# **Privacy Policy**

# TSPi LLC

# **Corporate Website Privacy Policy**

This Privacy Policy is designed to tell you what will happen to the information you provide through this website or through any other form of communication with us, TSPi or our agents or contractors (referred to in this privacy policy as "we" or "us"). Please be sure to read this entire Privacy Policy before using this website or submitting personal information to us or our agents or contractors.

# **Our Commitment to Privacy**

At TSPi, your privacy is important to us. We are committed to complying with all applicable privacy regimes. We strive to provide an environment in which our employees, customers, stockholders, and partners trust us to handle personal information responsibly. We provide this privacy policy as part of our commitment to privacy by describing what personal information we collect, how we use it, how we protect it, and with whom we share it.

## What Information We Collect and How We Use It

While visiting our website you may be asked to voluntarily provide personal information in order to access our services or to accomplish the goal of your site visit. For example, if you are exploring career opportunities you may be asked to provide your email address, residence, education, work experience, and other personal information typically found on a résumé. The specific information that you may choose to provide will depend on the nature of the transaction to be completed and is always voluntary.

We collect personal information that is necessary for our business activities and in order to provide and develop our services. We may do this in a number of ways, including:

- directly from you, when you provide it to us or our agents or contractors;
- from publicly available resources;
- by analyzing our own records of your use of our services and website;
- from third parties; or
- from entities which are acquired by or merged with TSPi.

## **Other Website Technical Considerations**

Our website may contain links to other websites. You should carefully review the privacy notices and practices of other websites, as we cannot control or be responsible for the privacy practices of sites not affiliated with TSPi.

## **Children's Privacy**

TSPi is concerned about the safety and privacy of children online. Because of this, we will make all efforts to comply with the Children's Online Privacy Protection Act of 1998 ("COPPA"). COPPA and its accompanying FTC regulations establish United States federal law that protects the privacy of children using the internet. Further, the website or any other form of

communication with you have with us are neither intended for nor designed to attract Users under the age of 18.

# Anonymity and pseudonyms

Individuals may choose to engage with TSPi anonymously or under a pseudonym. Where anonymity or the use of a pseudonym is unlawful or does not allow us to provide the relevant services or do business, we may request that an individual identify themselves.

#### **How We Protect Your Information**

Personal information may be stored by TSPi in hard copy documents or electronic format. TSPi is committed to keeping personal information secure and safe, and takes reasonable steps to ensure that hard copies of personal information, and personal information stored on computers is appropriately protected from misuse, loss, modification, unauthorized access or disclosure. We use reasonable physical, electronic, and managerial procedures to safeguard and secure the information you provide to us against loss, misuse, or unauthorized access. All personal information that we collect is protected using industry standard computer security and industrial security practices.

Additionally, TSPi will review the personal information held by us from time to time, ensuring that information which is no longer required for the purpose for which it was initially collected, and which is not otherwise required to be kept by law, is destroyed or de-identified.

#### Use & Disclosure of Personal Information

- The personal information you provide us may be used for a number of purposes connected with our business operations, which include: applying for employment, responding to solicitations, partnering with TSPi, and sending communications to individuals as requested by them;
- Conducting promotional and marketing activities;
- Ascertaining the suitability of individuals for potential employment opportunities;
- Answering enquiries and providing information or advice about our services;
- Assessing the performance of our website and continually improving its operation so as to create a better overall user experience for individuals;
- Updating our records and to keep the contact details for individuals up to date;
- Processing and responding to any complaints made by an individual; and
- Complying with any law or in cooperation with any governmental authority or agency of any country.

TSPi may disclose your personal information to trusted third parties, including:

- Our third party service providers, on the basis that such providers treat such information confidentially and in accordance with this Privacy Policy;
- Our advisors, consultants and insurers;
- To an entity which acquires or is merged with an TSPi entity;
- As required by our government clients; and
- As required by law.

TSPi will not disclose an individual's personal or sensitive information without their consent or for reasons other than as described in this policy.

## **Access to Personal Information**

You may request access to the personal information that TSPi holds about you by contacting our Privacy Officer. Please refer to Contact Us section.

If access to your personal information is granted, access will usually be provided within 10 business days of our acknowledgement. Should the timeframe to provide you with access to your personal information extend beyond this period, you will be notified accordingly. You will need to verify your identity before access to your personal information can be granted. Furthermore, whilst TSPi cannot and does not charge a fee to individuals who apply to access their personal information, we may charge a fee for actually giving individuals access to their personal information in their preferred format (where reasonable and possible), which will cover our costs involved in locating and collating their personal information, as well as reproduction costs. If access to your personal information is denied, we will advise you in writing of the denial of access and the reasons for such within 10 business days of our acknowledgment.

#### Notifiable data breaches

We will comply with applicable laws requiring us to notify you in relation to any loss or unauthorized access or disclosure of your personal information.

# **Notification of Changes**

We may update this privacy policy periodically without prior notice to reflect changes in our practice. If we decide to change our privacy policy, we will post these changes to this privacy policy and other places we deem appropriate so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

# How to contact us or make a complaint

TSPi's personnel are educated on the importance of maintaining the privacy and confidentiality of the personal information provided to us. TSPi takes any breach of privacy seriously, and appoints appropriate individuals to ensure that our management of personal information is in accordance with this policy and applicable laws and regulations.