



Title: **External GDPR Privacy Notice**

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## 1. Overview

This Privacy Notice is designed to inform about the type of information that TikaMobile Inc gathers about business clients, how the information is used, and details on disclosing the info and the choices business clients have regarding our use of that information.

## 2. Purpose

- Consumer Education
- Corp. Accountability

## 3. Scope

- Privacy Notice: common practices, promises, policies, versions, accessible online
- Purpose:
  - Consumer Education
  - Corp. Accountability
- Layered notices (since privacy notices are becoming legalese and lengthy):
  - Top short notice: scope and basic points
    - Bottom full notice: comprehensive information disclosure that articulates the organization's privacy notice.
    - Effective date
    - Scope of notice
    - Types of PII collected (both actively and passively)
    - PII uses and disclosures
    - Choices available to the end user
      - Methods for requests: accessing, correcting, or modifying personal information or preferences
      - Methods for contacting the organization or registering a dispute
  - 1. Provide updates and revisions (at least annually)
  - 2. Ensure that the appropriate personnel are knowledgeable about the privacy policy (training)

## 4. Policy

### 4.1 INTRODUCTION

#### For Individuals

Our Privacy Notice is below. It is designed to inform you about the type of information that we gather about you, how we may use that information, whether we disclose it to anyone, and the choices you have regarding our use of that information.

LAST UPDATED: November 19, 2021, effective November 19, 2021.

#### Summary:

*This Notice describes how TikaMobile, Inc. obtains and uses Personal Data (data which can be used to identify a specific individual) via website, apps or directly from business clients. Certain provisions of the Notice, which are clearly labeled, apply only to data subjects who are citizens or residents of particular regions of the European Union. TikaMobile, Inc. may change this Notice at any time by posting the revised Notice here. TikaMobile, Inc. will notify current clients of the changes through email or otherwise. TikaMobile, Inc. needs certain Personal Data (e.g., name, an ID, location coordinates, or other specific factors) to provide the Services. The Services are not directed at children, and we will remove any information we have about children.*

- **General:** This Privacy Notice (the “**Notice**”) describes how TikaMobile, Inc. and its affiliates (“**we**”) collect, use and share information about visitors to our website (“**Site**”) at

[www.tikamobile.com](http://www.tikamobile.com) (together with its subdomains) and the client users of our mobile, and web applications (each an “**App**” and, collectively, the “**Apps**”). The Apps and the Site together are the “**Services**.” “**You**” refers to any user of the Services, including, as applicable, visitors to the Site. “**Anonymous**” refers to Personal Data that can no longer be attributed to a specific data subject.

- **Region-Specific Provisions:** Certain provisions of the Notice apply only within, or to residents of, specific jurisdictions, and are clearly labeled as such. Otherwise, the Notice applies to all users of our Services, regardless of location.
- **Changes:** We may change this Notice at any time. When we do so, we will post the updated Notice on this page and, if the changes are material, inform existing clients through email or the Services. Any changes to the Notice will be effective immediately for new clients or new users and, for existing clients or existing users, 30 days after we post the changes on our website or otherwise inform them of the changes.

- **Children:** The Services are not directed to children. However, children who are invited to use the Services by a parent or guardian (under a family plan or equivalent) may do so. If you become aware that a child (based on the jurisdiction where the child lives) has provided us with Personal Data without parental consent, contact us at [privacy@tikamobile.com](mailto:privacy@tikamobile.com). We will remove the information from our systems as soon as reasonably practicable.
- **Personal and Anonymous Data:** As used in this Notice, "Personal Data" has the meaning provided in the EU General Data Protection Regulation of 2018 (the "GDPR"), and includes any information which, either alone or when combined with other information we hold, identifies an individual, such as name, mailing address, email address, IP address, and telephone number. Anonymous Data refers to data that can no longer be attributed to a specific data subject.
- **Why Do We Process Personal Data?** We need certain Personal Data in order to provide Services. This is done per contractual agreements between clients and TikaMobile, Inc.; and for such things as providing Company materials, e.g., when a user makes a request for information on the Site.

## • 4.2 PARTICULARLY IMPORTANT INFORMATION (EU) European Users

- **Who We Are:** For the purpose of the GDPR, the data processor of your Personal Data is TikaMobile, Inc. of 485 Madison Ave, 7<sup>th</sup> floor New York, NY 10022. You may contact our data privacy officer at [privacy@tikamobile.com](mailto:privacy@tikamobile.com).

