

Tulip Interfaces, Inc.

Privacy Policy

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This site is not intended for use by individuals under the age of 18.

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WHAT THIS POLICY COVERS

Tulip Interfaces, Inc. and its affiliates and subsidiaries (collectively, “Tulip” “we” or “us” or “our”) recognizes that your privacy is very important and takes it seriously. This Privacy Policy (“Privacy Policy”) describes our policies and procedures on the collection, use, disclosure, and sharing of your Personal Information when you use Tulip Websites and/or Services. This Privacy Policy applies to our

website at www.tulip.co and to mobile and other applications (the “Websites”), as well as to products and services provided by Tulip (“Services”). If you do not agree with the data practices described in this Privacy Policy, you should not use the Websites or the Services. As used in this Privacy Policy, “Personal Information” shall have the meaning attributed to the term or the term “personal data” under applicable data protection laws and means, in essence any information that relates to, is capable of being associated with, describes, or could be linked to, an identified or identifiable natural person (“you”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Tulip’s customers (“Customer”) may electronically submit data or information to the Services for hosting and processing purposes (“Customer Data”). Tulip will not review, share, distribute, or reference any such Customer Data except as provided in Tulip’s Terms of Service. Tulip’s obligations with respect to Personal Information that may be held on behalf of Customers in connection with Services are defined in our agreements with our Customers and are not governed by this Privacy Policy.

Tulip respects your statutory data subject rights. If Personal Information pertaining to you as an individual has been submitted to us by a Tulip Customer and you wish to exercise any rights you may have to, *inter alia*, access, correct, amend, or delete such data, please inquire with the Customer directly. If you wish to make your request directly to Tulip, please provide the name of the Tulip Customer that submitted your data to our Services. We will refer your request to that Customer, and will support them as needed in responding to your request within a reasonable timeframe.

THE CATEGORIES OF PERSONAL INFORMATION WE COLLECT

The categories and types of Personal Information collected directly from or about you may include, without limitation:

- *Contact information, including identifiers:* Information used to communicate with you, such as first and last name, title, company name, email address, telephone number, and postal address;
- *Account and commercial information:* Information that Tulip maintains in association with your account, such as your account number, username/user ID, password, payment information, purchase records, information about your use of the Services, information about your registration or participation in a class, certification, training, webcast or other event, your preferred language and other preferences, credit and billing status and support inquiries;
- *Professional or employment-related information:* Information contained in your job inquiries or applications, such as resume, cover letter, age, education, professional history and contact details;
- *Internet or other similar network activity information (“Internet Information”):* Information collected when you visit a website, such as IP address, language and locale settings, browsing history, information on your interaction with the website, browser type, version and language, native client type and version, operating system, location, date and time; and

- *Inferences*: Information drawn from the Personal Information collected above, such as what topics you may be interested in based on the areas of the website you visit or what products you may be interested in based on purchase records.

When you visit the Websites, we may request that you provide Personal Information, and we collect Internet Information. Often you are able to choose what information you provide, but from time to time we may require certain information from you in order for us to provide the Services or in order for you to take advantage of certain content on the Websites (e.g., Tulip University courses).

Tulip generally does not collect sensitive Personal Information, which is data such as your religious or philosophical beliefs, racial or ethnic origin, health or medical information (other than for the purpose of responding to an accommodation request for an event), genetic or biometric data, bank account information (other than for the purpose of processing your order) or other similar sensitive Personal Information as such term is defined under applicable law. If Tulip reasonably needs to collect any sensitive Personal Information from you, Tulip will obtain your consent for the collection of such Personal Information as may be required under applicable law.

HOW WE COLLECT PERSONAL INFORMATION

Tulip collects Personal Information directly from you and from other categories of sources as described in more detail below. The categories of Personal Information collected directly from you by Tulip include all of the categories identified above in "The Categories of Personal Information We Collect" section. Tulip collects Personal Information directly from you when you interact with us through the Websites and when you use our Services, including when you:

- Create a user account (individual or corporate);
- Request customer service or support;
- Register for or participate in a course, certification, training, webcast or other event;
- Request information or materials;
- Participate in surveys or evaluations;
- Provide feedback;
- Participate in promotions, contests, or giveaways;
- Apply for employment;
- Submit questions or comments; or

- Input, submit, post, upload, transmit, store or display content that you create in the process of using our Services or Websites if such content includes any Personal Information that you choose to include (“passively-collected Personal Information”).

