

SIGRID PRIVACY STATEMENT

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1. INTRODUCTION

In providing the Sigrid service, SIG may control and/or process data that counts as personal data under the applicable laws and regulations, such as the General Data Protection Regulation (GDPR). This Privacy Statement explains our practices regarding the collection, use, and process of your personal data in connection with the Sigrid Platform.

We only collect and process the minimum amount of personal data for the following purposes:

- To provide our products and deliver our services;
- To record user logging information for accountability and non-repudiation purposes;
- To understand user and user preferences to enhance user experiences;
- To provide customer support and respond to users' questions.

We will not share your personal data with any third parties. Your personal data is stored in the European Union.

2. DEFINITIONS

- "Customer Personal Data" means the personal data of Sigrid users.
- "Data Protection Legislation" means the GDPR, which is the applicable data protection regulation.
- "Subprocessors" means (a) all wholly-owned SIG subsidiaries entities that have logical access to, and process, Customer Personal Data (each, a "SIG Subprocessor"), and (b) all third parties (other than wholly-owned SIG subsidiaries) that are engaged to provide services to Customer or SIG and that have logical access to, and process, Customer Personal Data (each, a "Third Party Subprocessor").
- The terms "personal data", "processing", "data subject", "controller" and "processor" have the meanings given to them in the GDPR.

3. WHAT INFORMATION SIGRID COLLECTS

This Privacy Policy applies to the processing of personal data that we collect in the following ways.

3.1 INFORMATION USERS PROVIDE TO SIGRID

Registration information: we collect information such as your name, username, email address, your organization name during account creation.

Data that the Customers send to Sigrid: as Sigrid analyzes our Customers' source code, we collect the data (including source code) that Customers upload to Sigrid for analysis. It is possible that Customers, either intentionally or inadvertently, submit personal data of others to Sigrid. This may happen when a source code repository that is uploaded to Sigrid contains personal data in e.g. test files. In that case, the Customer acts as a data controller for that data, and SIG is merely a data processor.

3.2 INFORMATION SIGRID COLLECTS

When you visit or use our Service, we collect the following information automatically.

User logging information: if you are accessing Sigrid, we automatically collect your logging information for accountability and non-repudiation purposes. This includes information such as the date and time of your logging, the account and your IP address.

Usage information and Interactions: If you are using Sigrid, we may automatically collect information about how you use and how your device interacts with Sigrid. This includes the pages you view and the date/time of each request. This is for providing innovative services and personalized experiences.

4. PROCESSING OF CUSTOMER PERSONAL DATA

We may use your information to provide, administer, analyze, and operate the service. For example, we use your information for the following purposes:

- To provide our products and deliver our services;
- To record user logging information for accountability and non-repudiation purposes;
- To understand user and user preferences to enhance user experiences;
- To provide customer support and respond to users' questions.

SIG does not use the data it collects to measure the performance of individuals nor does it support customers in doing so.

Customer Personal Data provided by Customer at the request of SIG. If the Data Protection Legislation applies to the processing of Customer Personal Data, then as between the Parties, the Parties acknowledge and agree that: (a) SIG is the controller of Customer Personal Data provided under the Agreement by Customer to SIG at the request of SIG; (b) SIG will comply with its obligations under the Data Protection Legislation as the controller for such Customer Personal Data provided by Customer at the request of SIG; and (c) SIG will only process such Customer Personal Data provided by Customer at the request of SIG to be able to provide the Service and/or to carry out SIG's rights and obligations towards Customer, and SIG will not process Customer Personal Data for any other purpose.

5. PERSONAL DATA LOCATION AND TRANSFERS

SIG may store and process the relevant Customer Personal Data anywhere SIG or its Subprocessors maintain facilities, as long as Customer Personal Data is stored within the European Union, and Subprocessors are compliant with the Data Protection Legislation.

6. USER RIGHTS REGARDING PERSONAL DATA PROCESSING

Access, correction, and deletion. If you're a Sigrid user, you may access, update, alter your basic user profile information by editing your user profile or contacting the Sigrid Support Team to delete your profile.

On receipt of a written request from the user, SIG will process the request within a maximum period of 30 days. The personal data removal process may include contacting the user to obtain additional information as well as the relevant Customer to confirm the acceptance of the consequences. If SIG considers the user's request valid, SIG will permanently destroy the personal data in possession of SIG, unless applicable legislation or legal process prevents it from doing so, without undue delay. Personal data archived in backups will be deleted automatically in the course of routine rotation of backups. Please refer to the [SIG Information Security Policy](#) for the backup process details.

7. COOKIE USAGE

Sigrid does not store cookies that contain personal data. There are several cookies that Sigrid may use to store user-specific data:

- Cookies that store user authentication choices on whether the user accesses Sigrid via SSO. If the user accesses Sigrid via SSO, the cookie will store the organization name.
- Cookies that store a few details about the user such as the unique visitor ID
- Cookies that store the referrer initially used to visit the website

8. SUBPROCESSORS

SIG may engage processors or Subprocessors to provide limited parts of the Service, subject to the restrictions in these Terms.

- List of subprocessors.* At the publication date of the Privacy Statement, SIG uses the following subprocessors:
 - AWS: SIG deploys Sigrid in the AWS data centers located in the European Union. Personal data stored in AWS are the user registration information, logging and usage data.
 - Vitally: SIG uses Vitally as the Customer Success Platform. Personal data, including user name, email address, Sigrid roles and logging data, are stored in the European Union.At the written request of the Customer, SIG will provide additional information regarding Subprocessors and their locations.
- Subprocessing restrictions.* SIG will ensure that Subprocessors only access and use Customer Personal Data in accordance with *Data Location and Transfers* and terms of the Agreement and that they are bound by written agreements that require them to provide at least the level of data protection required by the Data Protection Legislation.
- Consent to Subprocessing.* Customer consents to SIG subcontracting the processing of Customer Personal Data to Subprocessors in accordance with the Agreement.

9. SIGRID'S SECURITY POSTURE

SIG takes reasonable security measures to protect your personal data. Please refer to the [SIG Information Security Policy](#) for details. Furthermore, SIG maintains its ISO/IEC 27001 certification and the SOC2 Type II report that cover the Sigrid service.

10. CHANGES TO THE PRIVACY STATEMENT

SIG may change this Privacy Statement from time to time, to reflect changes in our products, technologies, to comply with applicable laws and regulations, and to increase transparency. If we do make updates, we will provide notice of material changes to this Privacy Statement through our Website at least 1 month prior to the change taking effect.