



Privacy Policy

This policy is effective as of June 9, 2026.

Protecting your personal information is a priority of Acre Operating Group, LLC and its affiliates and subsidiaries (collectively, “Acre”). This Privacy Policy governs how Acre collects, transfers, uses and discloses Personal Information.

This Privacy Policy is intended to be comprehensive and to meet the requirements of applicable global data protection laws, including the EU/EEA General Data Protection Regulation (GDPR), the California Consumer Privacy Act as amended by the California Privacy Rights Act (CCPA/CPRA), Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA), and all other relevant privacy regulations worldwide.

Summary

This policy applies to

- Visitors to our websites (“Sites”)
- Customers, Resellers, Distributors
- Users of our products and services

The purpose of this Privacy Policy is to let you know how we collect, use, store, share, retain, transfer and process your Personal Information. This policy also describes your choices and rights with respect to your Personal Information and how to exercise those rights. “Personal Information” is any information relating to an identified or identifiable individual.

We may amend this policy from time to time. Where we make material changes, we will notify you by posting a prominent notice on our website and, where we hold your contact details, by email, with reasonable advance notice before the changes take effect. We encourage you to review this policy periodically. If you do not agree with this policy, please refrain from using or accessing our website, products or services.

What Personal Information We Collect

We may collect various types of information depending on how you interact with us and what products or services you use. The Personal Information we may collect includes the following:

- **Identity Information:** This includes details that help us recognize and communicate with you, such as your full name, job title, the organization you represent, your email address, telephone numbers, and mailing address (including street, city, state or province, postal code, and country).



- **Account & Access Credentials:** Information you provide when creating or managing an account on our Sites or through our products and services, including your chosen username, authentication credentials, and any security or access-management details associated with your profile.
- **Talent & Recruitment Information:** Information submitted in connection with employment inquiries or applications, such as résumé details, professional background, qualifications, and any other materials you choose to share during the hiring process.
- **Professional & Organizational Contact Details:** Information relating to individuals acting on behalf of a business or other entity; such as employees, owners, officers, directors, contractors, or authorized representatives; including names, roles, and professional contact information.
- **Marketing & Communication Preferences:** Information regarding your subscription choices, communication preferences, and responses to marketing outreach, including whether you wish to receive updates, newsletters, or other promotional materials from us.
- **Payment & Billing Information:** Financial and billing-related details necessary to complete transactions, such as payment card numbers or other account identifiers, billing addresses, and authorization information required to process orders for our products or services.
- **Export Control & Compliance Information:** Information such as nationality, citizenship status, and country of residence that enables us to determine eligibility to receive certain technology, services, or information under applicable export or trade regulations.
- **Commerce & Transaction Records:** Details associated with inquiries, purchases, or service requests, including product or service selections, order history, transaction details, billing records, and information needed to process or fulfill purchases.
- **Event & Enrollment Information:** Information you provide when signing up for webinars, training sessions, demonstrations, conferences, or other events, including responses submitted through electronic registration forms.
- **Feedback & User Input:** Any information you choose to share with us regarding your experience with our Sites, products, or services—such as survey responses, comments, suggestions, or other forms of voluntary feedback.

Other Categories of Data: When you visit or interact with our Sites, certain information is gathered automatically through the use of cookies, web beacons, and other digital tracking tools. We only use these technologies where permitted by law, and you may have rights that allow you to limit or disable their use.

This automatically collected information includes:

- **Site interaction information:** Details about how you browse and engage with our Sites, such as the pages you access, the content you view.
- **Device and technical information:** Data related to the device and software you use to reach our Sites, which may include your IP address, browser type and settings, language preferences, operating system, and similar diagnostic or technical details.

For more information about the tracking tools we use and the choices available to you, please refer to our [Cookie Notice](#).



Note on Missing Information: If you choose not to provide certain information when requested, we may be unable to deliver the service, complete a transaction, or fulfill the purpose for which the information is required.

Unless otherwise noted in this policy, we act as the “controller” of personal data that we collect and process.

