks, social networks, co-sponsors of marketing events, and data analytics providers. In addition, we may allow third parties to collect personal information from our sites or services if those third parties are authorized service providers who have agreed to our contractual limitations as to their retention, use, and disclosure of such personal information, or if you use our sites or services to interact with third parties or direct us to disclose your personal information to third parties. To learn more, please see our Cookies Policy, available at www.huntress.com/cookies.

As further described above, we may collect personal information from the following sources:

- Our customers
- Business partners and affiliates
- Directly from the individual
- Advertising networks
- Data analytics providers
- Social networks
- Internet service providers
- Operating systems and platforms
- Publicly available sources

In addition to the rights detailed above in the “Your Rights” section of this Policy, subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of personal information we collect (including how we use, disclose, or may sell this information), to delete their personal information, to opt out of any “sales”, to know and opt out of sharing of personal information for delivering advertisements on non-Huntress websites, and to not be discriminated against for exercising these rights.

California consumers may make a request pursuant to their rights under the CCPA by contacting us at privacy@huntress.com. We will verify your request using the information associated with your account, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf. Authorized agents must submit proof of authorization.

Changes to This Privacy Policy

This Policy may change from time to time and your continued use of the Websites and Services is deemed to be acceptance of such changes. Please check the Policy periodically for updates.

How to Contact Us

You can contact us by email or mail if you have any questions about this Privacy Policy or the information we hold about you, to exercise a right under a data protection law, or to make a complaint. If you are a EEA/UK/Swiss resident, see the “Additional Information for EEA/UK/Swiss Residents” section above for

contact information for our representatives in those regions. For all others, our contact details are shown below:

privacy@huntress.com

Privacy

Huntress Labs Incorporated

6996 Columbia Gateway Dr, Ste 101

Columbia, MD 21046