

LitLingo Technologies Privacy Policy

Effective: July 20, 2023

This Privacy Policy describes how LitLingo collects, uses and discloses information, and what choices you have with respect to the information.

Updates in this version of the Privacy Policy reflect changes in data protection law. In addition, we have worked to make the Privacy Policy clearer and more understandable by:

- providing a series of examples that help illustrate how the policies may be implemented by LitLingo and
- defining and capitalizing a few terms that are used more than once for simplicity and brevity.

When we refer to “**LitLingo**”, we mean LitLingo Technologies, Inc, the entity that acts as the controller or processor of your information.

Applicability Of This Privacy Policy

This Privacy Policy applies to LitLingo’s online workplace productivity tools and platform, including the associated LitLingo mobile and desktop applications (collectively, the “**Services**”), LitLingo.com and other LitLingo websites (collectively, the “**Websites**”) and other interactions (e.g., customer service inquiries, user conferences, etc.) you may have with LitLingo. If you do not agree with the terms, do not access or use the Services, Websites or any other aspect of LitLingo’s business.

This Privacy Policy does not apply to any third party applications or software that integrate with the Services through the LitLingo platform (“**Third Party Services**”), or any other third party products, services or businesses. In addition, a separate agreement governs delivery, access and use of the Services (the “**Customer Agreement**”), including the processing of any messages, files or other content submitted through Services accounts (collectively, “**Customer Data**”). The installing person, organization or entity (e.g., you, your employer or another entity or person) that entered into the Customer Agreement (“**Customer**”) controls the instance of the Services (their “**Instance**”) and any associated Customer Data. If you have received an

invitation to join an Instance but have not yet created an account, you should request assistance from the Customer that sent the invitation.

Information We Collect And Receive

LitLingo may collect and receive Customer Data and other information and data (“**Other Information**”) in a variety of ways:

- **Customer Data.** Customers or individuals granted access to an Instance by a Customer (“**Authorized Users**”) routinely submit Customer Data to LitLingo when using the Services.
- **Other Information.** LitLingo also collects, generates and/or receives Other Information:
 1. Instance and Account Information. To create or update an Instance account, you or your Customer (e.g., your employer) supply LitLingo with an email address, phone number, password, domain and/or similar account details. In addition, Customers that purchase a paid version of the Services provide LitLingo (or its payment processors) with billing details such as credit card information, banking information and/or a billing address.
- Usage and Context Information.
 - *Services Metadata.* When an Authorized User interacts with the Services, metadata is generated that provides additional context about the way Authorized Users work. For example, LitLingo logs the Instances, channels, people, organizations, features, content and links you interact with, the types of files shared and what Third Party Services are used (if any).
 - *Log data.* As with most websites and technology services delivered over the Internet, our servers automatically collect information when you access or use our Websites or Services and record it in log files. This log data may include the Internet Protocol (IP) address, the address of the web page visited before using the Website or Services, browser type and settings, the date and time the Services were used,

information about browser configuration and plugins, language preferences and cookie data.

- *Device information.* LitLingo collects information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and crash data. Whether we collect some or all of this Other Information often depends on the type of device used and its settings.

- *Location information.* We receive information from you, your Customer and other third-parties that helps us approximate your location. We may, for example, use a business address submitted by your employer, or an IP address received from your browser or device to determine approximate location. LitLingo may also collect location information from devices in accordance with the consent process provided by your device.

2. **Cookie Information.** LitLingo uses cookies and similar technologies in our Websites and Services that help us collect Other Information. The Websites and Services may also include cookies and similar tracking technologies of third parties, which may collect Other Information about you via the Websites and Services and across other websites and online services.
3. **Third Party Services.** Customer can choose to permit or restrict Third Party Services for their Instance. Typically, Third Party Services are software that integrate with our Services, and Customer can permit its Authorized Users to enable and disable these integrations for their Instance. Once enabled, the provider of a Third Party Service may share certain information with LitLingo. For example, if an enterprise HR management application is enabled to permit data to be imported to an implementation instance, we may receive user name and email address of Authorized Users, along with additional information that the application has elected to make available to LitLingo to facilitate the integration. Authorized Users should check the privacy settings and notices in these Third Party Services to understand what data may be disclosed to LitLingo. When a Third Party Service is enabled, LitLingo is authorized to connect and access Other Information made available to LitLingo in accordance with our agreement

with the Third Party Provider. We do not, however, receive or store passwords for any of these Third Party Services when connecting them to the Services.

4. Contact Information. In accordance with the consent process provided by your device, any contact information that an Authorized User chooses to import (such as an address book from a device) is collected when using the Services.
5. Third Party Data. LitLingo may receive data about organizations, industries, Website visitors, marketing campaigns and other matters related to our business from parent corporation(s), affiliates and subsidiaries, our partners or others that we use to make our own information better or more useful. This data may be combined with Other Information we collect and might include aggregate level data, such as which IP addresses correspond to zip codes or countries. Or it might be more specific: for example, how well users are communicating with specific subsets of other users.
6. Additional Information Provided to LitLingo. We receive Other Information when submitted to our Websites or if you participate in a focus group, contest, activity or event, apply for a job, request support, interact with our social media accounts or otherwise communicate with LitLingo.