Combination of Personal Data. Personal Information we collect online may also be combined with Personal Information you provide to us through offline channels such as through a call center, during an interview or in conjunction with a Tulip event you attend.

Analytics. We and our analytics providers may also collect diagnostic and other information indirectly from you relating to your use of our Websites and Services through the use of various technologies (with your consent where necessary). The categories of Personal Information collected in this manner are what we refer to above as “Internet or other similar network activity and inferences,” or Internet Information. Collecting information in this manner allows our engineers to improve Tulip Services and allows us to analyze the effectiveness of our Websites, Services, operations, systems, and marketing efforts, personalize your experience and improve our interactions with you. For more information about the technology we employ for these purposes, see the "Cookies and Other Technology" section below. You can disable our collection of analytics information from products via the administrator settings or by blocking collection at the local network level.

Customer-Generated Content and Applications. In addition to information gathered through the Websites or submitted to the Services, we may obtain Personal Information through Customer-Generated Applications running on the Tulip Player (“Customer-Generated Applications”) that Customers or their authorized individuals (“Users”) create and run on Customer or User devices (“Devices”). Customer-Generated Applications may obtain information from, or access data stored on, Devices to provide services related to the relevant Customer-Generated Application. Customer-Generated Applications may provide Tulip with information related to Users’ use of the Customer-Generated Application, information regarding Users’ computer systems, and information regarding Users’ interaction with Customer-Generated Applications, which Tulip may also use to provide and improve the Services. Customers configure Customer-Generated Applications and can upload content (“Customer Content”).

Supplementing Personal Information. We may also supplement the Personal Information we collect from you with additional Personal Information we receive from third parties, such as your employer, Customers, and our business partners where you purchase any of our Services through such business partners. The categories of Personal Information we receive from this type of third party includes account and commercial information and professional or employment-related information. We do this to help us improve the overall accuracy of the information and its completeness and to help us better tailor our interactions with you.

HOW WE USE (PROCESS) YOUR PERSONAL INFORMATION

In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information for a number of business and commercial purposes. The following table identifies the use/processing purpose, the categories of Personal Information processed and the lawful basis for such processing:

Processing Purpose	Categories of Personal Information	Lawful Basis
To Communicate with you, including responding to your comments, questions, and requests	contact information, including identifiers; account and commercial information	We process Personal Information on the basis of our legitimate interest in facilitating our Customers' use of our Services and on the basis that it is necessary in order for use to provide the Services.
Provide customer service and support	contact information, including identifiers; account and commercial information; internet or other similar network activity; and inferences.	We process Personal Information on the basis of our legitimate interest in facilitating our Customers' use of our Services and on the basis that it is necessary in order for use to provide the Services.
Provide you with information about services, features, surveys, newsletters, offers, promotions, contests and events; providing other news or information about us and our select partners	contact information, including identifiers; account and commercial information	We process Personal Information on the basis of our legitimate interest in promoting our Services, events and product offerings, and in managing our business.
Provide you with technical notices, updates, security alerts, and support and administrative messages	contact information, including identifiers; account and commercial information	We process Personal Information on the basis of our legitimate interest in that it is necessary in order to provide the Services; this processing is also covered by the applicable agreement between a Customer and Tulip.
Processing Purpose	Categories of Personal Information	Lawful Basis
Send information (other than marketing communications) which we think may be of interest to you or that you have consented to receiving by post, email, or other means	contact information, including identifiers; account and commercial information	We process Personal Information on the basis of our legitimate interest in providing our Services and in providing related information that we think may be helpful or of interest.
Send you marketing communications relating to our business or the businesses of carefully-selected third parties	contact information, including identifiers; account and commercial information	Where required by applicable law, we will obtain your consent before sending marketing messages. It is in our legitimate business interests to provide

