

Privacy Policy

Effective: December 15, 2019

TAMAC Consulting, India (“TAMAC or ReCapp” or “we”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive from users of our website, accessible at www.2recapp.com (“Site”), and our mobile applications (collectively, “ReCapp App”) as well as use of our proprietary set of services made available through the same (“ReCapp Services”). This Privacy Policy applies to your access to and use of the Site, the ReCapp App and the ReCapp Services, and by choosing to use them, you consent to the collection, transfer, processing, storage, disclosure and other uses of your information described in this Privacy Policy.

As used in this policy, the terms “using” and “processing” information include using cookies on a computer, subjecting the information to statistical or other analysis and using or handling information in any way, including, but not limited to collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within our organization or among our affiliates within the United States or internationally.

As used below, the term “Personal Information” is used to indicate any piece of information or data that can be used to identify any individual. Personal Information may relate to you as a User, or it may relate to the individual that is the subject of any Profile that you create or allow creation, if you create or allow creation of a Profile for a student or a customer.

Any other defined term that is not defined in this Privacy Policy has the meaning given that term in the ReCapp / 2Recapp.com / TAMAC Terms of Service or any Additional Terms of Service, as applicable.

Modifications:

TAMAC reserves the right, at its sole discretion, to modify this Privacy Policy, at any time and without prior notice. If we modify this Privacy Policy, we will post the modified Privacy Policy and alert you to the modified Privacy Policy on the Site and the ReCapp App or will otherwise provide you with notice of the modification. We will also update the “Effective Date” at the top of this Privacy Policy. By continuing to access or use the Site, the ReCapp App or the ReCapp Services after we have posted a modified Privacy Policy or have provided you with notice of a modification, you are indicating that you agree to be bound by the modified Privacy Policy. If the modified Privacy Policy is not acceptable to you, your only recourse is to cease using the Site, ReCapp App and ReCapp Services. Information we collect under the old Privacy Policy will remain subject to the old Privacy Policy unless and until you consent to the application of any modified Privacy Policy to such information.

The Information We Collect:

Personal Information

You may browse the Site and download the ReCapp App without expressly providing us any Personal Information that expressly identifies you, however, in order to make full use of the ReCapp Services as made available via the Site and/or the ReCapp App, you will be required to register with us. When you register with us to create an account and become a User, we will ask you for certain Personal Information. In order to set up your account, you need to provide your email address and you will need to select a password. You maybe required to add any other Personal Information to your Account we will collect that information and use it and share it as set forth below.

As a User, you set up a Profile within the ReCapp Services. The Profile may be personal to you or the subject of the Profile may be a student or a customer who we assume has authorized you to provide information on their behalf and you will be governed by all the Terms. When you set up a Profile, you will be asked to provide Personal Information about the individual that is the subject of the Profile, whether yourself or your student, parent or customer. When you set up a Profile in the ReCapp Services We will collect and store any Information that you may elect to provide to us as part of the Profile Content, which may include but is not limited to educational information, gender, date of birth, personal contacts, learning content, photographs and files. In the event you set up a Profile that relates to someone other than yourself, you are solely responsible for ensuring that you have any and all consents and permissions to share that Personal Information with us and to use that information as part of the ReCapp Services. You may provide us with Personal Information of a third party Caregiver, as contemplated by the ReCapp Terms of Service, to access a Profile that you create. If you elect to invite any third party to access a Profile connected to your Account, we will ask you for such third party's name and email address. We will send the third party emails inviting him or her to register for the ReCapp Services. We store this information for the sole purpose of sending this one-time email. The third party may contact us at droplets@tamac.in to request that we remove this information from our database. We cannot control whether such third party will elect to register for the ReCapp Services.

Non-Personal Information

We also collect the following information any time you visit our Site or the ReCapp App, as applicable. This information may not necessarily identify you, but if we have your Personal Information, or you otherwise set up an Account with us, we may link any of the below non-personal information with your Personal Information in our records.

- **Browser Log Data.** When you visit the Site, whether as a User or a non-registered user just browsing the Site, our servers automatically record information that your browser sends whenever you visit a website ("Browser Log Data"). This Browser Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, operating system or the webpage you were visiting before you came to our Site, pages of our Site that you visit, the time spent on those pages, access times and dates, and other statistics. We use this information to monitor and analyze use of the Site and for the Site's technical administration, to increase our Site's functionality and user-friendliness, and to better tailor it to our visitors' needs. For example, we use this information to verify that visitors to the Site meet the criteria required to process their

requests. We do not treat Browser Log Data as Personal Information or use it in association with other Personal Information, though we may aggregate, analyze and evaluate such information for the same purposes as stated above regarding other Non-Identifying Information.

