



# PRIVACY POLICY

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## Thanks for joining Tofnatech!

Tofnatech and its affiliates (collectively "Tofnatech", "we" and "us") respect your privacy. We offer services that enable firstline workers to reach and collect data on the field totally hands-free.

This Privacy Policy describes how we – Tofna Teknoloji ve Gıda A.S. (together with its affiliates companies – "Tofnatech", "we", "our" or "us") collect, store, use and disclose personal data regarding individuals ("you") who:

- 1) visit or otherwise interact with our websites ("Visitors"), available at [www.Tofnatech.com](http://www.Tofnatech.com), or any other website, webpage, e-mail, text message or online ad under our control (collectively – "Sites");
- 2) use our cloud-based task management platform, via the Sites, or the Tofnatech.com or mobile applications, addons or extensions (the "Users"; and together with the Sites – the "Service"). This policy also describes how we use Personal Data, with whom we share it, your rights and choices, and how you can contact us about our privacy practices.

Your privacy is important to us, and we are strongly committed to making our practices regarding your personal data more transparent and fairer. Please read this Privacy Policy carefully and make sure that you fully understand and agree to it.

This policy does not apply to third-party websites, products, or services, even if they link to our Services or Sites, and you should consider the privacy practices of those third-parties carefully.

You are not legally required to provide us with any Personal Data (defined below), and may do so (or avoid doing so) at your own free will.

If you do not wish to provide us with such Personal Data, or to have it processed by us or any of our Service Providers (defined below), please simply do not enter our Sites or use our Service. You may also choose not to provide us with "optional" Personal Data, but please keep in mind that without it we may not be able to provide you with the full range of our services or with the best user experience when using our Service.

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# 1 Overview

Tofnatech obtains Personal Data about you from various sources to provide our Services and to manage our Sites. "You" may be a visitor to one of our websites, a user of one or more of our Services ("User" or "Tofnatech User").

## 2 Personal Data We Collect

### 2.1 Personal Data that we collect about you

Personal Data is any information that relates to an identified or identifiable individual. The Personal Data that you provide directly to us through our Sites and Services will be apparent from the context in which you provide the data. In particular:

- When you register for a Tofnatech account we collect your full name, email address, company name, telephone number, country that you connect, and account log-in credentials.
- When you fill-in our online form to contact our sales team, we collect your full name, work email, country, and anything else you tell us about your project, needs and timeline.

When you respond to Tofnatech emails or surveys we collect your email address, name and any other information you choose to include in the body of your email or responses. If you contact us by phone, we will collect the phone number you use to call Tofnatech. If you contact us by phone as a Tofnatech User, we may collect additional information in order to verify your identity.

- If you are a Tofnatech User, you will provide your contact details, such as name, postal address, telephone number, and email address. As part of your business relationship with us, we may also receive financial and personal information about you, such as your date of birth and government identifiers associated with you and your organization (such as your national ID number (such as social security number in USA, tax number, or Employer Identification Number).
- When you make payments or conduct transactions through our website or application or device we provide, we will receive your transaction information. We may receive this information directly from you, or from third parties. The information that we collect will include payment method information (such as credit or debit card number, or bank account information), purchase amount, date of purchase, and payment method. Different payment methods may require the collection of different categories of information. The

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payment method information that we collect will depend upon the payment method that you choose to use from the list of available payment methods that we offer to you. When you make a transaction, we may also receive your name, email, billing or shipping address and in some cases your transaction history to authenticate you.

When we conduct fraud monitoring, prevention, detection, and financial compliance activities or provide such services to our Users, we will receive Personal Data from you (and your device) and about you through our Service and from our business partners, financial service providers, identity verification services, and publicly available sources (e.g., name, address, phone number, country), as necessary to confirm your identity and prevent fraud. Our fraud monitoring, detection and prevention services may collect Personal Data about you and use technology to help us assess the risk associated with an attempted transaction by you with us.

You may also choose to submit information to us via other methods, including:

1. in response to marketing or other communications,
2. through social media or online forums,
3. through participation in an offer, program or promotion,
4. in connection with an actual or potential business relationship with us, or
5. by giving us your business card or contact details at trade shows or other events.

## 2.2 Information that we collect automatically on our Sites

Our Sites use cookies and other technologies to function effectively. These technologies record information about your use of our Sites, including:

- Browser and device data, such as IP address, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons and the language version of the Sites you are visiting.
- Usage data, such as time spent on the Sites, pages visited, links clicked, language preferences, and the pages that led or referred you to our Sites.

We also collect information about your online activities on websites and connected devices over time and across third-party websites, devices, apps and other online features and services. We use Google



Analytics and other third-party site analytics tools on our Sites to help us analyze your use of our Sites and diagnose technical issues.

To learn more about the cookies that may be served through our Sites and how You can control our use of cookies and third-party analytics, please see our [Cookie Policy](#).

## 3 How We Use Personal Data

### 3.1 Our products and services

We rely upon a number of legal grounds to ensure that our use of your Personal Data is compliant with applicable law.

