

## Privacy and Security Policy

BankruptcyRisk.com is committed to state-of-the-art security and user data privacy. Therefore, this Privacy and Security Policy is enforced by our CEO, Patrick Brennan, who is responsible for compliance. This policy is reviewed at least annually. This Privacy and Security Policy describes our practices for the collection, protection, use and disclosure of the information we collect from customers, their suppliers and partners, and visitors to our websites (collectively, our software “Users”), who use our software applications in any media: web, mobile, email, text, etc. (the “Service”).

BankruptcyRisk.com is the registered “Doing Business as” brand name for Accelor Corp’s financial risk management solution. Accelor Corp was incorporated in California in January 2000. Corporate headquarters is located at 1755 E Bayshore Rd, Ste 14B, Redwood City, San Mateo County, California, in the heart of Silicon Valley. This document uses “Accelor Corp”, “BankruptcyRisk.com”, “we”, and “our” interchangeably.

### BankruptcyRisk.com Multi-Level Security

BankruptcyRisk.com is a secure, encrypted, permission-based platform for understanding the current financial status and predicting future financial distress or stability.

BankruptcyRisk.com adheres to stringent multi-level security requirements that cover physical, procedural, and technical safeguards for storage, processing, and transfer of data. These safeguards include the following:

- **Hosting in secure Azure data centers** which have achieved SOC 1 Type 2, SOC 2 Type 2, and SOC 3 reports.
- **Secure solution architecture** including
  - o State-of-the art network security, firewalls, hardened servers
  - o Hardened software applications
  - o No BankruptcyRisk.com servers are accessible from the internet
- **Encryption** of data in transit and at rest.
- **Permission-based access.**
- **User and Password management** by Microsoft Azure Active Directory, a highly secure, encrypted, cloud-based service. BankruptcyRisk.com has no access to passwords.
- **Data and software resilience** with hourly backups between redundant Azure data centers separated by 2500 miles (4000 km).
- **Physical data center security** including 24x365 guards and monitored operations center.

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- **Monitoring** including log analysis, copying log events to separate server, malware detection, real-time event alerting and active response.
- **Procedural controls** such as security training, minimizing access to production data to few personnel, enabling access only through encrypted, internal VPN.
- **Testing** to prevent unauthorized access, accidental loss, destruction, or damage and to ensure timely recovery in the event of an outage.

### Privacy Protections and Certifications

BankruptcyRisk.com certifies that the BankruptcyRisk.com Privacy and Security Policy and practices, described in this document, is a public commitment to data security, control, and privacy.

Please read this Privacy Policy carefully and make sure that you fully understand and agree to it. You are not legally required to provide us with any data and may do so (or avoid doing so) at your own free will. If you do not wish to provide us with Personal Data or other data, or to have it processed by us or any of our Service Providers, please simply do not enter our Sites or use our Service. You agree to this Privacy Policy by accessing or using the Service.

BankruptcyRisk.com is committed to adhering to exceptional privacy and security principles in compliance with international privacy frameworks. We are committed to providing:

1. **Notice:** Inform data subjects via this detailed online privacy policy. Data subjects can opt out of communications and can update and delete their information themselves at any time at the secure BankruptcyRisk.com website.
2. **Choice:** We will not share your information with a third party for a purpose that is materially different from original purpose (supply chain risk reduction) without your consent. Personal Data (name, job title, email and telephone number) resides in secure software applications that we built and in secure SaaS-based third party technical support and communications systems that we use to support and communicate with our customers and their suppliers.
3. **Security:** BankruptcyRisk.com safeguards data that it collects with multi-level data security, including leading technology, procedural and policy measures, as described above.
4. **Data Integrity:** Personal Data is limited to what is relevant for the purpose of the processing, namely the contact names, job title, email address and telephone number of our customers and their suppliers. BankruptcyRisk.com takes measures to ensure that Personal Data is accurate, complete, and current.
  - o Personal Data is processed fairly and in a transparent manner for specified, explicit and legitimate purposes and kept no longer than is necessary for the purposes for which the Personal Data are processed. BankruptcyRisk.com maintains a Register of Systems that it uses to process Personal Data and reviews that Register at least annually.

