

PLUTO SECURITY PRIVACY POLICY

Last Updated: October 21, 2025

In order to ensure transparency and give you more control over your personal information, this privacy policy (“**Privacy Policy**”) governs how we, Pluto Security Inc., (“**Pluto**”, “**we**”, “**our**” or “**us**”) use, collect and store personal information that we collect or receive from or about you (“**you**”) in connection with <https://pluto.security/> (the “**Website**”) and the services provided by Pluto (the “**Services**”).

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal information. **Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory rights, including your rights to a remedy or other means of enforcement.

Table of contents:

1. What personal information we collect, why we collect it, and how it is used
2. How we protect and retain your personal information
3. How we share your personal information
4. Your privacy rights
5. International transfers of personal information
6. Use by children
7. Interaction with third party products
8. Analytic tools/ Cookies
9. Contact us

This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement material changes in the way we use your personal information, in a manner that is different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means and take any additional steps as required by applicable law.

1. WHAT PERSONAL INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

(i) We Process the Following Personal Information:

- a. **Personal information provided through the Website.**
 - a. When you visit and use the Website, we collect and process your full name and email address and any other information that you decide to provide us with.
 - b. When you make a request for us to search for websites related to your domain, we collect your business email address.
- b. **Personal information provided through the Services.** We collect personal information that you voluntarily provide, including your full name, email address, username and password, as well as any other personal information that you decide to provide us with. We also collect the contact and billing information of our customers.
- c. **Personal information automatically collected.** We automatically collect certain information through your use of Pluto's Services and Website, such as cookie, pixels, tracking technologies and similar identifiers (“**Technologies**”), your Internet protocol (IP) address, and other device identifiers that are automatically assigned to your device, browser type and language, hardware type, operating system, internet service provider and other personal information about actions taken through the use of the Services and Website.
- d. **Personal information from Other Sources.** Pluto also may obtain information about you from other sources, including publicly - or commercially- available information, and through third-party data platforms, partners and service providers. Pluto also maintains a database of low-code/no-code applications and websites that are publicly available online. We collect this information by using automated tools to identify applications associated with corporate domains. The information we collect may include metadata from publicly available websites and applications, the domain under which the application was created and creator information if it is publicly available in metadata or code.
- e. **Personal information you provide to us in person.** For example, when you visit one of our exhibition booths or attend one of our events and you provide us with your contact details.
- f. **Personal information we collect from online interactions.** For example, if you attend a webinar, contact us via social media or otherwise interact with our business, including as a representative of a current / prospective customer, supplier or partner, we track and make a record of those interactions, which may contain your contact details, such as full name, email address, messages and any other personal information that you decide to provide us with.

(ii) We process personal information for the following purposes:

- g. **To allow you to make use of our Website.** We will use your personal information to allow you to make use of our Website, including: (i) if you request a demo, we will use your personal information to process and answer your request for a demo (ii) to allow you to sign up for updates and communicate with us; and (iii) to analyze your use of our Website and to improve our Website; and (iv) to customize your experience. In addition, we will use some of the information collected (e.g., your business email address) to generate a list of applications associated with your organization's domain.
- h. **To provide you with the Services.** We will use the personal information, including, without limitation, for the following purposes: (i) allow you to create an account; (ii) to provide you the Services and to process your requests; (iii) communicate with you about your use of the Services and for support purposes; (iv) fulfill any instruction and/or request made by you in the context of the Services; (v) send you push notifications and/or emails and notifications regarding your account or certain features of the Services; (vi) to personalize your experience with our Services; (vii) to allow you to create more users and administrate your users; and (viii) to generally administer and improve the Services.
- a. **For Administrative Purposes.** We use your personal information (i) to respond to your questions, comments, and other requests for customer support, or information, including information about potential or future services; (ii) to provide you with our Services; (iii) for internal quality control purposes; (iv) to establish a business relationship; and (v) to generally administer our Services.
- b. **To Market our Website and Services.** We use personal information to market our Website and Services. Such use includes (i) notifying you about offers and services that may be of interest to you; (ii) developing and marketing new products and Services, and to measure interest in our Services; (iii) other purposes disclosed at the time you provide information; and (iv) as you otherwise consent.
- c. **Security purposes.** Some of the personal information mentioned in this Privacy Policy will be used for detecting, taking steps to prevent and prosecuting fraud or other illegal activity; to identify and repair errors; to conduct audits; and for security purposes. Personal information may also be used to comply with applicable laws, with investigations carried out by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims.
- d. **De-identified and Aggregated Information Use.** In certain cases, we may or will anonymize, aggregate and/or de-identify part or all of your personal information. This data may be used for analyzing, enhancing and improving Pluto's product, Website and Services and for research purposes. We may also share this aggregated information and/or disclose it to third parties without restrictions.
- e. **Cookies and Similar Technologies.** We use Technologies to automatically collect information through the Website and Services, which in certain cases could be considered personal information. We use Technologies that are essentially small data files placed on your device that allow us to record certain pieces of information whenever you visit or interact with the Website and Services. If you would like to opt out of the cookies and similar technologies we employ on the Website, you may do so by blocking, deleting, or disabling them as your browser or device permits or by changing your setting and preferences on your browser.