Generally, no one is under a statutory or contractual obligation to provide any Customer Data or Other Information (collectively, “**Information**”). However, certain Information is collected automatically and, if some Information, such as instance setup details, is not provided, we may be unable to provide the Services.

How We Use Information

Customer Data will be used by LitLingo in accordance with Customer’s instructions, including any applicable terms in the Customer Agreement and Customer’s use of Services functionality, and as required by applicable law. LitLingo is a processor of Customer Data and Customer is the controller. Customer may, for example, use the Services to grant and remove access to an Instance, assign roles and configure settings, access, modify, export, share and remove Customer Data and otherwise apply its policies to the Services.

LitLingo uses Other Information in furtherance of our legitimate interests in operating our Services, Websites and business. More specifically, LitLingo uses Other Information:

- **To provide, update, maintain and protect our Services, Websites and business.**

This includes use of Other Information to support delivery of the Services under a Customer Agreement, prevent or address service errors, security or technical issues, analyze and monitor usage, trends and other activities or at an Authorized User's request.

- **As required by applicable law, legal process or regulation.**
- **To communicate with you by responding to your requests, comments and questions.** If you contact us, we may use your Other Information to respond.
- **To develop and provide search, learning and productivity tools and additional features.** LitLingo tries to make the Services as useful as possible for specific Instances and Authorized Users. For example, we may improve recommendations functionality by using Other Information to help determine and importance and relevance of content, methods, or expertise for an Authorized User, make Services suggestions based on historical use and predictive models, identify organizational trends and insights, to customize a Services experience or create new productivity features and products.
- **To send emails and other communications.** We may send you service, technical and other administrative emails, messages and other types of communications. We may also contact you to inform you about changes in our Services, our Services offerings, and important Services-related notices, such as security and fraud notices. These communications are considered part of the Services and you may not opt out of them. In addition, we sometimes send emails about new product features, promotional communications or other news about LitLingo. These are marketing messages so you can control whether you receive them.
- **For billing, account management and other administrative matters.** LitLingo may need to contact you for invoicing, account management and similar reasons and we use account data to administer accounts and keep track of billing and payments.
- **To investigate and help prevent security issues and abuse.**

If Information is aggregated or de-identified so it is no longer reasonably associated with an identified or identifiable natural person, LitLingo may use it for any business purpose. To the extent Information is associated with an identified or identifiable natural person and is protected as personal data under applicable data protection law, it is referred to in this Privacy Policy as **"Personal Data."**

Data Retention

LitLingo will retain Customer Data in accordance with a Customer's instructions, including any applicable terms in the Customer Agreement and Customer's use of Services functionality, and as required by applicable law. Depending on the Services plan, Customer may be able to customize its retention settings and apply those customized settings at the Instance level, channel level or other level. Customer may also apply different settings to messages, files or other types of Customer Data. The deletion of Customer Data and other use of the Services by Customer may result in the deletion and/or de-identification of certain associated Other Information. LitLingo may retain Other Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping your Other Information after you have deactivated your account for the period of time needed for LitLingo to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

How We Share And Disclose Information

This section describes how LitLingo may share and disclose Information. Customers determine their own policies and practices for the sharing and disclosure of Information, and LitLingo does not control how they or any other third parties choose to share or disclose Information.

- **Customer's Instructions.** LitLingo will solely share and disclose Customer Data in accordance with a Customer's instructions, including any applicable terms in the Customer Agreement and Customer's use of Services functionality, and in compliance with applicable law and legal process.
- **Displaying the Services.** When an Authorized User submits Other Information, it may be displayed to other Authorized Users.
- **Customer Access.** Owners, administrators, Authorized Users and other Customer representatives and personnel may be able to view, access, respond to, or restrict access to Other Information. This may include, for example, your employer using Service features to view logs of instance activity.
- **Third Party Service Providers and Partners.** We may engage third party companies or individuals as service providers or business partners to process Other Information and

support our business. These third parties may, for example, provide virtual computing and storage services.

- **Third Party Services.** Customer may enable or permit Authorized Users to enable Third Party Services. When enabled, LitLingo may share Other Information with Third Party Services. Third Party Services are not owned or controlled by LitLingo and third parties that have been granted access to Other Information may have their own policies and practices for its collection and use. Please check the privacy settings and notices in these Third Party Services or contact the provider for any questions.
- **Corporate Affiliates.** LitLingo may share Other Information with its corporate affiliates, parents and/or subsidiaries.
- **During a Change to LitLingo's Business.** If LitLingo engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of LitLingo's assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence), some or all Other Information may be shared or transferred, subject to standard confidentiality arrangements.
- **Aggregated or De-identified Data.** We may disclose or use aggregated or de-identified Other Information for any purpose. For example, we may share aggregated or de-identified Other Information with prospects or partners for business or research purposes, such as telling a prospective LitLingo customer the average use of common words within a typical Instance.
- **To Comply with Laws.** If we receive a request for information, we may disclose Other Information if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation or legal process. Please see the [Data Request Policy](#) to understand how LitLingo responds to requests to disclose data from government agencies and other sources.
- **To enforce our rights, prevent fraud, and for safety.** To protect and defend the rights, property or safety of LitLingo or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.

