

## TECH 2 SUCCESS LLC PRIVACY POLICY

This Privacy Policy was last modified on September 21, 2020.

Your privacy is important to Us. Tech 2 Success LLC (“Tech 2 Success” or “Us” or “We” or “Our”) is committed to protecting Your privacy and information in accordance with applicable legal and industry standards. Users of Tech 2 Success’s Services (“You,” “Your,” or “Customer”) should have a comprehensive understanding of Our information collection and usage practices and know that You have control of the personal and commercial information that You provide to Us.

This Privacy Policy explains how Information (defined below) is collected, used and disclosed by Tech 2 Success when You access or use the Services (all as defined below).

If you do not agree with the terms of this Privacy Policy, do not access or use Our Services.

Data protection law in certain jurisdictions differentiates between the “controller” and “processor” of information. In general, You are the controller of Information. In general, Tech 2 Success is the processor of the Information.

This privacy policy is applicable only to Tech 2 Success. It does not apply to any third-party applications or software that integrates with the Services. Tech 2 Success is not responsible for the privacy policies or practices of any third parties

### **I. WHAT INFORMATION DO WE COLLECT?**

When you use utilize Tech 2 Success’s products or services (collectively “Services”), You may be asked to provide personally identifiable information (collectively, “Personal Information”).

Tech 2 Success will not collect or monitor any Personal Information about You or Your customers (collectively “Information” or “Personal Data”) without Your consent by virtue of: (i) You providing the Information, and/or (ii) Your use of the Services (collectively Your “Consent”). You agree to and will obtain consent from Your customers for the use and access of their personal and commercial Information (and that personal and commercial information is included in the term “Information”) by Tech 2 Success and other third parties, before inputting such on the Services and are expressly prohibited from inputting such on the Services before obtaining such consent. The only Information We collect is what You provide to Us via Your Consent. If, after agreeing to allow Us to use Information for a particular purpose via Your Consent, You decide that You do not want Information to be used in that manner, You must contact Us by e-mail at [support@tech2success.com](mailto:support@tech2success.com), by phone at (240)54-TECH2 {(240)548-3242} or log on and change Your preferences. Please keep in mind that it may take several days for Tech 2 Success to implement the change in Your preferences.

Tech 2 Success collects Information from You at several different points in Your use of the Services:

a) New Account Registration and Use of Services

i) What Information is collected at this stage?

(1) When You register for an account with Tech 2 Success, You will be asked to create a login name and password, as well as to provide Your contact and company information, such as Your name, title and email address.

(2) When You use the Services, You may input information.

(3) We may collect Your customers' name, email, shipping and billing address, payment details, company name, phone number, IP address, and information about orders or transactions that You initiate.

(4) You may also be asked to provide billing information;

ii) We collect the above Information for the following purposes:

(1) To identify You when You use the Services and in order to customize and personalize Your experience.

(2) To provide You with the Services.

(3) In order to monitor and improve the Services.

(4) To maintain the security of the Services.

(5) To prepare and send invoices or to charge you for Your use of the Services.

(6) To prevent fraud.

(7) To contact You when necessary in connection with Your use of the Services and for our contact management database.

(8) To send You periodic updates, product/Services information and/or newsletters, if You have signed up to receive them.

(9) For account management and other administrative matters.

(10) To communicate with you by responding to your requests, comments and questions and to send emails and other communications.

(11) To provide, update, maintain and protect our Services and business.

(12) We may aggregate and anonymize information with data collected from other users of the Services.

b) Access to Services and Device Information and Identifiers

i) What Information is collected at this stage?

1) Log Data and Session information such as IP (Internet Protocol) addresses, browser types and operating platform, device information, software and hardware attributes, unique device advertising and app identifier, and location information in accordance with the consent process provided by your device.

2) File system information such as stored file folder names, file extensions and file sizes.

3) Cookies and web tracking: When You use the Services as a guest or as an account holder, cookies or web beacon, pixel tags and clear GIFs may be stored on Your computer. Cookies are small text files containing some information about Your preferences and allows Your usage to be tracked. Some of these cookies might include (but are not limited to) session id, unique token, and sessional. The use of cookies or other web tracking is industry standard, and You will find them used on most major websites. You can always choose to disable cookies or other

web tracking from being stored on Your computer by changing Your browser settings. Disabling cookies or other web tracking, however, may result in a limited experience of functionality and services, and in some cases may mean that We are unable to provide You with the Services, or parts of the Services. Some of Our business partners whose content is incorporated into or linked to from Our site or Services may also use cookies or web tracking. However, We have no access to or control over these cookies or web tracking.

ii) Why do We collect it?

