



Panop Privacy Policy

Panop SA, Chemin du Château 4B, 1023 Crissier

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This privacy policy ("Privacy Policy") governs how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services") provided by Panop SA, Chemin du Château 4B, 1023 Crissier, Switzerland ("Panop").

This Privacy Policy is relevant in these cases, such as when you:

- Visit and use our website <https://panop.io/>, the Cockpit, or any other service or application of ours that links to this Privacy Policy
- Order, subscribe to, or use our security services, including attack surface assessments, monitoring, and scans
- Engage with us in other related ways, including any sales, marketing, or events

Reading this Privacy Policy 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 info@panop.io.

Summary of Key Points

This summary provides key points from our Privacy Policy, but you can find out more details about any of these topics in the corresponding section below.

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 Panop and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We do not process sensitive personal information.

Do we receive any information from third parties? We do not receive any information from third parties.

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 and with specific third parties, in particular the sub-processors we engage to operate our business and deliver the Services.

How do we keep your information safe? We have organizational 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 unauthorized 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 contacting us at dpo@panop.io. We will consider and act upon any request in accordance with applicable data protection laws.

1. What information do we collect?

Personal information you disclose to us

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

We may collect personal information that you voluntarily provide to us when you interact with Panop and the Services, 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
- email addresses
- contact data
- authentication data (where applicable)

Sensitive information

We do not process sensitive information.

Payment data

No Service has been designed to process payment data.

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.

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), and device event information (such as system activity, error reports, and hardware settings).
- **Device data.** We collect device data such as information about the device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

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 administer the Services.** We may process your information to provide the Services you have subscribed to, including attack surface assessments, monitoring, and scans, and to manage the Zones and Assets you add in the Cockpit.
- **To respond to your enquiries and provide support.** We may process your information to respond to your requests and to provide the support included in your Plan.
- **For security and fraud prevention.** We may process your information to keep the Services secure, to monitor for and prevent fraud, and to investigate suspected misuse of the Services.

- **To comply with our legal obligations.** We may process your information where necessary to comply with applicable law or to exercise or defend our legal rights.

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 Switzerland, the EU, or the UK, this section applies to you.

The Swiss Federal Act on Data Protection (FADP), the General Data Protection Regulation (GDPR), and the 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 where it is necessary to provide the Services you have ordered or to otherwise perform our agreement with you.
- **Legitimate interests.** We may process your information where it is necessary for our legitimate business interests, such as securing and improving the Services, provided your rights and freedoms do not override those interests.
- **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.

4. When and with whom do we share your personal information?

In Short: We may share your personal information with the sub-processors we engage to run our business and to provide the Services.

Panop uses certain sub-processors in the general running of its business and to assist it in providing its Services to its customers. A sub-processor is a third-party service provider or data processor engaged by Panop, who has or potentially will have access to or process personal data. Panop engages different types of sub-processors to perform various functions. The latest

version of the list of sub-processors can be found at <https://panop.io/legal/sub-processors>, or is available from us on request.

We may also disclose your personal information where we are required to do so by law, or where disclosure is necessary to exercise or defend our legal rights.

5. Is your information transferred internationally?

In Short: We may transfer, store, and process your information in countries other than your own.

Our servers and those of our sub-processors are located in Switzerland and in the European Union. If you are accessing our Services from outside Switzerland or the European Economic Area (EEA), please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "When and with whom do we share your personal information?" above), in Switzerland, the European Union, the United Kingdom, and the United States. If you are a resident in the EEA or the United Kingdom, these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this Privacy Policy and applicable law.

European Commission's Standard Contractual Clauses

We have implemented measures to protect your personal information, including by using the European Commission's Standard Contractual Clauses for transfers of personal information between us and our third-party providers. These clauses require all recipients to protect all personal information that they process originating from the EEA, the United Kingdom, or Switzerland in accordance with European and Swiss data protection laws and regulations. Our data processing agreements that include Standard Contractual Clauses are available at <https://panop.io/legal>. We have implemented similar appropriate safeguards with our third-party service providers and partners, and further details can be provided upon request.

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 Policy 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 Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this Privacy Policy will require us keeping your personal information for longer than fourteen (14) days past the termination of the contract for the Services.

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

7. How do we keep your information safe?

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

We have implemented appropriate and reasonable technical and organizational 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 unauthorized 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.

8. Do we collect information from minors?

In Short: We do not knowingly collect data from or market to children under 18 years of age. We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at dpo@panop.io.

9. What are your privacy rights?

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

In some regions (like Switzerland, the EEA, and the 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 using the contact details provided in the section "How can you contact us about this Privacy Policy?" below.

We will consider and act upon any request in accordance with applicable data protection laws. If you are located in the EEA or the UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are located in Switzerland, the contact details for the data protection authority are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

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 using the contact details provided in the section "How can you contact us about this Privacy Policy?" 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.

Account information

For the personal data we collect, refer to the list set out in the section "Personal information provided by you" above. If you would at any time like to review or change the information in your account or terminate your account, you can:

- Where it applies, log in to your account settings and update your user account.
- Contact us using the contact information provided below.

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.

If you have questions or comments about your privacy rights, you may email us at dpo@panop.io.

10. Do we make updates to this Privacy Policy?

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

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated version number and date, and the updated version will be effective as soon as it is accessible. If we make material changes to this Privacy Policy, 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 Policy frequently to be informed of how we are protecting your information.

11. How can you contact us about this Privacy Policy?

If you have questions or comments about this Privacy Policy, you may contact our Data Protection Officer by email at dpo@panop.io, or by post to:

Panop SA
Data Protection Officer

Chemin du Château 4B
1023 Crissier
Switzerland

12. How can you review, update, or delete the data we collect from you?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please send a request to dpo@panop.io.

Notice and disclaimer: This document is subject to change at any time. Revised: 23 August 2026.

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