How We Use Your Information

We may use the personal information we collect, whether obtained through our Sites, our products, or when you contact us, to support our operations, deliver our services, and meet our legal and regulatory obligations. These uses include, but are not limited to, the following:

- **Business and Professional Interactions:** We use business contact information to communicate with individuals acting on behalf of customers, partners, suppliers, and other third parties. This may include managing commercial relationships, performing due diligence, supporting contract negotiations, processing orders and fulfilling compliance or audit requirements. We may also use this information when necessary to protect our legal interests or respond to claims.
- **Service Delivery and Transaction Support:** We process personal information to provide the services you request and to complete transactions you initiate. Examples include confirming product availability, registering devices or software, processing purchases, facilitating renewals, assisting with warranty matters, updating product documentation, and responding to technical or customer support inquiries.
- **Site Management and Security:** We use personal information to maintain, monitor, and secure our Sites and digital services. This may involve system administration, diagnostics and performance monitoring, troubleshooting, data hosting, security logging, and protecting our networks against unauthorized access or harmful activity.
- **Enhancing Products and Services:** We may analyze personal information to better understand how our Sites, products, and services are used, to identify improvement opportunities, and to develop new features.
- **Communications, Marketing, and Outreach:** Where permitted by applicable law, we may use personal information to share news about our products, services, events, surveys, newsletters, and other updates that may be relevant to you. You can opt out of marketing emails at any time by using the “unsubscribe” link or contacting us as described in this Privacy Policy. Depending on regional regulations, you may also have the ability to opt out of other types of promotional communications. Some jurisdictions (such as California) allow individuals to request information about how businesses share personal information for marketing purposes, and we will honor such requests in accordance with local law.



- **Interest-Based and Personalized Advertising:** We may analyze information about your online behavior or interactions with our Sites to understand your preferences and tailor advertising or content accordingly. If you prefer not to receive interest-based advertising, you may adjust your cookie preferences or refer to our Cookie Notice for available opt-out mechanisms.
- **Partner Programs:** If we offer financial incentive or loyalty programs, we may use the information you provide to manage participation, assign benefits, track activity, and enable the redemption of rewards or program credits. Program-specific terms may apply. You may withdraw from such programs at any time in accordance with their conditions or by contacting us using the details provided in this Privacy Policy.
- **Recruitment and Talent Acquisition:** If you submit information in connection with a job application or inquiry, we may use it to assess your suitability for employment, conduct background or eligibility checks where permitted, communicate with you about the process, and maintain records consistent with our legal obligations or recruitment practices. We may also work with third-party recruiters or employment platforms to manage applications.
- **Compliance, Enforcement, and Protection:** We may use personal information to detect, investigate, or respond to potential violations of our terms, suspected fraud, security threats, intellectual-property issues, or unlawful activity. We may also use it as required to comply with legal obligations, regulatory requests, or court orders.
- **Combining Information from Multiple Sources:** Where permitted by law, we may combine information collected through our Sites with data collected from our products, services, or other interactions. Doing so enables us to provide a consistent experience across touchpoints, maintain accurate records, enhance service quality, and support the purposes outlined in this Privacy Policy.

The Legal Basis For Collecting and Processing Information

Acre processes personal information only when we have a valid legal or lawful basis to do so. Depending on the circumstances and the jurisdiction, we may rely on one or more of the following grounds:

- **Consent:** We may process your personal information when you voluntarily provide consent. This includes situations such as subscribing to newsletters, requesting information about our products or services, opting into marketing communications, participating in events, or where explicit permission is required under applicable law. You may withdraw your consent at any time.
- **Performance of a Contract:** We process personal information when it is necessary to enter into, administer, or fulfill a contract with you or your organization. This includes providing products or services, managing accounts, processing transactions, delivering support, or taking steps at your request prior to entering into a contract.



- **Compliance With Legal Obligations:** We may process personal information when necessary to meet legal, regulatory, accounting, export-control, or compliance requirements. Examples include record retention, responding to lawful government or regulatory requests, and complying with applicable safety, reporting, and security obligations.
- **Legitimate Interests:** We may process personal information where it is necessary for our legitimate business purposes, provided those interests are not overridden by your rights and protections. These purposes may include improving our Sites and services, ensuring network and information security, preventing fraud, conducting business analytics, or communicating with business contacts. Where required, we will conduct a balancing assessment to confirm that our interests do not unfairly impact you.
- **Vital Interests:** Under limited circumstances, we may process personal information to protect the vital interests of you or another person, such as in emergency or safety-critical situations.

Other Legal Bases (Where Applicable): Some jurisdictions recognize additional lawful grounds, such as processing that is necessary in the public interest or pursuant to sector-specific requirements. Where these apply, Acre will rely on such bases in accordance with local law.

How We Share Information

We may share personal information with third parties only when there is a lawful and appropriate reason to do so, and only to the extent necessary for the purposes described in this Privacy Policy.

- **Affiliates and Group Entities:** We may share personal information with our subsidiaries, parent entities, and other companies within the broader Acre Group when required to support our operations, deliver services, or provide internal administrative functions. These entities process information in accordance with this Privacy Policy and applicable data-protection laws.
- **Service Providers and Authorized Vendors:** We engage carefully selected third-party service providers to support our business activities. These partners may provide services such as:
 - website hosting and maintenance
 - IT and security support
 - payment processing, billing, accounting, or audit functions
 - customer service and technical support
 - marketing operations (where permitted by law)

These parties may access personal information only as needed to perform services on our behalf and are contractually required to protect such information, use it solely for the purposes specified by Acre, and refrain from using it for their own marketing or any other independent purpose.

