



## Privacy Notice

**Effective Date:** 10/19/2023

TopBloc collects and uses personal information for various reasons. When we do so, we will use it in accordance with applicable laws.

Some jurisdictions, including the European Economic Area (“EEA”), the United Kingdom (“UK”), and Switzerland, require a legal basis – a reason why TopBloc is legally allowed to collect and use your personal information. TopBloc adheres to the principals of the EU-U.S. Data Privacy Framework (EU-U.S. DPF), 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. TopBloc relies on the EU-U.S. DPF as a legal basis for transfers of personal information. To view TopBloc’s Data Privacy Framework Notice as it pertains to personal information transferred from the EEA, UK and Switzerland, please visit [LINK](#).

TopBloc will rely on the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF as a legal basis to transfer personal information from the UK and Switzerland once the applicable local authorities approve the Adequacy Decisions. In the meantime, TopBloc continues to rely on the SCCs for the purpose of the UK and Swiss data protection law.

Below, we describe (1) in what instances we collect your information, (2) the categories of information we collect in those instances, (3) our purposes for collection, and (4) the legal bases for collection. If we need to collect other personal information from you, we will explain which information we need and why at the time we collect it.

### **About TopBloc**

TopBloc is a leading Workday Services Provider. This means customers of the Workday software (companies, schools and governments) will engage the professional services of TopBloc to implement, deploy and support tailored Workday solutions to help them improve and sustain their businesses with Workday.

TopBloc does not sell our customers’ users’ data or monetize it by selling advertising. Our customers control the data they provide to TopBloc and TopBloc only uses it to provide the services for which TopBloc has been engaged.

### **Application**

Some data protection laws in various jurisdictions distinguish between “controllers” and “processors” of personal information. While other jurisdictions may use different terminology, the concept typically remains the same. A controller decides why and how to process personal information. A processor only processes information on behalf of a controller based on the controller’s instruction; the processor does not make decisions about personal information. TopBloc may be either a controller or a processor, depending on the scenario.

This Privacy Notice applies when TopBloc is the data controller of your personal information (unless a different TopBloc privacy statement is displayed when we collect your personal information), and explains how TopBloc collects, uses, and shares your personal information for its own purposes. For example, this Privacy Statement covers when you:

- Visit a TopBloc website that links to this Privacy Statement
- Interact with TopBloc as a representative of a company that has an account with TopBloc (e.g. you are our customer or our supplier)



- Create or use an account offered directly by TopBloc (as opposed to an account offered by our customers)
- Register for or attend a TopBloc marketing, learning, recruiting, or training event or webinar
- Provide us with feedback about our products or services
- Receive a sales or marketing communication from us, including emails or telephone calls

This Privacy Notice does not cover how we process personal information on behalf of our customers as a processor. If you are an employee, a student, or a job applicant of an organization that uses a Workday product/service or TopBloc service and you have questions or concerns about the personal information your organization holds in Workday or shares with TopBloc about you (when Workday/TopBloc is a processor), please direct your request to that organization. TopBloc cannot respond directly to your request. Additionally, Workday's Privacy Statement can be accessed [HERE](#).

If you are a TopBloc employee or job applicant or you visit a TopBloc facility, information about how we use and protect your information is communicated to you in a separate statement.

### **Information We Collect**

We collect information to provide goods and/or services to you, to help improve your customer experience, and to support our business functions. We may collect the following categories of consumer personal data:

<b>Category</b>	<b>Examples</b>
Identifiers	A real name, alias, location, time zone, postal address, unique personal identifier, online identifier, Internet Protocol address, telephone number, email address, account name, or other similar identifiers.
Financial Information	Account numbers, credit or debit card numbers.
Demographic Information	Age, race, color, citizenship, marital status, gender.
Commercial information.	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
Professional or employment-related information.	Current or past job history, title, tenure, role, job information, company.

