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## PICKLE WORKS PRIVACY POLICY

**Effective Date: November 10, 2025**

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### 1. INTRODUCTION

Pickle Works ("we," "our," or "us") is committed to protecting the privacy and security of your personal information. As a Managed Service Provider (MSP) and Managed Security Service Provider (MSSP) serving small businesses and professional practices, particularly in the financial services sector, we understand the critical importance of data privacy and security.

This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website, use our services, or interact with us. We comply with all applicable data protection laws, including GDPR, CCPA, and financial services regulations including SEC and FINRA requirements.

**Your Privacy Rights:** You have the right to understand how your data is collected and used, access your personal information, request corrections or deletion, and control how your information is shared.

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### 2. INFORMATION WE COLLECT

#### 2.1 Information You Provide Directly

**Contact Information:** - Full name - Email address - Phone number - Company name and job title - Business address - Broker/dealer platform information

**Account Information** (for service clients): - Username and password - Security questions and answers - Payment and billing information - Tax identification numbers (for invoicing purposes)

**Service Request Information:** - Support ticket details - Problem descriptions - System configuration information - Communication preferences

**Communications:** - Emails, phone calls, and chat messages - Feedback and survey responses - Consultation notes and meeting records

## **2.2 Information Collected Automatically**

**Website Usage Data:** - IP address and device identifiers - Browser type and version - Operating system information - Pages visited and time spent - Referring website or application - Click patterns and navigation paths

**Technical System Data** (when providing MSP/MSSP services): - Network configuration and topology - System logs and event data - Security monitoring data - Performance metrics - Software and hardware inventory - Vulnerability scan results - Backup and recovery logs

**Cookies and Tracking Technologies:** - Session cookies for functionality - Analytics cookies for usage analysis - Preference cookies for settings - Security cookies for authentication

## **2.3 Information from Third Parties**

**Business Partners:** - Broker/dealer platform providers (with your authorization) - Technology vendors and integrators - Professional references and referrals

**Public Sources:** - Business directories and registrations - FINRA BrokerCheck and SEC databases (for compliance verification) - Professional social media profiles (LinkedIn)

**Service Providers:** - Payment processors - Email service providers - CRM and marketing platforms

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## **3. HOW WE USE YOUR INFORMATION**

### **3.1 Service Delivery**

**MSP/MSSP Services:** - Provide technology support and managed services - Monitor and maintain your IT infrastructure - Implement security measures and threat detection - Perform system backups and disaster recovery - Manage software updates and patches - Respond to support tickets and incidents

**Platform Integration:** - Configure and optimize broker/dealer platforms - Integrate third-party applications and tools - Provide technical training and documentation - Troubleshoot platform-specific issues

**Security and Compliance:** - Conduct security assessments and audits - Monitor for security threats and vulnerabilities - Implement and maintain security controls - Assist with regulatory compliance requirements - Generate compliance reports and documentation

### 3.2 Business Operations

**Communication:** - Respond to inquiries and requests - Send service notifications and alerts - Provide technical support and assistance - Deliver educational content and updates - Conduct customer satisfaction surveys

**Account Management:** - Create and maintain client accounts - Process billing and payments - Manage service agreements and contracts - Track service usage and performance - Handle renewals and upgrades

**Marketing and Sales:** - Provide information about our services - Send newsletters and promotional materials (with consent) - Conduct market research and analysis - Personalize your experience on our website - Analyze marketing campaign effectiveness

### 3.3 Legal and Regulatory Compliance

**Compliance Requirements:** - Meet SEC and FINRA obligations - Comply with GDPR, CCPA, and other privacy laws - Respond to legal processes and government requests - Maintain required records and documentation - Report security incidents as required by law

**Risk Management:** - Detect and prevent fraud and abuse - Investigate security incidents and breaches - Enforce our Terms of Service - Protect our rights and property - Ensure system and network security

### 3.4 Improvement and Innovation

**Service Enhancement:** - Analyze usage patterns and trends - Identify service improvements and optimizations - Develop new features and capabilities - Test and evaluate new technologies - Conduct quality assurance activities

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## 4. HOW WE SHARE YOUR INFORMATION

### 4.1 We Do NOT Sell Your Data

**Absolute Commitment:** Pickle Works never sells, rents, or trades your personal or business information to third parties for marketing purposes. Your data is not a commodity.

### 4.2 Service Providers and Partners

We share information with trusted third parties who assist in our operations, subject to strict confidentiality obligations:

**Technology Vendors:** - Cloud infrastructure providers (AWS, Azure, Google Cloud) - Security software providers - Monitoring and management tool vendors - Backup and disaster recovery services

**Professional Services:** - Legal counsel and compliance advisors - Accounting and financial services - Insurance providers - Business consultants

**Platform Providers:** - Broker/dealer platform vendors (with your authorization) - Financial services technology partners - Integration and API service providers

**All third parties are contractually required to:** - Use your data only for specified purposes - Maintain appropriate security measures - Comply with applicable privacy laws - Not disclose your data to others without authorization

### 4.3 Business Transfers

In the event of a merger, acquisition, reorganization, or sale of assets, your information may be transferred as part of that transaction. We will notify you via email and/or prominent notice on our website before your information is transferred and becomes subject to a different privacy policy.

