

Data Privacy Framework Notice

Last revised: 10/19/2023

TopBloc complies with the requirements of the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension of the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) set forth by the U.S. Department of Commerce concerning the personal information of the types described below that are transferred from the European Economic Area, UK and Switzerland to the United States. We have certified our participation in the Data Privacy Frameworks to the Department of Commerce that we adhere to the EU-U.S. Data Privacy Framework Principals (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. We have also certified to the U.S. Department of Commerce that we adhere 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/>. This Notice only applies to personal information within the scope of TopBloc's Data Privacy Framework certifications.

Our Data Privacy Framework certifications cover personal information regarding:

1. current, former, and prospective partners, principals, and employees (collectively "Personnel") in connection with the Personnel relationship;
2. personal information regarding clients and their personnel and customers in connection with the client relationship, such as the delivery of professional services and the administration of the client relationship; and
3. personal information regarding third parties (such as service providers and contractors) and their personnel in connection with the management and administration of the business relationships with such third parties.

Our certifications do not cover any disclosure of an individual's personal information to a third party who processes personal information for its own purposes when the



disclosure is made at the individual's request. We disclose personal information to third-party service providers in connection with the operation of our business, including our provision of services to clients and our Personnel and business relationships. We ascertain that these third-party service providers provide at least the same level of privacy protection as the Data Privacy Framework Principles require. We may be liable if both third parties fail to meet these obligations, and we are responsible for the event giving rise to the damage.

The Federal Trade Commission has jurisdiction over TopBloc's compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF. In certain situations, TopBloc may be required to disclose personal information to law enforcement, regulatory or other government agencies, or to other third parties in each case to comply with legal, regulatory, or national security obligations or requests.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, TopBloc commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact TopBloc at: privacy@topbloc.com. Further, any questions or complaints concerning our Data Privacy Framework compliance or requests to access, correct, amend, delete, or limit the use or disclosure of personal information (opt-out) may be directed to privacy@topbloc.com.

TopBloc commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF International Centre for Dispute Resolution/American Arbitration Association ("ICDR/AAA"), an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit [here](#) for more information or to file a complaint. The services of ICDR/AAA are provided at no cost to you.

For complaints regarding DPF compliance not resolved by any of the other DPF mechanisms, you have the possibility, under certain circumstances, to invoke binding arbitration. Further information can be found on the official DPF website.