

Privacy Policy

Last Revised: September 13, 2021

This privacy policy includes the provisions set forth herein and the Data Protection Agreement (available to view in Section 11) (“Privacy Policy”) are designed to inform you of the policies and procedures that will apply to the collection, security, use and disclosure of any of your Personal Data (defined below) collected by Curebit, Inc. dba Talkable (“Talkable”, “we”, “us”, or “our”) through [Talkable.com](https://www.talkable.com) (“Site”) or in connection with our products and services (“Services”). It also describes your choices regarding use, access and correction of your Personal Data. Please contact us with any questions you have about this Privacy Policy at: security@talkable.com.

BY PROCEEDING TO USE OUR SITE AND/OR SERVICES YOU CONSENT THAT WE MAY PROCESS THE PERSONAL DATA THAT WE COLLECT FROM YOU IN ACCORDANCE WITH THIS PRIVACY POLICY.

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1. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time to reflect changes to our information practices, so check back frequently. Any changes to this Privacy Policy will be posted on this page, and where appropriate (for example, if there are material changes to this policy), we will notify you by e-mail or by means of a notice on our home page prior to the changes taking effect.

2. INFORMATION WE COLLECT FROM YOU

2.1. Overview. Our primary goals are to provide and improve our products and services, to provide quality customer service, to respond to your and to enable users to effectively navigate the Site. We may collect Personal Data and Non-Personal Data about you and process the same as set forth herein.

2.2. Personal Data. Personal Data means data that allows someone to identify or contact you, including, for example, your first and last name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data. We may also ask you to submit certain personal custom attributes (e.g. hair color, eye color, height etc.) (“Custom Attributes”). In case the Custom Attributes are collected in combination with other Personal Data, we will treat all such Custom Attributes as Personal Data and handle it as laid out in this Privacy Policy.

2.3. When you give us your information. You may give us your Personal Data in the following ways: (i) if you sign up for a demo, (ii) sign up for newsletters, (iii) send us an e-mail, and/or sign up for our Services, and (iv) if you are an Advocate or Friend (as those terms are defined in the Talkable Referral Program Terms of Service) and want to sign up for the Talkable Referral Program; (v) if you participate in the Talkable Conversion Program; and (vi) if you participate in the Talkable Loyalty Program. The Talkable Referral Program, Talkable Conversion Program, and Talkable Loyalty Program are each individually referred to herein as a “Talkable Program” and collectively referred to as the “Talkable Programs”.

We do not collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political

opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

3. HOW DO WE USE YOUR PERSONAL DATA?

We will use your Personal Data to:

- carry out our obligations arising from any agreements entered into between you and us;
- provide you with our Site, Services, Talkable Programs, products or information, you have requested from us;
- notify you about changes to our Site and Services; or
- ensure that content from our Site and Services are presented in the most effective manner for you and your device, or
- we may also use your Personal Data to contact you with certain marketing or promotional materials, as well as other information that may be of interest to you. If you no longer consent to such use please send us an email so stating to support@talkable.com or follow the unsubscribe instructions provided in any of the communications.
- If you participate in the Talkable Programs, we may share your Personal Data with the Merchant (as that term is defined in the applicable Talkable Program’s Terms of Service). Additionally, we may also use your Personal Data to communicate updates about the Talkable Program you are participating in. We may also use your Personal Data to improve the referral experience based on your location or engagement with the referral campaign. If you no longer consent to such use please send us an email so stating to support@talkable.com or follow the unsubscribe instructions provided in any of the communications.

4. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Contact us at security@talkable.com if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
For the purposes of your subscription and the	(a) Identity (b) Contact	Performance of our agreement with you

administration of our Site and Services		
To carry out Services	(a) Identity (b) Contact (c) Marketing and Communications	Performance of our agreement with you
To improve and provide you with customer service	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of our agreement with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our Site/Services)
To administer and maintain our Site and Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provide for the administration and IT services, network security, and to prevent fraud) (b) Necessary to comply with our legal obligations
To contact you (including sending information and updates relating to our Site and Services)	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how users use our Site and Services, and to develop them)
To use data analytics to improve our Site and Services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of users for our products and services, to keep our Site and Services updated and relevant and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (to develop our Services)

	(d) Usage (e) Profile	
To provide a personalized experience, including providing personalized discount offers	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Consent

5. CHANGE OF PURPOSE

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please us at security@talkable.com.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

PLEASE NOTE THAT WE MAY PROCESS YOUR PERSONAL DATA WITHOUT YOUR KNOWLEDGE OR CONSENT, IN COMPLIANCE WITH THE ABOVE RULES, WHERE THIS IS REQUIRED OR PERMITTED BY LAW.