### 4.4 Legal Requirements

We may disclose your information when required by law or in good faith belief that such action is necessary to:

- Comply with legal process (subpoenas, court orders, warrants)
- Enforce our Terms of Service and other agreements
- Respond to claims of rights violations
- Protect the rights, property, or safety of Pickle Works, our clients, or the public
- Detect, prevent, or address fraud, security, or technical issues
- Meet regulatory reporting and examination requirements

### 4.5 With Your Consent

We may share your information for purposes not described in this policy when we have your explicit consent.

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## 5. DATA SECURITY

### 5.1 Technical Security Measures

**Encryption:** - TLS 1.3 for data in transit - AES-256 encryption for data at rest - End-to-end encryption for sensitive communications - Encrypted backups and disaster recovery systems

**Access Controls:** - Multi-factor authentication (MFA) - Role-based access control (RBAC) - Principle of least privilege - Regular access reviews and audits - Secure password policies

**Network Security:** - Firewalls and intrusion detection/prevention systems - Network segmentation and isolation - VPN and secure remote access - DDoS protection and mitigation - Regular security patching and updates

**Monitoring and Detection:** - 24/7 security monitoring during business hours - Threat detection and alerting systems - Security information and event management (SIEM) - Vulnerability scanning and assessment - Penetration testing (annually)

### 5.2 Organizational Security Measures

**Policies and Procedures:** - Information security policy framework - Incident response and breach notification procedures - Business continuity and disaster recovery plans - Data retention and disposal policies - Vendor security assessment processes

**Personnel Security:** - Background checks for employees with data access - Security awareness training (quarterly) - Confidentiality and non-disclosure agreements - Termination procedures for access removal - Separation of duties and dual control

**Physical Security:** - Secure data center facilities - Restricted access to equipment and systems - Environmental controls and monitoring - Secure disposal of hardware and media - Video surveillance and access logs

### 5.3 Certifications and Compliance

**Current Certifications:** - Industry-standard security controls - Regular security assessments and audits - FINRA-compliant technology controls - SEC Rule 206(4)-2 (Books and Records) compliance

**Regular Assessments:** - Annual third-party security audits - Quarterly vulnerability assessments - Continuous compliance monitoring - Risk assessments and threat modeling - Security control effectiveness reviews

### 5.4 Data Breach Response

In the event of a data breach, we will:

1. **Immediate Response:** Contain the breach and assess the scope
2. **Investigation:** Determine what data was affected and how
3. **Notification:** Notify affected individuals within 72 hours (or as required by law)
4. **Remediation:** Implement measures to prevent future breaches
5. **Regulatory Reporting:** Notify appropriate regulatory authorities as required

**You will be notified via:** - Direct email to your registered address - Prominent notice on our website - Phone call for critical breaches - Written notice if email is unavailable

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## 6. DATA RETENTION

### 6.1 Retention Periods

**Active Client Data:** - Retained for the duration of the service relationship - Plus minimum retention periods required by law or regulation

**Former Client Data:** - Financial records: 7 years (IRS requirement) - Service records: 6 years (SEC Rule 206(4)-2) - Communication records: 3 years (FINRA requirement) - Security logs: 1 year minimum

**Marketing Data:** - Contact information: Until opt-out or 2 years of inactivity - Website analytics: 26 months (GDPR standard) - Cookie data: 13 months maximum

### 6.2 Deletion and Anonymization

**Secure Deletion:** - Data is securely deleted when no longer needed - Physical media is destroyed or degaussed - Cloud data is cryptographically erased - Deletion is verified and documented

**Anonymization:** - Aggregate data may be retained indefinitely - Personal identifiers are removed - Re-identification is not reasonably possible - Used for analytics and service improvement

## 6.3 Exceptions to Deletion

Data may be retained longer when: - Required by law or regulation - Necessary for legal proceedings or investigations - Needed to enforce agreements or resolve disputes - Required for backup and disaster recovery (90-day retention) - You have provided consent for extended retention

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## 7. YOUR PRIVACY RIGHTS

### 7.1 Universal Rights (All Users)

**Right to Access:** - Request a copy of your personal data - Receive data in a structured, commonly used format - Understand how your data is being used

**Right to Correction:** - Update inaccurate or incomplete information - Request corrections to your data - Verify accuracy of your information

**Right to Deletion** (“Right to be Forgotten”): - Request deletion of your personal data - Subject to legal retention requirements - May impact service delivery if account data is deleted

