PRIVACY POLICY

Upwind Security, Inc. and its affiliates ("**Upwind**", "**we**" or "**us**") respect the privacy of the visitors of our websites, other Prospects and Users of our Services (as such terms are defined below), and are committed to protection of the personal data (as defined below) that is made available to us.

This Privacy Policy describes how Upwind collects, stores, uses and discloses the following categories of personal data:

a. **Customer Data**: personal data that we collect, process, and manage on behalf of our business customers (the "**Customers**") as a part of the Upwind Cloud Security Platform or any other service, product or solution described on one or more applicable order forms and commercial agreements with the Customer (the "**Solutions**").

   If we process any Customer personal data, we will do so solely on behalf of and under the instruction of the Customer and in accordance with the commercial agreement and data processing addendum with them. Accordingly, this Privacy Policy (which describes Upwind's privacy and data protection practices) does not apply to such processing done on our Customers' behalf. To learn more about the privacy policy and practices of our Customers, please contact them directly.

b. **User Data**: personal data relating to our Customers' internal focal persons who directly engage with Upwind concerning their organizational account, and users of the Services on behalf of such Customers, e.g., the account administrators and users, billing contacts and authorized signatories on behalf of the Customer (collectively, "**Users**"); as well as the Customer's business needs and preferences, as identified to us or recognized through our engagement with them.

c. **Partner Data**: personal data relating to our business and channel partners, resellers, distributors and providers of professional services related to our Services who we engage to allow us to pursue growth opportunities by facilitating a stronger local presence for Customers, Users, and Prospects.

d. **Prospects Data**: personal data relating to visitors of our website (https://https://www.upwind.io/), participants at our events, prospective Customers, Users or Partners (collectively, "**Prospects**") who visit or otherwise interact with our website, online ads and content, emails or communications under our control (the "**Sites**" and collectively with the Solutions, the "**Services**"). This also includes participants at events, webinars and other business and marketing activities that we organize or participate in, as well as any other individuals who act as or work for our prospective Partners.

Specifically, this Privacy Policy describes our practices regarding:

1. Data Collection & Processing
2. Data Uses
3. Data Location
4. Data Retention
5. Data Disclosure
6. Cookies and Data Collection Technologies
7. Communications
8. Data Security
9. Data Subject Rights
10. Data Controller/Processor
11. Opt-Out of Sale/Sharing
12. Additional Notices and Contact Details

If you are a Customer, User, Partner or Prospect, please read this Privacy Policy carefully and make sure that you fully understand it.

Our Services are designated for businesses and are not intended for personal or household use. Accordingly, we treat all personal data covered by this Privacy Policy, including information about any Prospects to our Sites, as pertaining to individuals acting as business representatives, rather than in their personal capacity.

You are not legally required to provide us with any personal data and may do so (or avoid doing so) at your own free will. However, please keep in mind that without it, we may not be able to provide you with the full range of our Services or deliver the best user experience when interacting with them. If you prefer not to share your personal data with us, or have it processed by us or any of our Service Providers (as defined below), please refrain from providing it to us and avoid any interaction with us or with our Sites, or use our Services. You may also submit a request to exercise your rights as explained in Section 9 below.

1. Data Collection & Processing

When we use the terms "**personal data**" or "**personal information**" in this Privacy Policy, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual. It does not include aggregated or deidentified information that is maintained in a form that is not reasonably capable of being associated with or linked to an individual. Upwind does not collect, use or disclose sensitive personal data under this Privacy Policy.

Types of personal data collected. We may collect or generate the following types of personal data about individuals through the Services:

- **Usage, login credentials, and device information concerning Users, Partners and Prospects**. Connectivity, technical and aggregated usage data, such as IP addresses and approximate location based upon such IP addresses, user agent, digital identifiers, activity logs, session recordings, device data (like type, OS, device id, browser version, locale and language settings used), log-in credentials to the Services, the cookies and pixels installed or utilized on their device (which collect data such as how often Prospects visit or use the Sites, which pages they visit and when, and which website ad or email message brought them there), and inferred or presumed data on or generated from their use of the Services.
- **Information concerning our Customers, Users, Partners and Prospects**. Contact and business details such as name, email, phone number, position, workplace and related business insights, our communications with such individuals (correspondences, sensory information including call and video recordings, and transcriptions and analyses thereof), feedback and testimonials received, contractual and billing details, as well as any expressed, presumed or identified needs, preferences, attributes and insights relevant to our potential or existing engagement.
- **Personal data contained in Customer Data** which is provided by our Customers or processed on their behalf and under their instructions and in accordance with the data processing addendum with them. Such data may include any of the types of personal data described above with respect to Users or other individuals whose data is contained in the Customer Data (e.g., Customer's end-users that interact with Customer's cloud).