- **Business Partners and Solution Integration Providers:** In some cases, we may share personal information with trusted partners who collaborate with us to deliver integrated



solutions or joint offerings. Such sharing occurs only where necessary to fulfill your request, support a contracted service, or enable product interoperability, and is subject to appropriate safeguards.

- **Legal, Regulatory, and Compliance-Related Disclosures:** We may disclose personal information when required to comply with applicable laws, regulations, legal proceedings, or lawful requests from government authorities. This may include:
 - responding to subpoenas, warrants, or court orders
 - cooperating with law-enforcement investigations
 - meeting national security or regulatory reporting obligations

We may also disclose information when necessary to establish, protect, or exercise our legal rights, defend against legal claims, or prevent fraud or security threats.

- **Corporate Transactions:** If Acre undergoes a merger, acquisition, restructuring, or asset transfer, personal information may be shared with the involved entities as part of the transaction. Any such sharing will occur under confidentiality protections and continue to comply with applicable legal requirements.
- **With Your Authorization:** We may share personal information for purposes not described above if you explicitly request or authorize the disclosure.

How Long We Retain Your Information

How long we keep Personal Information depends on the type of information and the purpose for which it was collected. We retain Personal Information only for as long as necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable law. The criteria we use to determine retention periods include: (i) the duration of our relationship with you or your organization; (ii) applicable legal, tax, accounting, or regulatory obligations that require us to retain certain records; (iii) the existence of any legal claim or dispute for which the information may be relevant; and (iv) guidance from applicable data protection authorities. After the applicable retention period, we will either securely delete or anonymize your Personal Information.

We retain Personal Information where we have an ongoing legitimate business purpose to do so, for example to resolve disputes or to comply with ongoing legal obligations. For our products and services, we retain your personal information for as long as it is needed to provide our services to you and to fulfill our legal obligations and for a reasonable period of time after such services are completed.

Cookies and Other Tracking Technologies

Cookies are small files stored on your web browser when you visit our website. Some cookies last only as long as you remain on the website; others, called “persistent cookies” may be stored for longer periods of time. These cookies can make browsing easier by storing your password or your preferences regarding how you use the website. Cookies collect information such as the IP



address of your computer, your browser settings, and information about how you use the website. Your general location may be estimated from your IP address. Some cookies track users' activity on our website, apps, and services in order to deliver personalized advertising to you on this and other websites.

If you would like to opt out of cookies, you may change the settings on your web browser to reject or delete cookies. You may also find more information about cookies, including how to opt out of interest-based advertising, at www.youronlinechoices.eu (EU) or optout.aboutads.info (US).

More information about how we use cookies may be found here: [Cookie Notice](#).

Your Rights Regarding Access to and Control over Personal Information

If you reside in the EU/EEA or the United Kingdom, you may have the following rights with regard to your personal information:

- **Right of information and access** - You have the right to access your Personal Information we have about you and to be provided with a copy of your Personal Information.
- **Right to rectification** - You have the right to correct or update your inaccurate or out of date Personal Information.
- **Right of erasure** - You have the right to request that your Personal Information be permanently erased/deleted.
- **Right to restrict processing** - You have the right to restrict the processing of your Personal Information.
- **Right to object to processing** - You have the right to object to specific types of processing of your Personal Information.
- **Right to portability** - You may ask to receive a portable copy of your personal information in a format that may be transferred to another organization.
- **Right not to be subject to decisions based solely on Automated Decision Making** - You have the right not to be subject to decisions based solely on automated processing. Acre does not currently make decisions about individuals based solely on automated processing that produce legal or similarly significant effects. Should this change, we will update this policy and provide appropriate disclosures.
- **Right to complain to a data protection authority** - You have the right to complain to a supervisory authority in the country in which you reside, details of which can be provided upon request or to the lead supervisory authority for Acre, which is the Irish Data Protection Commission, info@dataprotection.ie. Our Data Protection Officer can be contacted at: privacy@acresecurity.com.
- **Right to withdraw consent** - If you have given us consent to collect or process your Personal Information, you may withdraw that consent at any time.
- **The Right to Non-Discrimination** - We may not discriminate against you if you exercise your privacy rights.



If you wish to exercise any of these rights please submit a request to:
privacy@acresecurity.com.

We may charge a reasonable fee if your request is not valid under applicable law, repetitive or excessive. We may also request additional information from you in order to verify your identity before processing your request.

