



# Privacy Policy

Last Updated: **10/30/2023**

Policy Contact: **Michael Kanet**

Manual: **Information Technology**

Company: **ITernal Networks**

## 1: Purpose

ITernal Networks values the privacy of our associates, partners, and clients. This privacy policy explains how we collect, use, and disclose information we receive through our cybersecurity services and web portal.

## 2: Assigned Responsibility

Senior management of ITernal Networks is responsible to enforce this policy and evaluate its effectiveness periodically. Any user (agent, employee, third-party affiliate, or subsidiary) of ITernal Networks is responsible to review, acknowledge, and comply with this Privacy Policy prior to accessing any sensitive or confidential information.

## 3: Information Collection and Use

When you create an account or purchase our services, we collect personal information, such as name, email address, and payment information. We also collect information related to your use of our services, including but not limited to data from the devices and networks you analyze with our services. The information we collect is used to provide, improve, and maintain our cybersecurity services, process payments, and communicate with you. This policy is managed using technical controls, employee privacy awareness training, and disciplinary action.

## 4: Data Storage and Security

We store all sensitive information on servers located within the United States of America. We take appropriate security measures to protect against unauthorized access, alteration, disclosure, or destruction of the information we collect and store.

## 5: Information Sharing and Disclosure

We do not sell, trade, or otherwise transfer your personal information to outside parties.

### 5.1:

We may disclose information to third parties in the following circumstances:

- With your consent
- To comply with legal requirements, such as a court order or subpoena
- To protect our rights and property

## **6: Changes to this Privacy Policy**

This Privacy Policy will be reviewed periodically and updated as part of a continuous improvement cycle to reflect changes in our privacy practices.

## **7: Notifications**

If we make any material changes to this Privacy Policy, we will notify you through our website or through other means. We will enforce this policy internally through the implementation of a Data Disclosure Policy and require all employees to read and sign acknowledgement of that policy prior to having access to your data. We will require all our employees to update their privacy skills each year, and we will evaluate our privacy training program each year to make it better and better.