- **Cookies.** The Site uses “cookies” to collect information. A cookie is a small data file that we transfer to your computer’s (device – computer, phone, tablet, storage media) hard disk for record-keeping purposes. We use cookies for two purposes. First, we utilize persistent cookies to save your login information for future logins to the Site. Second, we utilize session ID cookies to enable certain features of the Site, to better understand how you interact with the Site and to monitor aggregate usage by users and web traffic routing on the Site. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Site and then close your browser. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all portions or functionalities of the Site.
- **App Usage Data.** When you use the ReCapp App, whether as a Member or a non-registered user, our servers automatically record information that your mobile device sends whenever you use an Internet service. (“App Usage Data”). This App Usage Data may include information such as your computer’s IP address, device model and version, device identifier, operating system, time zone, name of your mobile operator or ISP, application performance measurements, and error conditions. It may also include a record of when specific features of the ReCapp App or ReCapp Service are used. We use this information to monitor and analyze use of the ReCapp App and ReCapp Service and for their technical administration, to increase their functionality and user-friendliness, and to better tailor them to our visitors’ needs. For example, we use this information to measure the popularity of different features and to more effectively resolve customer issues. We may aggregate, analyze and evaluate such information for the same purposes as stated above regarding other Non-Identifying Information.
- **Location Information.** The App, with your consent, may access your location. TAMAC will only access your location services while you are using the App and provided you have opted in to activate this feature. You may choose to allow TAMAC to access your location by granting the App access to your device’s location, when prompted by the App, or through your device’s location services settings.

How we Use Your Information:

- We do not sell your Personal Information.
- We will use any Personal Information in your Account as well as information in your Profile to provide the ReCapp Services, complete your transactions, administer your inquiries, and present you with offers for products and services that we think may be of use or interest to you. We may contact you in various ways including but not limited to, via email, Inbox in the app, telephone, cell phone, and SMS/text messages.
- We may aggregate and combine all Personal Information that we receive through your User Accounts and your Profiles with the information of other Users and Profiles. We use

this anonymous information to attempt to provide you with a better experience, to improve the quality and value of our services and to analyze and understand how our Site, ReCapp App and ReCapp Services are used.

Information Sharing and Disclosure:

In the event that a third party registers for access to the ReCapp Services pursuant to an invitation issued by your Account, we will provide them with access to all Profiles related to such Account. We cannot control how any such third party may use or disclose or otherwise exploit any Personal Information or other Profile Content that you may elect to make available to such third party. You expressly release TAMAC from any responsibility and liability resulting from any third party access to any Personal Information or Profile Content that you may permit. Any information you choose to provide and make available to third parties via the ReCapp Services should reflect how much you want others to know about you and the individual(s) whose information is in your Profile.

- **Other Third Parties.** If you elect to use or otherwise take advantage of some of the other third party services that we may provide and make available to you, we will share certain of your information with such third party and will disclose to you at the time what information would be necessary to share with such third party.
- **Aggregate Information and Non-Identifying Information.** We may share aggregated information that does not include Personal Information and we may otherwise disclose non-Personal Information with third parties for industry analysis, demographic profiling and other purposes.
- **Service Providers.** We will disclose Personal Information to the third party service providers that we engage to assist us in making the Site, ReCapp App and ReCapp Services available. These service providers consist of our datacenter provider, storage provider, customer support system provider, email service providers, and software development contractors. These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.
- **Compliance with Laws and Law Enforcement.** While TAMAC maintains information on your behalf, BBSI is not a covered entity under any of the personal laws or Consumer Protection Act). However, we take the protection of your information very seriously. In the event that we receive any subpoena or similar request from a court, government or law enforcement official, we will only disclose any Personal Information about you or other information in our custody or control as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect the property and rights of TAMAC or a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or legally actionable activity. Given the sensitivity of the Personal Information within your Profiles, it is our policy to carefully review any such request for information in our systems and we will decline to comply with any such request in our discretion.

- **Business Transfers.** TAMAC may sell, transfer or otherwise share some or all of its assets, including your Personal Information and related Account, Profiles and Profile Content, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.

Changing or deleting your information:

All Users may review, update, correct or delete their Account information and any associated Personal Information or Profile Content by contacting us or by accessing the ReCapp Services. If you would like to close your Account or delete any Profile from your Account, please contact us at droplets@tamac.in. We will use commercially reasonable efforts to honor your request. We will retain an archived copy of your records as set forth below.

Data Retention:

We will retain the information you provide via our Site or the ReCapp App for as long as your Account is active or as needed to provide you with the ReCapp Services. We will also retain and use the information you provide via our Site or ReCapp App, as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If you delete your Account or any Profile, any Personal Information associated with the same is moved out of our active databases, but will still be retained in our systems pursuant to our data backup and retention policies.

Do Not Track Signals and Ad Networks:

Our Site does not have the capability to respond to “Do Not Track” signals received from various web browsers.

How We Protect Your Data:

All communications between you and the Site, and between the App and the Site, are encrypted using the highest level encryption supported by your device. Data stored in the app and on the Site is encrypted at rest using industry-standard AES encryption.

Identity Theft:

Identity theft is of great concern to TAMAC. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, request your credit card information, your login information, or Aadhaar number in a non-secure or unsolicited e-mail or telephone communication.

Security Breach:

The Site, ReCapp App and ReCapp Services rely on the Internet and mobile networks, which are not always secure. We use commercially reasonable efforts to maintain the confidentiality, availability and integrity of any information we collect, but we cannot assure that the use of the Site, ReCapp App or ReCapp Services are secure or that your Personal Information or any

other data that we may have will be secure. In the event we become aware of a security incident, we will notify you to the extent required under applicable law.

Reporting A Problem:

If you feel your account may have been compromised, or you discover abuse or misuse of ReCapp Services, the Site or the ReCapp App, please report it immediately to droplets@tamac.in and we'll investigate.

International Transfers:

Your information may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Links To Other Websites or 3rd Party Websites:

Our Site may contain links to other websites. If you choose to click on a third party link, you will be directed to that third party's website. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. Other websites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

Contacting TAMAC:

If you have any questions about this Privacy Policy, please contact us at droplets@tamac.in