

Aspire Cyber Privacy Notice

Last Modified: January 24th, 2025

1. INTRODUCTION

Aspire Cyber, LLC (“**Aspire Cyber**,” “**we**,” “**our**,” or “**us**”) respects your privacy and are committed to protecting it through our compliance with this Privacy Notice (“**Notice**”). We are committed to providing our customers (“**Customers**,” “**you**,” “**your**”) with top-notch cybersecurity services. We are committed to being transparent in our handling and processing of personal information in accordance with applicable privacy and data protection laws.

This Notice describes our practices for collecting, using, maintaining, protecting, and disclosing your Personal Information (as defined below) on or through our website, <https://www.aspirecyber.com> (“**Website**”) any related applications, products and platforms (collectively with the Website, the “**Service(s)**”) or anywhere this Notice is posted as well as through any offline interactions. Please read this Notice carefully to understand our policies and practices regarding your information. If you do not agree with our terms, your choice is not to access or use our Services. By accessing or using the Services, you agree to this Privacy Notice.

2. CHILDREN’S PRIVACY

The Website is intended for a general audience and is not intended for use or access by children under 13 years of age without parental consent, and we do not knowingly collect information about children or sell products to children.

3. INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We may collect certain information from you and about users of our Services, such as Personal Information when you sign up for an account (“**Account**”) on our Website or order our Services. Personal information means information that identifies (whether directly or indirectly) a particular individual, such as the individual’s name, postal address, email address, and telephone number (“**Personal Information**”). Other types of information we collect is information related to how you use our websites and applications, which helps us improve our Services.

You expressly consent to receiving communications from Aspire Cyber through the information you provided to us. For more information on how to access and control your communication preferences, please see the **YOUR RIGHTS and the YOUR CHOICES REGARDING YOUR INFORMATION**, sections of this Notice below. When you provide us with information in connection with a particular activity or otherwise sign up for or order our products and Services or provide your contact information to us, including your email address or telephone number in connection with that

activity, product or service, you agree that such action constitutes a purchase or inquiry establishing a business relationship with us.

| INFORMATION PROVIDED BY YOU OR ON YOUR BEHALF | | |
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| Categories of Personal Information | How / When Personal Information is Collected | Purpose for Personal Information Collection |
| <p>Contact Information:</p> <ul style="list-style-type: none"> Email Address Full Name Phone Number Job title / Role Any other Personal Information you choose to share. | <ul style="list-style-type: none"> You input your Contact Information when filling out a webform, or by using the “Let’s Chat” function on our Website. You provide Contact Information when you communicate with us via email to request or receive our Services. | <ul style="list-style-type: none"> To provide the Services requested by you. To communicate with you about the Services you have requested. To provide you with customer support. To analyze your use of the Services, identify usage trends, determine the effectiveness of our promotional campaigns and to evaluate and to personalize and improve our Services, products, services, marketing efforts and your experience. To send communications about similar products and services, where appropriate, with the option to opt out at any time. To comply with applicable legal or regulatory requirements and law enforcement requests. To comply with and enforce our Terms of Service. |
| <p>Payment Information:</p> <ul style="list-style-type: none"> Contact Information Billing Address Credit/Debit, and/or Banking Information | <ul style="list-style-type: none"> You input this information if and when placing an order on the Website for our products or Services. Note that we do not process Payment Information and we use a third-party Service Provider, Stripe, to process your Payment Information subject to Stripe’s Privacy Policy. | <ul style="list-style-type: none"> To provide the Services requested by you. To communicate with you about your order and provide you with order support. To comply with applicable legal or regulatory requirements and law enforcement requests. To comply with and enforce our Terms of Service. |
| <p>User Content:</p> <ul style="list-style-type: none"> Any information including, Personal Information you may choose to share in the body of a comment form on our Website. | <ul style="list-style-type: none"> You may choose to input this information when interacting with the certain features such as comments to blog posts on the Website. Please be mindful when sharing such information as it may be visible to both | <ul style="list-style-type: none"> To provide the Services requested by you. To comply with applicable legal or regulatory requirements and law enforcement requests. To comply with and enforce our Terms of Service. To analyze your use of the Services, identify |

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| | users and non-users. | usage trends, determine the effectiveness of our promotional campaigns and to evaluate and to personalize and improve our Services, products, services, marketing efforts and your experience. |
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INFORMATION COLLECTED AUTOMATICALLY

