

## **Privacy Rights Policy**

**Last updated: November 2, 2020**

Subject to applicable law requirements, Tim Adtech Ltd. (“**Company**”, “**we**” or “**us**”) will provide individuals with the opportunity to exercise their rights with respect to their Personal Data.

We value the privacy rights of our Visitors, Business Partners and Users (as such terms are defined in our [Privacy Policy](#)) ( shall also be referred to herein as “**you**” or “**yours**”). We therefore created this Privacy Rights Policy (“**Privacy Rights Policy**” or “**Policy**”) as an overview of your rights associated with your Personal Data, under the EU General Data Protection Regulation (“**GDPR**”); and the California Consumer Privacy Act of 2018 (“**CCPA**”) which may apply to you in the event that you are a “California Resident” (as such term is defined under the CCPA).

Please note that any Privacy Rights Request Forms (as defined below) submitted to us shall be processed by us in our capacity as a “Data Controller”. As such, if you are a User (as such term is defined in our Privacy Policy i.e., an end user of our Business Partner), the Business Partner would be the “Data Controller”. Please note, that if we receive a Privacy Rights Request Form from a User, we will notify the relevant Business Partner as to such occurrence and will refer you to the relevant Business Partner, unless otherwise required under applicable laws. We will act in accordance with the Business Partner’s instructions in relation to any Privacy Rights Request Forms that we received from one of their Users.

### **ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS**

You have a right to request us to confirm whether we process certain Personal Data related you, as well as a right to obtain a copy of such Personal Data, with additional information regarding how and why we use this Personal Data. The GDPR and CCPA provide different protections. The GDPR enables access to all Personal Data processed by the controller, however, the CCPA's "Access Right" **only** applies to Personal Information collected in the 12 months prior to the request. After we receive such request, we will analyze and determine the veracity and appropriateness of the access request and provide you with the applicable confirmation of processing, the copy of the Personal Data or a description of the Personal Data and categories of data processed, the purpose for which such data is being held and processed, and details about the source of the Personal Data that was not provided by you. Our response detailed above will be provided within the period required by law (please see additional information under the “**Response Timing and Format**” section below).

### **DELETION REQUEST RIGHTS**

The Company is legally obligated to comply with a request to delete Personal Data if:

- the data is no longer needed for the original purpose that it was processed for and no new lawful purpose exists for its continued processing;
- the lawful basis for processing is consent of the data subject and such consent has been withdrawn;
- the data subject has exercised his or her right to object to the Company’s processing of his or her Personal Data, and the Company has no overriding grounds for processing the data;
- the Personal Data is processed unlawfully;
- erasure of the Personal Data is necessary to comply with applicable laws.

- if the Company has passed on Personal Data to a third party, a data subject also has a right to oblige the Company to tell those third parties that the information should be erased.

The right to erasure is not absolute. Even if a data subject falls into one of the categories described above, the Company is entitled to reject the data subject's request and continue processing data, subject to applicable law, if such processing is:

- necessary to comply with legal obligations;
- necessary to establish, exercise or defend legal claims; or is necessary for scientific research, etc.;
- necessary to perform a contract between you and us;
- necessary to detect security incidences, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity;
- necessary to debug, to identify and repair errors that impair existing intended functionality;
- to enable solely internal uses that are reasonably aligned with your expectations based on our relationship with you.

#### **RIGHT TO OBJECT / RIGHT TO OPT OUT**

You may object to our processing of your Personal Data if our lawful basis for processing such Personal Data is our **legitimate interests**. However, even if we receive your objection, we will be permitted to continue processing the Personal Data in the event that (subject to applicable laws and regulations):

- our legitimate interests for processing the Personal Data overrides your rights, interests and freedoms;
- the processing of such Personal Data is necessary to establish, exercise or defend a legal claim or right, etc.

#### **YOUR RIGHT TO BE INFORMED**

You have the right to be informed of the Company's details (e.g. name, address, etc.), as well as why and how we process Personal Data. This right includes, among others, the right to be informed with respect to the identity of the business, the reasons and lawful basis for processing Personal Data, and additional information necessary to ensure the fair and transparent processing of Personal Data. Furthermore, you have the right to be informed with respect to the categories of Personal Information collected, sold, and disclosed by us in the previous 12 months. As such we have made sure to include and disclose such information in our CCPA Privacy Notice and that it will be updated every 12 months. For more information, please see our [Privacy Policy](#).

#### **THE RIGHT OF RECTIFICATION**

The Company must ensure that all Personal Data that it holds and uses about a data subject is correct. If such data is not accurate, a data subject has the right to require that the Company correct such data so that it is accurate. In addition, if the Company has passed on incorrect information about a data subject to a third party, the data subject also has a right to oblige the Company to inform those third parties that this information should be updated.

#### **THE RIGHT OF RESTRICTION**

A data subject may limit the purposes for which the Company may process its Personal Data. The Company's processing activities may be restricted if: the accuracy of the data is contested; processing is unlawful and a data subject requests restriction instead of erasure; the Company no longer needs the data for its original purpose, but the data is still required to establish, exercise or defend legal rights; or consideration of overriding grounds in the context of an erasure request.

### **DATA PORTABILITY**

You may request us to send or "port" your Personal Data held by us to a third-party, however please note, that the GDPR and CCPA have different obligations with respect to this right and therefore, we will handle this according on a case by case basis based on the applicable jurisdiction you are subject to.

### **NONDISCRIMINATION**

Under the CCPA, you must not be discriminated against for exercising any of your rights, including by being denied goods or services, charging you different fees for such goods or services, including through the use of discounts or other benefits or imposing penalties; or it being suggested that you will receive a different price or rate for goods or services.

Notwithstanding the above it is allowed to set up schemes for providing financial incentives and you can opt-in to become part of them.

### **RESPONSE TIMING AND FORMAT**

We aim to respond to a verifiable data subject's request with undue delay and in any event within 30 days from the receipt of the request subject to GDPR and between 10-45 days from receipt of a request subject to the CCPA. If we require more time, we will inform you of our reasons for such extension and the extension period in writing. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Data that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

Furthermore, please note, under the CCPA your rights only apply to the Personal Information collected 12 months prior to the request and you are not entitled to submit more than 2 requests in a 12 months period.

This Policy applies solely to your rights concerning Personal Data / Personal Information (as defined under the applicable law) processed by us.

### **PLEASE SUBMIT A REQUEST BY:**

- \* Filling out the [Privacy Rights Request form](#)
- \* Emailing it to us at: **privacy@trinityaudio.ai**