## • 4.3 HOW DOES TIKAMOBILE, INC. OBTAIN DATA?

- We collect information in the following ways.
  - **Information You Provide:**
    1. Register to receive a whitepaper or for any inquiry
    2. Register to inquire about career opportunities
    3. Register to get a demo
  - **Data Collected by Technology:**
    - **Device and Browser Data:** We automatically log the following information about your computer or mobile device when you access the Services: operating system name and version, device identifier, browser type, browser language, and IP address. Some of this data is collected using cookies, as explained here: [Tikamobile.com Website Visitors](https://www.tikamobile.com/Website-Visitors) -

- **TikaMobile.** This data is used to secure your Account, and to ensure the Services are provided as per contract agreements. This data is kept in our system for as long as is reasonably necessary or required by law for the purpose of the processing.
  - **Usage Data:** We collect data about the use of the Services (for example, use of features, and interactions with the Apps and the Site) in order to provide and improve the Services ("Usage Data"). Usage Data is kept logically separated from Personal Data and is used to generate Aggregated Data.
  - **Aggregated Data:** We derive information about the use of our Services by aggregating Usage Data from large numbers of users (e.g., number of users within a particular jurisdiction). This "Aggregated Data" is Anonymous Data, is owned by TikaMobile, Inc., and is primarily used to help analyze and improve the Services.
- **Cookies:** As described in our [Tikamobile.com Website Visitors - TikaMobile](#), we use cookies and similar technologies such as web beacons to recognize you and/or your device(s) and provide a more personal and seamless experience when interacting with the Services.

## 4.4 HOW DOES TIKAMOBILE, INC. USE YOUR PERSONAL DATA?

- **General:** TikaMobile, Inc. will process Personal Data only if and to the extent that at least one of the following applies:
  - The Controller has provided Tika Mobile, Inc. consent to the processing of your Personal Data for any number of purposes
  - Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract
  - Processing is necessary for compliance with a legal obligation or regulation that would affect TikaMobile, Inc.
    - Respond to inquiries
    - Send newsletters
    - Send marketing communications
    - Respond to questions and concerns
    - Improve our Web site and marketing efforts

## 4.5 HOW DOES TIKAMOBILE, INC. SHARE PERSONAL DATA?

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TikaMobile, Inc. will never share or sell the Personal Data without explicit contractual agreement or consent. We share your Personal Data in the following circumstances:

- **Designated Third Parties:** We may share certain data with third party organizations, as per the instructions from the data controllers, as agreed upon under the contract agreement. The third parties are designated by the data controllers (not by TikaMobile) and how they process the data is based on the contract agreement between the third parties and data controllers
- **Other Disclosures:** Regardless of your choices regarding Personal Data, TikaMobile, Inc. may disclose your Personal Data where required to comply with applicable laws or governmental orders, or if we believe in good faith that doing so is necessary to protect our rights or the Services. TikaMobile does not store any PII data related to billing or credit card processing

## 4.6 DATA SECURITY

- **Summary:**

*We strive to protect the safety and security of all data in our possession, including Personal Data, through a variety of means, and we continually work to improve and update these practices.*

We use robust physical, organizational, technical, and administrative measures to safeguard Personal Data, and we regularly re-assess and revise our policies and practices to improve security. While we go to great lengths to protect your Personal Data, no method of data transmission or storage is totally secure. If you believe your Personal Data may have been compromised by us or the use of the Services, please contact us at [privacy@tikamobile.com](mailto:privacy@tikamobile.com) immediately.

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## 4.7 HOW CAN YOU CONTROL YOUR DATA?

- **Email Communications:** With your consent, we may periodically send you emails promoting the use of the Services, including tips on using the Apps. You can opt-out of these emails by following the unsubscribe instructions included in each email. You may also request removal through [privacy@tikamobile.com](mailto:privacy@tikamobile.com). Note that unsubscribing from marketing communications will not affect operational and transactional communications, including breach notices from within the Apps, renewal emails, etc. Our marketing emails are used only to promote

and educate users about the Services. We do not accept advertisements on our Site or market other companies' products to our users.

- **Applications:** You can stop all collection of information by an App by uninstalling that App, for example from your iPad. You may use the standard uninstall process available as part of your desktop or mobile device or via the mobile application marketplace or network. Uninstalling an App does not delete your account.

## 4.8 YOUR RIGHTS REGARDING PERSONAL DATA (EU)

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### Summary:

*The GDPR grants EU resident certain rights regarding their Personal Data, including the right to access and modify Personal Data held by providers (like us), and to have providers "forget" Personal Data. Most of these rights must be accessed from within the privacy and data preferences in the Services, but you may always contact us for assistance. Please include information about which rights you are seeking to exercise if you contact us. We may need to verify your identity before fulfilling your request. It should not need to be said, but we will never provide worse services to, or in any way punish anyone who chooses to exercise these rights.*

You have the following rights with respect to your Personal Data that we process or when we are the Controller of the data, e.g., data collected from the website. Except where indicated, these rights apply equally to EU users.

- **Withdraw**  
**Consent:** You may withdraw your consent to our processing of your Personal Data, in whole or in part (i.e., for marketing purposes). Certain Services may be ineffective upon opt out.
- **Access/Request Information:** You may access the Personal Data we hold about you at any time by contacting us directly.
- **Modification:** You may modify the Personal Data we hold about you at any time via your Account or by contacting us directly.
- **Erase and Forget:** Where we are the data Controller (e.g., your data are collected from our website), you can instruct us to delete your personal data at any time. Instructions to do this are provided below.