which we think may be of interest to you		customers/prospective customers and the public with information about our Services, and events.
Process and complete transactions, and send you related information, including purchase confirmations and invoices (note: if you give us credit card information, we use it solely to check your financial qualifications and collect payment from you - we use a third-party service provider to manage credit card processing)	contact information, including identifiers; account and commercial information	We process Personal Information on the basis of our legitimate interest in that it is necessary in order to provide the Services; this processing is also covered by the applicable agreement between a Customer and Tulip.
Provide and deliver Services	contact information, including identifiers; account and commercial information; internet or other similar network activity; and inferences.	We process Personal Information on the basis of our legitimate interest in that it is necessary in order to provide the Services.
Monitor/analyze trends, usage, and activities in connection with our Services and for marketing/advertising purposes	internet or other similar network activity; and inferences.	We process Personal Information on the basis of our legitimate interest in that it is necessary in order to provide the Services.
Investigate and prevent fraudulent transactions, unauthorized access to our Services, and other illegal activities	contact information, including identifiers; account and commercial information; professional or employment related information; internet or other similar network activity; and inferences.	We process Personal Information on the basis of our legitimate interest in preventing fraud and in increasing the reliability of our Website and Services.
Processing Purpose	Categories of Personal Information	Lawful Basis
Process your job application when you apply for a position at Tulip	contact information, including identifiers; professional or employment-related information	It is in our legitimate business interests to be able to review the qualifications of prospective employees and perform human resources functions with regard to our employees.
Comply with requests of law enforcement or data protection agencies	contact information, including identifiers; account and commercial information; professional or	We process Personal Information on the basis of our legitimate interest in protecting our company and/or complying with the law.

	employment-related information; internet or other similar network activity; and inferences.	
Seek your opinion or feedback on our Services or industry questions	contact information, including identifiers; account and commercial information	We process Personal Information on the basis of our legitimate interest in improving our Services and on the basis that it is necessary in order for use to provide the Services.
Facilitate seamless access to all of our Services to which you have subscribed	contact information, including identifiers; account and commercial information; internet or other similar network activity; and inferences.	We process Personal Information on the basis of our legitimate interest in that it is necessary in order to provide the Services.
Enforcing our legal rights or comply with legal requirements	contact information, including identifiers; account and commercial information; professional or employment related information; internet or other similar network activity; and inferences.	We process Personal Information on the basis of our legitimate interest in protecting our company and/or complying with the law.
comply with a legal or regulatory obligation	contact information, including identifiers; account and commercial information; professional or employment-related information; internet or other similar network activity; and inferences.	We process Personal Information on the basis of our legitimate interest in protecting our company and/or complying with the law.

We may post customer testimonials and comments on our Websites, which may contain Personal Information. We obtain each customer’s consent via email prior to posting the customer’s name and testimonial.

Consent and Use of Collected Information. The use of any data collected is governed by the relevant current legislation in your region as well as this Privacy Policy. Should we wish to use the data for a purpose requiring your consent in accordance with such legislation, we will request your explicit consent in each case. Mere registration, use of our Websites, or recognition of this Privacy Policy does not obviate your explicit declaration of consent. Once given, you may revoke your consent at any time with effect for the future. This revocation may be communicated through use of the unsubscribe links provided in emails or by reaching out to the contacts provided at the bottom of this policy. We will not use your Personal Information in a manner that is inconsistent with the purpose of its original collection, unless we have provided you additional notice and you have consented.

If you are in the People’s Republic of China (PRC, for the purpose of this Privacy Policy only, excluding Hong Kong, Macau and Taiwan), the information necessary for entering into or performing a contract with Tulip may be collected and processed by Tulip without your express consent or the act of providing the information to Tulip by you is deemed as consent.

Retention of Personal Information. Tulip will retain your Personal Information for only as long as is required to fulfill the purposes for which the information is processed or for other valid reasons (for example to comply with our legal and regulatory recordkeeping and other obligations, resolve disputes, enforce our agreements and for the establishment, exercise or defense of legal claims). We also maintain log files for internal analysis purposes. These log files are generally retained for a brief period of time, except in cases where they are used for site security and safety, to improve site functionality, or we are legally obligated to retain them for longer time periods. If such log files are maintained for a longer time period, they are anonymized and are not associated with Personal Information. We will remove this information from our servers at an earlier date if you so request, as described in “Opting-Out and Unsubscribing” below.