For the purposes of the California Consumer Privacy Act ("**CCPA**"), in the last twelve (12) months, we have collected the following categories of personal information, as defined in the CCPA: identifiers; customer record information; internet or other electronic network activity information; professional or employment-related information; geolocation data; commercial information; inferences; audio, electronic, and visual information; and inferences.

Categories of sources from which personal data is collected. We obtain personal data from the following categories of sources:

- **Data collected directly from you**. You may provide us with your personal data (e.g., when you submit a form on our website, engage our website chatbot, during an event, conference, or webinar you have participated in or during our commercial engagement with you).
- **Data collected from third parties**. We obtain personal data from third parties, such as our Customers or Service Providers. For example, we may get your details from your employer (which is our Customer) as a part of our commercial engagement. We may also obtain personal data from our Service Providers (e.g., marketing and sales tools, data enrichment services, our sales and marketing partners, distributors, your colleagues job recruiters, your colleagues, or from third party entities in connection with our purchase of all or some of such entities' assets). When we receive personal data from third parties, our use of the data is governed by this Privacy Policy.
- **Data that is automatically generated**. Some personal data is automatically generated when you visit our website and engage its features (such as your online activity, clicks, web-pages visits, chatbot use, etc.) by using cookies and the data collection technologies described in Section 6 below. We may also collect aggregated or technical data generated when you use our Services, relating to how you use them, so we can learn how Users use our Services and improve them and our users' experience.

2. Data Uses

We use personal data for the following business and commercial purposes (and in reliance on the legal bases for processing noted next to them, as appropriate):

Purpose	Legal basis for processing
User personal data	
To authenticate your identity and provide you access and use of our Services.	• Performance of a Contract (where applicable) • Legitimate Interests
To facilitate, operate, enhance, and provide our Services.	
To provide assistance and support to our Customers, Users and Partners, to test and monitor the Services, diagnose or fix technology problems or provide other technical services.	
To personalize our Services, including by recognizing an individual and remembering their information when they return to our Services, and to provide further localization and personalization capabilities.	
User, Partner and Prospect personal data	
To gain a better understanding of how you use and interact with our Services, which content and data you have processed through our Services, and how we could improve your and others' user experience and continue improving our Solutions, offerings, and the overall performance of our Services.	• Consent (where applicable) • Legitimate Interests
To facilitate and optimize our marketing campaigns, ad management, and sales operations, and to manage and deliver advertisements, including contextual, behavioral and interests-based advertising, for our Services more effectively, including on other websites and applications.	

To explore and pursue growth opportunities by facilitating a stronger local presence and tailored experiences.	
To facilitate, sponsor and offer certain events, contests, promotions and benefit programs.	
To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks or actual attempts of fraud, error, or any illegal or prohibited activity.	• Performance of a Contract (where applicable) • Consent (where applicable) • Legitimate Interests
To contact our Customers, Users, Partners and Prospects with general or personalized service-related messages, as well as promotional messages that may be of specific interest to you (as further described in Section 7 below).	
To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal, criminal or prohibited activity.	
To comply with our contractual and legal obligations and requirements, and maintain our compliance with applicable laws, regulations and standards.	
To evaluate, test and monitor our Services, diagnose or fix problems and bugs, as well as develop new features, technologies, and improvements to our Services.	• Legitimate Interests
To create aggregated statistical data, inferred non-personal data or anonymized or pseudonymized data (rendered non-personal and non-identifiable), which we or our business partners may use to provide and improve our respective services, or for any other purpose.	
To enforce our agreements with Customers, Partners, Service Providers, and other third parties, resolve disputes, and protect our business interests and the interests and rights of third parties.	
To enforce our Terms of Use and commercial agreements, to resolve disputes, to carry out our obligations and enforce our rights, and to protect our business interests and the interests and rights of third parties.	
To comply with court orders and warrants, prevent misuse of the Services, and take any action in any related legal dispute and proceeding.	• Legal Obligations • Legitimate Interests
To comply with applicable laws and regulations.	