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the scope of various Data Protection Laws, like:

- health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

**How we collect and use your personal information.**

- 1. Information provided by you.** We may ask you to provide personal information voluntarily. For example, your personal information may be required to create an account with us, subscribe to marketing communications or to submit inquiries. In some cases, we may combine the information you provide.
  - a. When you request information from us.** When you fill out a contact form or otherwise contact us to express interest in obtaining information about TopBloc or our services, we may ask you to provide us with your contact information such as full name, email, telephone number, college, year in school, company name, job level, functional role, and/or address.
    - i. Purpose and Legal Basis Under Applicable Laws.** We process your personal information in reliance on our legitimate interests or your consent (where you have opted in to email marketing) to fulfil your request and communicate with you or to provide you with information about our products or company, in accordance with your marketing preferences.
  - b. If you are a TopBloc customer.** If you are a representative of a company that has an account with TopBloc, we collect your business contact information including your name, business email, telephone number, and company name. If you contact TopBloc for support related to your organization's use of our services or events, we will also collect information about the reason for your inquiry and any other information you choose to provide to us.
    - i. Purpose and Legal Basis Under Applicable Laws.** We process your personal information in reliance on our legitimate interests or your consent (where you have opted in to email marketing) to communicate with you and fulfil your request, manage your organization's account (including invoicing and other account-related issues), or provide you with information about our products or company, in accordance with your marketing preferences.
  - c. If you are our supplier.** If you are a representative of a company that provides TopBloc with products or services, we collect your business contact information including your name, business email, telephone number and company name.
    - i. Purpose and Legal Basis Under Applicable Laws.** We process your personal information in reliance on our legitimate interests or your consent (where you have opted in to email marketing) to communicate with you and fulfil your request or manage your organization's account (including invoicing and other account-related issues).
  - d. If you register for events or webinars.** When you register for an event or webinar, we may ask you to provide us with your contact information such as your name, business email, telephone number, and company name; your health and safety information such as your emergency contact or dietary preferences; and

your billing information such as your billing name, billing address, and credit card number.

- i. Purpose and Legal Basis Under Applicable Laws.** We process your personal information with your consent (where you have opted in to email marketing), to perform or enter contracts or terms of service with you, or if we do not have a contract directly with you, in reliance on our legitimate interests to manage, plan and host the event, including to send related communications; improve our future events; improve or enhance your (or your organization's) experience interacting with TopBloc; provide you with information about our services, in accordance with your marketing preferences.
    - e. If you participate in research with us or otherwise provide us feedback.** When you participate in or register for a TopBloc survey or voluntarily submit certain information to us such as providing TopBloc with feedback about our products and services, we may ask for certain biographical or demographic information, such as your name, email address, contact information, time zone, location, company, employment status, tenure, role, job information, gender, age group, and other information relevant to the survey.
      - i. Purpose and Legal Basis Under Applicable Laws.** Where you have entered into a contract with us, we will process your personal information for the performance of such contract. If we do not have a contract directly with you, or otherwise obtain your consent, we rely on our legitimate interests to: fulfill the purpose set out in the survey; improve your (or your organization's) experience interacting with TopBloc; identify potential product or service improvements or future product developments for the workforce; contextualize your feedback and experience with our products and services so that we can improve them; improve how we conduct research.
    - f. If you participate in a sales call or online meeting with TopBloc.** We may record sales phone calls and online meetings (including audio and video content where applicable) for training, quality assurance, and administration purposes. This includes analyzing the content of such calls and online meetings using AI-powered tools to gain better insights into our interactions with our customers and prospects. We will always notify you before a call will be recorded and will obtain your consent where required under applicable law.
      - i. Purpose and Legal Basis Under Data Protection Law.** We process your personal information with your consent where required under applicable law or in reliance on our legitimate interests to: maintain high-quality sales calls and engagements with prospects and customers; provide training and coaching to our sales teams; generate automated call transcripts; keep our records up to date (for example, in relation to follow-up meetings, sales opportunities, and updating customer contact details); improve our sales processes and make our sales calls more impactful
- 2. Information collected automatically.** We also collect certain information related to your use of our websites. In some jurisdictions in the United States and countries in the EEA, the UK, and Switzerland, this information may be considered personal data under applicable data protection laws. We may combine this information with personal information provided by you. In particular, we collect the following personal information

from you automatically:

- a. When you access our websites or content.** When you visit our websites, we collect information about your device and your usage. The information collected may include your IP address, device type, unique device identification numbers, browser type, broad geographic location (for example, country or city-level location based on your public IP address), performance, and other usage and technical information. We also collect information about how you interact with our websites (for example, referring web page, pages visited, features used), emails, content, or other features (for example, when you open a marketing email or click on an embedded link, or if you watch videos on our site, or interact with/message using our chat function). Some of this information may be collected using cookies and similar tracking technology, as further explained in our Cookie Notice.
          - i. Purpose and Legal Basis Under Data Protection Law.** We process your personal information in reliance on our legitimate interests to:
            1. Better understand the visitors who come to our websites, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our websites to our visitors.
            2. Provide, operate, and maintain our websites, including providing access to content you have requested and displaying country-specific information.
            3. Protect the security and prevent misuse of our websites and services by tracking use of our websites and services, verifying accounts and activity, investigating suspicious activity, and enforcing our terms and policies.
- 3. Information obtained from other sources.** We also collect information about you from other sources including third parties, individuals at your organization, or publicly available sources. We may combine this information with personal information provided by you. Specifically, we collect personal information from the following other sources:
  - a. From third-party providers of business contact information.** TopBloc may collect business contact information about you from other sources including the co-sponsors of events attended by TopBloc, third parties from whom we have purchased business contact information, and from publicly accessible websites, such as your company's website, professional network services, or press releases. Business contact information may include: first name, last name, business email, telephone number, company name, job level, functional role, business street address, and online identifier, as well as previous employers and roles.
    - i. Purpose and Legal Basis Under Data Protection Law.** We process your personal information in reliance on our legitimate interests or with your consent (where you have opted in to email marketing) to: provide you with information about our products, in accordance with your marketing preferences (including telemarketing calls and marketing emails); understand our market and identify potential customer opportunities.
  - b. From your organization.** We also may receive information about you from your organization for the purposes of obtaining or providing services or to recommend individuals to participate in our research studies/surveys. For example, another

individual at your organization may provide us with your business contact information so that we can give you access to training materials purchased by your organization, or to grant you certain administrative privileges. If your organization is a TopBloc supplier, your organization may also provide us with your name and email address so that we can contact you about the services your organization supplies to us.

- i. **Purpose and Legal Basis Under Data Protection Law.** We process your personal information in reliance on our legitimate interests to: communicate with you about the goods and services provided; manage your (or your company's) account and provide the requested services to you or your company.

### **Disclosure of Personal Information**

TopBloc may share or make accessible your personal information to third parties as follows:

- **Service providers.** TopBloc may disclose both personal information and the categories of personal information described above to third-party service providers or vendors contracted to provide services on our behalf (for example, IT and hosting, data analytics, event services, customer support, call recording, data enrichment, email fulfillment, and payment services). These third-party service providers may use personal information we provide to them only as instructed by TopBloc.
- **TopBloc Partners.** When you participate in webinars, events, and other activities where TopBloc collaborates with third parties (such as Workday), we may disclose the information described under "if you register for events and webinars" above, such as your contact information and interests in these offerings or services to these approved third parties to communicate with you.
- **Your Organization.** Where your organization is a customer or potential customer of TopBloc, we may disclose your personal information to relevant people within your organization. For example, we may share a list of individuals attending a TopBloc event, or disclose inquiries from end users that should be addressed directly by the organization rather than TopBloc.
- **Advertising.** When you visit our website, we may enable third parties to use cookies and other trackers to show you ads on third-party websites that are more relevant to you. Under some data protection laws, our disclosure of this information with third parties through cookies and other trackers for targeted advertising may be considered a "sale" or "share" of personal information. Please see our Cookie Notice for more information about the types of cookies we use or set your preferences and opt-out of the sale or sharing (for targeted advertising) of your data. TopBloc does not have actual knowledge that it "sells" or "shares" the personal information of individuals under 16 years of age.
- **Additional disclosures:** TopBloc may disclose data if we have a good-faith belief that 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 our website Terms and Conditions; and/or (d) act to protect the interests of our customers, users, or others. If TopBloc goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of our assets, your personal information may be among the assets transferred, provided that we inform the actual or potential buyer (or its agents and advisors) that it must use your personal information only for the purposes disclosed in this Privacy Statement. TopBloc may also ask for your consent to disclose



your information to other unaffiliated third parties that are not described elsewhere in this statement.

### **Sensitive Personal Information (SPI) We Collect**

TopBloc does not collect “sensitive personal information” as the term is defined by California law beyond what is necessary to provide your requested services.

### **CONSUMER RIGHTS**

Depending on where you are located and how you interact with TopBloc, you may have certain legal rights over the personal information we hold about you, subject to local privacy laws.

Depending on your jurisdiction, your rights may include the right to:

#### **RIGHT TO ACCESS**

You may have the right to access PI which we may collect or retain about you. If requested, we shall provide you with a copy of your PI which we collect as permitted by the applicable privacy laws. You also have the right to receive your PI in a structured and commonly used format so that it can be transferred to another entity (“data portability”). Exercise your right by submitting the form [LINKED HERE](#) or by following the instructions below in the paragraph titled “Exercising Your Rights.”

