



**PRIVACY POLICY
ARMADILLO SECURITY LLC
V1.2025**

Armadillo Security LLC ("Armadillo Security," "we," "us," or "our") is deeply committed to respecting your privacy and protecting your personal data. This Privacy Policy explains how we collect, store, use, and share your information when you¹ visit our website, www.armadillosecurity.us (the "Site"), and interact with our services or apply for a position with us.

By accessing or using our Site, submitting information to us, or applying for a job, you signify that you have read, understood, and agree to our collection, storage, use, and disclosure of your personal information as described in this Privacy Policy and our Cookie Policy.

1. Information We Collect

We collect information that identifies, relates to, describes, or can be associated with you ("Personal Information"). We gather this information in various ways:

a. Information You Provide Directly to Us:

When you interact with our Site or us, you may voluntarily provide Personal Information. This includes, but isn't limited to:

- **Contact Information:** Your name, email address, phone number, mailing address, and company details when you fill out inquiry forms, request quotes, register for specific Site portions, subscribe to newsletters, or contact us directly.
- **Application Information:** Details you provide when applying for a job with Armadillo Security, including information in any application forms or CVs/resumes submitted. This may include educational details and employment history.
- **Service & Contractual Details:** Information necessary to perform services you request, including contact details for client relationship management, and financial or billing information to fulfill the terms of our contracts.
- **Communication Content:** The content and metadata of any communications you send to us or through the Site.

b. Information We Collect Automatically Through the Site:

When you visit our Site, certain information is automatically collected using technologies like cookies and web beacons. This helps us understand how you use our Site and improve your experience.



- Usage Data: Information about your interaction with the Site, such as the pages you view, the time spent on pages, links clicked, and navigation paths.
- Technical Data: Your IP address, browser type and version, operating system, device type, referral source, and other technical identifiers.
- Location Data: General geographical location derived from your IP address.

For detailed information about the cookies and tracking technologies we use, please refer to our separate Cookie Policy. Our automatic data collection currently includes services like Google Analytics and Site improve, primarily to gather anonymous usage statistics and improve content usability.

2. How We Use Your Information

Armadillo Security is the controller of your Personal Information when we determine the purposes and means of its processing, such as data collected through the Site, for marketing, client relationship management, or for our internal procedures and legal/regulatory compliance. We process all Personal Information in accordance with applicable data protection laws, including the EU General Data Protection Regulation 2016/6792 (GDPR), as incorporated into UK legislation (UK GDPR), and other relevant privacy regulations. We use the information we collect for various business purposes, which include:

- Providing Our Services: To fulfill your requests for services and manage our contractual obligations.
- Maintaining Business Relationships: For ongoing correspondence with you, whether you're a Site user, a client, or a job applicant.
- Responding to Inquiries & Complaints: To communicate with you, address your questions, comments, or complaints related to us or the Site, and provide customer support.
- Marketing & Communications: To provide you with information you've specifically requested or that we believe may interest you, including marketing materials and invitations to events, where you've opted in.
- Security & Fraud Prevention: To keep the Site and our systems secure, prevent fraud, and protect our rights, property, or safety, as well as that of our clients or others.
- Legal & Compliance Requirements: To meet legal, regulatory, and internal compliance obligations, and for the establishment, exercise, or defense of legal claims.
- Site Administration & Improvement: To administer the Site, analyze its use, and compile anonymous statistical data to enhance its content and usability.
- Personalizing Your Experience: To understand your interests and preferences so we can tailor the content and promotions on the Site to better match your needs (see also our Cookie Policy).

3. The Legal Basis for Processing Personal Information

We process Personal Information based on the following legal grounds:

- Necessary for Entering Into, or Performing, a Contract: To fulfill obligations arising from any contracts between you and us, or to take steps at your request before entering into such a contract.
- Necessary for Compliance with a Legal Obligation: When we are subject to legal requirements that necessitate processing your Personal Information, or when obliged by law or for national security reasons to disclose your data to regulatory bodies, government agencies, or law enforcement in response to a lawful request.
- Necessary for the Purposes of Legitimate Interests: We (or a third party) may process your Personal Information for our legitimate interests, provided these interests are not overridden by your rights and freedoms.³ Our legitimate interests include⁴ responding to requests and inquiries, maintaining client relationships, optimizing our website and customer experience, informing you about our services, ensuring efficient operations, and preventing fraud.
- Consent: In certain circumstances, we may ask for your explicit consent to process your Personal Information for a particular purpose. Where processing is based on your consent, you have the right to withdraw your consent at any time by contacting us as detailed below. This withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.

