

iTechTool Privacy Shield Policy

iTechTool Incorporated (“iTechTool,” “we,” “us,” “our”) provides messaging software and services to customers on a worldwide basis. iTechTool provides various messaging gateway services which merely route messaging data from the customer to mobile carriers worldwide and for which no at rest data is stored. In addition, iTechTool licenses messaging software which is installed on-premise within customer data centers. Finally, iTechTool provides its iTechTool Command Center™ product which stores recipient name, email address, phone number and other message delivery instructions. iTechTool Command Center™ is a self-service cloud based product for which recipients are able to add, delete, modify and review all of their associated data. iTechTool Command Center™ recipient data is never disclosed to any third party (except as required in response to lawful requests by public authorities including to meet national security and law enforcement requirements) and is used exclusively for the purpose of directing routing of messaging data via iTechTool messaging gateways. iTechTool does not store or utilize Sensitive Personal Data.

iTechTool complies with the *EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework* as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the *European Union, United Kingdom, or Switzerland* to the United States. iTechTool has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

Scope and Responsibility

This Privacy Shield Policy applies to Personal Data transferred from European Union member countries and Switzerland to iTechTool’s operations in the U.S. in reliance on the respective Privacy Shield framework.

All employees of iTechTool that have access in the U.S. to Personal Data covered by this Privacy Shield Policy are responsible for conducting themselves in accordance with this Privacy Shield Policy. Adherence by iTechTool to this Privacy Shield Policy may be limited to the extent required to meet legal, regulatory, governmental, or national security obligations.

Privacy Shield Principles

iTechTool commits to subject to the Privacy Shields’ Principles all Personal Data received by iTechTool in the U.S. from European Union member countries, the United Kingdom, and Switzerland in reliance on the respective Privacy Shield framework.

1. Notice

iTechTool notifies Data Subjects covered by this Choice Privacy Shield Policy about its data practices regarding Personal Data received by iTechTool in the U.S. from European Union member countries, the United Kingdom, and Switzerland in reliance on the respective Privacy Shield framework, including the types of Personal Data it collects about them, the purposes for which it collects and uses such Personal Data, the rights of Data Subjects to access their Personal Data, the choices and means that iTechTool offers for limiting its use and disclosure of

such Personal Data, how iTechTool's obligations under the Privacy Shield are enforced, and how Data Subjects can contact iTechTool with any inquiries or complaints.

iTechTool's recipient data is never disclosed to any third party.

iTechTool's accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, iTechTool remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process personal data on its behalf do so in a manner inconsistent with the Principles, unless iTechTool proves that it is not responsible for the event giving rise to the damage.

2. Choice

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to support@itechtool.com

3. Security

iTechTool takes reasonable and appropriate measures to protect Personal Data covered by this Privacy Shield Policy from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into due account the risks involved in the processing and the nature of the Personal Data.

4. Data Integrity and Purpose Limitation

iTechTool limits the collection of Personal Data covered by this Privacy Shield Policy to information that is relevant for the purposes of processing. iTechTool does not process such Personal Data in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the Data Subject.

iTechTool takes reasonable steps to ensure that such Personal Data is reliable for its intended use, accurate, complete, and current. iTechTool takes reasonable and appropriate measures to comply with the requirement under the Privacy Shield to retain Personal Data in identifiable form only for as long as it serves a purpose of processing, which includes iTechTool's obligations to comply with professional standards, iTechTool's business purposes and unless a longer retention period is permitted by law, and it adheres to the Privacy Shield Principles for as long as it retains such Personal Data.

5. Access

Pursuant to the Privacy Shield Frameworks, EU and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to support@itechtool.com. If requested to remove data, we will respond within a reasonable timeframe.

6. Recourse, Enforcement, and Liability

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, iTechTool is subject to the regulatory and enforcement powers of the U.S. Federal Trade Commission.

In compliance with the Privacy Shield Principles, iTechTool commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact iTechTool by email at support@itechtool.com

iTechTool has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/privacy-shield-complaints/> for more information and to file a complaint. This service is provided free of charge to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

iTechTool agrees to periodically review and verify its compliance with the Privacy Shield Principles, and to remedy any issues arising out of failure to comply with the Privacy Shield Principles. iTechTool acknowledges that its failure to provide an annual self-certification to the U.S. Department of Commerce will remove it from the Department's list of Privacy Shield participants.

Changes to this Privacy Shield Policy

This Privacy Shield Policy may be amended from time to time consistent with the requirements of the Privacy Shield. Appropriate notice regarding such amendments will be given.