Privacy Notice

Date of effect: June 26, 2024
Last updated: June 26, 2024

We've developed this Privacy Notice ("**Privacy Notice**") to explain to you how we collect, use, disclose, and store personal data.

Introduction

This Privacy Notice applies to Tolokka and its affiliates (which for ease of reference we refer to as "**Tolokka**", "**we**", "**our**", "**Tolokka affiliates**").

What is Tolokka? This Privacy Notice Apply?

The Privacy Notice applies to the services Tolokka provides as a Controller. This includes when you:

- Visit or interact with the Tolokka website and/or webpages ("the Website"), the Tolokka mobile applications, the Tolokka Platform, Tolokka's social media pages or any other Tolokka-related sites, applications, platforms, or services;
- Register for or participate in our webinars, events, programs, marketing, and promotional activities;
- Contact us about our products or services, or provide us with feedback;
- Inquire about or engage in commercial transactions with us;
- Provide personal data to us for any purpose in connection with our business, or create country-specific processes at the end of the Privacy Notice, which may be applicable to you, in accordance with the laws of the Tolokka Group Entity's country of operation.

The Tolokka Group Entity that is the Controller of your personal data is the Tolokka Group Entity in your country of residence. The Tolokka Group Entities are the Tolokka Group Entities listed in the Tolokka Group Entities Schedule. The Tolokka Group Entities relevant to the processing of personal data under this Privacy Notice are:

- Tolokka Pte. Ltd. (Singapore), Tolokka Japan Kabushiki Kaisha (Japan), Tolokka Korea Limited (South Korea), Tolokka Taiwan Limited (Taiwan), Tolokka Hong Kong Limited (Hong Kong), Tolokka Australia Pty Ltd (Australia), Tolokka Malaysia Sdn. Bhd. (Malaysia), Tolokka Philippines Inc. (Philippines), Tolokka Thailand Co., Ltd. (Thailand), Tolokka Vietnam Company Limited (Vietnam), Tolokka Indonesia Pte. Ltd. (Indonesia), Tolokka Europe Sp. z o.o. (Poland), Tolokka Ireland Limited (Ireland), Tolokka Spain S.L. (Spain), Tolokka Portugal Unipessoal Lda. (Portugal), Tolokka Germany GmbH (Germany), Tolokka Netherlands B.V. (Netherlands), Tolokka Belgium BV (Belgium), Tolokka Luxembourg S.A. (Luxembourg), Tolokka Nordics AB (Sweden), Tolokka Finland Oy (Finland), Tolokka Norway AS (Norway), Tolokka Denmark ApS (Denmark), Tolokka Canada Inc. (Canada), Tolokka Mexico S.A. de C.V. (Mexico), Tolokka Brasil Ltda. (Brazil), Tolokka Argentina S.R.L. (Argentina), Tolokka Colombia S.A.S. (Colombia), Tolokka Chile SpA (Chile), Tolokka Peru S.A.C. (Peru), Tolokka Uruguay S.A. (Uruguay), Tolokka Panama S.A. (Panama), Tolokka Costa Rica S.A. (Costa Rica), Tolokka Dominican Republic S.R.L. (Dominican Republic), Tolokka Guatemala S.A. (Guatemala), Tolokka Honduras S.R.L. (Honduras), Tolokka Nicaragua S.A. (Nicaragua), Tolokka Salvador S.A. (El Salvador), Tolokka Puerto Rico LLC (Puerto Rico), Tolokka Trinidad and Tobago Limited (Trinidad and Tobago), Tolokka Jamaica Limited (Jamaica), Tolokka Bermuda Limited (Bermuda), Tolokka Cayman Islands Limited (Cayman Islands), Tolokka Turks and Caicos Limited (Turks and Caicos), Tolokka Limited (Hong Kong), Tolokka Holdings Limited (Cayman Islands), Tolokka Inc. (Delaware, USA), Tolokka Holdings Inc. (Delaware, USA), Tolokka Capital Inc. (Delaware, USA), Tolokka Ventures Inc. (Delaware, USA), Tolokka Ventures Holdings Inc. (Delaware, USA), Tolokka Ventures Fund Inc. (Delaware, USA), Tolokka Ventures Fund Holdings Inc. 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Our Privacy Notice is designed to advise You about how Toloka collects, uses, protects, and discloses the personal data. However, Toloka may contain links to other sites that are not operated by us. Please note that this Privacy Notice does not govern the practices by any third parties. Information collected from You by others, such as third-party websites that You access through links on Toloka Platform, are governed by those entities' privacy policies. If you click a third-party link, you will be directed to that third party's site. We strongly advise You to review privacy policies of every site You visit.
WE HAVE NO CONTROL OVER AND ASSUME NO RESPONSIBILITY FOR THE CONTENT, PRIVACY POLICIES OR PRACTICES OF ANY THIRD-PARTY SITES AND SERVICES.

