



# Privacy Policy

SMBvCISO.com

Effective date: 25th day of June, 2025

Type of website: Business

SMBvCISO.com (the "Site") is owned and operated by SMBvCISO, LLC who is the data controller.

## Contact Information

If you have privacy questions, concerns, or complaints, contact us at:

### Data Protection Officer

Terry G. Raitt

### Mail

SMBVCISO, LLC  
600 INDEPENDENCE PKWY, #3419  
PLANO, TX 75075

### Email

vCISO@SMBvCISO.com

### Phone

1-469-996-4111

## Purpose

The purpose of this privacy policy (this "Privacy Policy") is to inform users of our Site and services of i) the personal data we will collect; ii) use of collected data; iii) who has access to the data collected; iv) the rights of Site and services users; and v) the Site's cookie policy.

This Privacy Policy applies in addition to the terms and conditions of our Site.

## GDPR

For users in the European Union, we adhere to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (the "GDPR"). For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018.

We have appointed a Data Protection Officer under Article 37 of the GDPR as listed in the *Contact Information* section above.





## Consent

By using our Site or services, users agree that they consent to the conditions set out in this Privacy Policy.

When the legal basis for us processing your personal data is that you have provided your consent to that processing, you may withdraw your consent at any time. If you withdraw your consent, it will not make processing which we completed before you withdrew your consent unlawful.

You can withdraw your consent by contacting the Data Protection Officer listed in the *Contact Information* section above.

## Legal Basis for Processing

We collect and process personal data about users in the EU only when we have a legal basis for doing so under Article 6 of the GDPR.

We rely on users having provided their consent to the processing of their data for one or more specific purposes as the legal basis to collect and process the personal data of users in the EU.

## Personal Data We Collect

We only collect data that helps us achieve the purpose set out in this Privacy Policy. We will not collect any additional data beyond the data listed below without notifying you first.

### Data Collected Automatically

When you visit and use our Site, we may automatically collect and store your i) IP address; ii) location; iii) hardware and software details; iv) clicked links; and v) content viewed.

### Data Collected in a Non-Automatic Way

When you use the chat widget on our Site (the “Chat Widget”), we may also collect your i) first and last name; and ii) email address.

When you, or we on your behalf, book meetings through outlook.office365.com links on our Site or elsewhere (the “Bookings App”), we may collect your i) first and last name; ii) email address; iii) address including street address, city, state, and zip code; iv) phone number; and vi) notes you provide.

When you contact us through our LinkedIn Company Page at linkedin.com/company/smbvciso (the “Company Page”), we may collect your i) email address; ii) first and last name; iii) job title; and iv) company name.

## How We Use Personal Data

Data collected through our Site, Chat Widget, Bookings App, and Company Page will only be used for the purposes specified in this Privacy Policy or indicated on the relevant pages of our Site. We will not use your data beyond what we disclose in this Privacy Policy.

The data we collect automatically is used for statistics.



The data we collect when you use the Chat Widget, Bookings App, or Company Page is used for communication.

## Who We Share Personal Data With

### Employees

We may disclose user data to any member of our organization who reasonably needs access to user data to achieve the purposes set out in this Privacy Policy.

### Other Disclosures

We will not sell or share your data with other third parties, except i) if the law requires it; ii) if it is required for any legal proceeding; iii) to prove or protect our legal rights; and iv) to buyers or potential buyers of this company in the event that we seek to sell the company.

If you follow hyperlinks from our Site to a third-party website, note that we are not responsible for and have no control over the third-party website's privacy policies and practices.

## How Long We Store Personal Data

User data will be stored until the purpose the data was collected for has been achieved.

You will be notified if your data is kept for longer than this period.

## How We Protect Your Personal Data

In order to protect your security, we use the strongest available browser encryption and store all of our data on servers in secure facilities. All data is only accessible to our employees. Our employees are bound by strict confidentiality agreements and a breach of this agreement would result in the employee's termination.

While we take all reasonable precautions to ensure that user data is secure and that users are protected, there always remains the risk of harm. The Internet can be insecure at times and, therefore, we are unable to guarantee the security of user data beyond what is reasonably practical.

## International Data Transfers

We transfer user personal data to the United States.

When we transfer user personal data, we will protect that data as described in this Privacy Policy and comply with applicable legal requirements for transferring personal data internationally.

If you are located in the United Kingdom or the European Union, we will only transfer your personal data if i) the country your personal data is being transferred to has been deemed to have adequate data protection by the European Commission or, if you are in the United Kingdom, by the United Kingdom adequacy regulations; or ii) we have implemented appropriate safeguards in respect of the transfer. For example, the recipient is a party to binding corporate rules, or we have entered into standard EU or United Kingdom data protection contractual clauses with the recipient.





## Your Rights as a User

Under the GDPR, you have the right i) to be informed; ii) of access; iii) to rectification; iv) to erasure; v) to restrict processing; vi) to data portability; and vii) to object.

## Children

We do not knowingly collect or use personal data from children under 16 years of age. If we learn that we have collected personal data from a child under 16 years of age, the personal data will be deleted as soon as possible. If a child under 16 years of age has provided us with personal data, their parent or guardian may contact us as specified in the *Contact Information* section.

## How to Access, Modify, Delete, or Challenge the Data Collected

If you would like to know i) if we have collected your personal data; ii) how we have used your personal data; iii) if we have disclosed your personal data; or iv) to whom we disclosed your personal data; or you would like v) your data to be deleted or modified in any way; or vi) to exercise any of your other rights under the GDPR, contact our Data Protection Officer listed in the *Contact Information* section above.

## Do Not Track Notice

Do Not Track ("DNT") is a privacy preference that you can set in certain web browsers. We do not track the users of our Site over time and across third-party websites and, therefore, do not respond to browser-initiated DNT signals.

## How to Opt-Out of Data Collection, Use or Disclosure

In addition to the method described in the *How to Access, Modify, Delete, or Challenge the Data Collected* section, you can opt-out of the collection, use, or disclosure of your personal data for marketing emails by clicking "unsubscribe" on the bottom of any marketing email.

## Cookie Policy

A cookie is a piece of state (i.e., condition) information supplied by a web server to a browser, in a response for a requested resource, for the browser to store temporarily and return to the server on any subsequent visits or requests.

Our Site may use i) functional cookies to remember the selections you make on our Site so that your selections are saved for your next visit; and ii) analytical cookies to analyze website traffic and optimize your website experience through improved Site design and functionality.

By accepting our use of cookies, your data will be aggregated with all other user data.

You can enable, disable, or selectively control cookies in your web browser.

## Modifications

This Privacy Policy may be amended from time to time in order to maintain compliance with the law and to reflect any changes to our data collection process. When we amend this Privacy Policy, we will update the "Effective Date" at the top of this Privacy Policy. We recommend that our users periodically review





our Privacy Policy to ensure that they are notified of any updates. If necessary, we may notify users by email of changes to this Privacy Policy.

## Complaints

If you have any complaints about how we process your personal data, contact us as specified in the *Contact Information* section so that we can, where possible, resolve the issue. If you feel we have not addressed your concern in a satisfactory manner, you may contact a supervisory authority. You also have the right to directly make a complaint to a supervisory authority. You can lodge a complaint with a supervisory authority by contacting the Federal Trade Commission (the "FTC").