Marketing Emails: Please note that if you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services. Every marketing email we send will provide you with the option to opt out of receiving future emails.

HOW WE DISCLOSE (SHARE) YOUR PERSONAL INFORMATION

Tulip discloses Personal Information to the following people or entities for the following business purposes:

- Service Providers. We may provide third-party service providers (such as training, implementation and certification partners, data storage and marketing vendors, software providers, and credit card payment processing partners) access to your Personal Information to perform services for visitors to our Websites on our behalf. We contractually require our service providers to provide protection for personal information and to limit the use of such information solely for the purpose of providing the specified services on our behalf.
- Other Providers of Products and Services. From time to time, Tulip may partner with other companies to jointly offer products or services. If you voluntarily purchase or specifically express interest in a jointly-offered product or service from or through Tulip, we may share your information in connection with your purchase or expression of interest with our partner(s). We contractually require such providers to provide protection for Personal Information, to only use your information to perform these tasks on our behalf, and to not disclose or use your information for other purposes. Engaging such third party service providers is often necessary for us to provide Services to you, particularly where such companies perform roles such as payment processing or shipping. In some cases these service providers are not strictly necessary, but help to improve our services by conducting research into how we could better service our users. In such cases we have a legitimate interest in working with these third party Service Providers. If you do not wish for your information to be shared in this manner, you may opt not to purchase or specifically express interest in a jointly offered product or service.

- We also may share your information in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, and in the unlikely event of bankruptcy. If we (or our assets) are acquired by another company, whether by merger, acquisition, financing, bankruptcy or otherwise, that company would receive all the Internet Information and other Personal Information gathered by Tulip on the Websites. This Personal Information would continue to be governed by this Privacy Policy. We may share your Personal Information with our current or future affiliates, which may include parent and subsidiary companies, joint ventures, or other companies under common control with which we have agreed on stringent data protection obligations in our Intercompany Data Processing Agreement. We may also share Personal Information with our auditors, attorneys or other advisors in connection with corporate functions.
- Legal Authorities. We cooperate with legal authorities and may in some circumstances be required to disclose Personal Information in response to requests from law enforcement authorities, or in response to a subpoena or other legal process. We also share information about you if we believe we should in order to (i) prevent a violation of the law; (ii) investigate with respect to and protect or defend our interests and our legal rights or property; (iii) protect the rights, interests, safety and security of users of the Websites or members of the public; (iv) protect against fraud or for risk management purposes; (v) comply with prudent legal practice as we may determine, and applicable law or legal process; or (iv) enforce our Terms of Use or your agreements with us.

Except with respect to Tulip's use of certain third party cookies and similar technology which activity may constitute a "sale" under California law, Tulip does not, and does not have any plans in the future to, sell your Personal Information. For California Website users and Customers, please see the California Supplemental Privacy Policy on Sale of Personal Data below.

COOKIES AND OTHER TECHNOLOGIES

When you visit our websites we may automatically collect Internet or other similar network activity, Internet Information and Inferences). We use cookies to collect information as you navigate our websites. A cookie is a small amount of data that is sent to your browser from a web server and stored on your device. The cookie may be placed by Tulip or by an authorized third party. We use both session-based and persistent cookies on our websites. Session-based cookies exist during a single session and disappear when you close your browser or turn off your device. Persistent cookies remain on your device even after you close your browser or turn off your device. We also use other forms of other technologies such as

- web beacons also known as image tags, pixel tags, clear GIFS or web bugs which are clear electronic images that can recognize certain types of information on your device, such as cookies, when you viewed a particular website tied to the web beacon, and a description of a website tied to the web beacon;
- software development kits (usually referred to as SDKs), which serve a similar purpose to cookies and which allow us to monitor and improve our website; and
- embedded scripts which is programming code that is designed to collect information about your interactions with the website, such as the links you click on.

When we reference cookies in this Privacy Policy, this term includes these other technologies ("Cookies"). We categorize the Cookies into the following four categories:

- **Performance Cookies:** These Cookies allow us to track visits on our website so that we can measure and improve the performance of our website and understand which access points are the most or least popular, or to record error messages on the website.
- **Functional Cookies:** These Cookies allow us to improve the functionality and personalization of the website. They ensure that your end device is maintained and help us to include third-party services on the website.
- **Advertising Cookies:** These Cookies help us to personalize your online experience and to provide targeted advertising based on your interests and previous browsing history.
- **Strictly Necessary Cookies:** These Cookies are technically necessary for the functioning and management of the website cannot be disabled in our systems.

