

WEBSITE PRIVACY POLICY

Last updated: November 9, 2025

1. INTRODUCTION AND GENERAL BACKGROUND

- 1.1. TSG Ltd. ("TSG", "we" or "us") present this privacy policy, as may be amended from time to time (the "**Privacy Policy**") in order to provide our website user ("User", "you" or "your") information about TSG's data protection practices in relation to Personal Data collected, used and/or otherwise processed by TSG and/or third parties acting on its behalf, through its website <https://www.tsgitsystems.com/en/> (the "**Website**").
- 1.2. When accessing, browsing and using the Website, you may be required to provide TSG with Personal Data about yourself that is protected by law. As a result, TSG, as data controller, has implemented appropriate security measures in order to protect your Personal Data.
- 1.3. If you have questions or concerns regarding this Privacy Policy, please contact us at tsg@tsgitsystems.com
- 1.4. **PLEASE SEE OUR FULL PRIVACY POLICY BELOW IN ORDER TO BETTER UNDERSTAND OUR PRACTICES IN DETAIL.**

2. WHAT PERSONAL DATA DO WE PROCESS AND FOR WHAT PURPOSES?

- 2.1. When we use the term "Personal Data" in this Privacy Policy, we mean (i) information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular person, consumer or household; and (ii) any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly.
- 2.2. The table below details the categories of Personal Data, purposes, EU legal basis, and processing:

Category of Personal Data	How we collect Personal Data	Purposes	Example of use of Personal Data	Legal Basis (for EEA Users only)
• <u>Identification data or identifier</u>, i.e., first and last name,	Such Personal Data is provided directly from the User on the Website, via the	Managing your contact request	• to answer your questions and inquiries • to contact you if necessary	Legitimate interest of TSG in managing its contact request

Category of Personal Data	How we collect Personal Data	Purposes	Example of use of Personal Data	Legal Basis (for EEA Users only)
• <u>Contact details</u>, i.e., email address and Company Name. • <u>Any information you decide to add in the empty box</u> (i.e., date, area of subject and content of your exchanges with TSG's staff). The provision of certain types of Personal Data may be necessary or optional, depending on your requests. Mandatory data will be marked as such at the moment of collection of your personal data. If you refuse to provide mandatory data, TSG may not be able to process your request (i.e., reply to your contact request).	'Contact' form or other forms	Supporting and enhancing data security measures of the Website	• to prevent and mitigate the risks of fraud, error or any illegal or prohibited activity • technical administration and troubleshooting of the Website • to diagnose and repair Website errors, and, in cases of abuse, track and mitigate the abuse.	Legitimate interest of TSG to secure its Website and User's experience.
		Managing litigation	• to manage any dispute or litigation involving you with respect to the Website • to establish, protect, or exercise our legal rights • to defend against legal claims or demands.	Legitimate interest of TSG in defending its rights and interests.
		Complying with legal and regulatory obligations	• to perform any reporting and notifications obligations we may be subject to, to competent governmental agencies and authorities • to process your requests to exercise your rights • to detect, investigate, prevent, or take	Legal and regulatory obligations to which TSG is subject.

Category of Personal Data	How we collect Personal Data	Purposes	Example of use of Personal Data	Legal Basis <i>(for EEA Users only)</i>
			action(s) against illegal activities, fraud, or situations involving potential threats to the rights.	

