

# PRIVACY POLICY

Last updated March 23, 2023

This privacy notice for TLM Software Design LLC ("**we**," "**us**," or "**our**"), describes how and why we might collect, store, use, and/or share ("**process**") your information when you use our services ("**Services**"), such as when you:

- Visit our website at <https://swtlim.com>, or any website of ours that links to this privacy notice.
- Engage with us in other related ways, including any sales, marketing, or events.

**Questions or concerns?** Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [privacy@swtlim.com](mailto:privacy@swtlim.com)

## SUMMARY OF KEY POINTS

**What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.

**Do we process any sensitive personal information?** We do not process sensitive personal information.

**Do we receive any information from third parties?** We do not receive any information from third parties.

**How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

**How do we keep your information safe?** We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

**What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

**How do you exercise your rights?** The easiest way to exercise your rights is by contacting us at [privacy@swtlim.com](mailto:privacy@swtlim.com), or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

## 1. WHAT INFORMATION DO WE COLLECT?

### Personal information you disclose to us

***In Short:** We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- email addresses
- job titles
- phone numbers

**Sensitive Information.** We do not process sensitive information.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

### Information automatically collected

***In Short:** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).

- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

## 2. HOW DO WE PROCESS YOUR INFORMATION?

***In Short:*** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

**We process your personal information for a variety of reasons, depending on how you interact with our Services, including:**

- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To evaluate and improve our Services, products, marketing, and your experience.** We may process your information when we believe it is necessary to identify usage trends, determine the effectiveness of our promotional campaigns, and to evaluate and improve our Services, products, marketing, and your experience.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To improve the quality.** We may process your information to improve the quality of the <https://4testcom.com/> website and to help users navigate through the website.

## 3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

***In Short:*** We only process your personal information when we believe it is necessary and have a valid legal reason (i.e., legal basis) to do so under applicable law, such as with your consent, to comply with laws, to provide you with services, to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.

For EU and UK users, we may rely on the following legal bases to process your personal information:

- **Consent** - We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract** - We may process your personal information when necessary to fulfill our contractual obligations to you or at your request prior to entering into a contract with you.
- **Legitimate Interests** - We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms.
- **Legal Obligations** - We may process your information where we believe it is necessary for compliance with our legal obligations.
- **Vital Interests** - We may process your information when necessary to protect your vital interests or the vital interests of a third party.

For Canadian users, we may process your information with your express or implied consent. You can withdraw your consent at any time. In some exceptional cases, we may process your information without your consent under applicable law, such as for investigations, fraud detection and prevention, business transactions, insurance claims, identifying injured or deceased persons, financial abuse, or compliance with subpoenas, warrants, court orders, or rules of the court relating to the production of records.

#### **4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

***In Short:** We may share information in specific situations described in this section and/or with the following categories of third parties.*

**Vendors, Consultants, and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors, or agents ("**third parties**") who perform services for us or on our behalf and require access to such information to do that work. The categories of third parties we may share personal information with are as follows:

- Data Analytics Services
- Cloud Computing Services
- Data Storage Service Providers

We also may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

#### **5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

***In Short:** We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

#### **6. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?**

***In Short:** We may transfer, store, and process your information in countries other than your own.*

Some of our Cloud Providers servers are located in the United States. If you are accessing our Services from outside the United States, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "When and with whom do we share your personal information?" above), in the United States, and other countries.

If you are a resident in the European Economic Area (EEA) or United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

## **7. HOW LONG DO WE KEEP YOUR INFORMATION?**

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **8. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## **9. DO WE COLLECT INFORMATION FROM MINORS?**

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [privacy@swtlim.com](mailto:privacy@swtlim.com).

## **10. WHAT ARE YOUR PRIVACY RIGHTS?**

***In Short:** You may review, change, or terminate your personal data at any time.*

**Withdrawing your consent:** If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "How can you contact us about this notice?" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

If you have questions or comments about your privacy rights, you may email us at [privacy@swtlim.com](mailto:privacy@swtlim.com).

## **11. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## **12. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?**

***In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

### **13. DO WE MAKE UPDATES TO THIS POLICY?**

*In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.*

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

### **14. HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this notice, you may email us at [privacy@swtlim.com](mailto:privacy@swtlim.com) or contact us by post at:

TLM Software Design LLC, office № 2101-03, Al Habtoor Business Tower, Marsa Dubai, Dubai, UAE

### **13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please contact us at [privacy@swtlim.com](mailto:privacy@swtlim.com)