

Topo.ai Privacy Policy

Effective Date: November 1, 2018

Last Updated: November 1, 2018

Introduction

TAI Technologies, Inc. doing business as Topo.ai (collectively referred to herein as “Topo”, “we”, “our” or “us”), recognize the importance of protecting personal data we may collect from visitors and any other individual or entity (“Users”, “you”, or “your”) who visit our web sites. This Privacy Policy applies to data collection by Topo and shall apply to your use of the website, topo.ai, and other Topo-related sites, apps, communications, capabilities and services (“Services”) accessible on or by any top-level Topo domain owned by us (each, a “Site” and collectively the “Sites”), but excluding services that state that they are offered under a different privacy policy.

Our Privacy Policy explains: (1) what information we collect; (2) why we collect it; (3) how we use that information; (4) how we may share it; and (5) the choices we offer, including how to access and update information. Specifically, our Privacy Policy covers the following topics:

This Privacy Policy is organized into two sections:

1. The first section applies to information we collect through the Site(s).
2. The second section applies to the information we collect through our Services.

Please familiarize yourself with our privacy practices and let us know if you have any questions. By using the Sites, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Sites.

Irrespective of which country you live in, you authorize us to transfer, store, and use your information in the United States, and any other country where we operate. In some of these countries, the privacy and data protection laws and rules regarding when government authorities may access data may vary from those in the country where you live. Learn more about our data transfer operations in the “International Transfer” section below. If you do not agree to the transfer, storage and use of your information in the United States, and any other country where we operate, please do not use the Sites or Services.

If you have any questions or comments about this Privacy Policy, please submit a request to privacy@topo.ai.

When this Privacy Policy Applies

Our Privacy Policy applies to all of the services offered by Topo and its affiliates, and services offered on other sites, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you, or other sites linked from our services. Our Privacy Policy

does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

Terms of Use

By accessing or using the Sites in any manner, you also agree to be bound by Topo's [Terms of Use](#) (the "Agreement"). Please read the Agreement carefully. If you do not accept all of the terms and conditions contained in or incorporated by reference into the Agreement, please do not use the Sites.

Information We Collect

We collect information, including personal data, to provide better services to all our Users. We use the term "Personal Data" to refer to any information that identifies or can be used to identify you. Common examples of personal data include: full name, home address, email address, date of birth, digital identity, such as a login name or handle, information about your device, and certain metadata.

"Sensitive Personal Data" refers to a smaller subset of personal data which is considered more sensitive to the individual, such as race and ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic or biometric information, physical or mental health information, medical insurance data, or sexual orientation. Topo does not collect or use Sensitive Personal Data and asks that you do not provide Sensitive Personal Data to us.

We collect Personal Data in the following ways:

1. Information You Give to Us

You may choose to provide us with personal data about yourself, including your name, email, and phone number by completing forms on our website, such as when you request information about our Services.

When using our Services, you may provide us with messages sent between those individuals you have authorized to use our Services. In some instances, you may elect to provide us with location and address information. You may also provide us with Personal Data about yourself when you report a problem or have a question about our services.

The Sites offer interactive and social features that permit you to submit content and communicate with other users. You may provide personal data to us when you post information in these interactive and social features. Please note that your postings in these areas of the Sites may be publicly accessible or accessible to other users.

Please note that if you do not provide us with Personal Data, your ability to use certain aspects of our products and services may be limited.

2. Information We Obtain from Your Use of Our Services

We collect certain information automatically, such as your operating system version, browser type, and internet service provider. When you use our Site, we automatically collect and store this information in service logs. This includes: details of how you used our Site; Internet protocol address; and cookies that

uniquely identify your browser. We may also collect and process information about your actual location. The information we collect automatically is statistical data and may or may not include Personal Data, but we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties.

3. Cookies and Similar Technologies

We and our partners use various technologies to collect and store information when you visit one of our services, and this may include using cookies or similar technologies to identify your browser or device. We also use these technologies to collect and store information when you interact with services from our partners, such as advertising services. Our third party advertising and analytics partners include Google, Hubspot, and similar and any other third party advertising or analytics partners.