3. WITH WHOM DO WE SHARE PERSONAL DATA?

3.1. We may share your Personal Data with third parties as detailed below:

- 3.1.1. **With our Affiliates.** Your Personal Data will be shared with our affiliates to manage the Website and the companies' services.
- 3.1.2. **Service Providers and Subcontractors,** including data storage providers, data security services, fraud detection and prevention services, content transcription and analysis services, consent management platform (CMP) which is external service that provides use with the ability to allow website visitors to control and manage their cookies and other tracking preferences, insurers. We share Personal Data with selected third-party companies and individuals we engage to perform services on our behalf. We only provide such service providers with Personal Data so they can perform their required functions on our behalf.
- 3.1.3. **Governmental, Administrative or Judiciary Authorities.** We will disclose or allow government and law enforcement officials access to certain Personal Data, exclusively in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur with or without notice to you, if we have a good faith belief that we are legally compelled to do so, or that disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing.
- 3.1.4. **Corporate Transactions.** We may share Personal Data in connection with any proposed or actual financing, reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- 3.1.5. **Lawyers and Interested Parties.** We will share Personal Data exclusively in case of the management of possible disputes and other legal matters where appropriate, including with respect to the Website; to establish, protect, or exercise our legal rights; as required to enforce agreements; to defend against legal claims or demands; to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights.

- 3.2. In the last 12 months, we have not sold, shared or disclosed Personal Data for monetary or other consideration to any third parties or for cross-contextual behavioral advertising.

4. HOW IS PERSONAL DATA TRANSFERRED OUTSIDE OF YOUR COUNTRY?

- 4.1. We may host, store, process, maintain or transfer the Personal Data to various sites worldwide, outside your jurisdiction, including through cloud-based service providers.
- 4.2. Where specific laws or regulations relating to Personal Data transfer apply to us, we will endeavor to ensure that the Personal Data is protected and transferred in a manner consistent with legal requirements.
- 4.3. **EEA Transfers.** When we transfer Personal Data from within the European Economic Area ("EEA") to countries or international organizations that are based outside the EEA, the transfer takes place on the basis of an adequacy decision by the European Commission.

5. HOW LONG DO WE STORE PERSONAL DATA FOR?

- 5.1. We retain Personal Data for as long as a User is using our Website. The Personal Data collected as part of your online contact requests are retained until such requests have been fully processed.
- 5.2. Other circumstances in which we will retain your Personal Data for longer periods of time include: (a) where we are required to do so in accordance with legal and regulatory requirements, or (b) for us to have an accurate record of your interaction with us in the event of any inquiries or contact requests, or (c) if we reasonably believe there is a prospect of litigation.

6. HOW DO WE KEEP YOUR PERSONAL DATA SECURE?

- 6.1. We endeavor to maintain appropriate technical and organizational measures compliant with industry standards to protect Personal Data in particular, against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.
- 6.2. However, although we make every effort to protect the Personal Data which you provide to us or we generate, we cannot completely ensure the security of any Personal Data you transmit to us over the internet or guarantee that this Personal Data will not be accessed, disclosed, altered, or destroyed.
- 6.3. If you have found a vulnerability or would like to report a security incident, you may send an email to tsg@tsgitsystems.com.

7. WHAT RIGHTS DO YOU HAVE REGARDING PERSONAL DATA?

7.1. General Provisions

- 7.1.1. Please note that under certain circumstances and depending on your jurisdiction, you are entitled to specific rights regarding your Personal Data (subject to some exceptions).
- 7.1.2. In most cases, you can exercise such rights free of charge.
- 7.1.3. When you ask us to exercise any of your rights under this Privacy Policy and the applicable privacy and data protection laws, we may need to ask you to provide us with certain credentials to make sure that you are who you claim you are, to avoid disclosure to you of Personal Data which is related to others that you are not authorized to receive, and to ask you questions to better understand the nature and scope of Personal Data of your request.
- 7.1.4. Please note that you can deliver your request by contacting us at tsg@tsgitsystems.com.

7.2. EEA Users. If you are based in the EEA, you have the following rights:

- 7.2.1. You have the **right to access** your Personal Data in order to obtain clear, transparent and understandable information on **how we process** your Personal Data and on your rights (as provided in this Privacy Policy), as well as a **copy** of your Personal Data.
- 7.2.2. You have the right to **rectify** your Personal Data in case your Personal Data is obsolete, inaccurate or incomplete.
- 7.2.3. You have the right to **object** the processing of your Personal Data when the processing is based on TSG's legitimate interest. We will no longer process your Personal Data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, such as the respect of a legal obligation (e.g., legal obligation involving the retention of documents), or for the establishment, exercise or defense of legal claims.
- 7.2.4. In certain circumstances under applicable data protection law, you have the right to **restrict the processing** of some of your Personal Data during a limited period of time.
- 7.2.5. You have the right to **withdraw your consent** when it has been obtained and processing is based on consent.
- 7.2.6. In certain circumstances under applicable data protection law, you have the right to request **data portability**, meaning that you can receive the Personal Data originally provided by you in a structured and commonly used format or that you can request the transfer of the Personal Data you provided to another data controller.

