Transmit Security Privacy Policy

Effective date: *November 24, 2026*

1. Introduction

This privacy policy ("Policy") describes how Transmit Security and its related or affiliated companies ("Transmit", "us", "we", "its" and "our") collect, use, disclose and share the personal information of users of its website ("Website Visitors") at https://www.transmitsecurity.com/ ("Website"), as well as end users of customers ("Users") of its identity and security products (the "Platform", together with the Website, the "Services") and other individuals within our customers, business partners, suppliers, and other organizations with which Transmit Security has or contemplates a business relationship ("Customers", altogether with Website Visitors and Users, "you").

If you have any questions or concerns about this Policy or its implementation, please contact us at privacy@transmitsecurity.com or as otherwise described in the "Contact us" section below.

2. Transmit Security and User Personal Information

The Transmit Security entity identified in the "Contact us" section below is responsible for processing your personal information, and if applicable is the controller of such data. In relation to Website Visitors and Customers, Transmit Security is always the controller of your personal information and this Policy applies.

Transmit Security as processor.

When Users are provided with access to our Platform by any of our Customers, including for the purpose of verifying a User's identity, Transmit Security will usually be the processor of the personal information a User provides to the Platform and the Customer will be the controller. There are a few circumstances where we act as a separate controller of User personal information, which are set out below this paragraph.

Please refer to the privacy policy of our Customer for information as to how they use your personal information and how to exercise your rights. Please contact that Customer directly if you have questions as to how your data is processed, and to exercise your rights.

Transmit Security as Controller for Fraud Detection and Security Activities

For certain Platform services, we may process limited User personal information for our own specified service-security, fraud-prevention, analytics or improvement purposes as an independent controller only where permitted by applicable law and our Customer agreements. Where applicable, we provide information about the categories of data, purposes, lawful bases and available rights in this Policy or a supplemental notice.

For certain fraud detection, fraud prevention, threat intelligence, and platform security activities associated with Transmit Security's Fraud Detection and Response Services ("DRS"), Transmit Security may act as an independent controller of limited information, including device identifiers, IP addresses, network attributes, behavioral signals, fraud indicators, and related security intelligence. This processing is performed solely for fraud prevention, threat detection, security monitoring, abuse prevention, platform protection, and related security purposes. Transmit Security does not disclose Customer Data to other customers or identify any customer as the source of fraud intelligence.

3. Personal Information We Collect

We collect personal information about you from different sources listed below. In this Policy, "**personal information**" means any information that we process about you that relates to you, or that can be used to identify you directly or indirectly, and does not include data whereby personally identifiable information has been removed (such as anonymous data). Information that is pseudonymized or de-identified may still constitute personal information where an individual can reasonably be identified or the information otherwise remains subject to applicable privacy law.

Personal information you provide to us

- **Customer account information:** If you are a Transmit Security Enterprise Customer and create an account with us to use the Platform and depending on the service, we may collect your full name, email address, company details, password and other information that the Customer may input into the Platform.

- **User information**: If you are a User, we collect personal information about you to verify your identity or provide other security services to our Enterprise Customers via the Platform. When we provide certain services to Customers, we will collect on their behalf a copy of your government issued ID and a selfie, which we process as described in part A of the "How we use your personal information" section below.

- **Correspondence and other communications**: When you contact us, including via our Services such as to request a demonstration of the Platform, via email, social media or other means, we collect your full name, contact details such as email address and phone number, and job title and company name. We also, as applicable, process the content of your communication.

- **Support information**: When you request technical support services, we will process your personal information such as your name and the contact details you use to contact us, as well as information on the reasons for your support request, and any additional information you may provide in that context.

- **Blog subscription**: When you subscribe to our blog, you provide us with your name and email address.

Where applicable, we may indicate whether and why you must provide us with your personal information as well as the consequences of failing to do so. For example, it may be necessary for you to disclose certain personal information in order for us to provide the Services to you.

Information collected via automated means

- **Device data:** We collect information about the User's device such as the device's operating system type and version, manufacturer and model, browser type, device type (e.g., phone, tablet), IP address, language settings, mobile device carrier, mobile network information (e.g., Wi-Fi, LTE, 4G), and general location information such as city, state or geographic area.