If you reside or are using the Services in a territory governed by privacy laws under which "consent" is the only or most appropriate legal basis for the processing of personal data as described herein (in general, or specifically with respect to the types of personal data you expect or elect to be processed by or via the Services, or due to nature of such processing), your acceptance of our Terms of Use (and/or the terms that govern your use of the Platform) (collectively, the "**Terms**") and this Privacy Policy will be deemed as your consent to the processing of your personal data for all purposes detailed herein. If you wish to revoke such consent, please contact us at privacy@upwind.io.

3. Data Location

We and our authorized Service Providers maintain, store and process personal data in the United States, Israel, European Union, United Kingdom, and in other locations as reasonably necessary for the proper delivery and performance of our Services, or as may be required by law.

While privacy laws may vary between jurisdictions, Upwind is committed to protecting personal data in accordance with this Privacy Policy and customary industry standards, and such appropriate lawful mechanisms and contractual terms requiring adequate data protection, regardless of any lesser legal requirements that may apply in the jurisdiction to which such data is transferred.

If we transfer personal data originating from the European Economic Area (EEA), the UK, or Switzerland to countries that provide an adequate level of data protection based on adequacy decisions published by the European Commission, the UK, and Switzerland (as applicable), we rely on these adequacy findings regarding the level of data protection offered by the recipient country.

To the extent we transfer personal data originating from the EEA, the UK or Switzerland elsewhere, we and the relevant data exporters and importers rely on appropriate data transfer mechanisms as established under applicable law, such as adequacy decisions or, when transferring personal data to non-adequate countries, the standard contractual clauses adopted by the EU (available here) and the UK (available here). You can obtain a copy by contacting us as indicated in Section 12 below.

4. Data Retention

We retain personal data for as long as we deem it as reasonably necessary in order to maintain and expand our relationship and provide you with our Services and offerings; in order to comply with our contractual obligations; or to protect ourselves from any potential disputes (i.e., as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with our data retention policy.

To determine the appropriate period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and the applicable legal requirements.

If you have any questions regarding our data retention practices, please contact us by email at privacy@upwind.io.

5. Data Disclosure

We disclose personal data in the following ways:

- **Service Providers**: We engage selected third-party companies and individuals to perform services on our behalf or complementary to our own. Such service providers may include hosting and server co-location services, communications and content delivery networks (CDNs), data security services, billing and payment processing services, fraud detection and prevention services, web and product analytics, e-mail distribution and monitoring services, session or activity recording services, website chatbot services, remote access services, content transcription and analysis services, performance measurement, data optimization and marketing services, social and advertising networks, content and data enrichment providers, event production and hosting services, e-mail, voicemails, support, enablement and customer relation management systems, and our legal, financial and compliance advisors (collectively, "**Service Providers**").

  Our Service Providers may have access to personal data, depending on each of their specific roles and purposes in facilitating and enhancing our Services, and may only use the data as determined in our agreements with them.

