



DATA PROTECTION POLICY in accordance with EU General Data Protection Regulation (GDPR)

Goal of the data protection policy

GDPR is the General Data Protection Regulation, a sweeping legislation passed by the EU and enforceable as of May 25, 2018. GDPR maintains that data protection is a fundamental human right and it is the responsibility of any company that controls and processes data to protect that right.

Data protection and privacy is the driving mission behind Tycon Systems® and aligns with the rights of the GDPR. Tycon Systems® vision is to enable individuals to have full control over their online data. It's been exciting to see the large adoption of these values that GDPR has caused across major sectors of technology.

The goal of the data protection policy is to depict the legal data protection aspects in one summarized document. This is not only to ensure compliance with the European General Data Protection Regulation (GDPR) but also to provide proof of compliance.

Preamble

In compliance with the European Union Member States' Data Protection Authorities, Tycon Systems Inc. (hereafter referred to as "Tycon®") confirms it is, in compliance with the Official European Commission guidance on GDPR.

This Privacy Policy (hereafter referred to as "Policy") serves to inform you of our policies and procedures regarding the collection, use and disclosure of the information we receive when you visit the website and associated domains of <http://www.tyconsystems.com/index.php> (the "Site") and when you access or use any part of our services, content, programs and products available through the Site or other related toolbars, applications or distribution channels operated by us (the "Services"). This Policy applies only to information that you provide to us through the Site or the Services, when you access or use any content appearing on the Site or made available through the Services, or that we collect on your behalf as part of the Services.

This Policy is an integral part of our Terms of Service (the "Terms of Service").



IMPORTANT – TRANSFER OF DATA AND PERSONAL INFORMATION TO THE U.S.A.

IF WE STORE DATA ABOUT YOU, INCLUDING PERSONAL INFORMATION, ON SERVERS LOCATED AND OPERATED WITHIN THE UNITED STATES OR, IF YOU RESIDE OUTSIDE OF THE UNITED STATES, IN ORDER TO PROVIDE THE SERVICES TO YOU, WE MAY SEND AND STORE INFORMATION PROVIDED BY YOU (ALSO COMMONLY REFERRED TO AS PERSONAL DATA) OUTSIDE OF THE COUNTRY WHERE YOU RESIDE OR ARE LOCATED, TO THE UNITED STATES. THEREFORE, OUR COLLECTION AND USE OF YOUR PERSONAL INFORMATION IS SUBJECT TO THE UNITED STATES' LAWS RELATED TO PRIVACY AND USE OF PERSONAL DATA AND INFORMATION. THESE LAWS, INCLUDING WHAT IS DETERMINED TO BE "PERSONAL DATA AND/OR INFORMATION," ARE DIFFERENT AND MAY BE LESS PROTECTIVE THAN THOSE APPLICABLE TO YOU IN YOUR COUNTRY OF RESIDENCE. BY ACCEPTING THE TERMS OF THIS POLICY, YOU ACKNOWLEDGE, AGREE AND CONSENT TO (1) THE TRANSFER TO AND PROCESSING OF PERSONAL INFORMATION ON SERVERS LOCATED OUTSIDE OF THE COUNTRY WHERE YOU RESIDE, (2) OUR COLLECTION AND USE OF YOUR PERSONAL INFORMATION AS DESCRIBED HEREIN AND IN ACCORDANCE WITH THE LAWS OF THE UNITED STATES THAT MAY BE DIFFERENT AND MAY BE LESS PROTECTIVE THAN THOSE IN YOUR COUNTRY AND (3) THAT YOU ARE TAKING A RISK BY USING THE SITE AND SERVICES.

Changes to this Policy

We reserve the right, at our sole and absolute discretion, to change, modify, add to, supplement or delete any of the terms and conditions of this Policy by posting an updated version to the Site. You should visit this page periodically to review the most current Policy, because it is binding on you. We will endeavor to notify you of material changes by email, but will not be liable for any failure to do so. If any future changes to this Policy are unacceptable to you or cause you to no longer be in compliance with this Policy, you must terminate, and immediately stop using, the Services. Your continued use of the Services following any revision to this Policy constitutes your complete and irrevocable acceptance of all such changes.