4. How We Share Your Information

We may share your Personal Information with third parties under the following conditions:

- Service Providers: We engage third-party companies and individuals to perform services on our behalf (e.g., website hosting, data analytics, email delivery, IT support, marketing assistance). These service providers only access your Personal Information to perform their functions for us and are contractually obligated not to disclose or use it for any other purpose.
- Affiliates and Group Companies: Where relevant to satisfy the purpose for which the Personal Information was initially collected, data may be shared with Armadillo Security's affiliates and associated companies.
- International Data Transfers: If Personal Information is transferred from the UK or EU to third parties located in jurisdictions that do not provide an equivalent level of data protection (e.g., outside the UK or EEA), Armadillo Security ensures such transfers are subject to adequate safeguards as required under applicable law (e.g., Standard Contractual Clauses or other approved mechanisms).
- Legal Requirements & Protection: We may disclose your information if required by law, court order, subpoena, or similar legal mechanisms, or in the good faith belief that such action is necessary to (a) comply with a legal obligation, (b) protect and defend the rights or property of⁵ Armadillo Security LLC, (c) act in urgent circumstances to protect the personal safety of users or



the public, or (d) protect against legal liability.

- Business Transfers: In the event of a merger, acquisition, sale of assets, or other similar transaction, your Personal Information may be transferred as part of that transaction. We will notify you via email or a prominent notice on our Site of any such change in ownership or control of your Personal Information.
- With Your Consent: We may share your information with your explicit consent or at your direction.

We do not sell, rent, or trade your Personal Information to third parties for their direct marketing purposes.

5. Data Security

The security and protection of Personal Information are of the highest importance to Armadillo Security. We implement generally accepted standards of technology and operational security to protect Personal Information we process from loss, misuse, alteration, or destruction, and to ensure compliance with applicable data protection legislation.

However, please be aware that no method of transmission over the internet or electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. Once we receive your information, we use strict procedures and security features to try to prevent unauthorized access.

6. Your Data Protection Rights

You have certain rights concerning the Personal Information we hold about you. We will require evidence of your identity before we can act on your request. These rights include:

- Right of Access: You have the right to request a copy of your Personal Information we hold. Where we have a good reason, and if applicable data protection law permits, we may refuse your request for a copy or certain elements of it (e.g., if it would disclose third-party Personal Information). If we refuse, we will provide our reasons.
- Right of Correction or Completion: If your Personal Information we hold is inaccurate, outdated, or incomplete, you have the right to have it rectified, updated, or completed. Please advise us of any changes to your information.
- Right of Erasure ("Right to be Forgotten"): In certain circumstances, you have the right to request the erasure of your Personal Information, for example, if the information is no longer necessary for the purposes for which it was collected or processed, or if our processing is based on your consent (which you wish to withdraw) and there are no other legal grounds for us to continue processing it.

- Right to Object to or Restrict Processing:** In certain circumstances, you have the right to object to our processing of your Personal Information. Specifically, you have the right to object: (a) At any time to Armadillo Security's use of your Personal Information for direct marketing purposes; (b) To Armadillo Security's processing of your Personal Information where it is based on our legitimate interests, unless we have compelling legitimate grounds to process the information, or we need to do so in relation to legal claims. You may also have the right to restrict our use of your Personal Information, such as when you have challenged the accuracy of the information and during the period we are verifying its accuracy.

- Right to Data Portability:** In certain instances, you have the right to receive any Personal Information you have provided to us previously, which is processed by us using automated means, in a structured, commonly used, and machine-readable format. You can ask us to transmit that information to you or directly to a third-party organization. We cannot guarantee technical compatibility with a third-party organization's systems, and we may be unable to comply with requests that relate to others' Personal Information without their consent. Most of these rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

7. Data Retention

Personal Information is stored according to our internal data retention policies. Our policies establish that Personal Information is stored no longer than is necessary for the purposes for which it was processed.

We may, however, retain your Personal Information where such retention is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person.

