

Privacy Policy

Last updated 7 March 2021

This Privacy Policy (the "Privacy Policy") describes how Umbrella Digital Pty Ltd (ABN 65 617 798 937) and its Affiliates ("RONIN," "we," "our" or "us") collect, use, manage and share personal information collected through the use of our websites (including ronin.cloud), services, and applications (collectively, the "Services").

We are committed to protecting your personal information, and ensuring its privacy, accuracy and security. We handle your personal information in a responsible manner in accordance with the Privacy Act 1988 (Cth) (**Act**) and the Australian Privacy Principles (**APPs**).

For the purposes of this Privacy Policy, 'Personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether or not recorded in a material form.

This Privacy Policy does not apply to information our customers may process when using our Services.

We may collect and receive information about users of our Services ("users," "you," or "your") from various sources, including:

1. information you provide through your user account on the Services (your "Account") if you register for the Services;
2. your use of the Services; and
3. from third-party websites, services, and partners.

When you use our Services, you agree that you accept the practices and policies outlined in this Privacy Policy. You consent to us collecting, using and managing your information in the ways detailed in this Privacy Policy.

We recommend that you read this Privacy Policy in full to ensure you are fully informed. If you have any questions about this Privacy Policy or RONIN's data collection, use, and disclosure practices, please contact us at privacy@ronin.cloud.

Who Are We?

Umbrella Digital is an Australian based software company who developed the RONIN cloud orchestration engine. RONIN is the software stack you will use to manage your AWS resources, from within your AWS account.

The RONIN software is hosted on your AWS account on servers in your selected country/region. RONIN is NOT Software as a Services (SaaS).

RONIN is installed on an AWS account that is under your control. RONIN inherits the security posture of the AWS account where it is installed. RONIN orchestrates the instantiation and management of your cloud resources. We have no access to your information or data. Your data is stored within AWS data centres and leverages the strict physical security requirements to achieve the high levels of certification held by the

company. More can be found here on the best practices implemented:
https://d0.awsstatic.com/whitepapers/Security/AWS_Security_Best_Practices.pdf

What This Privacy Policy Covers

This Privacy Policy covers our treatment of your personal information. It does not cover the practices of companies we don't own or control, or people that we don't manage.

This Privacy Policy provides a standard for RONIN with respect to its treatment and protection of personal information globally. Certain local laws may require stricter standards. Where local laws are stricter than this Privacy Policy, we will handle personal information in accordance with applicable laws and regulations at the place where the personal information is collected. Where applicable local law provides a lower level standard of protection than established by this Privacy Policy, then the requirements of this Privacy Policy will govern how we treat the personal information collected in that location. Questions about compliance with local law may be addressed to privacy@ronin.cloud.

Sensitive information: The *Privacy Act 1988* (Cth) defines some types of personal information as sensitive. We don't commonly collect sensitive information, which includes information about a person's race, ethnic origin, political opinions, health, religious or philosophical beliefs and criminal history. In the event we require any sensitive information, we would only collect this with your permission, and we will only use it for the purpose for which you provided it.

INFORMATION WE COLLECT

Information You Provide

1. **Account Registration** - when you register for an Account, we may ask for your contact information, including items such as name, company name, address, email address, and telephone number. If we are your solution provider partner then we will also collect your related and relevant AWS account information.
2. **Payment Information** - when you add your financial account information to your Account, that information is directed to our third-party payment processor. We do not store your financial account information on our systems; however, we have access to, and may retain, subscriber information through our third-party payment processor.
3. **User Content** - our 'blog' feature allows you to publicly post content on our Services. By registering for our blog, you agree that your profile information and the content you post may be viewed and used by other users and third parties we do not control.
4. **Communications** - if you contact us directly, we may receive additional information about you such as your name, email address, phone number, the contents of the message and/or attachments you may send us, and any other information you may choose to provide. We may also receive a confirmation when you open an email from us.

Information We Collect When You Use Our Services.