Where we are the data Processor but not the data Controller, we will work with the Controller and comply with your request. Additionally, the Controller at any time can instruct us to delete your personal data or request that the user account be deleted. In all cases related to deleting your personal data, we commit to responding promptly to your request.

- **Portability:** You may request a copy of your Personal Data and may always move it to other entities as you desire.
- For our Software Solutions, TikaMobile is a Data Processor of EU Personal Data under the direction of our Customers who are Data Controllers. Here, TikaMobile has no direct relationship with the individuals whose Personal Data it processes. If you are a customer of one of our Customers and would no longer like to be contacted by one of our Customers that use our Services, please contact the Customer that you interact with directly. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct queries to the appropriate TikaMobile Customer (the Data Controller). If a TikaMobile Customer requests our assistance in the removal of data, TikaMobile will respond to such requests within 30 business days.
- TikaMobile is compliant to Data Protection Legislation for the following,
  - Inform individuals about (see Privacy Policy FAQs):
    1. the type or identity of third parties to which TikaMobile discloses personal information upon the request by the data controller, and the purposes for which it does so -> providing examples of purpose (for example, master data management). The third parties are designated by the data controllers (not by TikaMobile) and how they process the data is based on the contract agreement between the third parties and data controllers.
      - a. the right of individuals to access their personal data
        - i. the choices and means TikaMobile offers individuals for limiting the use and disclosure of their personal data
        - ii. TikaMobile being subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC)
        - iii. the possibility, under certain conditions, for the individual to invoke binding arbitration



iv. the requirement for TikaMobile to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements

A. TikaMobile's liability in cases of onward transfers to third parties

■ Requests and Assistance

- If you need assistance, contact [privacy@tikamobile.com](mailto:privacy@tikamobile.com) or write us at the address below. In your request, please make clear: (i) **what** Personal Data is concerned; and (ii) **which of the above rights** you would like to enforce. For your protection, we may only fulfill requests with respect to the Personal Data associated with the email address from which you send your request, and we will need to verify your identity before doing so (which is typically done by having you make the request from within the Services). We will comply with your request promptly, but in any event within 30 days of your request. We may need to retain certain information for record-keeping purposes or to complete transactions that you began prior to requesting such change or deletion.

■ Compliance with DPF

TikaMobile complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Tikamobile has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. TikaMobile has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit

<https://www.dataprivacyframework.gov/>

## 4.9 CONTACT INFORMATION AND COMPLAINTS

- If you have questions, concerns, or complaints about this Notice or our data collection or processing practices, or if you want to report any security violations, please contact [\\_privacy@tikamobile.com](mailto:_privacy@tikamobile.com) or write us at the address below:

TikaMobile, Inc. Attn: Privacy Officer

**485 Madison Ave, 7th floor**

New York, NY 10022

**EU Users Only.** We hope to promptly resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you may always contact your local data protection supervisory authority, a list of which is available [here](#).

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Tikamobile commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

In compliance with the Data Protection Legislation (section 4.10), TikaMobile commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our privacy policy should first contact TikaMobile at:

Data officer at [privacy@tikamobile.com](mailto:privacy@tikamobile.com)

- In the event we are unable to resolve your concern, Tikamobile commits to cooperate with the relevant EU Data Protection Authority and the Swiss Federal Data Protection and Information Commissioner and comply with their advice regarding personal and human resource data transfers and the data protection legislation laws. Per the terms of the frameworks and under certain circumstances, you may invoke binding arbitration.

#### 4.10 DATA PROTECTION LEGISLATION

- TikaMobile's privacy policy is consistent with Data Protection Legislation described below,
  - Data Protection Legislation shall mean all applicable laws, enactments, orders and regulations relating to the processing of Personal Data, including without limitation, any US federal or state privacy laws such as the US Privacy Act, the HIPAA, the ECPA, the CCPA, major legislative texts of other jurisdictions such as the EU GDPR, the UK Data Protection Act 2018, and any law, enactment, regulation or order transposing, implementing, adopting, supplementing or derogating from the EU GDPR and the EU Directive 2002/58/EC in each EU Member State and the United Kingdom; as well as the Swiss Federal Act on Data Protection, all as amended or replaced from time to time.
- TikaMobile, Inc. is hosted on the Amazon Web Services (AWS) EC2 platform. All AWS system availability guarantees apply with respect to the cloud-based service. AWS is also GDPR compliant and complies with all industry and local governing rules and regulations. Tika data is backed up and retained to ensure rollover, if absolutely necessary.

## 5. Enforcement and Violations

This policy will be enforced by the relevant people manager(s) and/or the Executive Team. Violations may result in disciplinary action, which may include suspension, restriction of access, or more severe penalties up to and including termination of employment. Where illegal activities or theft of company property (physical or intellectual) are suspected, the company may report such activities to the applicable authorities.

Any employee or partner who is requested to undertake an activity which he or she believes is in violation of these or any other TikaMobile policies and/or procedures should provide a

written or verbal complaint to his or her manager, any other manager, or anyone on the TikaMobile Leadership Team as soon as possible.

## 6. Definitions

N/A

## 7. References

N/A

## 8. Attachments