

Privacy Policy

Last Revised: February 02, 2021

As used herein, “we” or “us” refers to The CIMA Companies, Inc., XS/Group, Inc., Volante Global and GBMS Tech Ltd, individually or collectively, as applicable. This Privacy Policy applies to the personal information that we collect from you as a visitor to cyberlockout.com (“the Website”) or as a representative of your business or employer seeking cyber liability insurance and/or cybersecurity and ransomware protection services, as applicable (collectively, “Cyber Lockout Services”). You can jump to particular topics by going to the headings below.

Types/Categories Of Information We Collect

Use And Processing Of Information

Sharing Of Information.

Your Choices.

Authorized Agent.

How We Protect Information

Miscellaneous

Contact Information

Types/Categories Of Information We Collect

We receive information, including business account information and personal information from our clients and potential clients. The following provides examples of the type of information that we collect and how may we use it:

Context	Types/Categories of Data	Primary Purpose for Collection and Use of Data
Account Registration	We may collect information regarding your business if you create an account to manage your policy. We may also collect information relating to the actions that you perform while logged into your account.	We have a legitimate interest in providing account related functionalities to our users. Accounts can be used for claim and policy administration, as well as to save your preferences and transaction history.
Information about Clients	We collect the name, and contact information, of our clients and their employees with whom we interact.	We have a legitimate interest in communicating with our clients concerning normal business administration such as projects, services, and billing.
Cookies and First Party Tracking	We may use cookies and clear GIFs. “Cookies” are small pieces of information that a website sends to a	We have a legitimate interest in making our website operate efficiently and

	computer's hard drive while a web site is viewed. Clear GIFs are near-invisible graphics that allow us to track when a webpage opens and displays.	understanding how visitors interact with our websites.
Cookies and Third Party Tracking	We may participate in behavior-based advertising, this means that a third party uses technology (e.g., a cookie) to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests on our website, or on other websites.	We have a legitimate interest in engaging in behavior-based advertising and capturing websites' analytics. Where required by law, we base the use of third party cookies upon consent.
Email Interconnectivity	If you receive email from us, we use certain tools to capture data related to when you open or interact with our messages.	We have a legitimate interest in understanding how you interact with the communications that we send to you.
Feedback/Support	If you provide us feedback or contact us for support we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply.	We have a legitimate interest in receiving, and acting upon, your feedback or requests for support.
Joint Ventures	We may collect information from Clients and other relevant or related information from parties with whom we have a joint venture(s) in order to deliver you products or services that may be applicable or of interest to you.	We have a legitimate interest in providing consumers with products or services that they are seeking to purchase or may have an interest in purchasing.
Mailing List	We may offer you the ability to sign up for a mailing list. If we do so we will collect your email address or postal address.	We share information about our products and services with individuals that consent to receive such information. We have a legitimate interest in sharing information about our products or services.
Surveys	If you participate in a survey we will collect information that you provide through the survey. If the survey is provided by a third party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We have a legitimate interest in understanding your opinions, and collecting information relevant to our organization.
Website interactions	We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.	We have a legitimate interest in understanding how you interact with our websites to better improve them, and to understand your preferences and interests in order to select offerings that you might find most useful. We also have a legitimate interest in detecting and preventing fraud.
Web logs	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a	We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us

	number that is automatically assigned to a computer when the Internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.	understand which of our services is the most popular.
--	--	---

In addition to the information that we collect from you, we may also receive information about you from other sources, including third parties, business partners, affiliates, or publicly available sources.

Use And Processing Of Information.

In addition to the purposes and uses described above, we use information in the following ways:

- To identify you when you visit our websites;
- To provide your business or employer insurance products or services, as applicable;
- To provide cybersecurity and ransomware protection services to your business or employer;
- To provide non-insurance products and services to your business or employer;
- To improve our services and product offerings;
- To process payments, including those for premiums for insurance and those for fees for non-insurance services, as well as applicable taxes and fees;
- To conduct analytics;
- To respond to inquiries related to support or other requests;
- To send marketing and promotional materials, including information relating to our products, services, sales, or promotions; and
- For internal administrative purposes, as well as to manage our relationships.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. For example, if your business or employer purchases Cyber Lockout Services through us, we may collect your information to provide our Cyber Lockout Services to your business or employer, but we may also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about you may have about the Cyber Lockout Services. As a result, our collection and processing of your information is based in different contexts, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

Sharing Of Information.

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

1. **Affiliates and Acquisitions.** We may share information with our corporate affiliates (e.g., parent company, sister companies, subsidiaries, or other companies under common control) or joint ventures to which we are a party. If another company acquires, or anticipates acquiring, all or a portion of our company, business, or our assets, we may also share information with that company, including at the negotiation stage.
2. **Other Disclosures with Your Consent.** We may ask if you would like us to share your information with unaffiliated third parties who are not described elsewhere in this policy.
3. **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, discovery requests, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights; to defend against or

bring a legal claim; to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.

4. **Service Providers.** We may share your information with service providers. Among other things service providers may help us to administer our website, conduct surveys, provide technical support, and process payments.
5. **Sharing with Affiliates and Non-Affiliates for Marketing and Other Purposes.** We may share your information with affiliates and non-affiliates for marketing and other purposes.