- **With Consent.** LitLingo may share Other Information with third parties when we have consent to do so.

Transferring personal data to the U.S.

LitLingo has its headquarters in the United States. Information we collect about you will be processed in the United States. By using LitLingo's services, you acknowledge that your personal information will be processed in the United States.

According to the latest adequacy decision for the EU-U.S. Data Privacy Framework adopted by the European Commission, the United States ensures an adequate level of protection – compared to that of the EU - for personal data transferred from the EU to US companies participating in the EU-U.S. Data Privacy Framework.

Depending on the circumstance, LitLingo also collects and transfers to the U.S. personal data with consent; to perform a contract with you; or to fulfill a compelling legitimate interest of LitLingo in a manner that does not outweigh your rights and freedoms.

LitLingo endeavors to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with LitLingo and the practices described in this Privacy Statement. LitLingo also enters into data processing agreements and model clauses with its vendors whenever feasible and appropriate. Since it was founded, LitLingo has received zero government requests for information.

Security

LitLingo takes security of data very seriously. LitLingo works hard to protect Other Information you provide from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the Other Information we collect, process and store, and the current state of technology. Given the nature of communications and information processing technology, LitLingo cannot guarantee that Information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others.

Age Limitations

We do not knowingly collect or maintain Personally Identifying Information from anyone under the age of 13, unless or except as permitted by law. Any person who provides Personally Identifying Information through the Website represents to us that he or she is 13 years of age or older. If we learn that Personally Identifying Information has been collected from a user under 13 years of age on or through the Website, then we will take the appropriate steps to cause this information to be deleted.

If you are the parent or legal guardian of a child under 13 who has become a member of the Website or has otherwise transferred Personally Identifying Information to the Website, please contact us using our contact information below to have that child's account terminated and information deleted.

Changes To This Privacy Policy

LitLingo may change this Privacy Policy from time to time. Laws, regulations and industry standards evolve, which may make those changes necessary, or we may make changes to our business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, LitLingo will provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, you should deactivate your Services account. Contact the Customer if you wish to request the removal of Personal Data under their control.

Identifying The Data Controller And Processor

Data protection law in certain jurisdictions differentiates between the “controller” and “processor” of information. In general, Customer is the controller of Customer Data. In general, LitLingo is the processor of Customer Data and the controller of Other Information. LitLingo Technologies, Inc., a US company based in Austin, Texas is the controller of Other Information and a processor of Customer Data relating to Authorized Users who use Instances established for Customers in the US and Canada.

Your Rights

Individuals located in certain countries, including the European Economic Area and the UK, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to

update, delete or correct this Information. You can usually do this using the settings and tools provided in your Services account. If you cannot use the settings and tools, contact LitLingo for additional access and assistance. To the extent that LitLingo's processing of your Personal Data is subject to the General Data Protection Regulation, LitLingo relies on its legitimate interests, described above, to process your data. LitLingo may also process Other Information that constitutes your Personal Data for direct marketing purposes, and you have a right to object to LitLingo's use of your Personal Data for this purpose at any time.

Data Protection Officer

LitLingo is headquartered in Austin, TX, in the United States, 110 Wild Basin RD, Suite 150, Austin, TX 78746. LitLingo has appointed an external data protection officer for you to contact if you have any questions or concerns about LitLingo's personal data policies or practices. If you would like to exercise your privacy rights, please direct your query to LitLingo's data protection officer. LitLingo's data protection officer's name and contact information are as follows:

Adam Brogden

GDPRLocal Ltd

dpo.support@gdprlocal.com

Tel: + 441 772 217 800

GDPR Local Ltd

1st Floor Front Suite 27-29 North Street, Brighton England BN1 1EB

EU/UK Article 27 Representative Information

Our EU Representative:

Under Article 27 of the GDPR, we have appointed an EU Representative to act as our data protection agent. Our nominated EU Representative is:

Instant EU GDPR Representative Ltd.

Adam Brogden contact@gdprlocal.com

Tel +35315549700

INSTANT EU GDPR REPRESENTATIVE LTD

Office 2,

12A Lower Main Street, Lucan Co. Dublin

K78 X5P8

Ireland

Our UK Representative:

Under Article 27 of the UK Data Privacy Act, we have appointed a UK Representative to act as our data protection agent. Our nominated UK Representative is:

GDPR Local Ltd.

Adam Brogden contact@gdprlocal.com

Tel +44 1772 217800

1st Floor Front Suite

27-29 North Street, Brighton

England

BN1 1EB

Contacting LitLingo

Please also feel free to contact LitLingo if you have any questions about this Privacy Policy or LitLingo's practices, or if you are seeking to exercise any of your statutory rights. You may contact us at privacy@LitLingo.com or at our mailing address below:

For Customers and Authorized Users who use Instances established for Customers in the US:

LitLingo Technologies, Inc.

110 Wild Basin Rd. Suite 150

Austin, TX 78746

United States