We use Personal Data as necessary for the performance of our Service; to comply with our legal and contractual obligations; and to support our legitimate interests in maintaining and improving our Service, e.g. in understanding how our Service are used and how our campaigns are performing, and gaining insights which help us dedicate our resources and efforts more efficiently; in marketing, advertising and selling our Service to you and others; providing customer service and technical support; and protecting and securing our Users, Customers, Visitors, ourselves and our Service.

If you reside or are using the Service (i) in a territory governed by privacy laws which determine that "consent" is the only or most appropriate legal basis for processing Personal Data (in general, or specifically with respect to the types of Personal Data you choose to share via the Service), your acceptance of this Privacy Policy will be deemed as your consent to the processing of your Personal Data for all purposes detailed in this Privacy Policy. If you wish to revoke such consent, please contact us by email at [hi@Tofnatech.com](mailto:hi@Tofnatech.com).

More specifically, we use Personal Data for the following purposes:

- To facilitate, operate, and provide our Service;
- To authenticate the identity of our Users, and to allow them to access our Service;
- To provide our Visitors, Users and Customers with assistance and support;
- To gain a better understanding on how Visitors and Users evaluate, use and interact with our Service, and how we could improve their and others' user experience, and continue improving our products, offerings and the overall performance of our Service;

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- To facilitate and optimize our marketing campaigns, ad management and sales operations, and to manage and deliver advertisements for our products and services more effectively, including on other websites and applications. Such activities allow us to highlight the benefits of using our Service, and thereby to increase your engagement and overall satisfaction with our Service. This includes contextual, behavioral and interests-based advertising based on the Visitor's or User's activity, preferences or other data available to us or to our Service Providers and business partners;
- To explore and pursue growth opportunities by facilitating a stronger local presence and tailored experiences, including through partnerships with local distributors, resellers and providers of professional services related to our Service;
- To contact our Visitors, Users and Customers (whether existing or prospective) with general or personalized service-related messages, as well as promotional messages that may be of specific interest to them;
- To facilitate, sponsor and offer certain events, contests and promotions;
- To publish your feedback and submissions to our public forums and blogs;
- To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity;
- To create aggregated statistical data, inferred non-personal data or anonymized or pseudonymized data (rendered non-personal), which we or our business partners may use to provide and improve our respective services, or for any other purpose; and
- To comply with applicable laws and regulations.

### 3.2 Marketing and events-related communications

We may send you email marketing communications about Tofnatech products and services, invite you to participate in our events or surveys, or otherwise communicate with you for marketing purposes, provided that we do so in accordance with the consent requirements that are imposed by applicable law. For example, when we collect your business contact details through our participation at trade shows or other events, we may use the information to follow-up with you regarding an event, send you information that you have requested on our products and services and, with your permission, include you on our marketing information campaigns.

### 3.3 Advertising

When you visit our Sites, we (and our service providers) may use Personal Data collected from you and your device to target advertisements for Tofnatech Services to you on our Sites and other sites you

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visit ("interest-based advertising"), where allowed by applicable law. For example, when you visit our Site, we will use cookies to identify your device and direct ads for our Services to you. You have choices and control over our cookies (or similar technologies) we use to advertise to you. Please see our [Cookie Policy](#) for more information. At present, there is no industry standard for recognizing Do Not Track browser signals, so we do not respond to them.

**We do not sell or rent the Personal Data of our Users, or our Site visitors.**

## 4 How We Disclose Personal Data

Tofnatech does not sell or rent Personal Data to marketers or unaffiliated third parties. We share your Personal Data with trusted entities, as outlined below.

### 4.1 Tofnatech entities

We may share Personal Data with other Tofnatech entities in order to provide our Services and for internal administration purposes.

### 4.2 Service providers

We share Personal Data with a limited number of our service providers. We have service providers that provide services on our behalf, such as identity verification services, website hosting, data analysis, information technology and related infrastructure, customer service, email delivery, and auditing services. These service providers may need to access Personal Data to perform their services. We authorize such service providers to use or disclose the Personal Data only as necessary to perform services on our behalf or comply with legal requirements. We require such service providers to contractually commit to protect the security and confidentiality of Personal Data they process on our behalf. Our service providers are predominantly located in the European Union and the United States of America.

### 4.3 Business partners

We share Personal Data with third party business partners when this is necessary to provide our Services to our Users. Examples of third parties to whom we may disclose Personal Data for this purpose are banks and payment method providers (such as credit card networks) when we process payment, and the professional services firms that we partner with to deliver features like voice recognition.

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#### 4.4 Our Users and third parties authorized by our Users

We share Personal Data with Users as necessary to maintain a User account and provide the Services. We share data with parties directly authorized by a User to receive Personal Data, such as when a User authorizes a third-party application provider to access the User's Tofnatech account. The use of Personal Data by an authorized third party is subject to the third party's privacy policy.

#### 4.5 Corporate transactions

In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we may share Personal Data with third parties in connection with such transaction. Any other entity which buys us or part of our business will have the right to continue to use your Personal Data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

#### 4.6 Compliance and harm prevention

We share Personal Data as we believe necessary: (i) to comply with applicable law, or payment method rules; (ii) to enforce our contractual rights; (iii) to protect the rights, privacy, safety and property of Tofnatech, you or others; and (iv) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.