6. NON-PERSONAL DATA WE COLLECT FROM YOU

6.1. **Non-Personal Data.** Non-Personal Data means data that is not associated with or linked to your Personal Data; Non-Personal Data does not, by itself, permit the identification of individual persons.

6.2. **Log Data.** When you visit the Site, we automatically collect technical and statistical data about your visit, such as your browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data, the pages you visit and any search terms you use (“Log Data”).

6.3. **IP Address.** We also collect your public IP address when you visit the Site. We may use your public IP address in order to determine whether certain requests are fraudulent or frivolous and we may automatically cross-reference your public IP address with your domain name (usually the domain name of your ISP or employer). Because you may be visiting the Site from your personal residence (for example, because you are telecommuting), your IP address and any associated domain name are treated as “Personal Network Information” instead of Personal Data. “Log Data” does not include Personal Network Information. Although such Personal Network Information may be used to administer and maintain the Site and Services, it is not shared with any third parties, except as described below in the sections titled “Service Providers,” “Compliance with Laws and Law Enforcement” and “Business Transfers”. We will use Log Data for any purpose. **PLEASE NOTE: DEPENDING ON YOUR JURISDICTION YOUR IP ADDRESS MAY BE CONSIDERED PERSONAL DATA. IN ALL SUCH CASES IT WILL BE ACCORDINGLY TREATED AS SUCH.**

6.4. **Cookies.** We use many different cookies on our Site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit aboutcookies.org for detailed

guidance. Cookies allow us to identify and authenticate visitors, track aggregate behavior, and enable important website features. We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period, and we use that to identify you should you return to our Site and want to find information that you had started even if you are not logged in, or don't have a user account. Session cookies are used to maintain your shopping state as you browse through our Site. We also contract with analytics services and third party affiliate services to collect similar information for specific purposes. The use of cookies by our partners is not covered by this Privacy Policy. Though you may disable cookies through your web browser, doing so may prevent you from taking advantage of some of our Site's features. To opt out of these collection services, please see the section "Your Choices" below. The use of cookies by our partners is not covered by this Policy. To opt out of the services related to these cookies, please see section "Your Choices" below. Please note that if you block certain of these cookies, certain features of our Services may not work.

- Some of our cookies may collect your Personal Data. Specifically, Talkable may utilize uuid cookies, which may collect your first name, last name, email address, Custom Attributes, or IP address.

6.5. Web Beacons/Tags. We automatically collect aggregate anonymous information through web beacons. Website beacons allow third parties to provide anonymized, aggregated auditing, research and reporting for us.

6.6. Use of Non-Personal Data. We may also use your Log Data and Personal Network Information to: (i) administer our Site and Services for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; (ii) improve our Site to ensure that content is presented in the most effective manner for you and for your device; (iii) allow you to participate in interactive features of our Service and Site, when you choose to do so; (iv) as part of our efforts to keep our Site and Services safe and secure.

6.7. Pixel Tags. In addition, we use "Pixel Tags" (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to cookies, that are used to track online movements of Web users. In contrast to Cookies, which are stored on a user's computer hard drive, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and they tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to users. We do not tie the information gathered by Pixel Tags to Personal Data.

6.8. Flash LSOs. When we post videos, third parties may use local shared objects, known as "Flash Cookies," to store your preferences for volume control or to personalize certain video features. Flash Cookies are different from browser Cookies because of the amount and type of data and how the data is stored. Cookie management tools provided by your browser will not remove Flash Cookies. To learn how to manage privacy and storage settings for Flash Cookies, click [here](#).

6.9. Google Analytics. We may use Google Analytics to help analyze how users use the Site. Google Analytics uses Cookies to collect information such as how often users visit our Site and Services, what pages they visit, and what other sites they used prior to coming to our Site. We use the information we get from Google Analytics only to improve our Site. Google Analytics collects only the IP address assigned to you on the date you visit the Site, rather than your name or other Personally Data. We do not combine the information generated through the use of Google Analytics with your Personal Data. Although Google Analytics plants a persistent Cookie on Your web browser to identify you as a unique user the next time you visit the Site and use Services, the Cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to our Site and use of Services are governed by the Google Analytics' Terms of Use and Privacy Policy.