In addition, we collect data by running queries against website content across our user base for the purposes of generating Usage Data. "Usage Data" is aggregated data about a group or category of services, features or users that can contain Personal Information.

Consent and Legitimate Interest in Processing

The placement and subsequent processing of Strictly Necessary Cookies is based on our legitimate interest or in order to provide you with an expressly requested tele media service. Our legitimate interest is to provide you with a technically optimized, user-friendly and appropriate website and/or Service. We use other types of Cookies only with your consent. You can withdraw your consent at any time with effect for the future, e.g. by managing your Cookie settings on the website and/or Service or by sending an e-mail to the contract details set out herein.

In addition, most Web browser settings allow you to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Websites. Third party ad networks may collect information about your visits to our Websites and other websites, such as your IP address, your Internet service provider, and the browser you use to visit our websites. They do this using cookies, web beacons or other technologies. You will be provided with the choice of whether to accept or decline these cookies and can update your preferences at any time using the "Cookie Preferences" link in the footer.

YOUR RIGHTS AND CHOICES

In accordance with the laws of certain countries, you may have certain rights and choices regarding the Personal Information we collect and maintain about you, and how we communicate with you.

Where the EU General Data Protection Regulation 2016/679 ("GDPR"), the Brazilian General Data Protection Law ("LGPD"), the California Consumer Privacy Act of 2018 ("CCPA"), the Personal Information Protection Law ("PIPL") of the PRC, or similar legal requirements apply to the processing of your Personal Information, especially when you access the website from a country in the European Economic Area ("EEA"), Brazil, the PRC or as a consumer in the state of California or in a jurisdiction with similar legal protections, you have the following rights, subject to some limitations, against Tulip (although individuals with inquiries or complaints regarding our Privacy Policy should first contact Tulip at privacy@tulip.co):

- The right to request information about our use of your Personal Information (e.g., the pieces and categories of Personal Information we have; the categories of sources, purposes for collection, the third parties with whom we have shared Personal Information, and Personal Information we have disclosed);
- The right to review and access your Personal Information including the right to obtain a copy of your personal data;
- The right to rectify (correct, update or modify) the Personal Information we hold about you;
- The right to erase (e.g., delete), de-identify, anonymize or block your Personal Information;
- The right to restrict our use of your Personal Information;
- The right to object to our processing of your Personal Information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- The right to request the transfer of your Personal Information we hold about you to a third party; and
- The right to lodge a complaint with your local data protection authority (in the EU: your EU Member State of habitual residence, place of work or where the alleged infringement of data protection law occurred).

If you would like to exercise any of these rights, you may do so by contacting privacy@tulip.co. If you have submitted a valid European Union General Data Protection Regulation data subject access request to exercise your right to be forgotten we will delete your personal data without undue delay after receiving the request. For California consumers, you may also submit requests by calling Tulip's U.S. toll free number at 833.468.8547.

Where the GDPR, LGPD, CCPA, PIPL or similar legal requirements apply, you also have the right to withdraw any consent you have given to uses of your Personal Information. If you wish to withdraw consent that you have previously provided to us, you may do so by contacting privacy@tulip.co. However, the withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal, nor will it preclude our ability to retain your Personal Information for legal reasons.

Where the GDPR, LGPD, CCPA, PIPL or similar legal requirements do not apply, Tulip grants you the ability to access, modify, or update some of your Personal Information online at any time. You may log in and make changes to your information, such as your password, your contact information, your general preferences, and your personalization settings. If necessary, you may also contact us at privacy@tulip.co and describe the changes you want made to the information you have previously provided. However, note

that changing or deleting information necessary for Tulip to assist with support and customer service may result in a delay or interruption in assisting you.