The technologies we use for this automatic data collection may include:

Cookies. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our services. For more information about our use of cookies, including details on how to opt-out of certain cookies, please see our [Cookie Policy](#).

Web Beacons. Pages of our services or our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Clickstream Data. Clickstream data is information collected by our computers when you request Web pages from the Sites. Clickstream data may include information such as the page served, the time spent viewing the page, source of the request, type of browser making the request, the preceding page viewed and similar information. Clickstream data permits us to analyze how visitors arrive at the Sites, what type of content is popular, what type of visitors in the aggregate are interested in particular kinds of content on the Sites.

Mobile Device Identifiers and SDKs. A mobile SDK is the mobile app version of a web beacon (see “Web Beacons” above). The SDK is a bit of computer code that app developers can include in their apps to enable ads to be shown, data to be collected, and related services or analytics to be performed.

If you want to control the cookies that are placed on your computer or other device, you could view cookies stored on your hard drive, choose whether or not to permit cookies to be set by default by changing browser settings, or delete the cookies stored on your hard drive. Please be aware, however, that your decision to control cookies may affect your experience of our Sites – you may not be able to access all or parts of those Sites.

The main Web browsers allow you to change your cookie settings directly through their sites. These settings will typically be found in the ‘options’ or ‘preferences’ menu of your browser. In order to

understand these settings, the following links may be helpful; otherwise you should use the 'Help' option in your browser for more details.

How We Use Information We Collect

We use your personal data in ways that are compatible with the purposes for which it was collected or authorized by you, including for the following purposes:

1. To inform you about services available from Topo;
2. To authorize access to our Sites and Services;
3. To provide you with Services and Products;
4. To offer and administer programs;
5. To administer content, promotion, sweepstakes, surveys, voting polls or other Site features;
6. To communicate about, and administer your participation in, special programs, surveys, contests, online campaigns, online programs, sweepstakes, and other offers or promotions, and to deliver pertinent emails;
7. To improve our customer service;
8. To respond to and support users regarding their use of the Sites and Services;
9. To comply with all applicable legal requirements.
10. To investigate possible fraud or other violations of our Terms of Use or this Privacy Policy and/or attempts to harm our Users.

We use the information we collect from our Sites to provide, maintain, and improve them, to develop new services, and to protect our Company and our users.

We use information collected from cookies and other technologies, to improve your user experience and the overall quality of our services. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. We may use your personal information to see which web pages you visit at our Site, which web site you visited before coming to our Site, and where you go after you leave our Site. We can then develop statistics that help us understand how our visitors use our Site and how to improve it. We may also use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

Our Legal Basis for Collecting Personal Data

Whenever we collect Personal Data from you, we may do so on the following legal bases:

1. Your consent to such collection and use;
2. Out of necessity for the performance of an agreement between us and you, such as your agreement to use our Services or your request for Products;
3. Our legitimate business interest, including but not limited to the following circumstances where collecting or using Personal Data is necessary for:
 - Intra-organization transfers for client data for administrative purposes;

- Product development and enhancement, where the processing enables Topo to enhance, modify, personalize, or otherwise improve our services and communications for the benefit of our users, and to better understand how people interact with our Sites;
- Communications and marketing, including processing data for direct marketing purposes, and subject to your opt-in for these purposes, and to determine the effectiveness of our promotional campaigns and advertising;
- Fraud detection and prevention;
- Enhancement of our cybersecurity, including improving the security of our network and information systems; and
- General business operations and diligence;

Provided that, in each circumstance, we will weigh the necessity of our processing for the purpose against your privacy and confidentiality interests, including taking into account your reasonable expectations, the impact of processing, and any safeguards which are or could be put in place. In all circumstances, we will limit such processing for our legitimate business interest to what is necessary for its purposes.

