

# Chronicle Privacy Policy

*Updated December 23, 2019*

Chronicle LLC respects the privacy of our users and has developed this Privacy Policy to help explain who we are, how we collect, share and use personal data and other information that we may collect through our website at [www.chronicle.security](http://www.chronicle.security) ("Website") and in other contexts if and when we refer to this Privacy Policy. Our products have separate privacy terms and disclosures which are explained in our customer agreements.

This Privacy Policy also explains choices you can make to control how data is used and what choices you can make to exercise your privacy rights. Please read this Privacy Policy in full before using our Website or providing your information to us, but also feel free to contact us with questions about our privacy practices anytime, at [privacy@chronicle.security](mailto:privacy@chronicle.security).

We recommend that you read this Privacy Notice in full to ensure you are fully informed.

## What does Chronicle do?

Chronicle is an enterprise software company focused on the areas of security, information and analytics. Chronicle is headquartered in the United States with subsidiaries in Ireland and Spain. Our products and services provide our customers with information and tools to combat cybercrime.

## What information does Chronicle collect and why?

The information we may collect about you broadly falls into the following categories:

**Information that you provide voluntarily:** We may ask you to provide personal information voluntarily - for example, we may ask you to provide your contact details in order to obtain services or receive marketing from us, inquire about commercial or employment opportunities and/or to ask us questions or send us feedback. If you choose to provide personal information, the types of personal information you will be asked for and the reason we may ask for it will be made clear to you at the point of collection.

**Information that we automatically collect when you use our Website or interact with us online:** We may collect information about how our Website is used and to better understand our visitors including where they come from, and what content is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of products and services. Some of this information may be collected using cookies and similar tracking technology.

**Device information:** We may collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number).

**Log information:** We will collect and store certain information in server logs, such as details of how you

used the Website, your internet protocol address, device event information (such as crashes), system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL as well as cookies that may uniquely identify your browser.

**Location information** about your actual location using various technologies to determine location, including IP address.

**Local storage:** We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.

**Cookies and similar technologies:** We may use various technologies to collect and store information when you visit our Website, including using cookies or similar technologies to identify your browser or device. You may set your browser to block all cookies, including cookies associated with the Website, or to indicate when a cookie is being set by us.

## How do we use information that we collect?

We use information we collect to protect our users, to provide, maintain, protect and improve our Website, products and services, to recruit and hire talent, and to contact you with marketing, promotional materials and other personalized information that may be of interest to you in particular. We may use information you provide to us as well as information provided by third parties (where permitted) for this purpose.

When you contact us, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming events, changes or improvements. We may use information collected from cookies and other technologies to improve your user experience and the overall quality of our Website. We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

## Does Chronicle share information?

We may disclose information about you for the following reasons:

- to our subsidiaries, third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information;
- to comply with any applicable law, regulation, legal process or enforceable governmental request;
- to enforce applicable terms of service, including to investigate potential violations;
- to detect, prevent or otherwise address fraud, security or technical issues, protect against harm to our rights, property or safety or those of our users or the public to the extent required or permitted by applicable laws;

- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary to: meet any applicable law, regulation, legal process or enforceable governmental request; enforce applicable terms of service, including investigation of potential violations; detect, prevent or otherwise address fraud, security or technical issues; protect against harm to our rights, property or safety or those of our users, customers or the public, as required or permitted by law; to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy; and
- for any other reason with your consent or at your direction.

## How does Chronicle keep my personal information secure?

We use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

## International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective). Our servers are located in many countries around the world, and our subsidiaries and third-party service providers and partners operate globally.

This means that when we collect your personal information we may process it in any of these countries. However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy.

## Privacy Shield

As described in Chronicle's Privacy Shield certification, Chronicle complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, Switzerland and the United Kingdom to the United States in reliance on Privacy Shield. Chronicle has certified to the Department of Commerce that it adheres to the Privacy Shield Principles and is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission with respect to personal information received or transferred pursuant to the Privacy Shield Frameworks. In the event of a conflict between the terms of this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles govern.

Chronicle commits to resolve complaints about our collection or use of personal information received or transferred pursuant to the Privacy Shield Frameworks in compliance with the Privacy Shield Principles. Chronicle remains responsible for any of your personal information that is shared under the Onwards Transfer Principle with third parties for external processing on our behalf, as described above.

EU, Swiss and British individuals with inquiries or complaints regarding our use of personal information about them in conjunction with our obligations under the Privacy Shield Principles should contact us at [privacy@chronicle.security](mailto:privacy@chronicle.security). Chronicle has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU and Switzerland. You may also refer a complaint to your local data protection authority and we will work with them to resolve your concern. In certain circumstances, the Privacy Shield Framework provides the right to invoke binding arbitration to resolve complaints not resolved by other means, as described in Annex I to the Privacy Shield Principles.

To learn more about the Privacy Shield program and to view our certification, please visit the [Privacy Shield](#) site.

## EEA, Swiss and UK resident data protection rights

If you reside in the European Economic Area (“EEA”), Switzerland or the UK you have certain rights and protections related to the processing of your personal data. We may process your personal data to effectuate a contract, when we have a legitimate interest, to comply with legal requirements, or if you have consented to processing. If you are a resident of the EEA, Switzerland or the United Kingdom and wish to access, correct, update, restrict processing, request transfer, or request deletion of personal information we may hold about you, you can do so at any time by contacting us at [privacy@chronicle.security](mailto:privacy@chronicle.security).

## California Consumer Privacy Act (CCPA)

If the California Consumer Privacy Act (CCPA) applies to your information, we provide these disclosures and the contact information described in this Privacy Policy so you can exercise your rights to receive information about our data practices, as well as to request access to and deletion of your information. You can also read more about Chronicle’s data retention in the “Data Retention” section of this Privacy Policy.

Chronicle does not sell your personal information. We only share your information as described in the “Does Chronicle Share Information” section of this Privacy Policy. Chronicle processes your information for the purposes described in this Privacy Policy, which include “business purposes” under the CCPA. These purposes include:

- Protecting against security threats, abuse, and illegal activity. Chronicle may use and disclose information to detect, prevent and respond to security incidents, and to protect against other malicious, deceptive, fraudulent, or illegal activity. For example, to protect our services, Chronicle may receive or disclose information about IP addresses that malicious actors have compromised.
- Auditing and measurement. Chronicle may use information for analytics and measurement to understand how our services are used, and may use information to fulfill obligations to our partners.
- Maintaining our services. Chronicle may use information to ensure our services are working as intended, such as tracking outages or troubleshooting bugs and other issues that you report to

us.

- Research and development. Chronicle may use information to improve our services and to develop new products, features and technologies that benefit our users and the public.
- Use of service providers. Chronicle may share information with service providers to perform services on our behalf, in compliance with our Privacy Policy and other appropriate confidentiality and security measures. For example, we may rely on service providers to help provide customer support.

If you have additional questions or requests related to your rights under the CCPA, you can contact us at [privacy@chronicle.security](mailto:privacy@chronicle.security).

## 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 your personal information, we will either delete or anonymize 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.

## Updates to this Privacy Policy

We will update this Privacy Policy from time to time to reflect changes in our practices or services or in response to changing legal, technical or regulatory requirements. We recommend that you regularly visit the Website to remain familiar with the terms of this Privacy Policy. When we update this Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make and we will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

## How to contact us

If you have any questions or concerns about our use of your personal information or our privacy practices, please contact us at [privacy@chronicle.security](mailto:privacy@chronicle.security). If you reside in the EEA, Switzerland or the UK, if you have a concern about our processing of your personal information that we are unable to resolve, you have the right to lodge a complaint with your local data protection authority.