Security policy and responsibilities in the company

- For Tycon, in addition to existing corporate objectives, the highest data protection goals are defined and documented. Data protection goals are based on data protection principles.
- Tycon has determined its roles and responsibilities (e.g. representatives of the company, operational data protection officers, coordinators or data protection team and operational managers)
- Tycon is committed to continuous improvement of a data protection management system in place
- Tycon Training, sensitization and obligation of the employees has been put in place



Legal framework in the company

- Tycon Industry-specific legal or conduct regulations for handling personal data have been put in place
- Requirements of internal and external parties have been cemented

Documentation

- Tycon has set in place the process for conducting internal and external inspections
- Tycon understands and agrees to the Data protection need and determination of protection needed with, in regard to confidentiality, integrity and availability. The [BSI Standard 100-2](#) categories from the German Federal Office for Information Security [*Bundesamt für Sicherheit in der Informationstechnik – BSI*] are helpful, e.g.: 'normal', 'high' and 'very high'.

Compliance with Laws and Law Enforcement

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to:

- (a) comply with a legal requirement or process, including, but not limited to, civil and criminal subpoenas, court orders or other compulsory disclosures;
- (b) enforce this Policy or the Terms of Service;
- (c) respond to claims of a violation of the rights of third parties;
- (d) respond to user comments or service inquiries;
- (e) protect the rights, property, or safety and the rights, property and safety of the Services, our users or the public; or
- (f) prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable.

Existing technical and organizational measures (TOM)

Appropriate technical and organizational measures have been implemented and substantiated, inter alia, the purpose of the processing, the state of the technology and the implementation costs.



The description of the implemented TOM is based on the structure of ISO/IEC 27002, taking into account ISO/IEC 29151 (guidelines for the protection of personal data).

Examples of such guidelines by which Tycon is in conformity include:

- Guideline for the rights of data subjects
- Access control
- Information classification and handling
- Physical and environmental-related security for end users such as:
 - a. Permissible use of values
 - b. Guideline for information transfer based on the work environment and screen locks
 - c. Mobile devices and telecommuting
 - d. Restriction of software installation and use
- Data backup
- Information transfer
- Protection against malware
- Handling technical weak points
- Cryptographic measures
- Communication security
- Privacy and protection of personal information
- Supplier relationships: Regular inspection and evaluation of data processing, especially the efficacy of the implemented technical and organizational measures.

Data Subject Rights

You have certain rights with how your Personal Data is processed which are described below. In some circumstances, we may not be able to fully comply with your requests, or we may ask you to provide us with additional information, regarding your request, which may be Personal Data, for example, if we need to verify your identity or the nature of your request. In such situations, however, we will still respond to let you know of our decision.

Right to be informed - You have the right to know how your data is being processed.

Right of Access - You have the right to access and request copies of your data that's being collected.



Right of Rectification - You have the right to modify or update your personal data if incorrect data is being used.

Right to Erasure - You have the right to delete any personal data that has been collected.

Right to Restriction - You have the right to prevent a company from processing certain types of personal data.

Right to Data Portability - You have the right to access your personal data and transfer it between controllers.

Right to Object - You have the right to withdraw consent to the processing of your data for public interest, marketing or research.

Right to Reject Automated Decisions - You have the right to object to your data being processed by automatic systems.

Changing or Deleting Your Information

You may review, update, correct or delete Your Information, if not required to be retained by law or for legitimate business reasons and purposes. You may delete your account at any time. If you close your tyconsystems.com account, we will mark your account in our database as "Inactive/Closed," but will keep your account information in our database for a limited period of time. This is necessary to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account. However, if you close your account, your personally identifiable information will not be used by us for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

For assistance with deleting or inactivating your Account, contact us at Accounting@tyconsystems.com.

Canadian Visitors to the Site.

Canadian citizens, except under circumstances defined by law, are entitled to access their own Personal Information collected by us by contacting us at legal@tyconsystems.com. If you believe that the Personal Information about you that we have collected is incomplete or inaccurate, we will correct the information upon verification of the omission or error and of the identity of the person



requesting the change. If you wish additional information about our Personal Information management, to access, correct or have us investigate any matters in relation to your Personal Information, please contact us.

Marketing

We do not share, rent, or disclose your Personal Information to third parties for the third parties' direct marketing purposes.

Security

Tyconsystems.com is very concerned about safeguarding the confidentiality of your personally identifiable information. We employ administrative, physical and electronic measures designed to protect your information from unauthorized access. However, we cannot guarantee unauthorized personnel will not gain access to your personal information despite our efforts. You should note that in using tyconsystems.com, your information could travel through third party infrastructures, which are not under our control. PLEASE DO NOT PROVIDE ANY PRIVILEGED INFORMATION ON THE SITE OR WHEN USING tyconsystems.com.

If you receive an email asking you to update your Personal Information, do not reply and please contact us at legal@tyconsystems.com.

Contact Us

If you have any concerns or questions about this Policy, please contact us at legal@tyconsystems.com.