Information We Share

We do not share personal information with companies, organizations and individuals outside of the Organization unless one of the following circumstances applies:

- **With your consent.** We will share personal data with companies, organizations or individuals outside of Topo when we have your consent to do so.
- **Enterprise accounts.** Your employer or school may offer you access to our Services. We will share personal data with your employer or school. Your employer can review and manage your use of such enterprise Services.
- **For external processing.** We provide personal information to our affiliates or other trusted businesses or partners to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. These third parties include payment processors, such as financial institutions and their vendors and contractors that process transactions, email marketing partner, and similar partners. It is our policy to only share Personal Data with contractors, service providers and other third parties who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. Under certain circumstances, you may avoid having us share your information with our business partners and vendors by not granting us permission to share your information. Not granting us permission to share your information with our business partners or vendors may limit your access to their services through the Sites. We do not share personal information with third parties for their own marketing purposes.
- **For Legal Reasons.** We will share Personal Data with companies, organizations or individuals outside of Topo if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
 - meet any applicable law, regulation, legal process or enforceable governmental request.
 - enforce applicable Terms of Use, including investigation of potential violations.
 - detect, prevent, or otherwise address fraud, security or technical issues.

- protect against harm to the rights, property or safety of Topo, our Users or the public as required or permitted by law.

We attempt to notify Users about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

- **Business Transfers.** If we establish a new related entity, are acquired by or merged with another organization, or if substantially all of our assets are transferred to another organization, Personal Data about our users is often a transferred business asset. In the event that Topo itself or substantially all of our assets are acquired, Personal Data about our users may be one of the transferred assets.
- **Aggregate Site Use Information.** We may share aggregate and anonymized/pseudonymized Personal Data to third parties in order to promote or describe use of the Sites, for research, marketing, advertising, or similar purposes.

Your Failure to Provide Personal Data

Your provision of Personal Data is required in order to use certain parts of our services and our programs. If you fail to provide such Personal Data, you may not be able to access and use our Services and/or our programs, or parts of our Services and/or our programs.

Our Retention of Your Personal Data

We may retain your Personal Data for a period of time consistent with the original purpose for collection. For example, we keep your Personal Data for no longer than reasonably necessary for your use of our programs and Services and for a reasonable period of time afterward. We also may retain your Personal Data during the period of time needed for us to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

We retain your Personal Data even after termination of your agreement if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our Terms of Use, or fulfill your request to “unsubscribe” from further messages from us. We will retain de-personalized information after your account has been closed.

Your Choices and Accessing, Updating or Deleting Your Personal Data

Whenever you use our services, we aim to provide you with choices about how we use your personal data. We also aim to provide you with access to your Personal Data. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. Subject to applicable law, you may obtain a copy of personal information we maintain about you or you may update or correct inaccuracies in that information through your Topo account at <http://topo.ai>, or by contacting us. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that personal information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated in the How to Contact Us section below.

- **Your Rights With Respect to Personal Data**

Some data protection laws, including the European Union’s General Data Protection Regulation (“GDPR”) and some U.S. state laws, provide you with certain rights in connection with Personal Data you have shared with us. Depending on your U.S. state and country of residence, you may have the following rights:

1. **The right to be informed.** You are entitled to be informed of the use of your Personal Data. This Privacy Policy provides such information to you.
2. **The right of access.** You have the right to request a copy of your Personal Data which we hold about you.
3. **The right of correction:** You have the right to request correction or changes of your Personal Data if it is found to be inaccurate or out of date.
4. **The right to be forgotten:** You have the right to request us, at any time, to delete your Personal Data from our servers and to erase your Personal Data when it is no longer necessary for us to retain such data. Note, however, that deletion of your Personal Data will likely impact your ability to use our services.
5. **The right to object (opt-out):** You have the right to opt-out of certain uses of your Personal Data, such as direct marketing, at any time.
6. **The right to data portability:** You have the right to a “portable” copy of your Personal Data that you have submitted to us. Generally, this means your right to request that we move, copy or transmit your Personal Data stored on our servers / IT environment to another service provider’s servers / IT environment.
7. **The right to refuse to be subjected to automated decision making, including profiling:** You have the right not to be subject to a decision and insist on human intervention if the decision is based on automated processing and produces a legal effect or a similarly significant effect on you.
8. **The right to lodge a complaint with a supervisory authority.**

To make these requests, you may contact us using the contact information below, and we will consider your request in accordance with applicable laws. 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.