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5. **Legal Basis of Processing Personal Data:** BankruptcyRisk.com processes Personal Data and other information of BankruptcyRisk.com customers and their suppliers because the processing is necessary for specific legitimate business purposes which include some or all of the following:
  - Fulfill agreements with BankruptcyRisk.com customers
  - Comply with the Information Collection and Use section of this policy
  - Improve the effectiveness of BankruptcyRisk.com services
  - Personalize our software
  - Enhance information security, such as by confirming that account information is current and safeguards to data and software access are in place
  - Understand how people interact with our software
  - Provide communications which we believe will be of interest to you
  - Address a service request from you
  - Comply with or avoid the violation of applicable law, regulation, or subpoena
6. **Access:** Data subjects can obtain confirmation of whether BankruptcyRisk.com processes Personal Data related to them by logging into the websites described above in section “1. Notice”.
7. **Accountability to Onward Transfers:** If BankruptcyRisk.com wishes to transfer Personal Data to a third party acting as an agent, BankruptcyRisk.com will ensure that the transfer is made with an expectation of privacy protection.
  - Personal Data (name, job title, email and telephone number) resides in secure software applications that we built and in secure SaaS-based third party technical support and communications systems that we use to support and communicate with our customers. BankruptcyRisk.com is not responsible for violations by third parties or if BankruptcyRisk.com is required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
  - Credit card and similar financial payment data are not stored by BankruptcyRisk.com. When you pay for service, you pass such information securely directly to a third-party provider, PayPal, and our software programs do not have access to such information.
8. **Enforcement and Redress:** Have in place an effective redress mechanism. Data Subjects have options for addressing data privacy protection issues, including but not limited to:
  - BankruptcyRisk.com (recommended, free): Please login to [bankruptcyrisk.com](http://bankruptcyrisk.com) to contact support for any Personal Data protection issues, suggestions, complaints or questions. BankruptcyRisk.com will normally reply within 1-3 business days
    - BankruptcyRisk.com is not required by GDPR Article 27 to designate a representative in the EU because processing is occasional and does not include on a large scale, processing of special categories of data as referred to in Article 9(1), nor in Article 10, and is unlikely to result in a risk to the rights and freedoms of natural persons, taking into account the nature, context, scope

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and purposes of the processing. We offer our Software as a Service solution to companies.

BankruptcyRisk.com encrypts its database. In the unlikely event of a breach involving unlawful or harmful unauthorized access of unencrypted personally identifiable information (PII) or other confidential information, BankruptcyRisk.com policy is to notify and work with affected BankruptcyRisk.com customers within 48 hours and authorities within 72 hours if required. The governing local law for BankruptcyRisk.com is California Civil Code § 1798.80 et seq; California Health & Safety Code § 1280.15; California Consumer Privacy Act (CCPA) of 2018. **We do not sell your personal information for the intents and purposes of the California Consumer Privacy Act (CCPA).**

### **Commitment to the UK Data Protection Act (DPA)**

BankruptcyRisk.com is also committed to processing and securing data in accordance with the data protection principles of the Data Protection Act (DPA). BankruptcyRisk.com ensures that data is:

1. Processed fairly and lawfully
2. Obtained for limited purposes and not further processed in any manner incompatible with those purposes
3. Adequate, relevant, & not excessive for the purposes for which they are processed
4. Accurate and up to date with ability for each company to update their data
5. Not kept for longer than is necessary
6. Processed in accordance with the data subject's rights and preferences
7. Secure
8. Not transferred to other countries without adequate protection.

### **Information Collection and Use**

#### **Information Collected by BankruptcyRisk.com**

BankruptcyRisk.com collects the data needed to provide accounts to users to communicate with them. This data includes the contact information normally found on standard business cards, such as name, email, job title and telephone. BankruptcyRisk.com may use your email address to send you Service-related notices and announcements. No sensitive Personal Data is stored by BankruptcyRisk.com. Credit card and similar financial payment data are not stored by BankruptcyRisk.com. When you pay for service, you pass such information securely directly to a third-party provider, PayPal, and our software programs do not have access to such information.

#### **Cookies and Log Data**

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Like most websites, BankruptcyRisk.com uses technologies, such as cookies, beacons, pixels, tags, and scripts (collectively, “Cookies”). BankruptcyRisk.com uses Cookies to provide, monitor, analyze, promote, and improve the Service. Cookies are small text files that are stored through the browser on your computer or mobile device. They allow websites to store information like user preferences, to perform basic functions, to recognize you, and to provide consistency as you navigate between pages. Cookies can have various durations. Session cookies are temporary and expire once you close your browser (or once your session ends). Persistent cookies remain on your hard drive until you delete them, or your browser deletes them automatically based on the cookie’s expiration date.