8. Children's Privacy

Our Site is not intended for, nor do we knowingly collect Personal Information from, individuals under the age of 18. Armadillo Security understands that children merit special protection and will never knowingly process their personal data. If we become aware that we have inadvertently collected Personal Information from a child under 18, we will take steps to delete such information¹⁹ from our records. If you believe we might have any information from or about a child under 18, please contact us.

9. Disclosure of Personal Data in Business Transfers

Armadillo Security will not share your Personal Data with third parties unless required by law, required to enable the fulfillment of the purpose for which the personal data was originally supplied, or as otherwise set out in this policy. Armadillo Security may transfer all or part of its business in the circumstances of a merger or sale of part or all of its business. In such



circumstances, Personal Information may be transferred, but this will only occur where the acquiring company has agreed to the same standards and terms of privacy as are set out in this policy.

10. Complaints

If you are unhappy about our use of your Personal Information, you can contact us using the details below. You are also entitled to lodge a complaint with the relevant data protection supervisory authority in your jurisdiction (e.g., your State's Attorney General or a federal agency if applicable).

11. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and updating the "Effective Date" at the top. We encourage you to review this Privacy Policy periodically for any changes.²² Your continued use of the Site after any modifications will constitute your acknowledgment and agreement to the modified Privacy Policy.

Addendum for US Residents: Fair Credit Reporting Act (FCRA) Compliance

This Addendum is specifically for Consumers (natural persons who are US residents) and applies solely when Armadillo Security LLC acts as a Consumer Reporting Agency (CRA) by processing Consumer data for services governed by the Fair Credit Reporting Act (15 U.S.C. § 1681 et seq., the "FCRA").

This Addendum supplements the main Armadillo Security Privacy Policy. If there's a conflict between this Addendum and the Privacy Policy, this Addendum's terms will prevail, but only where the FCRA is applicable.

For clarity, the terms "Consumer," "end user," and "permissible purpose" used here align with their definitions under the FCRA.

Services Subject to FCRA and Permissible Purpose

Armadillo Security LLC may be engaged by clients to furnish information that forms a "Consumer Report." A Consumer Report contains information about a Consumer's creditworthiness, character, general reputation, personal characteristics, or lifestyle. These reports are used, in whole or in part, as a factor in evaluating a Consumer's eligibility for:



- Employment
- Promotion
- Reassignment
- Retention

These are considered "Employment Purposes" and represent a permissible purpose for generating Consumer Reports under the FCRA. When a client requests such a report from Armadillo Security, they must certify that they have this permissible purpose. Clients are also prohibited from sharing the contents of the Consumer Report with any third parties beyond the Consumer themselves.

Your Rights as a Consumer Under the FCRA

If Armadillo Security LLC provides a Consumer Report about you for Employment Purposes, you, as a Consumer, have specific rights:

•*Right to Know if Information: Was Used Against You:* If an employer uses information from a Consumer Report to deny you employment, promotion, reassignment, or retention, or to take any other adverse action, they are legally required to notify you in writing. Please note that Armadillo Security LLC does not make employment decisions or determine your eligibility. For information on whether a Consumer Report influenced an adverse action, you should contact the employer or prospective employer directly.

•*Right to Access Your File:* You can request and obtain a copy of any information we have on file about you in a Consumer Report. In certain situations, Armadillo Security LLC will provide this information free of charge. These situations include, but are not limited to, when:

An adverse action was taken against you due to information in your Consumer Report.

- You are a victim of identity theft and have placed a fraud alert on your file.
- Your file contains inaccurate information due to fraud.
- You are receiving public assistance.
- You are unemployed and plan to apply for employment within 60 days.

•*Right to Rectification:* If you discover information in your file that is incomplete or inaccurate, you have the right to request correction. Armadillo Security LLC will initiate a dispute procedure to investigate and correct or explain the disputed information, unless we determine your request is unfounded or without merit. You can learn more about FCRA dispute procedures here: <https://www.consumerfinance.gov/rules-policy/regulations/1022/43/>.

•*Right to Have Inaccurate or Unverifiable Information Deleted:* Any information that is inaccurate, incomplete, or cannot be verified must generally be removed or corrected, typically within 30 days. Armadillo Security LLC aims to resolve disputes within 30 days of initiation. However, we



may continue to report information that has been verified as accurate.

Policy Updates

This Addendum may be updated, amended, or supplemented occasionally. New versions will be posted on our website and will become effective immediately upon publication. Changes may also be communicated via email. We encourage you to check this page periodically for any updates.