

Data Collection:

User Provided Information:

- “Account and profile information, such as name, age, username, password, language, email, phone number, social media account information, and profile image.”
- Comments, photos, live streams, audio, videos, and hashtags uploaded to the platform along with their metadata regarding where, who, and when content was posted.
- Credit card information, cookies saved on third party payment companies (e.g Paypal) billing and shipping addresses
- Phone and third-party social network contacts
- Documents to verify age and identify
- Information from user correspondence on Tiktok when a user contacts Tiktok support
- Information saved through surveys, research, marketing campaigns, and various other means of user engagement such as gender, likeness, age, and preferences

Information from Other Sources:

- When other third party social medias are linked to Tiktok, your public information revealed on those platforms may be collected
- Companies investing money into advertisements on Tiktok may collect information you provide to purchases and interactions which is relayed back to Tiktok
- User information is obtained from Tiktok through affiliated entities within their corporate group
- When specific actions such as tagging a user or mentioning a user, Tiktok collects data on those interactions
- Public databases from government entities can be collected for Tiktok’s personal logs

Automatically Collected Information:

- Information regarding use of Tiktok and content uploaded to the platform
- Information about the device running Tiktok such as IP address, mobile carrier, time zone settings, model of device, etc.
- Information about approximate location based on SIM card of device running Tiktok
- Image and audio information of content posted on the platform: scenery, facial and body structure data, voice recognition for captions, etc.
- Metadata about user content such as creation time, location of upload, device information, etc.
- Cookies based on user interactions to personalize content based on data collected from other content

Data Sharing Policies:

- May share data with business partners and service providers to perform operations such as “research, payment processing and transaction fulfillment, database maintenance, administering contests and special offers, technology services, deliveries, sending communications, advertising and marketing services, analytics, measurement, data storage and hosting, disaster recovery, search engine optimization, and data processing.”
- May disclose information for legal reasons to defend the rights, securities, and safety of Tiktok in the instance of a subpoena or court order.
- Data collected by Tiktok will be inherited to any entity in the event they acquire or merge with Tiktok

User Rights:

- Any user can submit a request to identify, correct, or delete information collected by Tiktok.
- Any user can delete content directly from the platform to terminate specific data collection concerns.
- Account information is able to be updated within the app, along with the ability to request a copy of personal Tiktok data
- In accordance with the appropriate jurisdiction, a user file a lawsuit through an authorized agent provided evidence the agent holds power as attorney or they are licensed to exercise rights on a user’s behalf
- As much data is sensitive data, a right to privacy is implied. Such purpose for this data could be to verify the identity of a user in the case of a transaction on the Tiktok store.

Opt-Outs

- Users can opt out of personal ads through in-app settings
- A user can opt out of marketing and advertising emails by using the “unsubscribe” link noted in these emails
- If a user possesses the current version of the app, precise locations are not collected; however those with older updates who granted Tiktok permission for precise location tracking can opt out through the app settings

Update Procedures

- Tiktok updates regularly, therefore terms and conditions may undergo changes in opt-out opportunities, data collection procedures, and data sharing transactions which users should stay in touch with

- Updates will be notified to users through email

Summary Matrix:

<u>Aspect</u>	<u>Details</u>
Data Collection	Collects account details, user-created content, messages, payment information, and contacts. Collects data from third-party services, advertisers, and other partners. Collects device information, usage information, location data, and cookies
Data Sharing	Shares with Service Providers and Business Partners payment processing, analytics, and marketing. Shares with affiliated entities for platform support. Shares with law enforcement agencies to comply with legal processes or to protect a user's rights and wellness.
User Rights	Users can access and update certain personal information through account settings. Users may request account deletion. Parents can consent to data collection and deletion from their child's account
Opt-Out Options	Users can opt out of targeted advertising campaigns. Users can opt out of cookie collection. Users can opt out of location tracking.
Updates	Notifies users of significant changes to the Privacy Policy with the app.

Regulatory Comparison (Compiled with help from ChatGPT)

CCPA

Notice Requirements: TikTok has a U.S.-specific Privacy Policy containing clauses of collection of personal information, purposes of collection, and third-party sharing practices, aligning with the CCPA.

Consumer Rights: Users can request details about the personal information TikTok collects and how it's used; users may request deletion of their personal data with certain exceptions; TikTok offers a means for users to opt out of the sale or sharing of their personal information; TikTok's policy states it does not discriminate against users for exercising their privacy rights.

Opt-Out Provisions: TikTok allows users to opt out of the sale or sharing of their data; TikTok honors GPC signals, enabling users to opt out via browser settings.

VCDPA:

Processing Limitations: TikTok states it collects data that is adequate, relevant, and reasonably necessary for company purposes; collection and implementation of sensitive data requires strict consent

Consumer Rights: Users can access their personal data collected by TikTok; users may request corrections to inaccuracies in their personal data; users can request deletion of their personal data; TikTok allows users to obtain a copy of their data in a portable format; users can opt out of targeted advertising, sale of personal data, and profiling.

Business Obligations: TikTok conducts assessments processing activities that present a heightened risk to consumers

GDPR:

Data Subject Rights: Users can request access to their personal data and information on how it's processed; users may request corrections to their personal data; users can request deletion of their personal data under certain conditions; users can object to data processing based on legitimate interests or for direct marketing purposes.

Consent Requirements: TikTok obtains explicit consent for processing sensitive data and for data transfers outside the EU; users can withdraw consent at any time, and TikTok provides settings to ensure this.

Data Transfer Provisions: TikTok utilizes SCCs for data transfers to other countries.

Processing Limitations: Data is only collected for company and safety purposes; only data necessary for the purposes stated is collected; data is retained only as long as necessary.

Documentation Requirements: TikTok maintains detailed records of data processing activities; DPIA's conducted for processing activities that are likely to result in high risk to individuals' rights and freedoms.