7. AGGREGATED DATA

After removing any information that would personally identify you from within the set of Personal Data, Personal Network Information and Log Data we collect from you, we may combine that information with information we collect from other users and customers (collectively the “Aggregated Data”) in order to improve the quality and value of Services and to analyze and understand how our Site is used. We may share Aggregated Data (after stripping of any information that would personally identify you) and Log Data with third parties for industry analysis, demographic profiling, and other purposes.

8. YOUR CHOICES

8.1. How You Can Access or Correct Your Information. You can access a variety of your Personal Data that we collect online and maintain it either online, or by contacting our customer service representatives via email at support@talkable.com . We use this procedure to better safeguard your information. You can correct factual errors in your Personal Data by sending us a request that credibly shows error. To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections.

8.2. How You Can Request for Your Information To Be Deleted. You can ask us to erase or delete all or some of your Personal Data (provided it is no longer necessary for legal purposes or to provide services to you). You may place a request by contacting our customer service representatives via email at support@talkable.com . We will delete all your Personal Data that we are not legally required to maintain within 30 days. We will also take reasonable steps to verify your identity before proceeding with deletion. Please realize that if you initialize this request while you have outstanding orders, those orders will be cancelled.

8.3. Opting out.

- **Analytics.** You may opt-out of Google Analytics by [following this link](#) .
- **Google AdWords.** Google AdWords remarketing service is provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the [Google Ads Settings page](#) .
- **Cookies.** You may disable, or delete cookies in your Web browser, but doing so may impact the usability of the website. To block cookies, you can also browse the site using your browser’s anonymous usage setting (called “Incognito” in Chrome, “InPrivate” for Internet Explorer, “Private Browsing” in Firefox and Safari etc.)

9. INFORMATION SHARING & DISCLOSURE

9.1. Service Providers. We may from time to time use certain third-party business partners, suppliers, and sub-contractors (“Services Providers” or “Subprocessors”) to perform Site-related services (for example, without limitation, website hosting, maintenance services, database management, Web analytics, and improvement of our Site and Services. These Service Providers have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. For a list of Talkable’s current Subprocessors, please see [here](#) .

9.2. Merchants. If you are participating in the Talkable Programs, we will also share your Personal Data with the Merchant (as that term is defined in the applicable Talkable Program’s Terms of Service) in order to provide the functionality of the Services (as that term is defined in the Talkable

Referral Program Terms of Service). The Merchant may contact you in relation to Merchant's own goods and/or services, or for their own marketing and promotional purposes. In certain cases, we may also share behavioral information, including how you interact with the Services (as defined in the applicable Talkable Program's Terms of Service). While this behavioral information may not personally identify you on its own, this information may be combined with other Personal Data, either by us or the Merchant.

9.3. Compliance with laws and law enforcement. Talkable cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose your Personal Data to government or law enforcement officials or private parties in response to lawful requests if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation (such as to meet national security or law enforcement requirements), to enforce or apply our terms and conditions or respond to claims and legal process, to protect the property and rights of Talkable or a third party, to protect the safety of the public or any person, or to prevent or stop any illegal, unethical or legally actionable activity (including for the purposes of fraud protection).

9.4. Business Transfers/Corporate Restructuring. If Talkable is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via e-mail and/or a prominent notice on our Site of any change in ownership or uses of your Personal Data, as well as any choices you may have regarding your Personal Data.

9.5. Affiliates. We may share some or all of your Personal Data with our parent company, subsidiaries, joint ventures, or other company's under a common control ("Affiliates"), in which case we will require our Affiliates to honor this Privacy Policy.

10. CALIFORNIA USERS

10.1. California Privacy Rights. Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of personal information the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To request a copy of the information disclosure provided by us pursuant to Section 1798.83 of the California Civil Code, please contact us at the below address: Talkable, Inc.