(1) Session information is used to troubleshoot technical issues and improve site usability.

(2) Cookies are used to identify You when You use the Services, and potentially avoid repeated entry of usernames or passwords.

(3) Aggregated user data may be collected from cookies and used by Tech 2 Success to make improvements to Our Services based on the aggregated usage statistics collected from cookies. These aggregated usage statistics are anonymous to third parties.

(4) We may use this data to secure Our Services, as well as to assist Us in preventing fraud.

c) Customer Contact

i) What Information is collected at this stage?

If You contact Tech 2 Success by telephone, email or otherwise, the details of Your contact, Your contact information and Your comments may be kept on record.

ii) Why do We collect it?

(1) To send You information about products and services that may be of interest to You (subject to Our opt-in/opt-out policy).

(2) In order to monitor and improve the Services.

(3) To maintain the security of the Services.

(4) To prepare and send invoices or to charge you for Your use of the Services.

(5) To prevent fraud.

(6) To contact You when necessary in connection with Your use of the Services and for our contact management database.

(7) To send You periodic updates, product/Services information and/or newsletters, if You have signed up to receive them.

(8) For account management and other administrative matters.

(9) To communicate with you by responding to Your requests, comments and questions and to send emails and other communications.

(10) To provide, update, maintain and protect our Services, and business.

(11) To identify You when You use the Services and in order to customize and personalize Your experience.

(12) We may aggregate and anonymize information with data collected from other users of the Services.

d) Online Surveys

i) What Information is collected at this stage?

From time to time, Tech 2 Success may conduct market research surveys either by itself or by employing the services of a third party to do so on Our behalf. You may choose to participate in Our surveys, and Your answers to Our survey, as well as Your contact information, may be kept on record. In such instances, the information You provide will be protected in a manner that is

consistent with the Privacy Policy. Please note that the information You provide through Our surveys will be used on an aggregated basis unless We inform You otherwise beforehand.

ii) Why do We collect it?

- (1) To send You information about products and services that may be of interest to You (subject to Our opt-in/opt-out policy).
- (2) In order to monitor and improve the Services.
- (3) To maintain the security of the Services.
- (4) To prepare and send invoices or to charge for Your use of the Services.
- (5) To prevent fraud.
- (6) To contact You when necessary in connection with Your use of the Services and for our contact management database.
- (7) To send You periodic updates, product/Services information and/or newsletters, if You have signed up to receive them.
- (8) For account management and other administrative matters.
- (9) To communicate with you by responding to Your requests, comments and questions and to send emails and other communications.
- (10) To provide, update, maintain and protect our Services, and business.
- (11) To identify You when You use the Services and in order to customize and personalize Your experience.
- (12) We may aggregate and anonymize information with data collected from other users of the Services.

e) Information from Third Parties

i) What Information is collected at this stage?

Third parties are individuals or businesses that have agreed to work with Tech 2 Success to promote the Services by referring clients to Us and, with Your consent, provide Your contact and company information, such as Your name, title and email address.

ii) Why do We collect it?

- (1) To send You information about products and services that may be of interest to You.
- (2) In order to monitor and improve the Services.
- (3) To maintain the security of the Services.
- (4) To prepare and send invoices or to charge for Your use of the Services.
- (5) To prevent fraud.
- (6) To contact You when necessary in connection with Your use of the Services and for our contact management database.
- (7) To send You periodic updates, product/Services information and/or newsletters, if You have signed up to receive them.
- (8) For account management and other administrative matters.
- (9) To communicate with you by responding to Your requests, comments and questions and to send emails and other communications.
- (10) To provide, update, maintain and protect our Services, and business.
- (11) To identify You when You use the Services and in order to customize and personalize Your experience.
- (12) We may aggregate and anonymize information with data collected from other users of the Services.

## f) Connection and Usage Data

### i) What Information is collected at this Stage?

At this stage, we may collect information about files you download, domain names, landing pages, usage activity, content viewed and accessed, dates and times of access, pages viewed, forms you complete or partially complete, search terms, uploads or downloads, whether you open an email and your interaction with email content, access times, error logs, and other similar information.