BankruptcyRisk.com uses several different types of Cookies on our website and platform:

- **Registration Cookies:** When you register and sign into our Services, we generate Cookies that let us know whether you are signed in or not, which Services you are authorized to use, and to maintain your login session. Such Cookies are essential for you to browse the website and use its features, such as accessing secure areas of the website.
- **Performance Cookies from Software We Created:** This type of Cookie helps us to secure and better manage the performance of our Services and remembers your preferences for features found on the Services, so you do not have to re-set them each time you visit.
- **Performance Cookies from Integrated Third-Party Software:** On some pages of our Services, we integrate the software sourced from other software organizations. Such software may also set their own Cookies. They do this to enable and improve the performance and interoperability of their applications, features or tools that are integrated with our services, to track performance, or to customize their services to you.
- **Analytics Cookies:** Analytics tools generate Cookies which can tell us (so long as they are allowed and not deleted) whether or not you have visited our Services in the past, tailor communications to you based on your usage, and provide aggregate information on how visitors and users use our Services.
- **Marketing & Advertising Cookies:** These Cookies allow us to know whether or not you have seen an ad or type of ad online, how you interacted with such an ad, and how long it has been since you've seen it. We may use Cookies to help with targeting advertising. We may use Cookies set by another organization, so we can more accurately target advertisements to you. We also set Cookies on certain other sites that we advertise on. If you receive one of those Cookies, we may use it to identify you as having visited that site and viewing our ad there, if you later visit our Services. We can then target our advertisements based on this information.

All modern web browsers allow you to change your Cookie permission settings. You can usually find these settings in the “Options”, “Preferences”, or “Set up” browser menu. Some web browsers also have a “do not track” feature. BankruptcyRisk.com, like many other reputable websites and online platforms, does not respond to “do not track” signals because

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of differences in how web browsers interpret this feature, send those signals, and lack of standardization. Therefore, it is not always clear whether visitors and users intend for these signals to be transmitted or whether they are even aware of them.

In addition, BankruptcyRisk.com uses databases and server logs to record information such as user web requests, Internet Protocol (“IP”) address, user location, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, mobile carrier, and other such information. Databases and logs help BankruptcyRisk.com to monitor, fix and improve the Service. When you access the Service using a mobile device, BankruptcyRisk.com may collect specific device information contained in your mobile device’s device identifier. BankruptcyRisk.com may associate this device identifier with your Service account and use data associated with your device identifier to tailor Services to your device and to analyze any device-related issues.

### **Links to Other Web Sites**

BankruptcyRisk.com is not responsible for the practices employed by websites linked to from within the Service, nor the information or content contained therein. Please remember that when you use a link to go from the Service to another website, our Privacy Policy is no longer in effect and your activities on that third party website is subject to such third party website’s own rules and policies.

ALL BANKRUPTCYRISK.COM SOFTWARE, INFORMATION, DOCUMENTATION, REPORTS, RECOMMENDATIONS, ADVICE, SERVICES, ETC. IN ANY MEDIA ARE PROVIDED ON AN “AS IS”, “AS AVAILABLE” BASIS. BANKRUPTCYRISK.COM DISCLAIMS ALL WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTIES OF ACCURACY, COMPLETENESS, AVAILABILITY, MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WORKMANLIKE EFFORTS, LACK OF NEGLIGENCE OR NON-INFRINGEMENT. BANKRUPTCYRISK.COM INTELLECTUAL PROPERTY INCLUDES BUT IS NOT LIMITED TO BANKRUPTCYRISK.COM SERVICES, DATA, SOFTWARE, ETC. AND REMAINS EXCLUSIVE PROPERTY OF BANKRUPTCYRISK.COM. BANKRUPTCYRISK.COM IS GOVERNED BY THE LAWS OF SAN MATEO COUNTY, CALIFORNIA, USA. PRIMARY AND BACKUP DATA CENTERS ARE LOCATED IN THE USA.

BankruptcyRisk.com is committed to providing a secure, permission-controlled environment to support financial risk management. Revisions to the policies in this document will be dated and posted on this website. This document was last updated on January 18, 2021.