As you navigate through and interact with our Services, We and our third-party service providers, including analytics and third-party content providers, may automatically collect certain information from you whenever you access or interact with the Service. We may combine this automatically collected log information with other information we collect about you. We do this to generally improve services we offer you, conduct analytics, and improve site functionality.

| Categories of Personal Information | How / When Personal Information is Collected | Purpose for Personal Information Collection |
|---|---|--|
| <p>Usage information:</p> <ul style="list-style-type: none"> Details of your visits to our Website or Services (e.g. links you've clicked on, content response times, location data, logs, and other similar communication data and statistics about your interactions) | <ul style="list-style-type: none"> This information is automatically collected when you visit our Website. | <ul style="list-style-type: none"> To analyze your use of the Services. To improve and develop our Website and Services and to enable us to offer new features and material. |
| <p>Device information:</p> <ul style="list-style-type: none"> Information about your computer and internet connection, including your Internet Protocol address, operating system, and browser type. | <ul style="list-style-type: none"> This information is automatically collected when you visit our Website. | <ul style="list-style-type: none"> To analyze your use of the Services. To protect the Services, our company, our employees, and our users from malicious attacks, hacking, fraud, or other illegal or unauthorized activity. To investigate and take steps to prevent potential fraud or other wrongdoing. |

Cookies and Other Automatic Data Collection Technologies

Aspire Cyber and its partners use cookies or similar technologies, which store certain information on your computer and allows us to, among other things, analyze trends, administer the Website, and to gather demographic information about our user base. The technology used to collect information automatically from Aspire Cyber users may include the following:

- Cookies:** Like many websites, we and our operational partners, analytics, and service providers use “cookies” to collect information. A cookie is a small data file that we transfer to your computer’s hard disk for record-keeping purposes. We use both persistent cookies that remain on your computer or similar device, and session ID cookies, which expire at the end of your

browser session. We also use cookies to enhance the reliability, security and performance of our Website, including cookies are passed by our Web Application Firewall.

- You may be able to opt-out of the automatic collection of some information by referring to your web browser's or mobile devices options or settings menu. Each browser is different, so check the "Help" menu of your browser to learn how to change your Cookie preferences or visit <http://www.allaboutcookies.org> for more information.
- **Web Beacons:** Web beacons are small graphics with a unique identifier that may be invisible to you, and which are used to track the online activity of Internet users.
 - You can also refer to the "Help" menu of your browser to learn more about Web Beacons and your ability to disable them. Disabling or rejecting cookies may disable some of the features and functionality of the Website.
- **Embedded Scripts:** An Embedded Script is programming code that is designed to collect information about your interactions with the Services, such as the links you click on. The code is temporarily downloaded onto your computer or other device and is deactivated or deleted when you disconnect from the Service.

Third-Party Cookies

- Aspire Cyber uses third-party vendor tracking cookies, pixels, and other technologies such as Google Analytics, to collect data about your activities when you visit our Website, the website of entities for which we serve advertisements, or the websites and online services where we display advertisements (see next paragraph for more information on Google Analytics). This information may include the content you view, the date and time that you view this content, the products you purchase, or your location information associated with your IP address. We use the information we collect to serve you more relevant advertisements (sometimes referred to as "Retargeting" or "Remarketing"). We collect information about where you saw the ads, we serve you and what ads you clicked on to measure the success of our advertising campaigns. You can generally opt-out of receiving personalized ads from third-party advertisers and ad networks who are members of the Network Advertising Initiative (NAI) or who follow the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising (DAA) by visiting the opt-out pages on the NAI website (<http://optout.networkadvertising.org>) and DAA website (<http://www.aboutads.info/choices/>).

Google Analytics

Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other sites they used prior to coming to this Website. We use the information we get from Google Analytics only to improve our Services. Google Analytics collects only the I.P. address assigned to you on the date you visit this Website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this Website, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics

about your visits to this Website is restricted by the Google Analytics Terms of Service and the Google's Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to this Website by disabling cookies on your browser.

Do Not Track Signal

Do Not Track (DNT) is a privacy preference that users can set in some web browsers, allowing users to opt out of tracking by websites and online services. We do not honor browser requests not to be tracked online (known as "Do Not Track"), but our cookie policy below describes how you can opt out of receiving cookies.