### ii) Why do We collect it?

- 1) To send You information about products and services that may be of interest to You (subject to Our opt-in/opt-out policy).
- (2) In order to monitor and improve the Services.
- (3) To maintain the security of the Services.
- (4) To prepare and send invoices or to charge you for Your use of the Services.
- (5) To prevent fraud.
- (6) To contact You when necessary in connection with Your use of the Services and for our contact management database.
- (7) To send You periodic updates, product/Services information and/or newsletters, if You have signed up to receive them.
- (8) For account management and other administrative matters.
- (9) To communicate with you by responding to Your requests, comments and questions and to send emails and other communications.
- (10) To provide, update, maintain and protect our Services, and business.
- (11) To identify You when You use the Services and in order to customize and personalize Your experience.
- (12) We may aggregate and anonymize information with data collected from other users of the Services.

## II. WHO DO WE SHARE INFORMATION WITH?

We do not share Information with anyone outside of Tech 2 Success unless one of the following circumstances applies:

- (1) With Your consent. We may share Information with companies, organizations or individuals outside of Tech 2 Success when We have Your specific consent to do so.
- (2) With account managers. If Your Tech 2 Success account is managed for You by a Tech 2 Success employee or representative, such as an account manager, then that person will have access to Information. With that access, Your account manager may be able to:
  - (a) view statistics regarding Your account.
  - (b) change Your account password.
  - (c) suspend or terminate Your account access.
  - (d) access or retain Information stored as part of Your account.
  - (e) access Your account Information in order to satisfy applicable law, regulation, legal process or enforceable governmental request.
  - (f) restrict Your ability to delete or edit Information or privacy settings.

(g) conduct external processing.

(3) Disclosure to Affiliates or Partners. We may provide Information to Our affiliates or other trusted businesses or persons, based on Our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures, (i) to process it for us in connection with the Services, and/or (ii) in connection with marketing agreements for the purposes of marketing related products and services.

(4) Disclosure of Anonymized Information. We may share aggregated, non-personally identifiable information publicly and with Our partners – like integrated and strategic partners, customers, vendors or connected sites. For example, We may share information publicly to show trends about the general use of Our services.

(5) Transmission over Third-Party Networks. Processing of Information on the Services and the transmission of messages between You and Tech 2 Success relating to the Services including Your account related data, may involve transmissions, processing or storage via various third-party networks or platform (which may or may not be secure) and to various countries outside of the United States. While We utilize current commercially acceptable security measures to safeguard Information, no security method is absolutely reliable and transmission of Your data over the Internet carries some inherent risk.

(6) Service Providers. We may share any category of data We collect, including Personal Data, with Our contracted third-party service providers (“Service Providers”) in order to provide Our Services. We may share Personal Data with Service Providers who administer surveys and perform user analysis to better understand Your needs and preferences. These Service Providers include business partners, payment and delivery services, advertising networks, analytics providers, credit reference agencies, social media companies, email distributors, marketing automation partners, customer survey companies, data storage and hosting partners, IT specialists and product developers.

(7) Disclosure for Legal Reasons. We may share Information with companies, organizations or individuals outside of Tech 2 Success if We have a good-faith belief that access, use, preservation or disclosure of the Information is reasonably necessary to:

a) meet any applicable law, regulation, legal process or enforceable governmental request.

b) enforce Tech 2 Success’s Terms and Conditions, or any agreement between You and Tech 2 Success, including investigation of potential violations.

c) detect, prevent, or otherwise address fraud, security or technical issues.

d) protect against harm to the rights, property or safety of Tech 2 Success, Our users or the public as required or permitted by law.

e) protect the security or integrity of Our Services.

f) protect vital interests

g) take precautions against legal liability.

(8) Merger or Other Transaction. In the event of a merger, consolidation, or acquisition of all, substantially all or a portion of Our business or assets, We may share data, including Information. You acknowledge and agree that data, including encrypted stored data and Information that we have collected, may be securely shared, disclosed and transferred to such successor or assignee.