Attn: Legal

2370 Market St, Suite 103

San Francisco, CA 94114

10.2. California Do Not Track Disclosure. Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. At this time, we do not recognize or respond to Do Not Track browser settings or signals and we will still receive information. As a result, we may still collect information about you and your internet activity, even if you have turned on the Do Not Track signal. It is possible that some or all of our third-party advertising partners or members of their affiliate network may participate in consumer opt-out programs. To learn more about internet-based advertising and consumer opt-out programs go

to <https://aboutads.info/choices/> or <https://www.networkadvertising.org/choices/>. We do not operate or control these sites, and are not responsible for the opt-out choices available there.

10.3 California Consumer Privacy Act. For purposes of this Section 10.3 only, the terms "personal information," "collection," "sell," "business purpose" and "commercial purpose" have the meaning given to them under the California Consumer Privacy Act of 2018 (the "CCPA").

If you reside in California, you have certain rights set forth below. These rights are in addition to any other rights you may have under this Policy. If you have any questions about these rights or how to

exercise them, please contact us at support@talkable.com . Please note that we may disclose your personal information for business or commercial purposes as described in this Privacy Policy. For more information about the categories of personal information we collect, the sources from which we collect personal information and how use, disclose and share such information, please see Sections 2, 3 and 4 of this Privacy Policy.

Disclosure and deletion requests. You have the right to request that we disclose to you what personal information about you we collect, use, disclose and sell. Subject to certain limitations in the CCPA, you also have the right to request that we delete your personal information. You may submit such a request by contacting us at support@talkable.com, writing us at the address listed in Section 24, submitting an [online request form](#). If you submit a request by email, your email must include “California Request” in the subject line. We will only use personal information provided in an online request form to verify the requestor’s identity or authority to make the request. We will not discriminate against you for exercising your rights under the CCPA.

Right to opt out. The CCPA also provides California consumers the right to opt out of the sale of their personal information. As explained in this Policy, we do not sell the personal information of our users.

Verification. We reserve the right to verify any request made under the CCPA by asking you to provide supporting documentation that the request is submitted by you, although we are not obligated to verify a request. You may also choose to have an agent submit a request on your behalf, in which case we may, but are not obligated to, verify that the agent is authorized to act on your behalf. We assume no responsibility for responding to any consumer requests.

10.4 Financial Incentive Notice. As part of a Talkable Program, Merchants may offer you various financial incentives such as discounts and special offers when you provide your contact information and identifiers such as your name and email address. When you sign-up for a Talkable Program, you opt-in to a financial incentive. You may withdraw from a financial incentive at any time by contacting us at support@talkable.com or writing us at the address listed in Section 24. Generally, we do not assign monetary or other value to personal information, however, California law requires that we assign such value in the context of financial incentives. In such context, the value of the personal information is related to the estimated cost of providing the relevant financial incentive(s) for which the information was collected.

11. INTERNATIONAL TRANSFERS AND DATA PROCESSING AGREEMENT

11.1. International Data Transfer. Information collected in the European Economic Area (“EEA”) may be transferred, stored and processed by us and our service providers in the United States and other countries whose data protection laws may be different from the laws of your country. Whenever we transfer your Personal Data out of the EEA, we ensure a similar degree of protection is afforded to it by entering into the European Commission’s model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses pursuant to Decision 2010/87/EU) with the relevant provider.

Please contact us at security@talkable.com if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

11.2. **Data Processing Agreement.** We use and protect Personal Data you provide use in accordance with applicable laws. Accordingly you may review and/or download our Data Processing Agreement which is part of this Privacy Policy. [DOWNLOAD DATA PROCESSING AGREEMENT](#)

12. YOUR RIGHTS

Under certain circumstances, you have rights the following rights under Data Protection laws:

12.1. **Request access to your Personal Data.** Request access to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

12.2. **Request correction of your Personal Data.** Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

12.3. **Request erasure of your Personal Data.** Request erasure of your Personal Data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. We may not immediately be able to delete all residual copies from our servers and backup systems after the active data have been deleted. Such copies shall be deleted as soon as reasonably possible.

12.4. **Object to processing of your Personal Data.** Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

12.5. **Request restriction of processing your Personal Data.** Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (i) if you want us to establish the data’s accuracy; (ii) where our use of the data is unlawful but you do not want us to erase it; (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

12.6. **Request transfer of your Personal Data.** Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

12.7. **Right to withdraw consent.** Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at support@talkable.com .