#### 4.7 Sharing your Feedback or Recommendations

If you submit a public review or feedback, note that we may (at our discretion) store and present your review to other users of our Sites and Service (including other Customers). If you wish to remove your public review, please contact us at [support@taksimo.com](mailto:support@taksimo.com). If you choose to send others an e-mail or message inviting them to use the Service, we will use the contact information you provide us to automatically send such invitation e-mail or message on your behalf. Your name and e-mail address may be included in the invitation e-mail or message.

#### 4.8 Community Forum

Our Sites include public blogs or forums. Any information you submit on these forums, blogs and communities – including profile information associated with the Account you use to post the information – may be read, collected, and used by others who access these Sites. Due to the nature

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of such public forums, your posts and certain profile information may remain visible to all even after you terminate your Account. To request removal of your information from publicly accessible Sites operated by us, please contact us at [support@Tofnatech.com](mailto:support@Tofnatech.com). In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to and why.

## 5 Your Rights and Choices

You have choices regarding our use and disclosure of your Personal Data:

### 5.1 Opting out of receiving electronic communications from us.

If you no longer want to receive marketing-related emails from us, you may opt-out via the unsubscribe link included in such emails. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages that are required to provide you with our Services.

### 5.2 How you can see or change your account Personal Data

If you would like to review, correct, or update Personal Data that you have previously disclosed to us, you may do so by signing in to your Tofnatech account or by contacting us.

### 5.3 Your data protection rights

Depending on your location and subject to applicable law, you may have the following rights with regard to the Personal Data we control about you:

- The right to request confirmation of whether Tofnatech processes Personal Data relating to you, and if so, to request a copy of that Personal Data;
- The right to request that Tofnatech rectifies or updates your Personal Data that is inaccurate, incomplete or outdated;
- The right to request that Tofnatech erase your Personal Data in certain circumstances provided by law;
- The right to request that Tofnatech restrict the use of your Personal Data in certain circumstances, such as while Tofnatech considers another request that you have submitted (including a request that Tofnatech make an update to your Personal Data); and



- The right to request that we export to another company, where technically feasible, your Personal Data that we hold in order to provide Services to you.

Where the processing of your Personal Data is based on your previously given consent, you have the right to withdraw your consent at any time. You may also have the right to object to the processing of your Personal Data on grounds relating to your particular situation.

### 5.3 Process for exercising data protection rights

In order to exercise your data protection rights, you may contact Tofnatech as described in the Contact Us section below. We take each request seriously. We will comply with your request to the extent required by applicable law. We will not be able to respond to a request if we no longer hold your Personal Data. If you feel that you have not received a satisfactory response from us, you may consult with the data protection authority in your country.

For your protection, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. If we no longer need to process Personal Data about you in order to provide our Services or our Sites, we will not maintain, acquire or process additional information in order to identify you for the purpose of responding to your request.

## 6 Security and Retention

We make reasonable efforts to ensure a level of security appropriate to the risk associated with the processing of Personal Data. We maintain organizational, technical and administrative measures designed to protect Personal Data within our organization against unauthorized access, destruction, loss, alteration or misuse. Your Personal Data is only accessible to a limited number of personnel who need access to the information to perform their duties. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please contact us immediately.

We retain your Personal Data as long as we are providing the Services to you. We retain Personal Data after we cease providing Services directly or indirectly to you, even if you close your Tofnatech account or complete a transaction with a Tofnatech User, to the extent necessary to comply with our legal and regulatory obligations, and for the purpose of fraud monitoring, detection and prevention. We also

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retain Personal Data to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the data by our contractual commitments to our financial partners, and where data retention is mandated by the payment methods that we support. Where we retain data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

## 7 International Data Transfers

We are a global business. Personal Data may be stored and processed in any country where we have operations or where we engage service providers. We may transfer Personal Data that we maintain about you to recipients in countries other than the country in which the Personal Data was originally collected. Those countries may have data protection rules that are different from those of your country. However, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your Personal Data remains protected to the standards described in this Privacy Policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Data.

## 8 Use by Minors

The Services are not directed to individuals under the age of sixteen (16), and we request that they not provide Personal Data through the Services.

## 9 Updates to this Privacy Policy and Notifications

We may change this Privacy Policy from time to time to reflect new services, changes in our Personal Data practices or relevant laws. The "Last updated" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes are effective when we post the revised Privacy Policy on the Services. We may provide you with disclosures and alerts regarding the Privacy Policy or Personal Data collected by posting them on our website and, if you are a User, by contacting you through your email address and/or the physical address listed in your Tofnatech account.

## 10 Links to Other Websites

The Services may provide the ability to connect to other websites. These websites may operate independently from us and may have their own privacy notices or policies, which we strongly suggest

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you review. If any linked website is not owned or controlled by us, we are not responsible for its content, any use of the website or the privacy practices of the operator of the website.

## 11 Contact Us

If You have any questions or complaints about this Privacy Policy, please [contact us](#) electronically.



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