You will be given an opportunity to tell us whether you would like to receive information, special offers, and promotional materials by email from Tulip or our business partners when you create a Tulip account, when you register for a Service, when you provide us with your Personal Information, or when we send you a marketing email. Where required by applicable law, we will obtain adequate consent to provide you with these marketing materials. You also have the ability to opt out of receiving marketing emails from Tulip at any time without cost by clicking on the “unsubscribe” link contained in our marketing emails or by contacting us at privacy.tulip.co. You can also exercise your rights and choices by contacting us as described below under "Contact Us." Please note that Customers cannot opt out of receiving transactional emails related to their account with us or our store as these communications are necessary for the completion of the Services.

When you exercise your privacy rights, such as those conferred by the GDPR, LGPD, CCPA or PIPL, you have a right not to **receive discriminatory treatment by Tulip for the exercise of such privacy rights.**

VERIFICATION

Before responding to a request for information about your Personal Information, we must verify the request. Verification is important to protect your information and to help confirm that we are responding to a valid request and providing the response to the correct individual. The information we ask to verify your identity may depend on your relationship with us.

When you exercise your privacy rights under the GDPR, LGPD, CCPA, PIPL or similar laws, you can designate an authorized agent or representative to make a request on your behalf by providing the authorized agent with written permission to do so and verifying your identity with us as part of the request, or by providing the authorized agent with Power of Attorney pursuant to applicable law (e.g., the California Probate code). We will ask the individual submitting the request to denote that they are an authorized agent or representative. When submitted by an authorized agent or representative, we ask the authorized agent or representative to provide name, email address and a description of the relationship with the individual who is the subject of the request and to certify that the representative has permission to submit the request, and may request proof of the consumer’s written permission.

SECURITY

Tulip has implemented reasonable and appropriate physical, administrative and technical safeguards to protect your Personal Information from unauthorized access, theft, use, modification, and disclosure. In addition, payment-related Personal Information (such as a credit card information) is collected for transactions with us, it is protected by our third-party payment processor. We also require that our business partners and service providers protect such information from unauthorized access, use and disclosure. Although we take reasonable precautions to assess the reliability of such technology, we rely on the statements of the vendors of those products and services as part of its security evaluation. While we have endeavored to create a secure and reliable site for users, the confidentiality of any communication or material transmitted to/from the site, and the security of your personal information, cannot be guaranteed. We urge you to take every precaution to protect your personal information when you are on the Internet.

To help protect yourself, use a strong password, do not use the same passwords to access your Tulip accounts that you use with other accounts or services, and protect your usernames and passwords to help prevent others from accessing your accounts and services.

SOCIAL MEDIA, PUBLIC FORUMS AND LINKS TO OTHER WEBSITES

Our Websites include Social Media Features, such as the Facebook Like button and Widgets, such as the “Share This” button or interactive mini-programs that run on our sites. These Features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Websites. Your interactions with these Features are governed by the Privacy Policy of the companies providing them, unless these companies and Tulip are joint controllers under the GDPR and jointly liable.

We may offer publicly accessible message boards, blogs, and community forums. Please keep in mind that if you directly disclose any information through our public message boards, blogs, or forums, this information may be collected and used by others. We will correct or delete any information you have posted on our servers if you so request, as described in “Opting-Out and Unsubscribing” below.

Our Websites provide links to other websites. We do not control, and are not responsible for, the content or practices of these other websites. Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices. This Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have. The foregoing shall not limit our statutory obligations to delete content where we have been made aware of content that infringes applicable laws.

CHILDREN’S ONLINE PRIVACY

The following is not applicable to EU data subjects.

The Websites are intended for a general audience and not intended for or targeted at children under 13, and we do not knowingly or intentionally collect personal information (as defined by the U.S. Children’s Privacy Protection Act, or “COPPA”) in a manner not permitted by COPPA. If you are a parent or guardian and you believe you believe that we have collected information about your child in a manner not permitted by law, please contact us at privacy@tulip.co, so that we may delete the information to the extent required by applicable law.

We do not knowingly “sell” the personal information of minors under 16 years old who are California residents without their affirmative authorization.