- **Partnerships**: Upwind engages with selected business and channel partners, resellers, distributors and providers of professional services related to our Services, which allow us to explore and pursue growth opportunities by facilitating a stronger local presence and tailored experiences for our Customers, Users and Prospects. In such instances, we may share relevant contact, business and usage details with the respective Partner, to allow them to engage with those entities and individuals for such purposes. If you directly engage with any of our Partners, please note that any aspect of that engagement which is not directly related to the Services and directed by Upwind is beyond the scope of Upwind's Terms of Use and Privacy Policy, and may therefore be covered by the Partner's terms and privacy policy.
- **Service Integrations**: You may choose to use a third-party service to integrate with our Services, for example, to upload or retrieve personal data to or from the Services, or to enrich the data you have processed on either service or enhance your usage thereof (provided that such integration is supported by our Services). The provider of this integrated third-party service may receive certain relevant data about or from your account on the Services or share certain relevant data from your account on the third-party provider's service with our Services, depending on the nature and purpose of such integration. This could include your Customer Data and/or User Data. Note that we do not receive or store your passwords for any of these third-party services (but do typically require your API key to integrate with them).
- **Legal Compliance**: We may disclose or allow government and law enforcement officials access to your personal data, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect our legitimate business interests, including the security or integrity of our products and services.
- **Sharing Personal Data with our Customers**: We may disclose Users' personal data to their affiliated organization. In certain cases, other Users from your organization may control your account and will be entitled to monitor, process and analyse your data and associated content, including (i) view any content you submit and your activities on the Services; (ii) view statistics regarding your account; (iii) change your account password or other access credentials or privileges; (iv) suspend or terminate your account access; and (v) access or retain data stored as part of your account. Please note that in these circumstances Upwind is not responsible for and does not control any further disclosure, use or monitoring by or on behalf of your organization, that acts as the "Data Controller" of such data (as further described in Section 10 below).
- **Protecting Rights and Safety**: We may disclose your personal data to others, if we believe in good faith that this will help protect the rights, property or personal safety of Upwind, any of our Prospects, Customers, Users or Partners, or any members of the general public.
- **Upwind Subsidiaries and Affiliated Companies**: We may disclose personal data internally to our affiliated companies, for the purposes described in this Privacy Policy. In addition, should Upwind or any of its subsidiaries or affiliates undergo any change in control, including by means of merger, acquisition or purchase of substantially all of its assets, your personal data may be shared with the parties involved in such event. If we believe that such change in control might materially affect your personal data then stored with us, we will notify you of this event and the choices you may have via e-mail and/or prominent notice on our Services.
- **Additional Sharing**: For the avoidance of doubt, Upwind may disclose your personal data in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so, or if we have successfully rendered such data non-personal and anonymous. Additionally, we may transfer, share or otherwise use non-personal data at our sole discretion and without the need for further approval.

For the purposes of the CCPA, in the past twelve (12) months, we may have disclosed identifiers; customer record information; internet or other electronic network activity information; professional or

employment-related information; geolocation data; commercial information; inferences; and audio, electronic, and visual information to Service Providers, to Partnerships, for Service Integrations for Legal Compliance, to Protect Rights and Safety or to Upwind Subsidiaries and Affiliated Companies. We did so in pursuit of the business and commercial purposes described in Section 2 above.

6. Cookies and Data Collection Technologies

We and our service providers use "cookies", anonymous identifiers, pixels, container tags and other technologies in order to provide our Services and ensure that they perform properly, to analyze our performance and marketing activities, for personalization purposes, for product development and improvements, and to personalize your experience. For more information on our cookie and data collection technologies practices, you may also use the "Your Privacy Choices" feature available in our Services depending on your location and activity on our Services, as applicable.

Cookies are packets of information sent to your web browser and then sent back by the browser each time it accesses the server that sent the cookie. Some cookies are removed when you close your browser tab or window. These are "Session Cookies". Some last for longer periods and are called "Persistent Cookies". We use both types.

Some cookies are necessary for the Services to function properly and cannot be declined or disabled unless you delete and block them through your web browser settings. Other cookies, which are used for functional, performance, analytics and marketing purposes, are optional. You may opt in to or opt out from the use of optional cookies through the "Your Privacy Choices" feature available on our website, depending on your location and activity on our Services, as applicable. If you choose to opt out of certain cookies, this will typically generate a new cookie which will preserve your choice and indicate it to our Services in your next visit so that the cookies you opted out of will not be utilized. You can also manage your cookies preferences, and accept, remove or entirely block cookies, through your browser settings.

Further to the above, whilst we do not change our practices in response to a "Do Not Track" signal in the HTTP header from a browser or mobile application, you can manage your cookies preferences, including whether or not to accept them and how to remove them, through your browser settings. Please bear in mind that disabling cookies may complicate or even prevent you from using the Services.

We also use the web analytics tool Google Analytics. This tool helps us understand users' behavior on our Services, including by tracking page content, and click/touch, movements, scrolls and keystroke activities. Further information about the privacy practices of our analytics service provider is available at: www.google.com/policies/privacy/partners. Further information about your option to opt-out of this analytics service is available at: https://tools.google.com/dlpage/gaoptout.

