Data Processing Policy

Last updated: September 2026

Overview

Black Kite (NormShield, Inc.) provides a third-party cyber risk intelligence platform. In delivering the Service, Black Kite processes limited personal data on behalf of its customers. This policy explains how that processing works, what data is involved, and the safeguards Black Kite applies.

This policy is a public summary. It does not itself create or modify contractual rights. Where a customer has executed a Data Processing Addendum ("DPA") directly with Black Kite, the specific terms of that signed DPA govern the processing of that customer's personal data and control over anything described here.

Roles

Black Kite acts as a processor (or service provider, under U.S. state privacy laws) on behalf of its customers, who act as the controller (or business) for their own data. Each party is responsible for its own compliance with applicable data protection law. Black Kite processes personal data only on documented customer instructions, as set out in the applicable agreement.

What Data Is Processed

Personal data processed in connection with the Service is limited and may include:

- First and last name
- Business contact information (company, email address, phone)
- IP address and browser information
- Product usage data, including network device information, activity logs, connection data, system usage, application information, and traffic data submitted through the Service

Black Kite does not process healthcare data, patient records, or insurance client data, and does not process cardholder data or financial account numbers.

Purpose of Processing

Black Kite processes personal data to:

- Host, deliver, and support the Service
- Provide customer support and respond to service requests
- Maintain and improve platform performance and security

Processing is continuous for the duration of the customer relationship and does not extend beyond what's needed to provide the Service.

Security

Black Kite maintains administrative, physical, and technical safeguards designed to protect the confidentiality, integrity, and availability of personal data. Black Kite does not materially decrease the overall security of the Service during a customer's subscription term. Further detail on Black Kite's security practices is available at trust.blackkite.com.

Subprocessors

Black Kite engages subprocessors to support delivery of the Service. Current subprocessors and their locations are published at trust.blackkite.com/subprocessors, including a mechanism to subscribe to update notifications. Customers with an executed DPA have a contractual right to object to new subprocessors under the terms of that DPA.

International Data Transfers

Where personal data is transferred out of the European Economic Area, the United Kingdom, or Switzerland, Black Kite relies on the applicable standard contractual clauses (including the UK Addendum and Swiss Addendum, where relevant) to safeguard the transfer, as reflected in the DPA. Black Kite is also registered with the EU/US DPF, along with the UK extension and US/Swiss DPF.

Data Retention and Deletion

Black Kite processes personal data for the duration of the customer agreement. At the end of the relationship, Black Kite deletes or returns customer personal data, unless retention is required by law, consistent with the terms of the applicable DPA.

Data Subject Rights

Individuals seeking to exercise rights over their personal data should contact the Black Kite customer that submitted their data, as that customer is the controller. Black Kite supports its customers in responding to verified data subject requests as required under applicable data protection law.

Data Security Incident Notification

If Black Kite becomes aware of a data security incident affecting a customer's personal data, Black Kite notifies the affected customer without undue delay and works with the customer to mitigate any adverse effects.

Governing Terms

This policy is a general description for informational purposes. Where a customer has entered into a Data Processing Addendum directly with Black Kite, the terms of that signed DPA — not this policy — govern the specific contractual obligations between Black Kite and that customer with respect to the processing of personal data. In the event of any conflict between this policy and an executed DPA, the DPA controls.

Questions about this policy or a customer's DPA can be directed to privacy@blackkite.com.