

Privacy Shield Privacy Policy for Topbloc

Revision Date: August 2020

Data privacy and customer trust is important to TopBloc. This Privacy Policy (“Policy”) describes the information TopBloc collects about individuals (“Personal Data”) and how TopBloc may use, collect, share and process such information. This policy applies when you visit TopBloc’s website, when this Policy is linked in a webpage or document, when individuals visit TopBloc offices, or when receiving communication from TopBloc (including but not limited to email correspondence). This policy does not apply to customer data processed, accessed or stored during Workday configuration services offered by TopBloc. Such access and use are governed by the contractual agreement between TopBloc and the customer or as may be required by law. As of the Effective Date, TopBloc’s subprocessors are Amazon Web Services, Zendesk and Asana. TopBloc is not responsible for the data security practices of its customers, which may differ from the terms of this policy. For more information on the processing of data in this scenario, please reach out to the TopBloc customer directly.

Topbloc complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Topbloc has certified to the U.S. Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

All references to “TopBloc”, “us” “we” “our” refers to TopBloc, LLC.

Scope:

This policy applies to the processing of personal data that TopBloc receives.

Type of Information We Collect/Process

You may choose to provide TopBloc with personal information, such as your name, email address, company information, street address, and telephone number. This may occur if you request additional information about our services, contact customer support or request customer service, or contact us using the “get in touch” or similar form on our website. While attending industry conferences and events, we may collect your business card which may contain your name, email address, company address, phone number, job title and company name. If you visit TopBloc offices, you may be required to register as a visitor and provide your name, email address, phone number, company name as well as date of arrival. If you interact with our website, TopBloc may collect information about you through technological means (such as cookies, web beacons etc.) which may be considered Personal Data. Topbloc will collect Customer Data and that data will not be disclosed to 3rd parties. Users may contact us at privacyshield@topbloc.com and the user then will be opting out of data being sent to third parties. If topbloc were work with a 3rd party a contract will be made and specific terms for processing data.

This Privacy Shield Policy applies to client information within the scope of TopBlocs Privacy Shield certification, which covers the following categories of information:

- Current Client Data from their ERP systems for the purposes of delivering Topblocs services and maintaining ongoing relationships with our clients.
- Topbloc collected prospective client's emails for the purpose of delivering Topbloc services.
- Client data is processed using Topbloc's proprietary software that allows us to perform our daily operations and provide a service to our clients.
- Data is not disclosed to any 3rd parties.

Why We Collect Personal Data

We use your Personal Data to (a) personalize your experience as you interact with TopBloc online, in person or through TopBloc's website, (b) evaluate how TopBloc's products and services are used and how they may be improved, and (c) communicate with you with respect to your use of or potential uses of the TopBloc products and services.

Disclosures for National Security or Law Enforcement

Under certain circumstances, we may be required to disclose your personal information in response to lawful requests to meet national security or law enforcement requirements. Our organization is subject to the investigatory and enforcement powers of the Federal Trade Commission(FTC).

Access to Personal Data:

At TopBloc only authorized employees are able to access the data and only for the purpose for which they are authorized. You may request to correct, delete or modify your Personal Data by contacting TopBloc. If you would like to request further information or a change, please email privacyshield@topbloc.com. We may request specific information to confirm your identity.

Use and Disclosure of Personal Data

TopBloc may disclose information if such action is necessary to (a) conform to legal requirements or comply with legal processes; (b) protect and defend our rights or property;(c) enforce the website Terms and Conditions; and/or (d) act to protect the interests of our users or others. If TopBloc goes through a business transition, such as a merger or acquisition, a reorganization or sale of all or a portion of its assets (including stock, equity and/or options), your Personal Data may be among the assets transferred. TopBloc may also share Personal Data with professional advisers including lawyers, bankers, auditors and insurers based in countries in which we operate who provide services in their respective fields. TopBloc may share your Personal Data with the

third parties to communicate with you about TopBloc services or support. TopBloc may share your Personal Data with a third party such as LinkedIn or Workday for legitimate business interest. TopBloc is not responsible for the data security practices of these third parties, which may differ from the terms of this policy. The third party will provide you with further information on the processing of your Personal Data as required by law or regulation. TopBloc may share your Personal Data to the extent necessary to fulfil your submitted request (e.g. via our website) or for customer support marketing or technical operations. Users have option to opt out of data being sent to 3rd parties. If this is something that would like to be done, please email privacyshield@topbloc.com and we will take care of that within 24 hours.

How to Contact Us:

In compliance with the Privacy Shield Principles, Topbloc commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Topbloc at: privacyshield@topbloc.com

Topbloc has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU. Under certain conditions, individuals may have the possibility to engage in binding arbitration through the Privacy Shield Panel.

Change Policy:

TopBloc will update this Policy from time to time to reflect changes in our practices, technology, legal requirements and other factors. When we do, we will update the “effective date” at the top of this Policy. If we make an update, we may provide you with notice prior to the update taking effect, such as by posting a conspicuous notice on our website or by contacting you using the email address you provided. We encourage you to review this Policy periodically to stay informed about our collection, processing, use and sharing of your Personal Data.