#### **RIGHT TO KNOW/CONFIRM**

You may have the right to request that we disclose the following about your PI:

- The specific PI we may collect;
- The categories of PI we may collect;
- The categories of sources from which we may collect your PI;
- The business purpose(s) for collecting or sharing your PI;
- The categories of PI we may disclose for business purposes; and
- The categories of third parties to whom we may share your PI.

#### **RIGHT TO OPT-OUT - DO NOT SELL MY PERSONAL INFORMATION**

Although this is a right in certain jurisdictions, TopBloc does not sell your personal information.

#### **RIGHT TO OPT-OUT - DO NOT SHARE MY PERSONAL INFORMATION**

You may have the right to limit how your PI is disclosed or shared with third parties. TopBloc does not share PI for cross-context behavioral advertising. Exercise your right by submitting the form [LINKED HERE](#) or by following the instructions below in the paragraph titled “Exercising Your Rights.”

#### **RIGHT TO DELETION**

In certain circumstances, you may have the right to request the erasure of your PI. Upon verifying the validity of a deletion request, we will delete your PI from our records, and instruct any service providers or third parties to delete your information, when applicable. Exercise your right by submitting the form [LINKED HERE](#) or by following the instructions below in the paragraph titled “Exercising Your Rights.”

#### **RIGHT TO CORRECT/RIGHT TO RECTIFICATION**

In certain circumstances, you may have the right to request correction of any inaccurate PI. Upon verifying the validity of a verifiable consumer correction request, we will use commercially



reasonable efforts to correct your PI as directed, taking into account the nature of the PI and the purposes of maintaining your PI.

Exercise your right by submitting the form [LINKED HERE](#) or by following the instructions below in the paragraph titled “Exercising Your Rights.”

### **EXERCISING YOUR RIGHTS**

TopBloc will not discriminate against you for exercising your rights. TopBloc does not make decisions based solely on automated processing that produces legal or similarly significant effects as part of the processing activities covered by this Privacy Notice. If your personal information has been submitted to us by or on behalf of a TopBloc customer and you wish to exercise any rights you may have under applicable data protection laws, **please inquire with the applicable customer directly.**

To exercise your rights with respect to information covered by this Privacy Notice, please contact us using the contact information provided in this Notice or the forms provided above. Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply. Except as described in this Notice or provided for under applicable privacy laws, there is no charge to exercise of your legal rights.

However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may:

- Charge a reasonable fee taking in account the administrative costs of providing the information or taking the action requested as permitted by law; or
- Refuse to act on the request and notify you of the reason for refusing the request.

You may opt-out of the sale or sharing of your personal information for targeted advertising by clicking “Cookie Preferences” below or by implementing the Global Privacy Control (GPC). For instructions on how to download and use GPC, please visit <https://globalprivacycontrol.org>. See our Cookie Notice for more information.

### **VERIFYING CONSUMER REQUESTS**

We will require your name, e-mail, phone number, and address. We will attempt to match our records based on that information. Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm their identity.

### **Data Storage and Security**

TopBloc shall use a reasonable standard of care to store and protect your personal information. We use appropriate physical, technical and/or organizational security measures and procedures to protect personal information from unauthorized use, loss, alteration, destruction or modification. However, the security of information transmitted through the internet can never be guaranteed. You are responsible for maintaining the security of your password or other forms of authentication involved in accessing password-protected or secured resources.

TopBloc shall retain your personal information until the initial purpose for collecting and retaining such data has been satisfied or TopBloc has an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting requirements). If you subsequently agree to a new or additional purpose, your personal information may be retained for that.

The criteria used to determine appropriate retention periods for personal information include:





- The length of time we have an ongoing business relationship with you;
- The amount, nature, and sensitivity of the personal information we process; and
- Whether we have a legal obligation to retain personal information or whether retaining personal information is necessary to resolve disputes, including the establishment, exercise, or defense of legal claims.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### **Changes to this Notice**

TopBloc reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the TopBloc website and update the notice's effective date. You are encouraged to periodically review this Privacy Notice for the latest information on our privacy practices.

#### **Contact Information**

If you have any questions or comments about this notice, including the ways in which TopBloc collects and uses your information, please do not hesitate to contact us at:

**Phone:** 1-888-988-7021

**Website:** [www.topbloc.com](http://www.topbloc.com)

**Email:** [Privacy@topbloc.com](mailto:Privacy@topbloc.com)

**Postal Address:**

TopBloc, LLC  
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Chicago, IL 60654