Information for California Residents

The California Consumer Privacy Act (CCPA) applies to information collected from California residents. Residents of California have the following rights with regard to their personal information:

- **The Right to Know and Access Information.** The categories of personal information we collect are described above in the section entitled “What Personal Information We Collect”. California residents may submit a verifiable request regarding the information collected, the types of sources from which personal information is collected, the purposes for which information is collected, and the specific personal information collected about them.
- **The Right to Have Personal Information Deleted**
- **The Right To Portability.** California residents may request a copy of their personal information in a format that can be transferred to another person or entity.
- **The Right to Correct.** California residents have the right to request that we correct inaccurate personal information we hold about them.
- **The Right to Limit Use of Sensitive Personal Information.** California residents have the right to direct us to limit the use and disclosure of sensitive personal information to purposes necessary to perform the services or provide the goods requested. To exercise this right, please contact us at privacy@acresecurity.com.
- **The Right to Non-Discrimination.** We may not discriminate against you if you exercise your privacy rights.

You may be asked for more information in order for us to verify your identity when you make a request. You may exercise your rights by emailing privacy@acresecurity.com.

We do not sell Personal Information to third parties as defined under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (CCPA/CPRA). To the extent we share Personal Information with third parties for cross-context behavioral advertising, you have the right to opt out of such sharing by submitting a request to privacy@acresecurity.com.

The section above “What Personal Information We Collect” lists the categories of Personal Information we have collected in the preceding 12 months.



International Data Transfers

Personal Information may be transferred from users residing in the European Union to our servers, partners, or vendors located in the United States and other non-EU countries where there may not be an adequacy opinion issued with respect to that country. We have taken appropriate safeguards to ensure that Personal Information remains protected wherever it is transferred. When we transfer Personal Information of individuals in the European Economic Area (“EEA”), Switzerland or the United Kingdom (“UK”) to the US, we make use of the Standard Contractual Clauses and the UK Addendum as well as additional safeguards and appropriate data transfer mechanisms.

Security

We take all reasonable steps to protect the information we receive from you from accidental or unlawful destruction, loss, alteration, and unauthorized disclosure or access. We have put in place appropriate physical, technical, and administrative measures to safeguard and secure your information, but no security measures are perfect; the risk of a data breach is possible. In the event of a data breach that is likely to result in a risk to your rights and freedoms, we will notify the relevant supervisory authority and, where required by applicable law, affected individuals, within the timeframes required by law.

Children’s Privacy

We do not knowingly collect or solicit personal information from children under age 16 (or under 13 where a lower age threshold is permitted by applicable law) without parental consent, unless permitted by law. If we become aware that we have collected personal information from a child without the required parental or guardian consent, we will delete it promptly. If you believe that a child may have provided us with personal information without such parental consent, please contact us at: privacy@acresecurity.com.

Sensitive Information

Unless specifically requested, we ask that you not send us, and you not disclose on or through our websites or otherwise to us sensitive personal Information unless specifically requested by us or required by law.

In the event we process sensitive personal information such as biometric information, government-issued identification information, or information about your race, religion, political opinions, or other similar sensitive data, we will only collect such information with your explicit consent.



Use of Artificial Intelligence in Our Products and Services

Acre uses artificial intelligence (“AI”) technologies in two contexts: internally to support our business operations, and within certain products we deliver to customers.

Internal Use

We use AI tools internally to support business functions such as customer support, communications, and operational efficiency. Where these tools interact with personal information, such processing is carried out in accordance with this Privacy Policy and applicable data protection law.

AI in Our Products

Certain Acre products may incorporate optional AI functionality, designed specifically to enhance the capabilities of that product such as the ability to search, add, modify, and delete data within their environment using natural language, in a manner relevant to the product and its intended use. The decision to enable and use these AI features is entirely the customers. AI functionality will never be activated without the customer's choice to adopt it.

Where a customer chooses to use AI features, their queries and any data they interact with may be processed by the AI in order to carry out their instructions. Acre does not use data processed through these AI features to train AI models without a lawful basis and appropriate safeguards in place, and approval to do so from the customer.

Automated Decision-Making

Acre does not make decisions about individuals based solely on automated processing that produce legal or similarly significant effects. Should this change, we will update this policy and provide appropriate notice in accordance with applicable law.

Questions

If you have questions about how AI is used in connection with your personal information, please contact us at: privacy@acresecurity.com.

Contact Us

If you have any questions about this privacy policy, or if you want to exercise your privacy rights as outlined above, please contact us at: privacy@acresecurity.com

or at any of the applicable numbers in the link: [Contact Acre | Get in Touch](#)