GDPR Alignment & Data Privacy

Fluid Attacks INC is committed to the protection of personal data and the privacy rights of individuals, applying the principles and requirements of the General Data Protection Regulation (GDPR, Regulation (EU) 2016/679).

Our privacy and data protection practices are independently audited and certified under the following international standards:

Certification	Scope	Relevance to GDPR
ISO 27701:2019	Privacy Information Management System (PIMS)	Direct mapping to GDPR obligations for controllers and processors — the primary international standard for GDPR-aligned privacy management
ISO 27018:2019	Protection of PII in public cloud services	Controls governing how cloud service providers handle personal data, aligned with GDPR processor obligations under Art. 28
ISO 27001:2022	Information Security Management System (ISMS)	Security controls supporting GDPR Art. 32 requirements for appropriate technical and organisational measures
ISO 27017:2015	Cloud service information security	Security controls specific to cloud environments where personal data is processed
SOC 2 Type II	Security	Independent verification of operational controls governing data handling and access

All certifications are issued by accredited third-party certification bodies. Certificates can be found in our Trust Center https://trust.fluidattacks.tech/.

Our Privacy Commitments

Fluid Attacks operates under a formally documented Privacy Information Management System (PIMS) that implements the following controls in alignment with GDPR requirements:

Lawful basis for processing. All personal data processing activities are documented in a Record of Processing Activities (RoPA), specifying the legal basis for each activity under GDPR Art. 6, maintained and reviewed by our Data Protection Officer.

Data subject rights. Fluid Attacks supports the exercise of data subject rights including access, rectification, erasure, restriction of processing, data portability, and the right to object. Requests may be submitted at any time via our privacy request channel.

Data minimisation. Personal data is collected and processed only to the extent strictly necessary for each documented purpose. All new systems and services undergo a data minimisation review prior to deployment.

Data Protection Officer. A Data Protection Officer (DPO) has been formally designated in accordance with GDPR Art. 37 and is available to data subjects and supervisory authorities.

Subprocessor management. All subprocessors handling personal data operate under Data Processing Agreements (DPAs) that impose equivalent data protection obligations. Subprocessors are prohibited from using customer data for their own commercial purposes, including model training, in compliance with ISO 27018.

Breach notification. In the event of a personal data breach, Fluid Attacks is committed to notifying competent supervisory authorities within 72 hours of becoming aware, and notifying affected data subjects without undue delay where a high risk to their rights and freedoms is identified, in accordance with GDPR Arts. 33 and 34.

International data transfers. Transfers of personal data outside the EU/EEA are governed by appropriate transfer mechanisms including Standard Contractual Clauses (SCCs) and adequacy decisions, as applicable. Current data storage locations and transfer destinations are documented in our subprocessor list.

Privacy by Design and Default. Privacy considerations are integrated into the design of all systems, services, and processes from inception, with default settings configured to the highest level of privacy protection.

Data Protection Officer

For any questions regarding the processing of your personal data, to exercise your data subject rights, or to contact us regarding our privacy practices:

Juan Restrepo — Data Protection Officer jrestrepo@fluidattacks.com

Subprocessors

A complete and current list of subprocessors with access to personal data, including service description and geographic location, is maintained at: https://trust.fluidattacks.tech/subprocessors

Customers acting as data controllers are notified a minimum of 30 days in advance of any changes to our subprocessor list and have the right to object to new subprocessors on reasonable data protection grounds.

Further Information

For additional documentation, including our Data Processing Agreement (DPA) template or details on our privacy controls, please contact: help@fluidattacks.com.

Version History

Version	Date	Description	Author	Approved by
1.0	Apr 6, 2026	Initial version	Diego Gomez	Aura Pabon