- **Changing or Deleting Your Information**

You may update or correct information about yourself, or request that we delete your personal information, by emailing us at privacy@topo.ai. We may retain an archived copy of your records as required by law, to comply with our legal obligations, to resolve disputes, to enforce our agreements or for other legitimate business purposes.

We may contact you to request that you update your Personal Data on a regular basis to ensure its integrity for the purposes of ongoing data management.

- **Our Opt-in/Opt-out Policy**

By providing an email address on the Topo Sites, you agree that we may contact you in the event of a change in this Privacy Policy, to provide you with any service related notices, or to provide you with information about our events, invitations, or related educational information.

For purposes of this Privacy Policy, “opt-in” is generally defined as any affirmative action by a user to submit or receive information, as the case may be.

We currently provide the following opt-out opportunities:

1. At any time, you can follow a link provided in offers, newsletters or other email messages (except for e-commerce confirmation or service notice emails) received from us to unsubscribe from the service.
2. At any time, you can contact us through privacy@topo.ai or the address or telephone number provided below to unsubscribe from the service and opt-out of our right per your consent under the terms of this Privacy Policy to share your Personal Data.

Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service related notices.

Third Party Links

The Sites may contain links to webpages operated by parties other than Topo. We do not control such websites and are not responsible for their contents or the privacy policies or other practices of such websites. Our inclusion of links to such websites does not imply any endorsement of the material on such websites or any association with their operators. Further, it is up to the User to take precautions to ensure that whatever links the User selects or software the User downloads (whether from this Site or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have their own privacy policies, which the User will be subject to upon linking to the third party's website. Topo strongly recommends that each User review the third party's terms and policies.

International Transfer

We are committed to complying with applicable laws, regulations and mandatory government standards regarding the protection of Personal Data.

Since we are a global organization, Personal Data and any additional information submitted may be used globally in connection with employment, business processes within Topo, or communicating with our clients. Therefore, Personal Data may be transferred to other Topo entities worldwide, where it will be processed in accordance with this Privacy Policy and laws that are applicable in each country. Countries where we process data may have laws which are different, and potentially not as protective, as the laws of your own country.

If we transfer your Personal Data out of your jurisdiction, we will implement suitable safeguards and rely on legally-provided mechanisms to lawfully transfer data across borders to ensure that your Personal

Data is protected.

How We Protect Personal Data

Topo maintains administrative, technical and physical safeguards designed to protect the User's Personal Data and information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, taking into account technological reality, cost, the scope, context and purposes of processing weighted against the severity and likelihood that the processing could threaten individual rights and freedoms. For example, we use commercially reasonable security measures such as encryption, firewalls, and Secure Socket Layer software (SSL) or hypertext transfer protocol secure (HTTPS) to protect Personal Data.

If Topo collects account information for payment or credit, Topo will use the information only to complete the task for which the account information was offered.

Children

The Site is not intended for use by children. We do not intentionally gather Personal Data about visitors who are under the age of 16. If a child has provided us with Personal Data, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 16 in the applicable jurisdiction, please contact us at privacy@topo.ai. If we learn that we have inadvertently collected the personal information of a child under 16, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

Direct Marketing and “Do Not Track” Signals

Topo does not respond to Do Not Track (DNT) signals. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser may include controls to block and delete cookies, web beacons and similar technologies, to allow you to opt out of data collection through those technologies.

California residents are entitled to contact us to request information about whether we have disclosed personal information to third parties for the third parties' direct marketing purposes. We do not disclose personal information to third parties for the third parties' direct marketing purposes. California users may request further information about our compliance with this law by e-mailing us at the address listed in the “How to Contact Us” section.