(9) Third Parties. Links and Integration may be present or available on the Services, that result in You leaving the Services and/or being taken to or utilizing applications, services or web sites controlled by other parties. Any information that You provide to such third-party applications, services or websites, is not subject to this Privacy Policy, and We strongly recommend that You make Yourself aware of the privacy and security policies of all third-party applications, services or websites that You access. Additionally, certain providers may be located in or have facilities that are located in a different jurisdiction than either You or Us; if You elect to proceed with a transaction that involves the services of a third-party Services provider, then the Information may become subject to the laws of the jurisdiction(s) in which that Services provider or its facilities are located.

### III. HOW LONG DO WE RETAIN INFORMATION?

Tech 2 Success will retain Information in accordance with the Agreement, as required by applicable law, and/or for the purposes described in this Privacy Policy. This may include keeping Information after you have deactivated Your account for the period of time needed for Tech 2 Success to pursue legitimate business interests, conduct audits, comply with and demonstrate compliance with legal obligations, pursuant to the Agreement, and to enforce the Agreement. Deletion of Your data may affect Your ability to utilize, and Tech 2 Success's ability to provide, the Services in whole or in part.

### IV. YOUR CONTROL OVER INFORMATION

In certain circumstances, you have the following rights:

- **The right to access, update or delete the Information we have about You.** Whenever possible, you can access, update or request deletion of Information directly within Your account settings section. If You are unable to perform these actions yourself, please contact Us to assist You.
- **The right to Erasure.** You have the right to request erasure of all Information that is incomplete, incorrect, unnecessary or outdated within a reasonable period of time. We will do everything possible to erase Information if You so request. However, We cannot erase all Information if it is technically impossible due to limitations of existing technology or for legal reasons, such as We are mandated by law to retain Information.
- **The right of rectification.** You have the right to have Information rectified if that Information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of Information.
- **The right of restriction.** You have the right to request that we restrict the processing of Information.
- **The right to data portability.** You have the right to be provided with a copy of the Information we have about You in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw Your consent at any time where We relied on Your consent to process Information.

- **Data Protection Contact.** The right to contact the relevant data protection regulator regarding Our handling of Information.

Please note that we may ask You to verify Your identity before responding to such requests.

Restriction or deletion of Your data may affect Your ability to utilize, and Tech 2 Success's ability to provide, the Services in whole or in part.

You may exercise control through Your preferences as to the frequency and content of Our communications with You.

Opt-In and Opt-Out Policy. By agreeing to the Agreement including the Terms and Conditions and this Privacy Policy, You agree to the following:

i) If You are a paying subscriber to the Services, You consent to receive information from Tech 2 Success, which may include newsletters, product information and service offers by email. You may opt out of receiving such information at any time by contacting Us by email at [support@tech2success.com](mailto:support@tech2success.com), by phone at (240)54-TECH2 {(240)548-3242} or by logging onto Your account and updating Your preferences.

ii) If You are not a paying subscriber to the Services, We will not send You any information without Your prior consent. You may opt in to receive additional information, or opt out of receipt of information, at any time by contacting Us by email at [support@tech2success.com](mailto:support@tech2success.com), by phone at (240)54-TECH2 {(240)548-3242}.

Notwithstanding the foregoing, You may not opt out of receiving invoices or other information important to the operation of the Services or Your account.

All opt-in and opt-out requests may take up to several days to implement.

#### Accessing Information

a) You may at any time access Your account if You log in to Your account with Tech 2 Success, or You can follow the links that may be provided within Our emails to You to manage Your preferences. You can also contact us at by email at [support@tech2success.com](mailto:support@tech2success.com), by phone at (240)54-TECH2 {(240)548-3242}. Although We will take reasonable steps to keep Information accurate, complete and up-to-date, We request that You keep the Information as current as possible so that We may continue to improve the Service.

b) We will only withhold Your access to Information in extremely limited circumstances where it is permitted and/or required by law, such as where it might create a dangerous situation, compromise an investigation or court proceeding, compromise Tech 2 Success's business efforts, or improperly disclose the personal information of another.

c) If You wish to view what Information we hold about You or if You want it to be removed from Tech 2 Success's Services, please contact us by email at [support@tech2success.com](mailto:support@tech2success.com), by phone at (240)54-TECH2 {(240)548-3242}



## **DO NOT TRACK**

We belong to advertising networks that may use browsing history across participating websites to show interest-based advertisements. Our Products and Services do not recognize if a browser sends a “do not track” signal or similar mechanism to indicate the wish not to be tracked or receive interest-based advertisements.

