

## **Data Privacy Framework ("DPF") Program Notice**

*Effective: January 19, 2026.*

This DPF notice (“**Notice**”) governs IronScales Inc. (“**IronScales**”, “**We**” or “**Our**”) participation in the EU-U.S. DPF, UK-DPF extension to the EU-U.S. DPF and the Swiss-U.S. DPF programs with respect to the Processing of Personal Data as further explained in Section 1 below.

If there is any conflict between the terms in this Notice and the DPF principles, the DPF principles shall govern. To learn more about the DPF and its principles please visit <https://www.dataprivacyframework.gov/>.

**“Personal Data”** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. **“Process”**, **“Processing”** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **1. SCOPE.**

IronScales' participation in the DPF applies to Personal Data that is subject to the EU, UK and Swiss data protection laws that IronScales receives and processes in the context of the provision of IronScales' Services (as defined below) including, from customers, IronScales' affiliates or other third parties.

### **2. PURPOSES OF DATA PROCESSING.**

#### **Non HR Data**

IronScales complies with the principles of the EU-U.S. DPF, EU-U.S. DPF, UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF regarding the collection, use, and retention of Personal Data transferred to the United States from the European Union, United Kingdom, and Switzerland. Our DPF program covers transfers of Personal Data in the following cases: (i) to provide IronScales' services; (ii) for IronScales' customers to be able to use IronScales' services; (iii) to comply with other documented reasonable instructions provided IronScales' customers (the “Service”); and/or (iv) to assess an individual as a candidate, and once said candidates are an employee for compensation, payroll, and benefit planning and administration, internal investigations, auditing, compliance, risk management and security purposes, employee communications and as required or expressly authorized by laws or regulations applicable to IronScales' business or by government agencies that oversee or regulate our business. The categories of Personal Data collected and Processed by IronScales, include, without limitation: Full name; username / log-in details; email address; title / job position; IP address; User ID (random number generated by the Services); handling orders; delivering products and services (including the communications/emails); communicating with customers, users, vendors, and sellers about orders, products and services; and/or any other Personal Data or information that the IronScales' customers provide or instruct IronScales to Process in the context of IronScales' Services. The data subjects are customer and/or clients, vendors employees, agents, advisors, freelancers of customer and/or their vendors, service providers or partners. IronScales has certified to the DoC that it adheres to the DPF Principles and Our DPF certification is available [here](#).

#### **HR Data**

IronScales may receive information from IRONSCALES Global Limited concerning employees, consultants and other freelancers located in the EU and/or UK. The purposes for which IronScales collects and uses such Personal Data is to assess an individual as a candidate, and once you are an employee for compensation, payroll, and benefit planning and administration (e.g. salary, tax withholding, tax equalization, awards, insurance and pension), workforce development, education, training, performance management, problem resolution (e.g., internal reviews, grievances), internal investigations, auditing, compliance, risk management and security purposes, employee communications and as required or expressly authorized by laws or regulations applicable to IronScales' business or by government agencies that oversee or regulate our business. Employee Personal Data may be shared with various third parties and third-party agents in the normal course of business. As an employee of IRONSCALES Global Limited, you may have rights to access and/or limit disclosures of certain types of personal data. For any questions directly related to this please contact us at [privacy@ironscales.com](mailto:privacy@ironscales.com).

### **3. ONWARD TRANSFERS OF PERSONAL DATA.**

3.1. Subject to Section 5 below, We will not transfer Personal Data originating in the EU, UK and/or Switzerland to third parties unless such third parties have entered into an agreement in writing with us requiring them to provide at least the same level of protection to the Personal Data as required by the Principles of the EU-U.S. DPF, UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF and/or applicable law. We may transfer Personal Data to processors, service providers, vendors, contractors, partners and agents (collectively "Processors") who need the information in order to provide services to or perform activities on Our behalf. We are potentially liable for such onward transfers to third pursuant to the EU-U.S. DPF, UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF. In addition, we may disclose or allow government and law enforcement officials access to Personal Data, in response to a subpoena, search warrant, or court order (or similar requirement), or in compliance with applicable laws and regulations, and/or if We believe in good faith that this will help protect the rights, property or personal safety of IronScales, any of our partners, customers (including, their administrators and/or users), or any member of the general public. We may share your Personal Data internally within our group of companies, when they have a need to know.