Please note that if you get a new computer, install a new browser, erase or otherwise alter your browser's cookie file (including upgrading certain browsers), you may also clear the opt-out cookies installed once you opt-out, so an additional opt-out will be necessary to prevent additional tracking.

7. Communications

We engage in service and promotional communications, through e-mail, phone, notifications, and other communication services and/or platforms.

Service Communications: Upwind may contact you with important information regarding our Services. For example, we may send you notifications (through any of the means available to us) of changes or updates to, billing issues, service maintenance or changes, log-in attempts or password reset or retrieval notices. Please note that certain communications essential to the operation and use of our Services cannot be opted out of.

Notifications and Promotional Communications: We may send you notifications concerning new features, offerings, events, and special opportunities or any other information we think you will find valuable. We may provide such notices through any of the contact means available to us (e.g.,

phone, mobile or email), through the Services, or through our marketing campaigns on any other websites or platforms.

If you do not wish to receive such promotional communications, you may notify us at any time by sending an email to privacy@upwind.io or by following the "unsubscribe", "stop", "change email preferences", or similar instructions contained in the promotional communications you receive.

8. Data Security

Upwind and its Service Providers implement systems, applications, and procedures to secure your personal data, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information. These measures provide sound industry-standard security. However, please be aware that regardless of any security measures used or implemented, we cannot and do not guarantee the absolute protection and security of any personal data stored with us or with any third parties.

9. Data Subject Rights

If you wish to exercise your privacy rights under any applicable law (including the EU or UK General Data Protection Regulation (GDPR), the CCPA, and others), you may do so by contacting us by email at privacy@upwind.io.

Such rights may include – to the extent available to you under the laws that apply to you – the right to know or request access to specific pieces of personal data collected, categories of data collected and sources from whom it was collected, as well as the purposes of collecting it and categories of third parties to whom we have disclosed it; the right to request rectification or erasure of your personal data held with Upwind; to restrict the processing of such data and to object to its processing (including the right to opt out of the sale or sharing of your data to third parties, as further detailed below); to port such data; or the right to equal services and prices (e.g., freedom from discrimination). Under some regulatory frameworks, such as the GDPR, you may also have the right to lodge a complaint with the relevant supervisory authority, as applicable.

These rights are also subject to various exclusions and exceptions under applicable laws. We will not charge a fee to process or respond to your verifiable privacy request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. Alternatively, we may refuse to comply with your request in such circumstances.

To the extent applicable to you, you may also designate an authorized agent, in writing or through a power of attorney, to request to exercise your privacy rights on your behalf. The authorized agent may submit a request to exercise these rights by emailing us.

Please note that when you or an authorized agent ask us to exercise any of your rights under this Privacy Policy or applicable law, we may need to ask you to provide us with certain credentials to make sure that you are who you claim you are, to avoid disclosure to you of personal data related to others and to ask you to provide further information to better understand the nature and scope of data regarding which you request to exercise your rights. Such additional data may be then retained by us for legal, compliance and auditing purposes (e.g., as proof of the identity of the person submitting the request or proof of request fulfilment). We will not fulfil your request unless you have provided sufficient information that enables us to reasonably verify that you are the individual about whom we collected the personal data.

We will acknowledge your request and provide a follow-up substantive response within a time period permitted by applicable law. We may redact from the data which we will make available to you, any personal data related to others.

10. Data Controller/Processor

Certain data protection laws and regulations, such as the EU GDPR, UK GDPR, and CCPA, typically distinguish between two main roles for parties processing personal data: the "**Data Controller**" (or under the CCPA, the "**Business**"), who determines the purposes and means of processing, and the "**Data Processor**" (or under the CCPA, the "**Service Provider**"), who processes the data on behalf of the Data Controller. Below we explain how these roles apply to our Services, to the extent that such laws and regulations apply.

Upwind is the "Data Controller" of its Prospects' and Partners' Personal Data. With respect to such data, we assume the responsibilities of Data Controller (solely to the extent applicable under law), as set forth in this Privacy Policy. In such instances, our Service Providers processing such data will assume the role of "Data Processor".