## **V. MINORS**

- a) The Service is not directed to minors and You may not use the Tech 2 Success Services if You are under the age of 18. Tech 2 Success does not intend, seek or knowingly collect information from or about minors.
- b) As We cannot distinguish the age of persons who access Our site, a blanket privacy policy is applied.
- c) Should a parent or guardian have reason to believe that a minor has provided Tech 2 Success with personal information, please contact Us to ensure that the information is removed and that We unsubscribe them from any promotional contact opportunities or other communications.

## **VI. SECURITY**

- a) Tech 2 Success has implemented technology and security features to safeguard the privacy of Information. A secure server protects Information. Additionally, with Tech 2 Success, You can be assured that the Information You provide to Tech 2 Success is transmitted using Secure Socket Layer (SSL) encryption and stored with a AES-256 encryption. If You become aware of any security breach, please let Us know as soon as possible.
- b) We have internal procedures in place requiring Our employees and data processors to respect the confidentiality of any Information held by Tech 2 Success. We restrict access to Information to Tech 2 Success employees, contractors and agents who need to know that information in order to process it in connection with the Service, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- c) Tech 2 Success will endeavor to take all reasonable steps to keep secure any Information that We hold. Information is stored on secure servers that are protected in controlled facilities. Tech 2 Success will not be held responsible for events arising from third parties gaining unauthorized access to Information, or people with access exceeding their authority.
- d) Please note also that Tech 2 Success may use overseas facilities to process or back up its Information. As a result, We may transfer and store Information in such overseas facilities. However, this does not change any of Our commitments to safeguard Your privacy.
- e) You can play Your part in safeguarding Information by never disclosing Your login name, password or account information to anybody. Whenever You log in to the Service, particularly on somebody else’s computer or on public computers, You should always log out at the end of Your session. Your assistance will help Us protect the privacy of Information.

f) Tech 2 Success cannot be held responsible for lapses in security caused by third party access to Information as a result of Your failure to keep Your personal, commercial or security information private. Please notify Us immediately if there is any unauthorized use of Your account by any other Internet user or any other breach of security.

## **VII. CHANGES**

Tech 2 Success reserves the right to update or otherwise change its Privacy Policy at any time, whereupon Tech 2 Success will update its website accordingly. We will notify You of any changes by posting the new Privacy Policy on this webpage. You are advised to review this Privacy Policy periodically for any changes. If the changes are significant, We will try to provide a more prominent notice (including, for certain services, email notification of changes or through the Services). We will also keep prior versions of this Privacy Policy in an archive for Your review upon request. Your continued use of the Services, after changes to Our Privacy Policy constitutes acceptance of those changes. If you disagree with the changes to this Privacy Policy, you should deactivate Your account.

### **NOTICE TO CALIFORNIA CUSTOMERS:**

Pursuant to the California Consumer Privacy Act of 2018 (the "CCPA"), natural persons who are California residents have certain rights concerning their personal Information held by Tech 2 Success as described below.

You have the right to request that We disclose what Information Tech 2 Success collects, uses, discloses and sells. You may submit a consumer request to know this Information by sending the same to Us by email at [support@tech2success.com](mailto:support@tech2success.com), by phone at  [\(240\)54-TECH2](tel:(240)54-TECH2)  [{\(240\)548-3242}](tel:(240)548-3242). In order to verify Your request, We will ask You to provide Your name, email address, and certain other pieces of identifying information. Once You have submitted this information and any necessary supporting documentation, We will confirm the information by reviewing it against Our records to verify Your identity.

For the categories of Information We have collected over the past twelve (12) months, or may collect about You, the categories of sources from which such Information is collected, the business and/or commercial purposes for collecting such Information, the categories of third parties to whom that Information is disclosed and the business and/or commercial purposes of disclosing such Information, please refer to Sections I through IV of Our Privacy Policy.

Tech 2 Success does not sell (as such term is defined in the CCPA) the Information we collect (and will not sell it without providing a right to opt out) except for incidental data transfer to third parties to assist in the delivery and/or facilitation of the Services and We may share contact information including name, email, phone number, etc., with business partners or companies We have marketing agreements with, for the purposes of marketing related products and services.