Section 2: The Topo AI Platform

Topo AI customers (“Clients”) engage us to deliver provider information databases and manage intelligence threats and news feeds. The Topo AI Service is a platform our customers use to manage threat intelligence and news. Client Information, Information about our Client's Contacts and Archival Information (each defined below) are governed by this Privacy Policy, the TAI Technologies Terms of Use and any other services agreements between Topo AI and the applicable Client. The Topo AI Platform collects the following information:

- **Client Information.** We collect information about individuals within our Client’s organization (“Client Information”). Client Information may include information related to the Client’s account, name, work e-mail address, work phone number, job title or similar kinds of information. We use Client Information to support the Client account, maintain our business relationship with the Client, respond to Client inquiries, or perform accounting functions. Clients may update personal information and password by logging into the Topo AI Platform and updating their account. Clients may contact Topo AI support in order to delete their personal data. In some cases, we may not be able to delete Client Information, and in such cases we will tell you why.
- **Information about our Client’s Contacts.** We collect information about any contacts that may be uploaded into the Topo AI Platform (“Information about our Client’s Contacts”). Information about our Client’s Contacts may include name, e-mail address, phone number, job title, or similar kinds of information. We use Information about our Client’s Contacts for the purposes of marketing to such contacts. Clients may update or delete information about their contacts in the Topo AI Platform. Clients may also contact Topo AI support in order to update and delete such information. In some cases, we may not be able to delete such information, and in such cases we will tell you why.
- **Archival Information.** We collect communications information for archival purposes on behalf of, and as directed by, our Clients. This information may include emails, texts, websites, social media messages or posts, and other forms of data or electronic communications (“Archival Information”). Archival Information includes data about our Clients and the third parties they correspond with. We do not control or monitor the information our Clients collect and store through our services, or their privacy practices or policies. It is our Client’s obligation to obtain all necessary consents and to comply with all applicable laws with respect to the Client’s communications and use of our services. Our Client’s privacy policies or practices apply to Archival Information, the purposes for which the Client collects Archival Information, how the Client may use Archival Information and what choices the individual may have with respect to Archival Information. Individuals must contact the applicable Client in order to correct, amend, or delete their information, or to opt out of any collection, uses or disclosure of their information by our Client.
- **Automatically Collected Information.** We collect information automatically about how our Clients use our services (“Automatically Collected Information”). We do this via data collection technologies such as cookies, web beacons, gifs or other tracking technologies. We collect this information in order to monitor, support and improve our services or to provide Clients with certain customized features. We may use Automatically Collected Information to tell us how our Clients use our services, to improve our services or develop new products, services or features. We may combine this information with other information we collect.

We treat Client Information, Information about our Client’s Contacts, Archival Information and Automatically Collected Information as the confidential and proprietary information of our Clients, subject to the terms of the TAI Technologies Terms of Use and any other service agreement between TAI Technologies or Topo AI and the Client. We do not share Client Information, Information about our Client’s Contacts, Archival Information or Automatically Collected Information with third parties unless directed to do so by our Client, as may be necessary to provide services to the client, to our advisors,

channel partners, affiliates, representatives, agents, service providers, in connection with a business transaction (such as a merger or sale), as allowed under the terms of our agreement with our Client, or in response to a court order, subpoena, warrant or to comply with a legal requirement or to cooperate with an investigation. We may disclose Client Information, Information about our Client's Contacts, Archival Information or Automatically Collected Information for the aforementioned reasons, or in order to protect our rights or the rights of our affiliates, clients, channel partners or service providers.

We will retain client information we process on behalf of our Clients for as long as needed to provide services to our Client, or for the period of time requested by a particular Client.

Changes to this Privacy Policy

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services or programs, email notification or privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

Revisions:

- November 1, 2018

How to Contact Us

If you have any specific questions about this Privacy Policy, you can contact us via email or writing to us at the address below:

Send e-mail to: privacy@topo.ai

Send mail to our address:

TAI Technologies, Inc.
Attn: Privacy Policy Inquiry
9128 Strada Place
Suite # 10115
Naples, Florida 34108
U.S.A.