Upwind is the "Data Processor" of Customer Data. Such data is being processed by Upwind on behalf of the Customer (who is the "Data Controller" of such data, and our Service Providers who process such Customer Data on our behalf are the "sub-processors" of such data). Accordingly, Upwind processes Customer Data strictly in accordance with our Customers' reasonable instructions and as further stipulated in our data processing addendum and commercial agreement with such Customer.

Our Customers are solely responsible for determining whether and how they wish to use our Services, and for ensuring that all individuals using the Services on the Customer's behalf or at their request, as well as all individuals whose personal data may be included in Customer data processed through the Services, have been provided with adequate notice and given informed consent to the processing of their personal data, where such consent is necessary or advised, and that all legal requirements applicable to the collection, recording, use or other processing of data through our Services are fully met by the Customer, including specifically in the context of an employment relationship. Our Customers are also responsible for handling data subject rights requests under applicable law, by their Users and other individuals whose data they process through the Services.

11. Opt-Out of Sale/Sharing

Under some US data protection laws, like the CCPA, our disclosure of certain internet activity and device information to third parties through cookies may be considered a "sale" or "sharing" of personal information. We do so in pursuit of the business and commercial purposes described in Section 2 above.

For the purposes of the CCPA, in the last twelve (12) months we have "sold" or "shared" internet or other electronic network activity information, geolocation data, and commercial information with our analytics and advertising partners and service providers. Upwind has not knowingly sold or shared the personal information of individuals under the age of sixteen (16).

We only activate cookies that may result in a "sale" and/or "sharing" of your personal information if you have directed us to do so by opting in to Upwind activating such cookies and storing them on your device. By default, these cookies will not be used by Upwind.

Should you wish to opt in to Upwind's use of such cookies, you may click the "Your Privacy Choices" widget on the lower-left hand corner of our website and select the "Accept All" button or toggle the "Analytics", "Performance" and/or "Advertisement" switches to on (here, the color blue), and then click the "Save My Preferences" button.

To the extent the opt-in activation of such cookies is considered a "sale" or "sharing" of your personal information under the CCPA, you may exercise your right to opt out again at any time through the following:

- Click the "Your Privacy Choices" widget (available in the lower left-hand corner of our website), move the toggle switches next to "Analytics", "Performance" and "Advertisement" to gray (disabled), then click the "Save My Preferences" button.

Please note: If you visit us from a different device or browser, or clear cookies, then you need to return to this screen to re-select your preferences.

- Set the Global Privacy Control (GPC) for each participating browser system that you use to opt out of the use of third-party Advertising or other cookies (instructions on how to download and use GPC are available here).

12. Additional Notices and Contact Details

Updates and Amendments: We may update and amend this Privacy Policy from time to time by posting an amended version on our Services. The amended version will be effective as of the published date. We will provide prior notice if we believe any substantial changes are involved via any of the communication means available to us or via the Services. After such notice period, all amendments to this Privacy Policy shall be deemed accepted by you.

External Links: While our Services may contain links or integrations to other websites, social networks or services, we are not responsible for their privacy practices and encourage you to pay attention when you leave our Services for the website or services of such third parties, or interact with social network integrations. We recommend you read the privacy policies of each and every website and service you visit. This Privacy Policy only applies to our Services.

Children's Privacy: Our Services are not intended for use by children under the age of sixteen (16). We do not knowingly collect personal data from minors under the age of sixteen (16) and do not wish to do so. If we learn that a person who is underage according to the law applicable to them is using the Sites, we will attempt to prohibit and block such use and will make our best efforts to promptly delete any personal data stored with us with regard to such a child (except for data that must be retained for legal purposes). If you believe that we might have any such data, please contact us by e-mail at privacy@upwind.io.

Database Controller: For the purposes of Israel's Protection of Privacy Law, Upwind Security, Inc. serves as the "Database Controller" responsible for the personal data processed in connection with our Services and may be contacted at privacy@upwind.io**.**

Contacting Us: If you have any comments or questions about our data practices or this Privacy Policy or if you have any concerns regarding your personal data held with us, please contact us at privacy@upwind.io.

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