- **Usage data:** When users access and use the Services across the Platform, we may receive and store information about interactions with our Services, including pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.

Information We Receive from Third Parties

We receive personal information from the third parties below, which process your information in accordance with their own privacy policies. Please review these policies carefully before using their services. The categories of information obtained from third parties and the purposes for which we use it depend on the applicable service and our role as processor or controller.

- **Social media information:** We maintain pages on social media platforms, such as LinkedIn, Facebook, Twitter and Instagram. You or the platform providers may provide us with information through the social media platform, and we will treat such information in accordance with this Policy.

- **Other sources**: We may obtain your personal information from other third parties, such as marketing partners, publicly available sources and lead generators. We may add this to the information that you provide to us through the Services.

4. How We Use Your Personal Information

A. Biometric Information

As part of the Services that we provide to our Customers, Users may be required to upload a photo of their government-issued ID and a selfie. As a service provider and processor, and on the instructions of our Customers, we collect, use, disclose and store Users' biometric identifiers and biometric information derived from the images Users upload to confirm that both facial images match and to verify Users' identity.

Transmit Security processes biometric identifiers and biometric information solely to provide identity verification, document verification, liveness detection, fraud prevention, and related security services on behalf of its customers and in accordance with applicable agreements and customer instructions. Biometric information is retained only as necessary to provide the Services,

comply with contractual obligations, satisfy legal requirements, and protect the security and integrity of the Services. When we use biometric identifiers for analytics and product-improvement purposes, we are not using such information for the purpose of uniquely identifying individuals.

Where we act as a controller, we process biometric data only where we have identified an applicable lawful basis and, where required, a separate condition for processing special-category or sensitive personal information. Depending on the processing activity and jurisdiction, additional notices, consent or other safeguards may apply.

We may share Users' biometric identifiers and biometric information with the parties identified in the "How we share your personal information" section below, except that we will never use or share such information for advertising or marketing purposes. We do not sell biometric identifiers or biometric information, and any disclosure to a service provider is limited to the purposes described in this Policy, applicable Customer instructions and applicable law.

We retain biometric identifiers and biometric information only for the period necessary for the disclosed purpose, subject to applicable law, documented retention schedules and Customer instructions where we act as a processor. Where a specific statutory retention or destruction schedule applies, we follow that schedule and make any required supplemental disclosure available.

B. Other Personal Information

We will use your other personal information for one or more of the purposes set out below.

- **To provide you with the Platform.** If you are a Customer, we use your personal information, including customer account information, payment and transaction information and information collected via automated means, to operate, maintain and provide you with the Platform to perform any contract we have with you under the Transmit Security Cloud Services Agreement. In particular we use personal information to allow you to create and use an account, and to deliver the requested Platform services to you.

- **To operate fraud detection and fraud prevention services.** We use certain personal information, device information, network information, behavioral information, fraud indicators, and related signals to provide fraud detection, fraud prevention, threat intelligence, and security monitoring.

- **To provide you with the Website and its features**. If you are a Website Visitor, it is in our legitimate business interests to use your personal information, including correspondence information, blog subscription information, and information collected via automated means, to operate, maintain and provide you with the Website, and to respond to any requests you make via the Website, including if you request a demonstration of the Platform.

- **To provide you with support and to respond to your requests and complaints**. If you reach out to us for support or for other reasons, it is in our legitimate interests to use personal information, including your correspondence with us, your contact details, your social media information, and to the extent applicable other personal information processed about you when you use our Services, to respond and resolve your queries and facilitate support.

- **To communicate with you about our Services**. It is in our legitimate interests to communicate with you about our Services including by sending you announcements, updates, security alerts, and support and administrative messages. The personal information we process when doing so includes your contact details, account information and information collected via automated means.

- **To protect, investigate and deter against fraudulent, harmful, unauthorized or illegal activity**. It is in our legitimate interests to keep our Services safe for our users, which includes conducting troubleshooting, testing and research and to keep the Services secure. When doing so we may use any applicable personal information that we hold about you including information collected via automated means.