**Right to Restriction:** - Limit how your data is processed - Object to certain uses of your data - Temporarily restrict processing during disputes

**Right to Portability:** - Receive your data in a machine-readable format - Transfer your data to another service provider - Applies to data you provided directly

**Right to Object:** - Object to processing for marketing purposes - Opt-out of automated decision-making - Object to profiling activities

### 7.2 California Residents (CCPA/CPRA)

If you are a California resident, you have additional rights:

**Right to Know:** - Categories of personal information collected - Sources of personal information - Business purposes for collection - Categories of third parties receiving your data

**Right to Opt-Out of Sale:** - Although we don’t sell data, you can submit a request - “Do Not Sell My Personal Information” link in footer

**Right to Non-Discrimination:** - Equal service and pricing regardless of privacy choices - No penalties for exercising your rights

**Financial Incentive Disclosures:** - We do not offer financial incentives for personal information

### 7.3 European Residents (GDPR)

If you are in the EEA, UK, or Switzerland:

**Legal Basis for Processing:** - Consent: You have given explicit permission - Contract: Necessary to fulfill our service agreement - Legal Obligation: Required by law or regulation - Legitimate Interest: Necessary for business operations

**Right to Withdraw Consent:** - Withdraw consent at any time - Does not affect prior processing - May impact service delivery

**Right to Lodge a Complaint:** - File complaint with your data protection authority - Contact us first to resolve issues - We will work with authorities to address concerns

**Data Protection Officer:** - Contact: dpo@pickleworks.tech - Dedicated privacy professional - Oversees GDPR compliance

## 7.4 Financial Services Clients

**SEC/FINRA-Regulated Clients:** - Right to privacy notices (Form ADV Part 2A for RIAs) - Right to opt-out of certain information sharing - Right to access regulatory examination materials - Right to confidentiality of trading and account information

**Additional Protections:** - Gramm-Leach-Bliley Act (GLBA) safeguards - Regulation S-P privacy requirements - FINRA Rule 4512 (Customer Account Information) - SEC Regulation S-ID (Identity Theft Red Flags)

## 7.5 Exercising Your Rights

### How to Submit Requests:

**Email:** privacy@pickleworks.tech **Phone:** (555) 123-4567 **Mail:** Pickle Works Privacy Team 123 Financial District Drive New York, NY 10001 **Web Form:** pickleworks.tech/privacy-request

**Request Process:** 1. **Verification:** We verify your identity to protect your data 2. **Processing:** Requests processed within 30-45 days 3. **Response:** Receive confirmation and requested information 4. **Appeal:** Right to appeal if request is denied

**No Fees:** Exercising your rights is free, except for excessive or repetitive requests

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## 8. COOKIES AND TRACKING TECHNOLOGIES

### 8.1 Types of Cookies We Use

**Strictly Necessary Cookies** (Cannot be disabled): - Session management and authentication - Security and fraud prevention - Form submission and error handling - Load balancing and performance

**Functional Cookies** (Can be disabled): - Language and region preferences - Customized content and settings - Remember login information - Accessibility features

**Analytics Cookies** (Can be disabled): - Website usage and traffic analysis - Performance monitoring - User behavior patterns - Conversion tracking

**Marketing Cookies** (Can be disabled): - Personalized advertising (if applicable) - Campaign effectiveness measurement - Retargeting and remarketing - Social media integration

### 8.2 Third-Party Tracking

**Analytics Services:** - Google Analytics (anonymized IP) - Hotjar (session recording, with notice) - Mixpanel (event tracking)

**Security and Fraud Prevention:** - reCAPTCHA (Google) - Cloudflare (DDoS protection) - Sift Science (fraud detection)

**Communication Tools:** - HubSpot (CRM and marketing) - Intercom (customer support chat) - Calendly (appointment scheduling)

### 8.3 Managing Cookies

**Browser Settings:** - Block all cookies (may impact functionality) - Delete existing cookies - Set cookie preferences per site - Use private/incognito browsing

**Our Cookie Preference Center:** - Accessible in website footer - Granular control over cookie types - Update preferences anytime - Consent management for GDPR compliance

**Do Not Track:** - We honor Do Not Track (DNT) browser signals - Analytics are disabled when DNT is enabled - Marketing cookies are not set with DNT

**Mobile App Tracking:** - Control in device settings - Opt-out of personalized ads - Reset advertising identifiers

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## 9. INTERNATIONAL DATA TRANSFERS

### 9.1 Data Storage Locations

**Primary Data Centers:** - United States (AWS US-East, US-West) - European Union (AWS EU-Central for EU clients) - Canada (Azure Canada Central for Canadian clients)

**Data Residency Options:** - Clients can specify preferred data location - EU data stays in EU for GDPR compliance - Financial services data kept in US for regulatory compliance