13. ADDITIONAL INFORMATION ABOUT YOUR RIGHTS

13.1. **No fee usually required.** You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

13.2. **What we may need from you.** We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

13.3. **Time limit to respond.** We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14. E.U. RESIDENTS AND E.U. U.S. PRIVACY SHIELD FRAMEWORK

We comply with the E.U. U.S. Privacy Shield Framework and are committed to ensuring that we adhere to the following principles: Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Resource, Enforcement and Liability. We are subject to the enforcement of the Federal Trade Commission and shall remain liability for harm caused in connection with our onward transfer of you data. To learn more about the E.U. U.S. Privacy Shield Framework, please visit the U.S. Department of Commerce website located at the following link: <https://www.privacyshield.gov/welcome>. We are committed to working with you to address questions, concerns or complaints you may have about this Privacy Policy or your Personal Data. For the avoidance of doubt, in the event there is a conflict between the Privacy Policy and the E.U. U.S. Privacy Shield Framework the terms of the E.U. U.S. Privacy Shield Framework shall govern. Please contact us at security@talkable.com if you have any questions or have an issue that you'd like to resolve.

15. DISPUTE RESOLUTION (E.U. RESIDENTS)

15.1. **General.** If you reside in E.U. and have any questions or concerns regarding the use or disclosure of Personal Data, you should first contact us for assistance. We will promptly investigate and attempt to resolve all complaints regarding our use of Personal Data. In the event we are unable to mutually resolve a complaint; we will work with you and agree to refer your complaint to an independent dispute resolution mechanism. In the event we are unable resolve your claim, you should contact our U.S. based third party dispute resolution provider free of charge at <https://www.jamsadr.com/eu-us-privacy-shield>. In certain instances conditions, described on the Privacy Shield's website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

15.2. **Questions and concerns.** Any questions or concerns regarding the use or disclosure of Personal Data should first be directed us. We will promptly investigate and attempt to resolve all complaints regarding our use of Personal Data. In the event we are unable to mutually resolve a complaint; we will work with you and agree to refer your complaint to an independent dispute resolution mechanism. You may also work with the Data Protection Authority in your country: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm to assist with this process as well.

16. PRIVACY RIGHTS & DATA PROTECTION OFFICER

16.1. **General.** You may modify the information you have provided to us at any time through your Account. You can also opt-out of receiving marketing communications, deactivate, or delete your Account at any time.

16.2. **Data Protection Officer.** We have appointed a Data Protection Officer to ensure continued commitment to privacy and security practices. For further information please contact us at: security@talkable.com.

17. INFORMATION SECURITY & CONFIDENTIALITY

We maintain (and requires its subcontractors and service providers to maintain) appropriate organizational and technical measures designed to protect the security and confidentiality of any information we process. However, no organizational or technical measures are 100% secure so you should take care when disclosing information online and act reasonably to protect yourself online.

18. DATA RETENTION

(a) How long will you use my Personal Data for?

We will only retain your Personal Data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six (6) years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: Please contact us for further information.

In some circumstances we may anonymize your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

19. SECURITY

We are concerned with safeguarding your information. We employ generally accepted standards of administrative, physical, procedural, and technological measures designed to protect your information from unauthorized access, both during transmission and once it is received. If you have any questions about the security of your Personal Data, you can contact us at security@talkable.com.

However, please note that no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, although Talkable complies with its legal obligations in respect of the security of your Personal Data we cannot guarantee its absolute security.

20. LINKS TO OTHER SITES

Our Site contains links to other websites. If you click on a third-party link you will be directed to that third party's website. We do not exercise control over third-party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personally identifiable information from you. This Privacy Policy addresses the use and disclosure of information that we collect from you through our Site and/or Service. Other websites follow different rules regarding the use or disclosure of the Personal Data you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit. The fact that we link to a website is not an endorsement, authorization, or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices.

21. OUR POLICY TOWARD CHILDREN

Neither our Site nor Services are directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with personal or contact information without their consent, he or she should contact us at security@talkable.com. If we become aware that a child under 16 has provided us with Personal Data, we will delete such information from our files immediately.

22. DOWNLOAD A COPY OF OUR PRIVACY POLICY

You can download a PDF version of our Privacy Policy [here](#).

23. CONTACTING US

If you have any questions or complaints about how we use your Personal Data, please contact us at:

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