- **To monitor, maintain, secure, improve, and enhance the Services, including fraud detection capabilities, verification systems, analytics, and security technologies. Where possible, we use aggregated and de-identified information for these purposes.** It is in our legitimate interests to analyze the use of our Services, and to use your personal information to improve our existing Services and create new products and services. When doing so, we will process personal information such as user information, and personal information which is collected via automated means.

- **To present you with interest-based advertising**. We engage our advertising partners, including third party advertising companies and social media companies, to advertise our Services around the web. These companies may use cookies and similar technologies to collect information about your interactions and use that information to serve online ads that may be of interest to you. For more information and to understand your choices, please see our Cookie Policy. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. Except where consent is required, we engage such advertising partners on the basis of our legitimate interest in marketing our services. Where applicable law requires consent or offers a right to opt out of the sale, sharing or use of personal information for targeted advertising, we honor those requirements and the choices described in the Cookie Policy and Your rights and choices sections.

- **To customize the Services**. It is in our legitimate interests to provide you with a tailored service. The personal information we use to do so includes information we collect via automated means.

- **To enforce the Transmit Security Cloud Services Agreement, to comply with legal obligations and to defend Transmit Security against legal claims or disputes**. It is in

our legitimate interests to enforce and comply with our terms and policies, to ensure the integrity of our Services and to defend ourselves against legal claims or disputes. Where we do so, we will use the personal information relevant to such a case. Some processing may also be necessary to comply with a legal obligation placed on Transmit Security for example to keep records of transactions, or as requested by any judicial process or governmental agency.

- **For aggregation and anonymization**. It is in our legitimate interests to aggregate or anonymize personal information in a form that does not allow users to be personally identified and use the resulting information for statistical analysis regarding the use of the Services, such as to better understand our customer base, or for other purposes.

- Certain Services incorporate artificial intelligence and machine learning technologies. Customer Data is not used to train generalized foundation models or generative artificial intelligence models. Any use of aggregated and de-identified information is subject to applicable agreements and safeguards.

We will only process personal information on the basis of our legitimate interests where such interests are not overridden by your interests or your fundamental rights and freedoms. Where we process personal information on this basis, or for the purpose of direct marketing, you have the right to object to the processing of personal information we hold about you.

Where we process personal information on the basis of your consent, such consent can be withdrawn at any time, including by contacting us in the "Contact us" section below. We will apply your preferences going forward. This will not affect the lawfulness of the processing before you withdraw your consent.

5. Automated Decision Making

Certain Services utilize automated processing, machine learning, statistical analysis, biometric comparison technologies, fraud detection technologies, and artificial intelligence functionality to generate outputs such as verification results, confidence indicators, fraud risk scores, anomaly indicators, security recommendations, and analytical insights.

These outputs are intended to support customer decision-making and are probabilistic in nature. Customers remain responsible for determining whether and how to act upon such outputs.

An automated identity-verification result may lead a Customer to request additional verification or decide whether to provide access to its services. Where we act as controller and applicable law provides rights relating to solely automated decisions with legal or similarly significant effects, individuals may request information about the decision and exercise applicable rights, which may include human review and contesting the decision. Where the Customer determines the outcome as controller, requests should be directed to that Customer._Where we act as a processor, the applicable Customer determines the purposes and means of processing and is generally responsible for responding to requests concerning decisions made using our outputs; we provide assistance as required by applicable agreements and law.

Where Transmit Security is acting as a processor in relation to your personal data, and a Customer uses your personal information to make automated decisions about you, please reach out to that customer with any questions you may have about that processing and your rights.

6. How We Share Your Personal Information

We disclose personal information about you with the following recipients and in the following circumstances:

- **Affiliates:** Affiliates and subsidiaries of Transmit Security, for purposes consistent with this Policy.

- **Service Providers:** We rely on vendors and service providers for the provision of our Services and for the purposes set out above, such as providers of analytics, hosting and cloud computing services and other IT services and customer support services in addition to other administrative services. These third parties may have access to or process your personal information as part of providing these services.