If you are a California resident under 18 years old and registered to use the Websites, you can ask us to remove any content or information you have posted on the Websites. To make a request, email us at the email address set out in “Contact Us” section with “California Under 18 Content Removal Request” in the subject line, and tell us what you want removed. We will make reasonable good faith efforts to remove the post from prospective public view, although we cannot ensure the complete or comprehensive removal of the content and may retain the content as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

DATA TRANSFERS

Tulip is a global organization, with legal entities, business processes, and technical systems that operate across borders. Tulip may transfer and access your Personal Information to and from around the world, including the United States. The United States and other countries may not have the same data protection laws as the country from which you initially provided the information. This can result in disadvantages for you such as an impeded enforcement of data subject rights, a lack of control over further processing and access by state authorities. Your legal remedies against this may be limited.

Safeguards. When transferring your Personal Information internationally (in particular from within the European Union (EU) and/or the European Economic Area (EEA) to recipients outside the EU/EEA ("Third Countries")). Where required by applicable law (and to the extent a Third Country Transfer is not covered by an adequacy decision of the EU Commission), we have put in place appropriate safeguards (such as by concluding the relevant standard contractual clauses approved by the European Commission with data importers or by means of binding corporate rules of our business partners and we supplement these transfer mechanisms with further contractual, technical and organisational measures where necessary in accordance with applicable legal requirements to ensure that your data is adequately protected., Tulip will protect your Personal Information as provided in this Privacy Policy and comply with applicable legal requirements as may be in effect from time to time. If you wish to obtain a copy of the relevant safeguards that are in place to protect the international transfer of your Personal Information, please contact us as described below under "Contact Us."

CHANGES TO THIS PRIVACY POLICY

Tulip reserves the right to make corrections, changes or amendments to this Privacy Policy at any time. The revised Privacy Policy will be posted on this website. A notice will be posted on our homepage for 30 days whenever this Privacy Policy is changed in a material way, and the date of last update will be indicated at the top of the Privacy Policy. If you do not refuse the changes in writing within that notice period and you continue to use our Websites. We encourage you to periodically review this Privacy Policy for any changes or updates. If you would like information related to the previous version of this Privacy Policy and/or a copy of the previous version, please contact us as described below under "Contact Us."

CONTACT US

If you have any questions about this Privacy Policy or our treatment of the information you provide us, please write to us by email at privacy@tulip.co or by mail to Tulip Interfaces, Inc., 77 Middlesex Ave., Suite A, Somerville, MA 021453, Attn: Privacy. For California consumers, you may also submit requests, or access the information provided in this Privacy Policy in an alternative format, by calling Tulip's U.S. toll free number at 833.468.8547.

For a PDF version of the Privacy Policy, please [click here](#).

CALIFORNIA SUPPLEMENTAL PRIVACY STATEMENT ON SALE OF PERSONAL INFORMATION

If you are a California consumer, you have rights under the California Consumer Privacy Act of 2018 (the “CCPA”). The above Privacy Policy describes Tulip’s general privacy practices and addresses the required disclosures about your Personal Information under the CCPA. This supplement to the above Privacy Policy is to provide you with information specifically on the CCPA’s provisions related to the “sale” of Personal Information.

Sale of Personal Data under California Law. Under the CCPA, a “sale” is defined to include disclosures of Personal Information to another business or a third party for monetary or valuable consideration. When you use Tulip websites, Tulip’s authorized partners may collect cookies and similar technology and use this data for their own purposes. This activity may qualify as a “sale” under the CCPA. You can make choices to allow or prevent such uses. Depending on your choices, during the past twelve months, we may have “sold” information within the following categories defined by the CCPA:

- Internet or other similar network activity relating to your interactions with Tulip websites
- Identifiers and location information, such as your IP address
- Inferences about your interests

For more information on Tulip’s use of cookies and similar technology, please see the section entitled “Cookies and Other Technologies” above.

Opt-Out of Sale of Personal Data. In addition to the rights described under the “Your Rights and Choices” section of the above Privacy Policy, as a California resident, you have the right to opt-out of the sale of Personal Information by Tulip to third parties for their own purposes. To opt-out of Tulip making information relating to cookies and similar technology available to third parties for their own purposes, you can click on the "Cookie Preferences and Do Not Sell My Personal Information" link in the footer of the website (or a similarly named link at the bottom of the website) and set your cookie preferences to "Required" or you can configure your browser so that it always rejects cookies or asks you each time whether you want to accept them or not.

You may also exercise your privacy rights as set forth under “Contact Us” in the above Privacy Policy.