2. HOW WE PROTECT AND RETAIN YOUR PERSONAL INFORMATION

- 2.1. **Security.** We implement and maintain industry-standard technical, organizational and security measures designed to protect your personal information. However, please note that we cannot guarantee that the personal information will not be compromised as a result of unauthorized penetration of our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 2.2. **Retention of your personal information.** Your personal information will be stored until we proactively delete it from our records, or until you send a valid deletion request. Please note that in some circumstances we store your personal information for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, and/or (iii) if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

3. HOW WE SHARE YOUR PERSONAL INFORMATION

We may share your personal information as follows:

- 3.1. The personal information Pluto gathers may be shared with our partners and other third parties.
- 3.2. We also share personal information about you with our affiliated companies.
- 3.3. We use third party service providers to process your personal information for the purposes outlined above, including, without limitation:
 - 3.3.1. With cloud service providers for hosting purposes;
 - 3.3.2. With websites and web content creation platforms in order to help us manage our Website;
 - 3.3.3. With email providers, marketing, CRM, other similar tool providers;
 - 3.3.4. With artificial intelligence tools and features; and
 - 3.3.5. With analytic and monitoring tools, in order to help us understand and analyze information we collect in accordance with this policy.
- 3.4. To the extent necessary, with regulators, courts, banks or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order, as well as for internal compliance procedures and to protect the safety, security, and integrity of Pluto, our Website and Services, customers, employees, property, and the public. We may use or disclose the personal information we collect in order to ensure that our users are complying with all applicable aspects of our policies.
- 3.5. We may disclose personal information with our lawyers, accountants, auditors and other professional advisors where necessary to obtain legal or other advice or otherwise protect and manage our business interests;
- 3.6. We may use or disclose the personal information to investigate, prevent, or take action regarding illegal activities, suspected fraud, cybersecurity threats, situations involving potential threats to the physical safety of any person, violations of this policy, or as otherwise required or allowed by law and regulations;
- 3.7. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your personal information to such third party (whether actual or potential) in connection with the foregoing events (including, without limitation, our current or potential investors). In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your personal information in connection with the foregoing events.
- 3.8. Where you have otherwise provided your consent to us for sharing or transferring your personal information.

4. YOUR PRIVACY RIGHTS

- 4.1. The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by specific laws):
 - i. You have the right to request access to your personal information held by us, along with details on how it is processed, subject to certain conditions. You have the right to request rectification of inaccurate personal information about you.
 - ii. You have the right to the erasure of personal information about you (your “right to be forgotten”) under certain conditions.
- 4.2. You can exercise your rights by contacting us at privacy@pluto.security. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. To protect your privacy, we may take steps to verify your identity before fulfilling your request. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.
- 4.3. **Marketing emails – opt-out:** You may choose not to receive marketing email by unsubscribing link found at the bottom of the email to opt out of receiving future emails, and we will process your request within a reasonable time after receipt.

5. **INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION.** In order to run our business and provide our Website and Services to you, we transfer personal information to certain countries around the world, including to our affiliates and service providers, many of whom are located outside of your jurisdiction. Therefore, your personal information may be processed in countries with privacy laws that are different from privacy laws in your country. Whenever personal information is transferred internationally, we ensure it is protected by executing data onward transfer instruments such as data processing and protection agreements.

6. **USE BY CHILDREN.** We do not offer our products or Services for use by children and, therefore, we do not knowingly collect personal information from, and/or about children under the age of 18. If you are under the age of 18, do not provide any information to us without the involvement of a parent or a guardian. In the event that we become aware that you provided personal information in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@pluto.security.

7. **INTERACTION WITH THIRD PARTY PRODUCTS.** We enable you to interact with third party websites, mobile software applications and products or services that are not owned, or controlled, by us (each, a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect personal information from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. ANALYTIC TOOLS/COOKIES

- **Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with information we collect. 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, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- We use log files. We use such personal information to analyze trends, administer the Website, track user movement around the Website, and gather demographic information.
- We reserve the right to remove or add new analytic tools, cookies, pixels and other tracking technologies.

9. **CONTACT US.** For any questions, concerns, or to exercise your privacy rights, please contact us at privacy@pluto.security.