- **Advertising Partners:** We engage our advertising partners, including third party advertising companies and social media companies, to display ads around the web and share personal information with them for this purpose, as set out in our Cookie Policy below. These companies do so in line with their own privacy policies.

- **Advisors:** We work with various advisors, including tax consultants and legal advisors, with whom we may share your personal information.

- **Legal:** Information about our users, including personal information, will be disclosed to law enforcement agencies, regulatory bodies, public authorities or pursuant to the exercise of legal proceedings if we are legally required to do so, or if we believe, in good faith, that such disclosure is necessary to comply with a legal obligation or request, to enforce our terms and conditions, to prevent or resolve security or technical issues, or to protect the rights, property or safety of Transmit Security, Users, Customers, Website Visitors, a third party, or the public.

- **Business Transaction:** If Transmit Security is involved in a merger, acquisition or asset sale, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your personal information may be sold, transferred or otherwise shared including as part of any due diligence process.

7. Transmit Security Website: Cookies, Web Beacon and Other Technologies ("Cookie Policy")

We collect information from your visits to our websites and your use of our Transmit Security services and our software products to help us gather statistics about usage and effectiveness, personalize your experience, tailor our interactions with you, and improve our products and services. We do so through the use of various technologies, including cookies, pixels, tags, software development kits, local storage and similar technologies, as applicable. We describe the

categories, purposes, third parties and available controls in our cookie preference tools or cookie notice.

What are cookies and why are cookies used? A cookie is a piece of data that a website can send to your browser, which may then be stored on your computer as a tag that identifies your computer. While cookies are often only used to measure website usage (such as number of visitors and duration of visit) and effectiveness (such as topics visitors are most interested in) and to allow for ease of navigation or use and, as such, are not associated with any personal information, they are also used at times to personalize a known visitor's experience of a website by being associated with profile information or user preferences. Over time this information provides valuable insight to help improve the user experience. Cookies and similar technologies may collect information that constitutes personal information, including where identifiers or browsing activity can be linked to a device or individual.

Cookies are typically categorized as "session" cookies or "persistent" cookies. Session cookies help you navigate through the website efficiently, keeping track of your progression from page to page so that you are not asked for information you have already provided during the current visit, or information needed to be able to complete a transaction. Session cookies are stored in temporary memory and erased when the web browser is closed. Persistent cookies on the other hand, store user preferences for current and successive visits. They are written on your device's hard disk and are still valid when you restart your browser. We use persistent cookies, for example, to record your choice of language and country location.

How to express privacy preferences regarding the use of cookies. You may manage cookies and similar technologies through your browser settings and any cookie management tools made available by Transmit Security. Where required by applicable law, Transmit Security provides mechanisms to obtain consent for non-essential cookies and to exercise applicable privacy choices. Browser settings may allow you to block or delete cookies; doing so may affect certain website functions. Where a cookie preference tool is available, you may use it to manage or withdraw your choices. Browser controls may not provide the same choices as a consent tool.

You can generally express your privacy preferences regarding the use of most cookies and similar technologies through your web browser. Look under the heading "Tools" (or similar heading) in your particular browser for information about controlling cookies. In most instances you can set your browser to notify you before you receive a cookie, giving you the option to decide whether to accept it or not. You can also generally set your browser to turn off cookies. Cookies in our software products can be turned off in the product itself. Since cookies allow you to take advantage of some of our websites' features or features of our software products and Transmit Security services, we recommend that you leave them turned on. If you block, turn off, or reject certain cookies, some website or service features may not function properly, including features that require sign-in.

Some Transmit Security websites, Transmit Security services and software products may also use web beacons or other technologies to better tailor those sites to provide better customer service. These technologies may be in use on a number of pages across Transmit Security's websites. When

a visitor accesses these pages, a non-identifiable notice of that visit is generated which may be processed by us or by our suppliers. These web beacons usually work in conjunction with cookies. If you don't want your cookie information to be associated with your visits to these pages or use of these products, you can set your browser to turn off cookies or turn off cookies in the product itself, respectively. If you turn off cookies, web beacon and other technologies will still detect visits to these pages; however, they will not be associated with information otherwise stored in cookies. For more information about the technologies employed by our Transmit Security services and software products, including how to turn them off, please consult the user guide for the particular software product or Transmit Security services you are using.