### 9.2 Transfer Mechanisms

**EU-US Data Transfers:** - Standard Contractual Clauses (SCCs) - EU-US Data Privacy Framework (when client is DPF-certified) - Explicit consent for specific transfers - Transfer Impact Assessments (TIAs)

**Other International Transfers:** - Adequacy decisions (when available) - Binding Corporate Rules (BCRs) - Necessity for contract performance - Derogations for specific situations

### 9.3 Safeguards for Transfers

**Contractual Protections:** - Data Processing Agreements (DPAs) - Sub-processor agreements - Security and confidentiality obligations - Audit rights and breach notification

**Technical Protections:** - Encryption in transit and at rest - Pseudonymization and anonymization - Access controls and authentication - Regular security assessments

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## 10. CHILDREN'S PRIVACY

### 10.1 Age Restrictions

**No Services for Children:** Pickle Works does not knowingly collect personal information from individuals under 18 years of age. Our services are directed to businesses and professionals only.



**If We Discover Child Data:** - Immediately delete the information - Notify parents/guardians if possible - Implement additional safeguards - Report to appropriate authorities if required

**Parents and Guardians:** - Contact us if you believe we have child data - Request immediate deletion - We will verify and respond within 10 days

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## 11. CALIFORNIA “SHINE THE LIGHT” LAW

Under California Civil Code Section 1798.83, California residents have the right to request information about the disclosure of their personal information to third parties for direct marketing purposes during the preceding calendar year.

**To Make a Request:** - Email: [privacy@pickleworks.tech](mailto:privacy@pickleworks.tech) - Subject: “California Shine the Light Request” - Include your name, address, and email

**Our Disclosure:** We do not share personal information with third parties for their direct marketing purposes without your explicit consent.

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## 12. NEVADA RESIDENTS

Nevada residents have the right to opt-out of the sale of their personal information. Although Pickle Works does not sell personal information, you may submit a request to opt-out by emailing [privacy@pickleworks.tech](mailto:privacy@pickleworks.tech) with “Nevada Opt-Out” in the subject line.

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## 13. CHANGES TO THIS PRIVACY POLICY

### 13.1 Policy Updates

**We May Update This Policy:** - To reflect changes in our practices - To comply with new legal requirements - To address new technologies or services - To improve clarity and transparency

**Notice of Material Changes:** - Email notification to registered users - Prominent notice on our website for 30 days - Pop-up or banner notification on first visit - Update to “Last Updated” date at top of policy

**Your Continued Use:** Continued use of our services after changes constitutes acceptance of the updated policy. If you disagree with changes, you may terminate your account.

### 13.2 Version History

- **v1.0 - November 10, 2025:** Initial publication
  - Future versions will be listed here with summary of changes
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## 14. CONTACT INFORMATION

### 14.1 Privacy Team

**Email:** [privacy@pickleworks.tech](mailto:privacy@pickleworks.tech) **Phone:** (555) 123-4567 **Hours:** Monday-Friday, 9:00 AM - 5:00 PM ET

**Mailing Address:** Pickle Works Privacy Team 123 Financial District Drive New York, NY 10001

### 14.2 Data Protection Officer (GDPR)

**Email:** [dpo@pickleworks.tech](mailto:dpo@pickleworks.tech) **Direct Line:** (555) 123-4568

### 14.3 Regulatory Contacts

**For SEC/FINRA Matters:** Compliance Officer [compliance@pickleworks.tech](mailto:compliance@pickleworks.tech)

**For Security Incidents:** Security Operations Center [security@pickleworks.tech](mailto:security@pickleworks.tech) 24/7 Emergency: (555) 123-9999

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## 15. ADDITIONAL RESOURCES

### 15.1 Related Policies

- Terms of Service: [pickleworks.tech/terms](https://pickleworks.tech/terms)
- Cookie Policy: [pickleworks.tech/cookies](https://pickleworks.tech/cookies)
- Security Policy: [pickleworks.tech/security](https://pickleworks.tech/security)
- Acceptable Use Policy: [pickleworks.tech/acceptable-use](https://pickleworks.tech/acceptable-use)

### 15.2 Regulatory Information

**Applicable Laws and Regulations:** - General Data Protection Regulation (GDPR) - California Consumer Privacy Act (CCPA) - California Privacy Rights Act (CPRA) - Gramm-Leach-Bliley Act (GLBA) - SEC Regulation S-P - FINRA Rule 4512 - HIPAA (if applicable to specific services)

### 15.3 Industry Standards

**Compliance Frameworks:** - NIST Cybersecurity Framework - Security best practices - CIS Critical Security Controls - FINRA Cybersecurity Guidelines

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## ACKNOWLEDGMENT

By using Pickle Works services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree with this policy, please do not use our services.

**Last Updated: November 10, 2025**

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