

YOUR PRIVACY RIGHTS

This privacy notice was last updated on July 1, 2020.

Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information collected from our websites and mobile applications. It also explains your rights in relation to your personal information and how to contact us in the event you have a complaint.

1. Definitions.

Key Terms	Definition
We, us, our	The Integration Group of Americas Inc.
Personal information	Any information relating to an identified or identifiable individual.
Application	Our software applications available for you to install or otherwise operate on your computer, cellular phone, or other device.

2. **Personal Information We Collect About You.** We may collect and use the following personal information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Categories of Personal Information	Personal Information Collected
Personal Identifiers	Name, address, phone, email
Communication	Emails or electronic correspondence that you send to us on our website or through our Applications.
Survey Answers	Your answers to survey questions that you voluntarily submit through an Application.
Internet or other electronic network activity information.	IP Address, URL, browsing history, search history, and information your interaction with the website, application, or advertisement.
Professional or employment-related information	We collect your Personal Identifiers and other information you provide when you submit an employment application to us online or by email.

3. How Your Personal Information is Collected. We collect most of this personal information directly from you, for example, when you contact us through our website or send us other Communications. However, we may also collect information:

- When you install and/or operate an Application on your device;
- When you submit Survey Answers through an Application;
- When you submit a job application on our website; and
- From cookies and similar online tracking and analytic technology on our website.

4. Use of Cookies. We use technologies, such as cookies, to analyze traffic to our website. You are given the option to consent to the collection and use of your data in this manner prior to it being collected.

- a. Google Analytics. For more information about how Google uses data when you use our site, visit www.google.com/policies/privacy/partners. Users may download the Google Analytics Opt-out Browser Add-on at: <https://tools.google.com/dlpage/gaoptout>.

5. How and Why We Use Your Personal Information. We use your personal information:

- Where you have given consent;
- We use Survey Answers to create aggregated reports of the responses that we share with third-parties as set forth below. Your Survey Answers are only disclosed in the aggregate as part of a survey report that does not identify you individually.
- To comply with our legal and regulatory obligations;
- For our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide products or services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To report on the results of surveys	To inform the public and policy makers on matters of public interest

To respond to your communications	To communicate with you in response to Communication
To prevent and detect fraud	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you
As necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations

Updating customer records	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products</p>
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> — existing and former customers; — third parties who have previously expressed an interest in our services; — third parties with whom we have had no previous dealings. 	<p>For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers</p>
External audits and quality checks	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>

6. Promotional Communications. We may use your personal information to send you updates (by email, text message, telephone or post) about our products and services.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”).

You have the right to opt out of receiving promotional communications from us at any time by:

- Using the “unsubscribe” link in emails or “STOP” number in texts; or

- Updating your preferences, with respect to Applications, through the settings of your Application.

We may ask you to confirm or update your preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

7. Who We Share Your Personal Information With. We routinely share personal information with:

- Service providers we use to help deliver our products and/or services to you, such as web hosting companies;
- We use Survey Answers to create aggregated survey reports that are shared with the public or other third-parties like news organizations. We do not share individual Survey Answers.
- Other third parties we use to help us run our business, such as marketing agencies or website hosts;
- We may share personal information with external auditors.
- We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.
- We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. may anonymize information, but this may not always be possible.

8. Do Not Track

Our website does not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

9. Personal Information We Sold or Disclosed for a Business Purpose. In the preceding 12 months, we have sold Personal Information to any third-party.

In the preceding 12 months, we have disclosed for a business purpose to one or more third parties the following categories of Personal Information:

- Personal Identifiers;
- Aggregated results of Survey Answers collected by our Application; and,
- Internet or other electronic network activity information

10. Where Your Personal Information is Held. Information is held at our offices and those of our service providers, representatives and agents as described above (see above: “Who We Share Your Personal Information with”) or on computer servers used or maintained by those entities.

11. How Long Your Personal Information Will Be Kept. Unless we delete your information subject to a legitimate request, we reserve the right to keep your personal information indefinitely, including while you have an account with us or while we are providing products and/or services to you. We will also keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

12. EU Data Subject’s Rights Under the GDPR.

If you are a data subject in the European Union, you may have the following rights under the GDPR:

Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to be Forgotten	The right to require us to delete your personal information—in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
Right to Object	The right to object: <ul style="list-style-type: none"> — at any time to your personal information being processed for direct marketing (including profiling); — in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.

Right Not to be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
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For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the General Data Protection Regulation.

13. Your Rights Under the CCPA. If you are a resident of California, you may have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:

Disclosure of Personal Information We Collect About You	<p>You may have the right to know:</p> <ul style="list-style-type: none"> • The categories of personal information we have collected about you; • The categories of sources from which the personal information is collected; • Our business or commercial purpose for collecting or selling personal information; • The categories of third parties with whom we share personal information, if any; and • The specific pieces of personal information we have collected about you. <p>Please note that we are not required to:</p> <ul style="list-style-type: none"> • Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained; • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a
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	<p>manner that would be considered personal information; or</p> <ul style="list-style-type: none"> • Provide the personal information to you more than twice in a 12-month period.
<p>Personal Information Sold or Used for a Business Purpose</p>	<p>In connection with any personal information we may sell or disclose to a third party for a business purpose, you may have the right to know:</p> <ul style="list-style-type: none"> • The categories of personal information about you that we sold and the categories of third parties to whom the personal information was sold; and • The categories of personal information that we disclosed about you for a business purpose. <p>You may have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to opt-out of the sale or disclosure of your personal information. If you exercise your right to opt-out of the sale or disclosure of your personal information, we will refrain from selling your personal information, unless you subsequently provide express authorization for the sale of your personal information. To opt-out of the sale of your personal information, please contact us at info@tiga.us</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your personal information from our records; and • Direct any service providers to delete your personal information from their records.

	<p>Please note that we may not delete your personal information if it is necessary to:</p> <ul style="list-style-type: none">• Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;• Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;• Debug to identify and repair errors that impair existing intended functionality;• Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;• Comply with the California Electronic Communications Privacy Act;• Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;• Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
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	<ul style="list-style-type: none"> • Comply with an existing legal obligation; or • Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
<p>Protection Against Discrimination</p>	<p>You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> • Deny goods or services to you; • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; • Provide a different level or quality of goods or services to you; or • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information.</p>

14. How to Exercise Your Rights. Application users may delete their account and control their data options on the settings of the Application. California and European users may exercise their rights at:

- Call us, toll-free, at 877-520-TIGA

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact directly (i.e., outside of logging in to your account on our website), you will need to provide us with:

- Enough information to identify you (e.g., your full name, address);

- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

15. Changes to This Privacy Notice. We may change this privacy notice from time to time—when we do, we may inform you via notice on the website or other means of contact such as email.

16. How to Contact Us. You may contact us at info@tiga.us.