We and our third-party service providers may use cookies, local storage (such as HTML5), and similar technologies to store information about your preferences, enhance website functionality, and improve your experience. These technologies may also be used to collect information about your interactions with our website and other websites to provide relevant advertising, subject to applicable law and your privacy preferences. You may manage or disable certain technologies through your browser settings or other available privacy controls.

We may also include web beacons in marketing e-mail messages or our newsletters in order to determine whether messages have been opened and links contained within clicked on.

Some of our business partners set web beacons and cookies on our site. In addition, third-party social media buttons may log certain information such as your IP address, browser type and language, access time, and referring website addresses, and, if you are logged in to those social media sites, they may also link such collected information with your profile information on that site. We do not control these third party tracking technologies. Information about third-party tracking technologies and available privacy choices may be provided through our applicable cookie notice or privacy controls.

8. Your Rights and Choices

Opt out of marketing communications. You may opt out of marketing-related communications by following the opt-out or unsubscribe instructions contained in the marketing communication we send you or by contacting us as provided in the "Contact Us" section below. You may continue to receive services-related and other non-marketing emails.

Online tracking opt out. You can opt out of third-party cookies as described in our Cookie Policy.

Personal information requests. We also offer you choices that affect how we handle the personal information that we control. Depending on your location and the nature of your interactions with our services, you may request the following in relation to personal information:

- **information** about how we have collected and used personal information. We have made this information available to you without your having to request it by including it in this Privacy Policy;

- to **access** the personal information, we hold about you. Where applicable, we will provide the information in a portable, machine-readable, readily usable format;
- to request we **correct** any inaccurate personal information we hold about you;
- to request we **delete** any personal information we hold about you;
- to **restrict** the processing of personal information we hold about you;
- to **object** to the processing of personal information we hold about you where we are processing your personal information for our legitimate interests, or where we are processing your personal information for direct marketing purposes; and
- to **opt out of targeted advertising and the sale of personal information**. We collect and share personal information with advertising partners that display targeted advertisements to users around the web. You can limit online tracking as described in our Cookie Policy or by clicking Your Privacy Choices on the footer of our website. We will not sell or use your biometric information or biometric identifiers for targeted advertising purposes.

To make a request, please email us or write to us as provided in the "Contact us" section below. We may ask for specific information from you to help us confirm your identity. Depending on where you reside, you may be entitled to empower an "authorized agent" to submit requests on your behalf. We will require authorized agents to confirm their identity and authority, in accordance with applicable laws. You are entitled to exercise the rights described above free from discrimination. Where applicable, you may also request information about categories of recipients, exercise rights regarding sensitive personal information, and withdraw consent or opt out of profiling as provided by law.

Limits on your privacy rights and choices. In some instances, your choices may be limited, such as where fulfilling your request would impair the rights of others, our ability to provide a service you have requested, or our ability to comply with our legal obligations and enforce our legal rights.

If we deny a privacy-rights request, you may appeal that decision where applicable law provides an appeal right by contacting us using the details below and identifying your request as an appeal. We will respond within the period required by applicable law and, where required, explain how to contact the relevant regulator or attorney general. You may also lodge a complaint with a competent data protection authority where applicable.

9. International Data Transfers

We transfer your personal information internationally, including within Transmit Security and to service providers in the United States, which means personal information you provide to us will be processed and stored in that country. Please note that the recipient countries may not provide the same protections as the data protection laws where you are based. The transfer mechanism applicable to a particular transfer depends on the exporting and importing entities, the relevant jurisdiction and the services involved.

We will ensure that relevant safeguards are in place to afford adequate protection for your personal information, and we will comply with applicable data protection laws, in particular if you reside in the European Economic Area ("EEA"), Switzerland or the UK by relying, as applicable, on an adequacy decision, the European Commission Standard Contractual Clauses, the UK International Data Transfer Agreement or UK Addendum, Swiss-law adaptations or another valid transfer mechanism. We implement supplementary measures where required by applicable law and relevant transfer assessments. For more information about how we transfer personal information internationally, please contact us as set out in the "Contact Us" section below.

