

Bulltrout Inc. Privacy Policy

Effective Date: May 15, 2026

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Statement of Privacy

Bulltrout Inc. (“Bulltrout”, “we”, “our”, or “us”) is committed to protecting the privacy, confidentiality, integrity, and security of personal information entrusted to us through our business operations, SaaS platform, phishing simulation services, security awareness training services, websites, and related technologies.

Bulltrout complies with applicable Canadian privacy legislation, including:

- the Personal Information Protection and Electronic Documents Act (“PIPEDA”);
- Alberta’s Personal Information Protection Act (“PIPA”);
- and other applicable provincial, federal, and international privacy laws where applicable.

This Privacy Policy applies to Bulltrout Inc., its employees, contractors, consultants, customers, platform users, websites, and related services.

Accountability

Bulltrout is responsible for personal information under its custody or control.

Bulltrout has designated a Privacy Officer responsible for overseeing compliance with applicable privacy and data protection legislation.

Questions, requests, or complaints regarding this Privacy Policy or the handling of personal information may be directed to:

Privacy Officer

Bulltrout Inc.

400 - 11012 Macleod Trail SE

Calgary, Alberta T2J 6A5

<https://www.bulltrout.co/>

Email: support@bulltrout.co

What Is Personal Information?

“Personal Information” means information about an identifiable individual.

Depending on the nature of the services provided, personal information may include:

- name;
- business email address;
- organization or employer information;
- account credentials and authentication data;
- IP address and device identifiers;
- browser and operating system information;
- phishing simulation participation data;
- security awareness training participation records;
- user activity logs;
- support communications;
- billing or payment information;
- technical usage data;
- and other information reasonably necessary to provide services.

What Personal Information Do We Collect?

Bulltrout collects only the information reasonably necessary to provide services, maintain platform functionality, improve security, administer accounts, and comply with legal obligations.

SaaS Platform and User Accounts

Bulltrout may collect information necessary to:

- create and manage user accounts;
- authenticate users;
- maintain platform security;
- provide dashboard functionality;
- manage subscriptions and billing;
- provide customer support;
- monitor system performance and reliability;
- and support phishing simulation and awareness training activities.

Phishing Simulation and Security Awareness Services

Bulltrout provides phishing simulation and security awareness services designed to help organizations improve cybersecurity awareness and reduce organizational security risks.

Website Information and Cookies

Bulltrout uses essential cookies and similar technologies primarily for:

- user authentication;
- session management;
- security monitoring;
- fraud prevention;
- and maintaining platform functionality.

Consent

Bulltrout obtains consent for the collection, use, and disclosure of personal information except where otherwise authorized or required by law.

Use and Disclosure of Personal Information

Bulltrout uses and discloses personal information only for purposes identified at or before the time of collection unless otherwise authorized by law.

Information Safeguards

Safeguards may include:

- role-based access controls;
- least-privilege access management;
- multi-factor authentication;
- password enforcement policies;
- encryption technologies;
- endpoint protection systems;
- secure cloud infrastructure;
- security monitoring and logging;
- vulnerability management processes;
- restricted access to information;

- employee confidentiality obligations;
- and incident response procedures.

Retention and Destruction of Information

Bulltrout retains personal information only as long as reasonably necessary to fulfill identified business, contractual, legal, security, or regulatory purposes.

Breach Notification

Bulltrout maintains incident response and breach management procedures designed to support timely investigation, containment, remediation, and notification of privacy or security incidents.

Access to Personal Information

Individuals may request access to personal information held by Bulltrout, subject to legal limitations and exceptions under applicable legislation.

Cross-Border Processing and Service Providers

Bulltrout may use third-party service providers, cloud hosting providers, and infrastructure technologies that process or store information outside Canada.

International Users

Bulltrout's services may be accessed by users located outside Canada.

Third-Party Websites

Bulltrout is not responsible for the privacy practices, content, or policies of external websites or third-party services.

Changes to This Privacy Policy

Bulltrout reserves the right to modify this Privacy Policy at any time.

Questions, Requests, and Complaints

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