1. **Cookies and Other Tracking Technologies** - as is true of most websites, we gather certain information automatically and store it in log files. In addition, when you use our Services, we may collect certain information automatically from your device. This information may include internet protocol (IP) addresses, browser type, internet

service provider (ISP), referring/exit pages, operating system, date/time stamp, clickstream data, landing page, and referring URL. To collect this information, a cookie may be set on your computer or device when you visit our Services. Cookies contain a small amount of information that allows our web servers to recognise you. We store information that we collect through cookies, log files, and/or clear gifs to record your preferences. We may also automatically collect information about your use of features of our Services, about the functionality of our Services, frequency of visits, and other information related to your interactions with the Services. We may track your use across different websites and services. In some countries, including countries in the European Economic Area ("EEA"), the information referenced above in this paragraph may be considered personal information under applicable data protection laws.

2. **Usage of our Service** - when you use our Services, we may collect information about your engagement with and utilization of our Services, such as processor and memory usage, storage capacity, navigation of our Services, and system-level metrics. We use this data to operate the Services, maintain and improve the performance and utilization of the Services, develop new features, protect the security and safety of our Services and our customers, and provide customer support. We also use this data to develop aggregate analysis and business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of our business.

Information We Receive from Third Parties.

1. **Third-Party Accounts** - if you choose to link our Services to a third-party account, we will receive information about that account, such as your authentication token from the third-party account, to authorize linking. If you wish to limit the information available to us, you should visit the privacy settings of your third-party accounts to learn about your options.
2. **Third-Party Partners** - we may also receive publicly available information about you from our third-party partners and combine it with data that we have about you.

HOW WE USE INFORMATION

We use the information we collect in various ways, including to:

1. Provide, operate, and maintain our Services;
2. Improve, personalise, and expand our Services;
3. Understand and analyse how you use our Services;
4. Develop new products, services, features, and functionality;
5. Communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the Service, and for marketing and promotional purposes;
6. Process your transactions;
7. Send you text messages and push notifications;
8. Find and prevent fraud; and
9. For compliance purposes, including enforcing our Terms of Service, or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.

HOW WE SHARE INFORMATION

We may share the information we collect in various ways, including the following:

1. **Vendors and Service Providers** - we may share information with third-party vendors and service providers that provide services on our behalf, such as helping to provide our Services, for promotional and/or marketing purposes, and to provide you with information relevant to you such as product announcements, software updates, special offers, or other information.
2. **Aggregate Information** - where legally permissible, we may use and share information about users with our partners in aggregated or de-identified form that can't reasonably be used to identify you.
3. **Third-Party Partners** - we also share information about users with third-party partners in order to receive additional publicly available information about you. Sometimes, we employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you; for example, we may use a payment processing company to receive and process your credit card transactions for us. Unless we tell you differently, our agents do not have any right to use the personal information we share with them beyond what is necessary to assist us.
4. **Analytics** - we may use analytics providers such as Google Analytics. Google Analytics uses cookies to collect non-identifying information. Google provides some additional privacy options regarding its Analytics cookies at <http://www.google.com/policies/privacy/partners/>.
5. **Business Transfers** - information may be disclosed and otherwise transferred to any potential acquirer, successor, or assignee as part of any proposed merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

As Required By Law and Similar Disclosures - we may also share information to:

1. satisfy any applicable law, regulation, legal process, or governmental request;
2. enforce this Privacy Policy and our Terms of Service, including investigation of potential violations hereof;
3. detect, prevent, or otherwise address fraud, security, or technical issues;
4. respond to your requests; or
5. protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

With Your Consent - we may share information with your consent.

LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only:

1. where we need the personal information to perform a contract with you;

2. where the processing is in our legitimate interests and not overridden by your rights; or
3. where we have your consent to do so.

We have a legitimate interest in operating our Services and communicating with you as necessary to provide these Services, for example when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities.

In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

We reserve the right to access, read, preserve, and disclose any information that we reasonably believe is necessary to comply with law or court order; enforce or apply our terms of service, policies and other agreements; or protect the rights, property, or safety of RONIN, our employees, our users, or others.

SECURITY

RONIN is committed to protecting your information. To do so, we employ a variety of security technologies and measures designed to protect information from unauthorised access, use, or disclosure.

Where you are asked to provide RONIN with a password, you must prevent unauthorised access to your account and personal information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. However, please bear in mind that the internet cannot be guaranteed to be 100% secure.

DATA RETENTION

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a Service you have requested or to comply with applicable legal, tax, or accounting requirements).

When we have no ongoing legitimate business need to process or retain your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

ACCESS

You have the right to request a copy of any personal information we hold about you. However, there are circumstances under Australian privacy laws where we may not give you access to the personal information we hold about you. For example, we can't give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety.

