



## Privacy Statement

At tealbook®, we are committed to protecting individuals' privacy and safeguarding personal information. The purpose of this Privacy Statement is to inform you about the types of personal information tealbook® collects, uses, and discloses and the choices you have regarding your own information and its use and disclosure.

Your privacy is one of our priorities. We are proud to demonstrate our commitment to your privacy, by complying with the laws and regulations under applicable privacy laws in Europe – notably, the *General Data Protection Regulation* ("GDPR").

From time to time, we may update this Privacy Statement, which is current as of the "last revised" date at the end of this document. We will treat Personal Information in a manner consistent with this Privacy Statement under which it was collected, unless we have your consent to treat it differently. This Privacy Statement applies to any information we collect or receive about you, or from any other source.

### 1. WHAT IS PERSONAL INFORMATION?

"Personal Information" is any information that is identifiable to an individual. This information may include but is not limited to, name, title, mailing address, both personal and work e-mail address, telephone number, as well as website usage data (as discussed below).

### 2. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We only collect your Personal Information by fair and lawful means (for example, when registering for a tealbook® account or updating a tealbook® profile). We may collect Personal Information directly from the individual and/or from third parties, where we have obtained consent to do so or as otherwise required or permitted by law.

### 3. WHERE DO WE STORE YOUR PERSONAL INFORMATION?

All Personal Information entered into tealbook® is securely stored on one of the largest shared hosting providers in the world on solid state cloud servers.

### 4. HOW DO WE USE YOUR PERSONAL INFORMATION?

We identify the purposes for which we use Personal Information at the time we collect such information, all prior to use. We may use Personal Information for the following purposes (the "Purposes"):

- to register or administer any membership account(s) associated with an individual;
- to process transactions;
- to optimize the experience on our website and tealbook® platform;
- to respond to or investigate legal claims, inquiries, or similar requests;
- to collect opinions and comments in regard to tealbook®;
- to conduct contests and promotions;
- to perform demographic analysis (but only on an aggregated and anonymous basis);
- other purposes for which tealbook® may obtain consent from time to time; and
- such other uses as may be permitted or required by applicable law.

### 5. TO WHOM DO WE PROVIDE YOUR PERSONAL INFORMATION?

We identify to whom, and for what purposes, we disclose your Personal Information, at the time we collect such information and obtain consent at that time to such disclosure.

We may transfer Personal Information to third party service providers with whom we have a contractual agreement that includes confidentiality provisions, where such third parties are assisting us with the Purposes – for example, service providers that provide technical support, data storage, processing, or hosting.

We may transfer your Personal Information outside of the country for the Purposes, including for process and storage by service providers in connection with such Purposes. However, you should note that to the extent that any Personal Information is out of the country, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts, or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. For written information about our practices regarding service providers, contact our Privacy Officer (see Section 16 below).

### 6. WHEN AND HOW DO WE OBTAIN CONSENT?

We generally obtain consent prior to collecting, and in any case, prior to using or disclosing Personal Information for any purpose. Consent may be granted to us either orally, electronically, or in writing. The form of consent that we seek, including whether it is express or implied, will largely depend on the sensitivity of the Personal Information and the reasonable expectations of privacy, relative to the data and circumstances of use.

### 7. HOW DO WE ENSURE THE PRIVACY OF PERSONAL INFORMATION WHEN DEALING WITH OUR AFFILIATES AND OTHER THIRD PARTIES?



We ensure that all affiliates and other third parties that are engaged to perform services on our behalf and are provided with Personal Information are contractually required to observe the intent of this Privacy Statement and our privacy practices.

**8. HOW LONG WILL WE UTILIZE, DISCLOSE OR RETAIN YOUR PERSONAL INFORMATION?**

We will utilize, disclose or retain your Personal Information for as long as necessary to fulfill the purposes for which that Personal Information was collected and as permitted or required by law.

**9. HOW CAN YOU REVIEW YOUR PERSONAL INFORMATION THAT WE HAVE COLLECTED, UTILIZED OR DISCLOSED?**

If you make a written request to review any Personal Information about you that we have collected, utilized, or disclosed, we will provide you with any such Personal Information to the extent required by law. We will make such Personal Information available to you in a form that is generally understandable, and will explain any abbreviations or codes.

**10. HOW DO YOU KNOW THAT THE PERSONAL INFORMATION WE HAVE ON YOU IS ACCURATE?**

We will ensure that your Personal Information is kept as accurate, complete, and up-to-date as possible. We will not routinely update your Personal Information, unless such a process is necessary. As a subscriber, we expect you, from time to time, to supply us with written updates to your Personal Information, when required.

**11. WHAT IF THE PERSONAL INFORMATION WE HAVE ON YOU IS INACCURATE?**

At any time, you can challenge the accuracy or completeness of your Personal Information in our records. If you successfully demonstrate that your Personal Information in our records is inaccurate or incomplete, we will amend the Personal Information as required. Where appropriate, we will transmit the amended information to third parties having access to your Personal Information.

**12. HOW FAST WILL WE RESPOND TO YOUR WRITTEN REQUESTS?**

We will attempt to respond to each of your written requests not later than 30 days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit. You have the right to make a complaint in respect of this time limit.

**13. ARE THERE ANY COSTS TO YOU FOR REQUESTING INFORMATION ABOUT YOUR PERSONAL INFORMATION OR OUR PRIVACY PRACTICES?**

We will not charge any costs for you to access your Personal Information in our records without first providing you with an estimate of the approximate costs, if any.

**14. HOW DO WE KNOW THAT IT IS REALLY YOU REQUESTING YOUR PERSONAL INFORMATION?**

We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your Personal Information. Any such identifying information shall be used only for this purpose.

**15. WHAT SAFEGUARDS HAVE WE IMPLEMENTED TO PROTECT PERSONAL INFORMATION?**

We have implemented physical, organizational, contractual and technological security measures to protect Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification. The only personnel granted access to Personal Information are those with a business 'need-to-know' or whose duties reasonably require such information.

**16. HOW DO YOU CONTACT US REGARDING ACCESS TO YOUR PERSONAL INFORMATION OR OUR PRIVACY PRACTICES?**

All comments, questions, concerns or complaints regarding your Personal Information, or our privacy practices should be forwarded:

**By email: [security@tealbook.com](mailto:security@tealbook.com)**

*Last revised: February 2021*