- 7.2.7. In certain circumstances under applicable data protection law, you have the right to **delete** your Personal Data (also known as the **right to be forgotten**).
- 7.2.8. If applicable, you may request not to be subject to a decision based solely on **automated processing**, including profiling, if such profiling produces a legal effect concerning you or similarly significantly affects you and if automated processing is used.
- 7.2.9. You have the right to **lodge a complaint** with your national data protection authority. If you have a complaint about how we use your Personal Data, we will always prefer you to contact us first. If you are unsure which data protection authority to contact, please contact us at tsg@tsgitsystems.com.
- 7.3. **California Users**. The following rights apply to California Users who resides in California:
- 7.3.1. **Right to Know what Personal Data we Have Collected**. You have the right to request what Personal Data we have collected, including the categories of Personal Data, the categories of sources from which the Personal Data is collected, the business or commercial purpose for collecting, selling, or sharing Personal Data, the categories of third parties to whom we discloses Personal Data, and the specific pieces of Personal Data we have collected about you.
- 7.3.2. **Right to Deletion**. You have the right to request the deletion of your Personal Data that we collect or maintain, subject to certain exceptions.
- 7.3.3. **Right to Correction**. You have the right to request the correction of your inaccurate Personal Data that we maintain about you.
- 7.3.4. **Right to Opt-Out of Sharing for Cross-Contextual Behavioral Advertising**. To the extent applicable, you have the right to opt-out of the “sharing” of your Personal Data for “cross-contextual behavioral advertising,” often referred to as “interest-based advertising” or “targeted advertising”.
- 7.3.5. **Right to Opt-Out from Selling**. To the extent applicable, you have the right to opt-out of the sale of your Personal Data to third parties. We do not have actual knowledge that we sell Personal Data.
- 7.3.6. **Right to Limit the Use or Disclosure of Sensitive Personal Information**. Under certain circumstances, to the extent we use or disclose SPI, you have the right to limit the use or disclosure of SPI.
- 7.3.7. **Right to Data Portability**. You may request to receive a copy of your Personal Data, including specific pieces of Personal Data, including, where applicable, to obtain a copy of the Personal Data you provided to us in a portable format.

7.3.8. **Right to Non-Discrimination.** You have the right to not receive discriminatory treatment if and when you exercise your rights regarding your Personal Data under the CCPA/CPRA.

7.3.9. Only you may make a request related to your Personal Data. If you are a California resident a request can be made by a person registered with the California Secretary of State that you authorize to act on your behalf, in such event you must provide us with signed documentation that you have authorized an agent to act on your behalf.

7.4. You can exercise your above rights by contacting us via contact details described in Section 7.1.4 above.

8. CHILDREN

8.1. The Website is directed towards and designed for use by persons aged 18 and older.

8.2. If we nevertheless receive Personal Data from an individual who indicates that he or she is, or whom we otherwise have reason to believe is, under the age of 18, we will endeavor to delete such Personal Data from our systems.

9. CHANGES TO THIS PRIVACY POLICY

9.1. This Privacy Policy may change from time to time. If we decide to change our Privacy Policy, we will post new or updated privacy policy in our Website. Each version of this Privacy Policy will be identified by its effective date, which you can find at the top of this Privacy Policy. The new or updated privacy policy will be effective from the date mentioned at the top page of the new privacy policy.

9.2. We strongly encourage you to review this Privacy Policy periodically to ensure that you understand our most updated privacy practices.

10. CONTACT INFORMATION AND DATA CONTROLLER INFORMATION

If you have any comments or questions regarding this Privacy Policy or the information practices in connection with the Website, please contact us at tsg@tsgitsystems.com.