4. HOW WE DISCLOSE AND SHARE YOUR INFORMATION

We may share information we receive about you as follows or as otherwise described in this Privacy Notice. When we disclose Personal Information, the recipient is required to keep that Personal Information confidential, secure and process the Personal Information only for the specific purpose for which they are engaged:

- **Affiliates & Business Partners:** We may share Personal Information with our affiliated entities and corporate group companies to ensure a consistent level of service across our products and services, and enhance our products, services, and your customer experience.
- **Service Providers:** We employ third party companies and individuals to provide Services on our behalf, to perform Service-related operations such as website maintenance database management, payment processing, web analytics, fraud detection or email marketing.
- **Corporate Transactions:** We may sell, transfer, or otherwise share some or all of our assets, including your Personal Information, in connection with a merger, acquisition, reorganization or sale of assets (including, in each case, as part of the due-diligence process with any potential acquiring entity) or in the event of bankruptcy.
- **If Required by Law:** Aspire Cyber will share Personal Information with government agencies as required by law in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: (i) to enforce our Terms of Service; (ii) to respond to claims, legal process (including subpoenas); (iii) to protect our property, rights, and safety and the property, rights, and safety of a third-party, our users, or the public in general; (iv) to stop any activity that we consider illegal, unethical or legally actionable activity; and (v) as required in accordance with applicable local, state, or federal laws.
- **With your Consent:** You may submit Personal Information to us through a form on the Website and consent to receive communication from us or our business partners or affiliates based on the information in the form.
 - From time to time, we may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, survey, and/or other general communications. In order to improve our Services, we may receive a notification when you open an email from Aspire Cyber or click on a link therein. If you would like to stop receiving marketing/promotional communications via email, you may simply opt-out by clicking the UNSUBSCRIBE button located in the email you receive from Aspire Cyber.

5. YOUR CHOICES REGARDING YOUR INFORMATION

You have several ways to exercise control over your information:

- **E-Mail:** You may opt-out of receiving marketing emails from us by following the opt-out instructions provided in those emails. Please note that we reserve the right to send you certain communications relating to your account or use of the Service (for example, administrative and service announcements) via email and other means and these transactional account messages may be unaffected if you opt-out from receiving marketing communications.
- **Providing Consent:** You may choose whether to receive from us offers and promotions for: our products and services, the products or services of third parties, or products and services that we think may be of interest to you, by providing your consent (for example, by clicking an unticked checkbox).
- **Contact Us:** You may contact us at info@aspirecyber.com to learn more about your rights and choices regarding your Personal Information.

Please be aware that if you do not allow us to collect Personal Information from you, we may not be able to deliver certain experiences, products, and services to you, and some of our Services may not be able to take account of your interests and preferences.

6. YOUR RIGHTS REGARDING YOUR INFORMATION

Depending on where you are located, you may have certain rights regarding your Personal Information. Residents of certain jurisdictions may access, correct, update or delete your Personal Information; object to our processing of this information, ask us to restrict our processing of your Personal Information, or request portability of your Personal Information. Please see the please see the (**YOUR RIGHTS REGARDING YOUR INFORMATION** and **the YOUR CHOICES REGARDING YOUR INFORMATION**), sections of this Notice to learn more about exercising your rights. Upon request, Aspire Cyber will provide you with information about whether we hold any of your Personal Information. You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information. If you submit a request to access all Personal Information you've submitted, we will respond to your request to access within 30 days or as otherwise required by law.

We will use commercially reasonable efforts to honor your requests for deletion; however, certain residual information may actively persist on the Service even if you close your account. In addition, the rights described above may be limited, for example, if fulfilling your request would reveal Personal Information about another person, or if you ask us to delete information, we are required by law to keep or have compelling legitimate interests in keeping (such as for fraud prevention purposes). Your Personal Information may remain in our archives and information you update or delete, or information within a closed account, may persist internally for our administrative purposes, to the extent permitted by law. It is not always possible to completely remove or delete information from our databases. In addition, we typically will not remove information you posted publicly through or on the Service. Bear in mind that neither you nor Aspire Cyber can delete all copies of information that has been previously

shared with others on the Service. If your information is deleted, then your account may become deactivated. If your account is deactivated or you ask to close your account, you will no longer be able to use the Services. Please note that our Services require a minimum amount of Personal Information in order to function. Individuals who do not provide Personal Information (e.g., by not filling out a profile) may not be able to access the full functionality of features found on the Services.