There is generally no cost for accessing the personal information we hold about you, unless the request is complex or resource intensive. If there is a charge, it will be reasonable and we will let you know what it is going to be so that you can agree to it before we go ahead.

If you are a registered user, you may access certain information associated with your Account by logging into our Services or emailing privacy@ronin.cloud. If you terminate your Account, any public activity on your Account prior to deletion may remain stored on our servers and may remain accessible to the public.

To protect your privacy and security, we may also take reasonable steps to verify your identity before updating or removing your information. The information you provide us may be archived or stored periodically by us according to backup processes conducted in the ordinary course of business for disaster recovery purposes. Your ability to access and correct your information may be temporarily limited where access and correction could: inhibit RONIN's ability to comply with a legal obligation; inhibit RONIN's ability to investigate, make or defend legal claims; result in disclosure of personal information about a third party; or result in breach of a contract or disclosure of trade secrets or other proprietary business information belonging to RONIN or a third party.

You have the right to request us to rectify or erase your personal information and the right to lodge a complaint with a supervisory authority if you are not satisfied with our response to your request. We will respond to this request in a timely manner, not exceeding 30 days. When you update information, however, we may maintain a copy of the unrevised information in our records. Some information may remain in our records after deletion of such information from your account. We may use any aggregated data derived from or incorporating your personal information after you update or delete it, but not in a manner that would identify you personally.

We aim to keep the personal information we hold about you accurate, up-to-date and complete. If you think our records need to be corrected, please contact us at privacy@ronin.cloud.

YOUR DATA PROTECTION RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)

For the purposes of this section, we refer to Personal Data as defined in the GDPR. If you are a resident of the European Economic Area, you have the following data protection rights:

You have the following rights:

1. ***Right of access to your Personal Data (Art. 15 GDPR)***: You have the right to ask us for confirmation on whether we are processing your Personal Data, and access to

the Personal Data and related information on that processing (e.g., the purposes of the processing, or the categories of Personal Data involved).

2. **Right to correction (Art. 16 GDPR):** You have the right to have your Personal Data corrected, as permitted by law.
3. **Right to erasure (Art. 17 GDPR):** You have the right to ask us to delete your Personal Data, as permitted by law. This right may be exercised among other things: (i) when your Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed; (ii) when you withdraw consent on which processing is based according to Art. 6 (1) (a) or Art. 9 (2) (a) GDPR and where there is no other legal ground for processing; (iii) when you object to processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or when you object to the processing pursuant to Art. 21 (2) GDPR; or, (iv) when your Personal Data has been unlawfully processed.
4. **Right to restriction of processing (Art. 18 GDPR):** You have the right to request the limiting of our processing under limited circumstances, including: when the accuracy of your Personal Data is contested; when the processing is unlawful and you oppose the erasure of your Personal Data and request the restriction of the use of your Personal Data instead; or when you have objected to processing pursuant to Art. 21 (1) GDPR pending the verification whether the legitimate grounds of KPT override your grounds.
5. **Right to data portability (Art. 20 GDPR):** You have the right to receive the Personal Data that you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that information to another controller, including to have it transmitted directly, where technically feasible.
6. **Right to object (Art. 21 GDPR):** You have the right to object to our processing of your Personal Data, as permitted by law. This right is limited to processing based on Art. 6 (1) (e) or (f) GDPR, and includes profiling based on those provisions, and processing for direct marketing purposes. After which, we will no longer process your Personal Data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

YOUR CHOICES

You can use some of the features of the Services without registering, limiting the type of information that we collect. However, if you choose not to provide your personal information, you may not be able to enjoy the full range of Services that we offer.

You may unsubscribe from receiving certain promotional emails from us. If you wish to do so, simply follow the instructions found at the end of the email. Even if you unsubscribe, we may still contact you for informational, transactional, account-related, or similar purposes.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may be modified from time to time, so please review it frequently. Changes to this Privacy Policy will be posted on our websites. If we materially change the

ways in which we use or share personal information previously collected from you through our Services, we will notify you through our Services, by email, or other communication.

CONTACT US

If you have any questions or concerns about this Privacy Policy, please feel free to email us at privacy@ronin.cloud.

The data controller of your personal information is RONIN.