10. Children's Privacy

Our Services are not directed to children, and we do not knowingly collect personal information from anyone under the age of 16. If you believe that we have collected personal information from a child contrary to applicable law, please contact Transmit Security using the details below. We will review the report and take appropriate action, including deletion where required.

11. Retention of Personal Information

We may provide additional product-specific or jurisdiction-specific retention information, including applicable biometric retention and destruction schedules, in supplemental notices or Customer documentation.

Where we act as controller, we retain personal information for the period reasonably necessary for the purposes described in this Policy, taking account of the type and sensitivity of information, legal requirements, security and fraud-prevention needs, and the establishment, exercise or defense of legal claims. Where we act as processor, retention and deletion are governed by Customer instructions and the applicable agreement, subject to legal requirements. Withdrawal of consent does not necessarily require immediate deletion where another lawful basis or retention obligation applies. Certain fraud intelligence, threat intelligence, security signals, and aggregated or de-identified information may be retained for fraud prevention, security, compliance, legal, and operational integrity purposes.

To determine the appropriate retention period for your personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we use your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

12. Security of Personal Information

We use reasonable organizational, technical and administrative measures designed to protect against unauthorized access, misuse, loss, disclosure, alteration and destruction of personal information we process. For example: Our safeguards are reviewed and updated in light of applicable risks and legal requirements.

- Transmit Security implements encryption and other technical and organizational safeguards designed to protect Customer Data against unauthorized access, disclosure, alteration, and loss. Specific measures vary by Service and are further described in applicable security documentation and contractual commitments..

- We protect your personal information with firewalls and networking tools such as Anti-DDoS. Access to systems containing personal information is subject to logging and monitoring controls appropriate to the Service and associated risks.

Furthermore, because certain areas on our Services are less secure than others (for example, if you set your support forum ticket to be "Public" instead of "Private", or if you browse to a non-SSL page), and since e-mail and instant messaging are not recognized as secure forms of communications, we request and encourage you not to share any personal information on any of these areas or via any of these methods.

Unfortunately, data transmission over the Internet cannot be guaranteed as completely secure. Therefore, while we strive to protect your personal information, we cannot guarantee its security.

13. Do Not Track

Transmit Security does not currently respond to legacy browser "Do Not Track" signals. However, where required by applicable law, we recognize and process qualifying opt-out preference signals, including Global Privacy Control (GPC), in accordance with applicable legal requirements.

14. Links To Other Sites

The Services may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

15. Changes and Updates to This Policy

Where required by applicable law, we will provide additional notice or obtain consent before a material change takes effect.

We will update this Policy from time to time. Please review this Policy periodically for any changes. If we make material changes, we will let you know. Changes to this Policy are effective when they are posted on this page.

16. Complaints

If you wish to lodge a complaint about how we process your personal information, please contact us at privacy@transmitsecurity.com. You may also submit a complaint to the data protection regulator, including in your country of residence, place of work, or where you believe an incident

took place. For example, if you are based in the UK, you may choose to lodge a complaint with the Information Commissioner's Office here, and if you are located in the EEA, you can find your data protection regulator here.

Contact Us

The Transmit Security entity responsible for the processing of your personal information varies depending on your location:

- If you are located in the United States, Mexico, Latin America or Japan: Transmit Security, Inc., based at 201 Washington Street, Suite 2600, Boston, Massachusetts, 02108, United States.

- If you are located in Canada: Transmit Security (CA) Services Ltd., based at 700 West Georgia Street, Suite 2200, Vancouver BC V7Y 1K8 Canada.

- If you are located anywhere else: Transmit Security Ltd., based at 94 Yigal Alon Street, Tel Aviv, 6789139, Israel. If you are located in the EEA or UK, this entity is the data controller.

If you have any questions or comments about this Policy, our privacy practices, or if you would like to exercise your rights with respect to your personal information, please contact us by email at privacy@transmitsecurity.com.

EU and UK representative: adam.desmond@transmitsecurity.com

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