

TopBloc Privacy Notice

Effective July 1, 2019

Data privacy and customer trust is important to TopBloc. This Privacy Notice (“Notice”) 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 Notice 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 is governed by the contractual agreement between TopBloc and the customer or as may be required by law. As of the Effective Date, TopBloc’s sub-processors 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.

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

THE PERSONAL INFORMATION WE COLLECT ABOUT YOU

Personal Data we collect directly from you

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 cookies which may be considered Personal Data (see Cookies, Web Beacons and Other Tracking Technologies below).

Personal data we collect from other sources

TopBloc may collect and combine information about you for human resources purposes. TopBloc may collect information about you from other sources, including third parties from whom we have purchased Personal Data or purchased access to Personal Data, and combine this information with Personal Data provided by you. This helps us to update, expand and analyze our records for candidate review and hiring. We collect Personal Data from LinkedIn Recruiter to see if you are open to new opportunities, if you’ve viewed specific job postings, and allows us to contact you directly. The LinkedIn Recruiter seat may allow us to access your business contact information, job title, email, and/or message you directly through the third-party LinkedIn. We may also receive your Personal Data if you choose to submit an application on LinkedIn.

COOKIES, WEB BEACONS AND OTHER TRACKING TECHNOLOGIES

When you visit our websites, our servers may place a cookie on your browser, which can collect information, including Personal Data, about your online activities. TopBloc only uses session-based and does not use persistent cookies. Session cookies disappear from your computer when you close your browser software or turn off your computer. During the session, these cookies allow the user to be recognized when navigating from page to page within the website and prevents duplicative entry of information. To control the use of cookies, configure settings at the individual browser level, but note that if you choose to disable cookies, it may limit your use of certain functionality or features on our websites or services.

TopBloc does not use web beacons, tags, scripts, Local Storage Objects (such as HTML5), flash cookies, required cookies, functional cookies or tracking/analytics software such as Google Analytics. TopBloc does not compile information about usage of our websites or interaction with emails from us.

TopBloc does not respond to web browser “Do-Not-Track” signals. We do not serve targeted advertisements in our Services at this time.

SOCIAL MEDIA FEATURES

TopBloc’s website may include links that direct you to social media websites such as Facebook, Twitter, LinkedIn, or Instagram. Your use of those sites, including any information you submit to those sites, is governed by their privacy policies, not this policy.

USE OF YOUR PERSONAL INFORMATION

This section describes some of the ways TopBloc uses the Personal Data we collect. There may be other uses of the Personal Data, which we would describe to you when we collect the information.

Website: TopBloc uses the Personal Data we collect about you to provide our website, services and support including providing the content you request (e.g. download of content from our website or using information provided to us in a “get in touch” submission to respond to your request).

Office visitors: We may process your Personal Data to register who visited our offices for security reasons.

Payments: If you have provided TopBloc financial information, we will process this information to collect payment for the contemplated transaction and in some circumstances check financial qualifications.

Legitimate Business Interest and Legal Rights and Obligations: We also retain some of your information as necessary to comply with our legal obligations under applicable law or regulation, to resolve disputes and pursue remedies available and limit damages, to enforce our agreements, to support business operations, and to continue to develop and improve our Services.

Communication regarding the services: We also use it to send transactional communications (e.g. via email), such as notices related to services or policy changes. Examples may include confirming your purchase, reminding you of an expiration, responding to your questions or requests, providing customer

support, providing technical notices, updates, security alerts and/or administrative messages. If an opt out is available, you will find that option within the communication itself.

Marketing Communications: We will process your Personal Data to send you marketing information, services recommendations and other non-transactional communications (e.g. marketing communications) about us and partners about our services or promotions. Please see “Your Rights” below to see how you can control your Personal Data with regards to marketing by TopBloc.

With your consent: TopBloc uses Personal Data when you have given us consent to do so for a specific purpose not listed above. For example, we may publish or share testimonials to promote the Services, with your permission.

LEGAL BASIS FOR PROCESSING (APPLICABLE TO EEA USERS)

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the TopBloc services you use and how you use them. TopBloc collects and uses your Personal Data only where:

- We need it to provide you the website and associated services, including to operate the website, provide customer support and/or customer service and to protect the safety and security of the website and associated services;
- It allows us to fulfil our contractual obligations to you.
- It satisfies a legitimate interest (which is not overridden by your data protection interests, rights or freedoms), such as to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- TopBloc need to process your Personal Data when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws.

SHARING PERSONAL DATA

TopBloc may disclose information 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 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 (e.g. Workday) to communicate with you about TopBloc services or support. As an employee of TopBloc, TopBloc may share your Personal Data with a third party such as LinkedIn or Workday for the 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.

