

#### 1. Introduction

Tower Apps Ltd. (hereafter: "we") processes the personal data of people who use Tower Apps' Apps, such as DocExport. We do this in order to provide our products and services and to achieve our goals. In this Privacy Policy, we explain why and how we process your personal data. By using Tower Apps' Apps you agree to this Privacy Policy. If you do not agree to this Privacy Policy, you must not use Tower Apps' Apps. We are happy to help you with your questions about data privacy. Should you have any questions or concerns, please contact us at support@towerapps.com.

This privacy statement was last amended in December 2023.

### 2. Who are we?

We are Tower Apps Ltd.. This Privacy Policy governs all data processing activities in relation to our <u>monday.com</u> Apps for which we are to be regarded as the data controller. However, in order to make it as clear as possible what personal data we process and how we deal with that personal data, we differentiate between several data processing activities.

We are located at 128 City Road, EC1V 2NX London, United Kingdom.

#### 3. Definitions

Below, we introduce some definitions to make a clear understanding of the terms used in this Privacy Policy:

- **License Agreement:** the License Agreement concluded between Tower Apps and the Licensee for the use of the Apps.
- Licensee: the party that has a License Agreement with Tower Apps.
- End User: the natural person who uses the Apps.
- Apps: the actual software app or Apps developed by Tower Apps that Licensee orders from Tower Apps, including new versions and user documentation, which Tower Apps makes available to the Licensee and its End Users that have accepted the End User License Agreement.

# 4. Types of data

The use of Tower Apps' Apps may involve several types of data that may contain personal data. The following data types are distinguished:

- **Content Data** Any data that you or your End Users enter into Tower Apps' Apps that is not any of the other data types below.
- **Support Data** Any data that you or your End Users provide to us directly in the support process that is not any other data type.
- Contact Data Data that you have provided to us in order to communicate with us.
- Feedback Data Data that you have provided to us in order to provide Feedback to us.
- Usage Data Data that is generated upon your use of Tower Apps' Apps.

### 5. Roles and scope of this Privacy Policy

With regard to **Content Data** and **Support Data**, the Licensee is to be regarded as the data controller. With regard to Content Data and Support Data we are to be regarded as the data processor. The way in which we process these two data types on the Licensee's behalf is governed by the **Data Processing Agreement**, which is an integral part of the License Agreement.

With regard to **Contact Data**, **Feedback Data** and **Usage Data**, we are to be regarded as the data controller. The way in which we process these types of data is governed by this **Privacy Policy**. The remainder of this Privacy Policy is therefore solely considers Contact Data, Feedback Data and Usage Data.c



## 6. Which personal data do we process?

Using Tower Apps' Apps, you can **contact us**, for example, when you register with <u>monday.com</u> or us (by installing an app) to evaluate an app or obtain a license for an app, send us an e-mail, or raise a support ticket. In such cases, we may process the following **Contact Data**:

- User Name
- User Email address
- Any other personal data that you may provide us directly

When you provide us with **feedback**, for example by means of filling out a survey or filing a complaint, we process the following **Feedback Data**:

- User Name
- User Email address
- Any other personal data that you may provide us directly

When you receive our welcome emails, we process the following personal data:

- User Name
- User Email address
- Data about your activity with regard to our drip feed emails

When you work with the DocExport App we process the following personal data:

- In the documents meta data:
  - User Name (for viewing in the document list)
  - Board Name (for viewing in the document list)
  - o Item Name (for viewing in the document list)
- The documents themselves are saved as .docx or .pdf files
  - o Any other personal data that you enter in the documents or via the placeholders
- For the templates:
  - User Name (for viewing in the template list)
- For the recipe:
  - User Name (for displaying in the recipe list)
  - User language and country (for date and number formats)

#### 7. Why do we process that personal data?

We process personal data for various purposes, including:

#### • Communicate with you

When you contact us for one of the reasons mentioned above, we process your personal data in order to make contact with you and to maintain contact. This allows us to contact you, e.g., per email, in order to provide customer support.

## Enable the provision of our Apps

We may use your **Contact Data** to enable the provision of our Apps, e.g., to create your user account, process billing information, do account management, or inform you about system maintenance.

### • Improve our products and services

When you provide us with **feedback** and/or by **using** Tower Apps' Apps, we process your feedback and Usage Data in order to maintain and improve the quality of our Apps, for example, by means of dashboarding the use of Tower Apps' Apps as a means of operations management and tracing trends and opportunities for improvement. We will do this based on anonymized and aggregated data as much as possible.



## • Research and report

By **using** Tower Apps' Apps, we may process your Usage Data for means of research and reporting. We will only do this based on fully anonymized and aggregated data. We may share research reports with third parties, such as other users of Tower Apps' Apps.

### Sending you drip feed emails

When you have installed one of our Apps, we process your personal information to send you our drip feed emails to help you on your way using our Apps.

## 8. Legal grounds for processing

We process your personal data based on the following legal grounds:

- To perform or prepare an agreement (communicate, provide our Apps, improve products and services)
- A legitimate interest (direct marketing to customers)

#### 9. Sensitive Data

On specific occasions, we may process sensitive personal data:

• When you provide sensitive personal data as Feedback Data

We strongly discourage you from sending sensitive personal data to us if it is not necessary for our processing goals.