California Residents – Your California Privacy Rights

If you are a California resident, the California Consumer Privacy Act (“**CCPA**”) and California Consumer Privacy Rights Act, amending the CCPA (“**CPRA**”) (collectively the CCPA and CPRA are the “**California Privacy Laws**”) provide you with additional privacy rights with respect to our collection, use and disclosure of your Personal Information, including:

- The right to know what Personal information we have collected and how we have used and disclosed that Personal Information in the 12-month period preceding your request.
 - We collected the following categories of Personal Information in the last 12 months: identifiers/contact information, commercial information, customer records information, Internet or other electronic network activity information, geolocation data, and inferences drawn from the above.
 - The sources of Personal Information from whom we collected are directly from users, analytics tools, social networks, and third-party services that update or supplement information we hold about you.
 - Please see the above section within this Notice titled **INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT**, to see the full list of categories of Personal Information we have collected about you.
 - Please see the above sections please see the **YOUR RIGHTS and the YOUR CHOICES REGARDING YOUR INFORMATION**, sections of this Notice, to see applicable business or commercial uses and disclosures of your Personal Information.
- **The right to request deletion** of your Personal Information.
- **The right to be free from discrimination** related to the exercise of any of your privacy rights.
- **The right to opt out** of the sale of your Personal Information, and to request information about whether we have sold your Personal Information in the past 12 months.
 - To the extent that our disclosure of Personal Information to the third parties described above in the **HOW WE DISCLOSE AND SHARE YOUR INFORMATION** section is considered a “sale” as defined under the CCPA, we have “sold” the following Personal Information in the previous 12 months:
 - **Aspire Cyber does not sell and has not sold Personal Information in the previous 12 months.**
- **The right to correct inaccurate Personal Information.**
- **The right to limit the use and disclosure of Sensitive Personal Information.**

- **The right to access information related to and opt-out of the use of automated decision-making technology.**

For more information on how to exercise any applicable rights you may have under California Privacy Laws, please contact us at info@aspirecyber.com please note that we may require you to verify your credentials, by matching your e-mail address, or other account information to the information in our systems, before you can submit a request to exercise any of these rights. If you authorize another person to act as your agent to submit requests on your behalf, then unless you provide the agent with power of attorney under the California Probate Code, we will ask the agent to provide us the written and signed authorization that you provided to the agent, we will confirm with you that you did provide the authorization, and we will verify your identity.

7. INTERNATIONAL JURISDICTIONS

Our Services are hosted and offered in the United States of America (US), and are subject to, and comply with all applicable US laws and regulations. If you are accessing the Services from another country, please be advised that you may be transferring your personal information to us in the US, and you consent to that transfer, processing and storage of your personal information in accordance with this Privacy Notice. You also agree to abide by the applicable laws of applicable to your US state as they concern your use of the Services and your agreements with us. Any persons accessing our Services from any jurisdiction with laws or regulations governing the use of the Internet, including the collection, use, or disclosure of personal information, different from those of the jurisdictions mentioned above may only use the Services in a manner lawful in their jurisdiction. If your use of the Services would be unlawful in your jurisdiction, you may not use our Services.

8. SECURITY

We use physical, technical and organizational measures designed to protect your information against unauthorized access, theft and loss. We restrict access to your Personal Information to those employees who need to know that information to service your account or perform their job functions. Although we take precautions intended to help protect information that we process, no system or electronic data transmission is completely secure. Any transmission of your Personal Information is at your own risk and we expect that you will use appropriate security measures to protect your Personal Information. You are responsible for maintaining the security of your account and the information in your account. We may suspend your use of all or part of the Services without notice if we suspect or detect any breach of security. You understand and agree that we may deliver electronic notifications about breaches of security to the email address on record on your account.

9. DATA RETENTION

Unless you request that we delete certain information (see **YOUR RIGHTS REGARDING YOUR INFORMATION** and **the YOUR CHOICES REGARDING YOUR INFORMATION**), We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide services to you (for example, for as long as you have an account with us or keep using the Website);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them);
- Whether retention is advisable; and considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations).

10. CHANGES TO THIS NOTICE

ASPIRE CYBER may update this Privacy Notice at any time and any changes will be effective upon posting. In the event that there are material changes to the way we treat your Personal Information, we will update the **Last Modified** date at the top of this Notice upon becoming effective. We may also notify you by email, in our discretion. Your continued access of our Services after we make changes is deemed to be acceptance of those changes.

11. HOW TO CONTACT ASPIRE CYBER

Aspire Cyber welcomes your questions regarding this Privacy Notice, and your rights as they apply to this policy and your Personal Information. If you believe that Aspire Cyber has not adhered to this Policy, please contact us at:

Aspire Cyber
9330 LBJ Freeway, Suite 900
Dallas, Texas 75243

Email: info@aspirecyber.com
Phone: 2147916999