You have the right to request the deletion of Information collected or maintained by Tech 2 Success. You may submit a consumer request to delete this Information by email at [support@tech2success.com](mailto:support@tech2success.com), by phone at (240)54-TECH2 {(240)548-3242}.

In order to verify Your request, We will ask You to provide Your name, email address, and certain other pieces of identifying information. Once You have submitted this information and any necessary supporting documentation, We will confirm the information by reviewing it against Our records to verify Your identity. For further details on how to request that we update or delete Information, please refer to Section IV of Our Privacy Policy.

You have the right not to receive discriminatory treatment by Tech 2 Success for exercising the privacy rights granted by the CCPA. In order to exercise the rights described above, You may designate an authorized agent to make a request under CCPA on Your behalf.

**Contact.** Please contact Us by email at [support@tech2success.com](mailto:support@tech2success.com), by phone at (240)54-TECH2 {(240)548-3242} if you have any questions about Our Privacy Policy and/or Our privacy practices.

## **EU Data Subject Rights**

If you are a resident of the European Economic Area (EEA), you have the right to: (a) request access to your Personal Data and rectification of inaccurate Personal Data; (b) request erasure of your Personal Data; (c) request restrictions on the processing of your Personal Data; (d) object to processing your Personal Data; and/or (e) the right to data portability (collectively, “EU Requests”).

We can only process EU Requests from a user whose identity has been verified. To verify your identity, please provide your email address or URL when you make an EU Request. For more information about how to get access to Personal Data and for exercising your rights, please contact us by email at [support@tech2success.com](mailto:support@tech2success.com), by phone at (240)54-TECH2 {(240)548-3242}.

## **GDPR ADDENDUM TO PRIVACY POLICY**

### **1. DEFINITIONS**

1.1. Data Protection Legislation: the General Data Protection Regulation ((EU) 2016/679) and any other directly applicable European Union regulation relating to privacy.

### **2. DATA PROTECTION**

2.1. You and Tech 2 Success will comply with all applicable requirements of the Data Protection Legislation. This clause 2.1 is in addition to, and does not relieve, remove or replace, Your or Tech 2 Success’s obligations under the Data Protection Legislation.

2.2. You and Tech 2 Success acknowledge that for the purposes of the Data Protection Legislation, You are the data controller and Tech 2 Success is the data processor (where Data Controller and Data Processor have the meanings as defined in the Data Protection Legislation). Schedule A sets out the scope, nature and purpose of processing by Tech 2 Success, the

duration of the processing and the types of personal data (as defined in the Data Protection Legislation, Personal Data) and categories of Data Subject.

2.3. Without prejudice to the generality of clause 2.1, You will ensure that You have all necessary appropriate consents and notices in place to enable lawful transfer of the Personal Data to Tech 2 Success for the duration and purposes of this agreement.

2.4. Without prejudice to the generality of clause 2.1, Tech 2 Success shall, in relation to any Personal Data processed in connection with the performance by Tech 2 Success of its obligations under this agreement:

2.4.1. process that Personal Data only on Your written instructions unless Tech 2 Success is required by Applicable Laws to otherwise process that Personal Data. Where Tech 2 Success is relying on laws of a member of the European Union or European Union law as the basis for processing Personal Data, Tech 2 Success shall promptly notify You of this before performing the processing required by the Applicable Laws unless those Applicable Laws prohibit Tech 2 Success from so notifying You;

2.4.2. ensure that it has in place appropriate technical and organizational measures, reviewed and approved by You, to protect against unauthorized or unlawful processing of Personal Data and against accidental loss or destruction of, or damage to, Personal Data, appropriate to the harm that might result from the unauthorized or unlawful processing or accidental loss, destruction or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures (those measures may include, where appropriate, pseudonymizing and encrypting Personal Data, ensuring confidentiality, integrity, availability and resilience of its platform and services, ensuring that availability of and access to Personal Data can be restored in a timely manner after an incident, and regularly assessing and evaluating the effectiveness of the technical and organizational measures adopted by it);

2.4.3. ensure that all personnel who have access to and/or process Personal Data are obliged to keep the Personal Data confidential; and

2.4.4. not transfer any Personal Data from within the European Economic Area to outside of the European Economic Area unless Your prior written consent has been obtained and the following conditions are fulfilled:

2.4.4.1. You or Tech 2 Success has provided appropriate safeguards in relation to the transfer;

2.4.4.2. the Data Subject has enforceable rights and effective legal remedies;

