PRIVACY POLICY

Last updated October 24, 2025

This privacy notice for Patronus Technologies LTD ('**Company**', '**we**', '**us**', or '**our**'), describes how and why we might collect, store, use, and/or share ('**process**') your information when you use our services ('**Services**'), such as when you:

- Visit our website at http://www.patronus-safeguarding.com, our web application at https://app.patronus-safeguarding.com or any website of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns?
Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at hello@patronus-safeguarding.com.

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics in the relevant section.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Patronus Technologies LTD and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law.

Do we receive any information from third parties? We may receive information from public databases, marketing partners, social media platforms, and other outside sources.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply

with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

In what situations and with which parties do we share personal information? We may share information in specific situations when required by law and with specific third parties.

How do we keep your information safe? We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by emailing us at hello@patronus-safeguarding.com. We will consider and act upon any request in accordance with applicable data protection laws.

TABLE OF CONTENTS

1. WHAT INFORMATION DO WE COLLECT?
2. HOW DO WE PROCESS YOUR INFORMATION?
3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?
4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?
5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?
6. HOW LONG DO WE KEEP YOUR INFORMATION?
7. HOW DO WE KEEP YOUR INFORMATION SAFE?
8. WHAT ARE YOUR PRIVACY RIGHTS?
9. CONTROLS FOR DO-NOT-TRACK FEATURES
10. DO WE MAKE UPDATES TO THIS NOTICE?
11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?
12. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short:*We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- mailing addresses
- job titles
- usernames
- passwords
- contact preferences
- contact or authentication data
- billing addresses

Sensitive Information. When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- data about a person's sex life or sexual orientation
- information revealing race or ethnic origin
- information revealing political opinions
- information revealing religious or philosophical beliefs

Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is stored by Stripe. You may find their privacy notice link(s) here: https://stripe.com/gb/privacy.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short:*Some information - such as your Internet Protocol (IP) address and/or browser and device characteristics - is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services(such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).

Information collected from other sources

In Short:*We may collect limited data from public databases, marketing partners, and other outside sources.*

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers,and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers,

intent data (or user behaviour data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short:*We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.**We may process your information so you can create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate delivery of services to the user.**We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.**We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.**We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfil and manage your orders.** We may process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.
- **To enable user-to-user communications.**We may process your information if you choose to use any of our offerings that allow for communication with another user.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.
- **Incident Reporting .**Our platform facilitates safeguarding and incident reporting, which may involve processing personal data related to safeguarding concerns, incidents, investigations, or follow-up actions. The data processed may include personal information of individuals involved, details of the incident, supporting evidence, and any follow-up actions taken. Sensitive information, such as data

revealing health, sexual orientation, or other protected characteristics, will be processed only when necessary to fulfill the purpose of safeguarding and will be subject to enhanced security measures. We ensure that such information is handled in accordance with applicable data protection laws and stored securely to prevent unauthorised access.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short:*We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.*

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.**We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

In legal terms, we are generally the 'data processor' under European data protection laws of the personal information described in this privacy notice. The customer that we

provide services to and with whom we have entered into a data processing agreement is the 'data controller' responsible for your personal information, and we merely process your information on their behalf in accordance with your instructions. If you want to know more about our customers' privacy practices, you should read their privacy policies and direct any questions you have to them.

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short:*We may share information in specific situations described in this section and/or with the following third parties.*

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short:*We may use cookies and other tracking technologies to collect and store your information.*

We use cookies to enhance your experience on our platform, analyse site usage, and improve our services. Cookies are small text files stored on your device that help us remember preferences, understand user interactions, and deliver relevant content. You can control cookie settings through your browser, and by continuing to use our site, you consent to their use.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short:*We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than three (3) months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, 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.

We regularly review the retention periods of sensitive personal data. Sensitive data will be securely deleted or anonymised as soon as the purpose of collection is fulfilled, subject to any legal retention requirements. In most cases, sensitive data will be retained for no longer than **six months** following the termination of a user's account unless otherwise legally required.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short:*We aim to protect your personal information through a system of organisational and technical security measures.*

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

We aim to protect your personal information through a system of organisational and technical security measures. However, in the event of a **data breach** involving your personal information, we will notify affected users and any applicable data protection authorities in compliance with legal obligations. We will provide details on the nature of

the breach, the impact on your personal data, and any recommended actions to mitigate risks.

8. WHAT ARE YOUR PRIVACY RIGHTS?

In Short:In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information.You may review, change, or terminate your account at any time.

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority orUK data protection authority.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications:You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe

link in the emails that we send, or by contacting us using the details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below. You will then be removed from the marketing lists. However, we may still communicate with you - for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

We handle sensitive personal data in compliance with applicable data protection laws and only when necessary to fulfill a specific purpose (e.g., safeguarding assessments, compliance obligations). Sensitive information will be retained only for as long as necessary to fulfill the purpose for which it was collected. When no longer needed, we will securely delete or anonymise this data to ensure continued protection.

If you wish to limit the processing of sensitive personal data, you can exercise this right by contacting us at hello@patronus-safeguarding.com.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- **Contact us using the contact information provided.**

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. You may also opt out of interest-based advertising by advertisers on our Services.

If you have questions or comments about your privacy rights, you may email us at hello@patronus-safeguarding.com.

9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

10. DO WE MAKE UPDATES TO THIS NOTICE?

In Short:Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO) , Martin Chapman,by email at martinchapman@patronus-safeguardig.com, by phone at 07973877117,or by post to:

Patronus Technologies LTD
Martin Chapman
Westgate House
Rochford, Essex SS41BE
United Kingdom

If you are a resident in the United Kingdom, the 'data controller' of your personal information is Patronus Technologies LTD. Patronus Technologies LTD has appointed Martin Chapman to be its representative in the UK. You can contact them directly regarding the processing of your information by Patronus Technologies LTD, by email at martinchapman@patronus-safeguarding.com, by phone at 07973877117, or by post to:

Westgate House
27-29 West Street
Rochford,EssexSS41BE
England

12. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

You have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please email hello@patronus-safeguarding.com

13. Security Accreditations

Patronus Safeguarding takes our cyber security responsibilities incredibly seriously. We have achieved both Cyber Essentials and ISO 27001 accreditation. Links to both of these certificates can be found below.

Cyber Essentials
https://registry.blockmarktech.com/certificates/169cee62-7cac-40c5-a659-6876708b24a8/?source=WEB

ISO 27001
https://uk.connect.amtivo.com/cert/amtivocert10002.asp?c=269205&v=k4qn4ck268&e=23508