INTERNATIONAL TRANSFER OF INFORMATION COLLECTED

Personal Data collected by TopBloc may be transferred to, stored and processed by us in the United States. Therefore, your Personal Data may be processed outside of the EEA. When you provide Personal Data to TopBloc, you consent to the processing and transferring of your information to and within the United States. TopBloc follows applicable data protection laws when transferring Personal Data.

CHILDREN

TopBloc services and website is not directed to children. We do not knowingly collect Personal Data from children under the age of 18. If you become aware that a child has provided TopBloc with Personal Data, please contact us in the manner described below (“Contact Us”) and we will take appropriate steps to delete such information from our systems.

DATA RETENTION

TopBloc may retain your Personal Data for only the length of time necessary to provide you as consistent with the original purpose of collection which may be for providing you services or legal obligations, enforcing agreements, resolving disputes, accounting or reporting requirements. We determine the appropriate retention period for Personal Data based on the quantity, nature, and sensitivity of such data, the potential risk of harm from unauthorized use or disclosure, and whether we can achieve the purposes of the processing through other means, as well as the applicable legal requirements.

Personal Data stored during Services (as defined in a Master Subscription Agreement) is retained in accordance with the agreement between the Customer and TopBloc. If your data has been submitted to TopBloc by a TopBloc customer, please inquire with the TopBloc customer directly to exercise your rights under applicable data protection laws. As TopBloc is considered a processor and not a controller in this relationship, we may only access your Personal Data upon our customer’s instruction.

YOUR RIGHTS

You may have certain rights regarding your Personal Data. Depending on local data protection laws, these may include the following rights:

- The right to be informed how TopBloc uses your Personal Data (described in this Notice)
- The right to access to your personal data so you can receive a copy of the personal data that we hold about you;
- The right to ask us to rectify Personal Data about you that is incomplete or inaccurate;
- The right to deletion or erasure, which may be known as the “right to be forgotten” to the extent permitted by other legal obligations;
- The right to restrict or limit the processing of your Personal Data;
- The right to portability of data. You may have the right to request a copy of your Personal Data in a common format or, to the extent possible, that your Personal Data is provided to another data controller;
- The right of object to the processing of your Personal Data (e.g., by prohibiting us from processing your data for direct marketing purposes);
- The right to not be subject to a decision based solely on automated processing also known as “Automated Decision-Making”; this currently does not take place on our website.

- To the extent that the collection, processing and/or sharing of your Personal Data is based on your consent, you have the right to withdraw your consent at any time, which will not affect the lawfulness of the processed information prior to withdrawal.
- If, you believe that we have not been able to resolve your request or concern in accordance with the EU General Data Protection Regulation, and you are located in the EEA, you have the right to lodge a complaint with the relevant supervisory authority.

EXERCISE YOUR RIGHTS

Please contact us by following the methods listed under “Contact Us”. We endeavor to respond to legitimate requests within one month of receiving the request. TopBloc will contact you if more information is needed to comply with your request. It may take us longer than a month if it is a complex matter or if we are experiencing a high volume of requests.

If you are an employee of a TopBloc customer, we recommend that you contact your employer, our customer, directly, to update your information.

PREFERENCES FOR MARKETING COMMUNICATIONS

If TopBloc processes your Personal Data to send marketing communications, and you wish to “unsubscribe” you may contact us through the process described in the “Contact Us” Section. If available, you may also opt out via the “unsubscribe” link in the communication. It is important to note that unsubscribing from marketing emails will not opt you out of receiving business communications related to current relationship (e.g. information about services, updates, administrative information or security information.)

SECURITY

TopBloc takes reasonable and appropriate precautions including organizational, technical, and physical measures, to help safeguard against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, theft, misuse or access to, the Personal Data we access, process or use. While we follow generally accepted standards to protect Personal Data, no method of storage or transmission is 100% secure. You are solely responsible for limiting access to your devices (including authentication for password protected resources). If you have any questions about the security of our websites, please contact us via the “Contacting Us” section below.

CHANGES TO THIS PRIVACY STATEMENT

TopBloc will update this Notice 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 Notice. 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 Notice periodically to stay informed about our collection, processing, use and sharing of your Personal Data.

CONTACT US

If you have questions regarding this Privacy Notice or to exercise your rights regarding your Personal Data, please contact us at:

TopBloc, LLC.

Attn: IT Department

800 W. Huron St. #200, Chicago, IL 60642

Email: it@topbloc.com

We are committed to working with you to resolve privacy concerns.