

# Gappify, Inc.

## EU-U.S. Privacy Shield Notice

Effective Date: February 4, 2019

Gappify, Inc. (“Gappify”, “we”, “us”) adheres to the EU-U.S. Privacy Shield Principles with respect to personal data of residents of the European Economic Area (“EEA”), that we receive from EEA residents who use our websites, and companies in the EEA. We registered for the Privacy Shield list maintained by the U.S. Department of Commerce at <https://www.privacyshield.gov/list> and our application is still under review.

This Notice does not apply to data that we collect from employees of our subsidiaries in the EEA or to data that we collect from other jurisdictions; we cover such data in other, separate notices as required.

### Types of personal data collected

We may collect the following types of personal data from you when provided on registration

- Name
- Email address

In addition, upon requested by our Customers using the application, we may collect the following types of data (but not limited to) as authorized by our Customers:

- Name
- Email address

- Company name
- Address information
- Contact information
- Vendor related bank information
- Vendor related invoice data

We may also automatically collect the following types of personal data when you use our websites:

- Location information, which allows us to periodically determine your location

Computer, device and usage information, which may include (i) internet protocol (IP) address and other technical information about your computer and website usage, such as your browser type and version, time zone setting, and operating system and platform (ii) information specific to the device you use to access the application (including, but not limited to, make, model, operating system, advertising identifier, language, carrier and similar information) and (iii) information about your use of features, functions, or notifications on the device.

## Commitment to subject to the Principles

We subject to the applicable Privacy Shield Principles all personal data that we receive from companies or individuals in the EEA and Switzerland in reliance on the Privacy Shield. We also receive some data in reliance on

other compliance mechanisms, including data processing agreements based on the EU Standard Contractual Clauses.

## Purposes of collection and use

Gappify collects and uses your personal data for one or more of the following purposes: • Administering your access to our websites, mobile sites and mobile applications, including any accounts for which you may have registered • Improving and personalizing your experience on our websites and mobile applications • Providing information about our products and services • Providing products, services and support to you • Communicating with corporate business partners about business matters • Conducting related tasks for legitimate business purposes • Aggregating data; and • Other purposes disclosed at the time of collection.

## How to contact us

If you have any questions regarding this notice or if you need to update, change or remove personal data that we control, you can do so by contacting [privacy@gappify.com](mailto:privacy@gappify.com) or by regular mail addressed to:

Gappify, Inc.

Attn: Privacy

845 Market Street, Suite 450 San Francisco, CA 94103 United States of America

Gappify will respond to your request to access or delete your information within 30 days.

# Where do we disclose the data collected in the application

We share personal data we collect from you with our Customers that have authorized Gappify and its related application(s) to request this data from you. We engage our services as subscriptions to end Customers who use the system to reach out to their vendors/customers (B2B).

In addition, we may provide data to meet Legal Requirements. We may disclose personal data if required to do so by law or in the good faith belief that such action is necessary to (a) comply with a subpoena or similar legal obligation, (b) protect and defend our rights or property, (c) act in urgent circumstances to protect the personal safety of users of any Site or the public, (d) protect against legal liability, or (e) or as otherwise required or permitted by law.

## Right to access

You have the right to access the personal data we have about you on file. To access your personal data, contact [privacy@gappify.com](mailto:privacy@gappify.com).

## Choices and means

You may choose to change your personal data, unsubscribe from email lists, or cancel an account by contacting [privacy@gappify.com](mailto:privacy@gappify.com) with information necessary to process the request. You may choose to unsubscribe from our marketing communications by following the instructions or unsubscribe mechanism in the email message.

# Independent dispute resolution body

Gappify has committed to respond to complaints and to provide appropriate recourse at no cost to you. If we fail to provide a timely response, or if our response does not address your concern, you may contact JAMS ( <https://www.jamsadr.com/eu-us-privacy-shield> ), which provides an independent third-party dispute resolution mechanism based in the United States. Gappify is subject to the investigative and enforcement powers of the Federal Trade Commission (FTC).

In addition, Gappify has committed to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to human resources data transferred from the EU in the context of the employment relationship.

## Arbitration

If you are located in the EEA and have exhausted all other means to resolve your concern regarding a potential violation of Gappify's obligations under the Privacy Shield Principles, you may seek resolution via binding arbitration. For additional information about the arbitration process please visit the Privacy Shield website: [www.privacyshield.gov](http://www.privacyshield.gov) .

## Requirement to disclose

Gappify may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

# Liability

If a third party service provider providing services on Gappify's behalf processes personal data from the EEA in a manner inconsistent with the applicable Privacy Shield Principles, Gappify will be liable unless we can prove that we are not responsible for the event giving rise to the damages.