Your Choices.

You can make the following choices regarding your personal information:

1. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send promotional materials to you. You can stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive. If you decide not to receive promotional emails, we may still send you service related communications.
2. **Promotional Mailings.** If at any time you do not want to receive offers and/or circulars from us you can remove yourself from our mailing lists by emailing us (our contact information is below) with "NO SNAIL MAIL" in the subject line along with your name, address and zip code. Please note that our mailings are prepared in advance of their being sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.
3. **Access To Your Personal Information.** We will grant you, where required by law, reasonable access to the personal information that we have about you. You may request access to (or, in some cases, transfer of) your personal information by contacting us at the address described below. If we are processing your information on behalf of one of our clients we will forward your request to that client and await instructions on whether access should be granted. Note that California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing.
4. **Changes To/Rectification of Your Personal Information.** You can contact us at the address described below in order to request that your information be modified. If we are processing your information on behalf of one of our clients we will forward your request to that client and await instructions on any changes that they believe are appropriate.
5. **Deletion Of Your Personal Information.** We typically retain personal information that we collect on our own behalf for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. You may request information about how long we keep a specific type of information, or request that we delete your personal information, by contacting us at the address described below. If we are processing your information on behalf of one of our clients we will forward your request to that client and await instructions from them on whether your information should be deleted.
6. **Revocation Of Consent or Objections.** You may revoke consent to processing (where our processing is based upon consent), or object to our processing (where our processing is not based upon your consent) by contacting us at the address described below. If you revoke your consent / object we may no longer be able to provide you services. In some cases we may limit or deny your request to revoke consent / object if the law permits or requires us to do so, or if we are unable to adequately verify your identity. If we are processing your information on behalf of one of our clients we will forward a revocation of consent to that client and await instructions from them on whether the processing to your information should cease.

7. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.

Please direct any requests or questions about your rights to the address(es) listed below in the Contact Information section below.

Note that, as required by law, we will require you to prove your identity. We may conduct identity verification by phone call or email. Depending on your request, we will ask for information such as your name, policy details, or the date of your last claim with us. We may also ask you to provide a signed declaration confirming your identity. Following a request, we will use reasonable efforts to supply, correct or delete personal information about you in our files.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. We will require verification that you provided the authorized agent permission to make a request on your behalf. You must provide us with a copy of the signed permission you have given to the authorized agent to submit the request on your behalf and verify your own identity directly with us.

Information for Authorized Agents

If you are an authorized agent submitting a request on behalf of an individual you must attach a copy of the following information to the request:

1. A signed and notarized permission from the consumer stating that the agent has authorization to act on his/her behalf.
2. If you are a business, proof that you are registered with the Secretary of State to conduct business in California.

If we do not receive both pieces of information, the request will be denied.

How We Protect Information

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any unauthorized access to your information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

Miscellaneous

The following additional information relates to our privacy practices:

- **Transmission Of Information To Other Countries.** By submitting your information to us you agree to the transfer, storage and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States and Canada. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us using the contact information below.

- Changes To This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted information to us will generally govern that information unless we receive your consent to the new privacy policy. Our privacy policy includes an “effective” and “last updated” date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.
- Information for California Residents.** California Civil Code 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicates that organizations should disclose whether certain categories of information are “sold” or transferred for an organization’s “business purpose” as those terms are defined under California law. You can find a list of the categories of information that we share in the section below entitled “California Information Sharing Disclosure”. Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. California residents may be entitled in some cases to opt-out of having their information sold to third parties. We do not discriminate against California consumers who exercise any of their rights described in this policy.

Contact Information. If you have any questions, comments, or complaints concerning our privacy practices please contact us at the address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

Party	Contacts
CIMA/XS Group	tdenman@xsgroup.net CIMA/XS Group 2750 Killarney Dr #202 Woodbridge, VA. 22192
Volante/GBMS	philip.goss@volanteglobal.com Volante Global 30 St. Mary Axe, London, EC3A 8BF United Kingdom

California Information Sharing Disclosure

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether the following categories of personal information are collected, transferred for “valuable consideration,” or transferred for an organization’s “business purpose” (as those terms are defined under California law). We do not “sell” data under California law. The table below indicates the categories of personal information we collect and transfer in a variety of contexts. Please note that because this list is comprehensive, it may refer to types of information that we collect and share about people other than yourself. For example, while we transfer credit card or debit card numbers for our business purpose in order to process payments for orders placed with us, we do not collect or transfer credit card or debit card numbers of individuals that submit questions through our website’s “contact us” page.

Categories of Personal Information We Collect	To Whom We Disclose Personal Information for a Business Purpose	To Whom We Sell Personal Information
<p>Identifiers – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, account name</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Data analytics providers • Data brokers • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms 	

<p>Additional categories of personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) – this may include signature, insurance policy number, bank account number, credit card number, debit card number, and other financial information</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Data analytics providers • Data brokers • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms 	
<p>Internet or other electronic network activity information – this may include browsing history, search history, and information regarding an individual's interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> • Advertising networks • Affiliates or subsidiaries • Business partners • Data analytics providers • Data brokers • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms 	