### 10. Personal data of minors

We explicitly do not have the intention to process personal data about minors unless they have permission from their parents or guardians. However, we cannot check if a user is a minor. We therefore advise parents and guardians to be involved in the online activities of their children in order to prevent that personal data about minors is processed without the consent of their parents or guardians. If you are convinced that we are processing personal data about minors without proper consent, please contact us at <a href="mailto:support@towerapps.com">support@towerapps.com</a> and we will remove this information.

#### 11. Automated decisions

We **do not** apply the principle where, based on automated data processing, decisions are made about cases that can have (considerable) implications for persons. This concerns decisions that are made by computer programs or systems without human intervention (such as an Tower Apps employee).

### 12. Data subject rights

As a data subject, you have a number of rights regarding the personal data that we process. We will do our very best to meet these rights. To use your rights, you can contact us by sending a specific request to <a href="mailto:support@towerapps.com">support@towerapps.com</a>.

- **Information and access:** You have the right to see what personal data we process about you. Upon request, we will also tell you how and why we have processed your personal data.
- **Rectification:** You have the right to the rectification of your personal data.
- Right to be forgotten: You have the right to have your personal data erased. To do so, you can send us
  the Right to Erasure Request Form to <a href="mailto:support@towerapps.com">support@towerapps.com</a>. A legal obligation may force us to
  process your personal data after all. In this case, we will inform you about this in reply to your request.



- **Restriction:** Are you of the opinion that we process your personal data unlawfully or incorrectly? Then you can express this to restrict processing.
- **Objection:** You have the right to object to the processing of your personal data. Is it for marketing purposes? Then we will stop processing your personal data as soon as possible.
- Portability: You have the right to transfer your personal data to yourself or another party.

#### You can also:

- Withdraw consent: For example, for receiving our newsletter (opt-out). If you want to withdraw consent for other processing, you can contact us.
- **File a complaint:** Are you of the opinion that we don't act in accordance with the privacy law? Then we would like to hear from you.

To make sure that the request to access data is placed by you, we ask you to add a copy of your identification to your request. In the copy, hide your photo, MRZ (machine readable zone), passport number, and citizen service number to protect your privacy. We will respond to your request as soon as possible, but in any case, within 4 weeks.

### 13. Retention periods

We retain your data no longer than strictly necessary to achieve our processing goals for which we use your personal data.

## 14. Information security

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. The latest version of our information Security Policy is available from: Security Policy. Unfortunately, the internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure. By using Tower Apps' Apps or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of Tower Apps' Apps. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice within Tower Apps' Apps or sending an email to you. You may have a legal right to receive this notice in writing. To receive a free written notice of a security breach (or to withdraw your consent from receiving electronic notice), please notify us at support@towerapps.com.

## 15. Sharing of personal data (with third parties)

We do not share your personal data (with third parties), except for carrying out our services. These third parties are, in fact, data processors. We work, for example, with Azure Microsoft, rapidmail GmbH for sending our drip feed emails, and with Freshworks Inc. to provide customer support. We do this only to carry out our agreement with you, for our legitimate interest, or when we have your consent. These parties process personal data in accordance with the instructions of Tower Apps. A legal obligation or similar disclosure, or a merger or sale of Tower Apps to another company, can also be reasons for us to share personal data with third parties. Within Tower Apps, customer data is shared among its group entities. Your personal data may be shared as part of customer data. Customer data is only shared with group entities for the purpose of contacting the customer. Tower Apps processes customer data in line with the current laws and regulations (including GDPR).

### 16. Applicability of this Privacy Policy to third parties

When you navigate away from Tower Apps' Apps to websites or Apps controlled by third parties, you leave Tower Apps' Apps, at which point this Privacy Policy no longer applies. You will not receive a warning when you leave Tower Apps' Apps. This Privacy Policy does not govern the data processing of anything that is not Tower Apps' Apps. We recommend that you read the privacy statements of other parties before using their services.



#### 17. Disclaimer to international users

By choosing to use Tower Apps' Apps or otherwise providing information to us, you agree that any dispute over privacy or this Privacy Policy will be governed by British law. If you are visiting from Australia, the United States, or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your personal information to the European Union. By providing your personal information, you consent to any transfer and processing in accordance with this Privacy Policy. You also consent to the adjudication of any disputes arising in connection with us or Tower Apps' Apps in accordance with the License Agreement and/or End User License Agreement, as applicable.

#### 18. New Uses

From time to time, we may use information, including personal information, for new, unanticipated uses not previously disclosed in our Privacy Policy. If our information practices change regarding information previously collected, we will make reasonable efforts to provide notice and obtain consent for any such uses as required by law.

# 19. Changes to the Privacy Policy

We have the right to change this Privacy Policy. We will post any changes to this Privacy Policy here. The revised version will be effective at the time it is posted. We recommend that you read this Privacy Policy regularly so you stay up to date about any possible changes.