3.2. The abovementioned Processors and the description of the services that they provide and/or the activities that they perform are set out on the table below and in our Subprocessors list available [here](#):

Processor's Purpose
Cloud service providers
Anti malware sub-processors
Cloud Hosting
Sales, sales management and Customer Success
Digital Signature
Marketing automation
Video conference
Team communication
Email and productivity tools, file hosting and file sharing, CRM
Web Analytics and monitoring
Customer success and support
Artificial tools and services

3.3. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other public or governmental agencies, or if required to do so by court order (including to meet national security or law enforcement requirement);

3.4. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your Personal Data to such third party (whether actual or potential) in connection with the foregoing events;

3.5. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your Personal Data in connection with the foregoing events, including, in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company; and/or

3.6. Where you have provided your consent to us sharing or transferring your Personal Data.

4. **RIGHT TO ACCESS, CHANGE OR DELETE PERSONAL DATA.** You have the right to access Personal Data about you, and in some cases, you are also allowed to correct, amend, or delete that Personal Data where it is inaccurate, or has been processed in violation of the DPF principles. In addition, you have the choice to limit the use and disclosure of your Personal Data. If you believe that We are Processing your Personal Data within the scope of Our DPF program, you can submit your request to: [privacy@ironscales.com](mailto:privacy@ironscales.com). Please be aware that in specific situations where fulfilling access or other requests might impose a disproportionate burden or expense, or potentially infringe upon the rights of others, we may be required to carefully review and, if permissible under applicable law, respectfully decline your request.

5. **REQUIREMENT TO DISCLOSE.**

IronScales may be required in certain circumstances to disclose Personal Data in response to lawful requests by courts or public authorities, including to meet national security or law enforcement requirement.

## **6. INDEPENDENT RECOURSE MECHANISM.**

In compliance with the DPF principles, We are committed to resolve complaints about Our collection or use of your Personal Data. EU, UK and Swiss individuals with inquiries or complaints regarding Our DPF policy should first contact IronScales at: [privacy@ironscales.com](mailto:privacy@ironscales.com) or by postal mail sent to: IronScales Inc, Attn: Privacy Department; 6 Concourse Parkway, Atlanta GA 30328 , USA.

- 6.1. **Non-HR Data:** IronScales has further committed to refer unresolved privacy complaints under the EU-U.S. DPF, UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to ICDR/AAA, an alternative dispute resolution provider located in the United States to assist with the complaint resolution process. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit ICDR-AAA's [https://go.adr.org/dpf\\_irm.html](https://go.adr.org/dpf_irm.html) for more information and to file a complaint. The services of ICDR/AAA are provided at no cost to you.
- 6.2. **HR Data:** In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, IronScales commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF in the context of the employment relationship.

## **7. U.S. FEDERAL TRADE COMMISSION ENFORCEMENT.**

IronScales is subject to the investigatory and enforcement powers of the Federal Trade Commission ("FTC") to ensure compliance with the EU-US DPF, UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF outlined in this DPF Notice.

## **8. ARBITRATION.**

- 8.1. Under certain conditions, more fully described on the DPF website (available [here](#)), you may also be able to invoke binding arbitration to determine whether a participating organization has violated its obligations under the DPF principles as to that individual and whether any such violation remains fully or partially unremedied ("residual claims") after you approached us and you used the independent recourse mechanism. The International Centre for Dispute Resolution-American Arbitration Association ("ICDR-AAA") was selected by the U.S. Department of Commerce to administer arbitrations pursuant to and manage the arbitral fund. Please visit ICDR-AAA's [website](#) for more information.