2.4.4.3. Tech 2 Success complies with its obligations under the Data Protection Legislation by providing an adequate level of protection to any Personal Data that is transferred; and

2.4.4.4. Tech 2 Success complies with reasonable instructions notified to it in advance by You with respect to the processing of the Personal Data;

2.4.5. assist You, at Your cost, in responding to any request from a Data Subject and in ensuring compliance with Your obligations under the Data Protection Legislation with respect to security, breach notifications, impact assessments and consultations with supervisory authorities or regulators;

2.4.6. notify You without undue delay on becoming aware of a Personal Data breach;

2.4.7. at Your written direction, overwrite Personal Data and copies thereof on termination of the agreement unless required by Applicable Law to store the Personal Data; and

2.4.8. maintain complete and accurate records and Information to demonstrate its compliance with this clause 2.4 and allow for audits of compliance with this clause 2.4 by You or Your designated auditor.

2.5. You do not consent to Tech 2 Success appointing any third-party processor of Personal Data under this agreement.

2.6. Either Tech 2 Success or You may, at any time on not less than 30 days' notice, revise this clause 2.6 by replacing it with any applicable controller to processor standard clauses or similar terms forming party of an applicable certification scheme (which shall apply when replaced by attachment to this agreement).

3. CURRENT PRACTICES: Without limiting the foregoing, Tech 2 Success represents, and You confirm that you are aware of and approve of, each of the following:

3.1. Tech 2 Success does not collect Personal Data from individuals, but rather Tech 2 Success's clients collect Personal Data from their customers, and in turn the collected data over to Tech 2 Success in the United States;

3.2. Tech 2 Success does not collect any Personal Data in the European Economic Area;

3.3. Tech 2 Success does not store any Personal Data in the European Economic Area;

3.4. Tech 2 Success does not transfer any Personal Data from within the European Economic Area to outside the European Economic Area;

3.5. Tech 2 Success does not rely on laws of a member of the European Union or European Union law as the basis for processing Personal Data; and

3.6. Tech 2 Success hosts Your data in the United States, and You confirm that this satisfies Section 2.4.2 above.

## SCHEDULE A

### PROCESSING, PERSONAL DATA AND DATA SUBJECTS

#### 1. PROCESSING BY TECH 2 SUCCESS

1.1. SCOPE: Tech 2 Success receives information from each of its clients regarding the client's retail customers and purchases

1.2. NATURE: Tech 2 Success organizes the foregoing categories of information into its software system as directed by each Tech 2 Success client, and provides each Tech 2 Success client access to its specific information, as directed by that Tech 2 Success client

1.3. PURPOSE OF PROCESSING: Tech 2 Success organizes the foregoing categories of information for each Tech 2 Success client in order to provide access to the information to each such Tech 2 Success client

1.4. DURATION OF THE PROCESSING: Tech 2 Success maintains the foregoing categories of information for each Tech 2 Success client in accordance with that Tech 2 Success client's instructions.

2. TYPES OF PERSONAL DATA: Tech 2 Success receives the following categories of information from its clients: customers' names, email addresses and telephone numbers specific to each Tech 2 Success client, any correspondence We have with You, Information You provide when You use the Services, Information You submit or upload to the Services, or data we collect from Your systems or third party services, details of transactions made by You through Services, details of Your visits to our website, which includes without limitation location and traffic data, weblogs, resources You access and other communication data. And Client Data submitted to Us

by You which may contain Personal Data (and potentially Sensitive Personal Data of Users and third parties. "Sensitive Personal Data" as defined by the GDPR.

You represent and warrant that you i) have the right to transfer such Personal Data to us for the purpose of receiving the Services; and ii) are solely responsible for obtaining all required consents, authorizations and permissions from such Users and third parties and providing all required notifications to such Users and third parties (where applicable) to enable You to provide such information to Us and to grant to Us the rights set forth in this privacy policy. You may not provide Us with any Client Data or other information containing Personal Data of Users or third parties unless and until You have obtained all necessary consents, authorizations and permissions to do so.

3. CATEGORIES OF DATA SUBJECT: Tech 2 Success receives information regarding Tech 2 Success's clients.

4. CONFIDENTIALITY: Tech 2 Success maintains strict confidentiality in connection with all of its clients' data.