

iTechTool EU-US Data Privacy Framework (EU-US DPF), the UK Extension to the EU-US DPF, and the Swiss-US Data Privacy Framework 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 Incorporated complies with the EU-U.S. Data Privacy Framework program (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework program (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. iTechTool Incorporated has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. iTechTool Incorporated has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework program Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>. Scope and Responsibility This Data Privacy Framework 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 DPF framework. All employees of iTechTool that have access in the U.S. to Personal Data covered by this DPF Policy are responsible for conducting themselves in accordance with this DPF Policy. Adherence by iTechTool to this DPF Policy may be limited to the extent required to meet legal, regulatory, governmental, or national security obligations. Data Privacy Framework Principles iTechTool commits to subject to the DPFs’ Principles all Personal Data received by iTechTool in the U.S. from European Union member countries and Switzerland in reliance on the respective Data Privacy Framework framework.

1. Notice iTechTool notifies Data Subjects covered by this Choice Data Privacy Framework Policy about its data practices regarding Personal Data received by iTechTool in the U.S. from European Union member countries and Switzerland in reliance on the respective DPF 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 DPF are enforced, and how Data Subjects can contact iTechTool with any inquiries or complaints. 2. Choice If Personal Data covered by this DPF Policy is to be used for a new purpose that is materially different from that for which

the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party, iTechTool will provide Data Subjects with an opportunity to choose whether to have their Personal Data so used or disclosed. Requests to opt out of such uses or disclosures of Personal Data should be sent to: support@itechtool.com

3. Security iTechTool takes reasonable and appropriate measures to protect Personal Data covered by this Data Privacy Framework 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 DPF 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 DPF 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 DPF Principles for as long as it retains such Personal Data.

5. Access Data Subjects whose Personal Data is covered by this DPF Policy have the right to access such Personal Data and to correct, amend, or delete such Personal Data if it is inaccurate or has been processed in violation of the DPF Principles (except when the burden or expense of providing access, correction, amendment, or deletion would be disproportionate to the risks to the Data Subject's privacy, or where the rights of persons other than the Data Subject would be violated). Requests for access, correction, amendment, or deletion should be sent to: support@itechtool.com

6. Recourse, Enforcement, and Liability In compliance with the EU-US Data Privacy Framework Principles, iTechTool Incorporated commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to the DPF Principles. European Union, Swiss and United Kingdom individuals with DPF inquiries or complaints should first contact iTechTool Incorporated at support@itechtool.com. iTechTool has further committed to refer unresolved privacy complaints under the DPF Principles to an independent dispute resolution mechanism, Data Privacy Framework Services, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/programs/all-programs/dpf-consumers/ProcessForConsumers> for more information and to file a complaint. This service is provided free of charge to you. If your DPF 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 <https://www.dataprivacyframework.gov/s/article/G-ArbitrationProcedures-dpf?tabset-35584=2>.

Changes to this Data Privacy Framework Policy This DPF Policy may be amended from time to time consistent with the requirements of the DPF. Appropriate notice regarding such amendments will be given.