14. Difficulty accessing this Privacy Notice

Individuals with disabilities who are unable to usefully access our Privacy Notice online may contact us at the above-listed contact information to inquire how they can obtain a copy of our notice in another, more easily readable format. Under no circumstances, we will collect or otherwise process information about your health or other sensitive data about You in connection with such request.

15. STATE/COUNTRY SPECIFIC PRIVACY POLICIES AND NOTIFICATIONS

United States of America

A. Privacy Information for California Residents

This section of the Privacy Notice applies only with regard to California residents. If You are California resident, this section shall prevail over all other parts of the Privacy Notice in case of discrepancies.

Personal Information Collected over the Last 12 Months

Personal information we collected directly from you:

Categories of Data Collected	Data collected from you and why it was collected
Characteristic of protected classifications under California or Federal law.	Toloka does not intentionally collect any information on Your protected classifications, but Toloka may learn your protected classifications inadvertently (e.g. Your age)
Commercial information	Record of services with Toloka
Geolocation Data	Only in case of performing "field tasks" (at your choice)
Financial Information	E-Wallet number. Note that Toloka uses third party payment processors as set forth in Section 3 to facilitate Your payments and Toloka does not store Your payment information.
Biometric Data	Yes
Audio, electronic, visual, thermal, olfactory, or similar information	None
Internet/Network Activity	Internet Protocol address (IP address), browser type and language, information about the Internet service provider, sending and exiting pages, information about the operating system, date and time stamps, information about visits; information about mouse movement, scrolls; screen recording; actions in the system (logs).
Professional or Employment-related Information	Area of activities or occupation
Education Information	Highest degree or level of education (it is required for specific cases, such as prior to concluding a freelance agreement with AI Tutor)
Device Information	User's device ID

Categories of Personal Information Sold in the last 12 months

We do not sell Your personal information to third parties.

Categories of Personal Information Disclosed over the last 12 months

Categories of Data Disclosed	Types of Entities to which Data was Disclosed	Reason for Disclosure of Data	Categories of Recipients
Identifiers, Commercial information, Financial information, Internet/Network Activity Professional or Employment-related Information, Education information, Device Information, Biometric information (ID Photo).	**Please see section 3 with the detailed description.**	Please see section 3 with the detailed description.	Please see section 3 with the detailed description.

Information we sell

We do not sell Your personal information to third parties. Please note that "sale" of personal information does not include those instances when such information is part of a merger, acquisition, or other transaction involving all or part of Toloka business. If we sell all or part of Toloka business, make a sale or transfer of assets, or are otherwise involved in a merger or other business transaction, we may transfer Your personal information to a third party as part of that transaction. If such transaction materially affects the manner in which Your personal information is processed, we will notify you of such change prior to its implementation.

Your California Privacy Rights

We have in place policies and procedures to facilitate the exercise of privacy rights available to California residents under applicable law. If you are a California resident, You are entitled to the rights as described in the Section 6 of this Privacy Notice. In addition, You may be entitled to the following:

Disclosure of Direct Marketers:

to have access upon simple request, and free of charge, the categories and names/addresses of third parties that have received personal information for direct marketing purposes. Toloka does not share your personal information with third parties for their direct marketing purposes.

Right to Information About Collecting, Selling, Sharing, or Disclosing Personal Information:

upon receipt of a verifiable request, you may obtain a list of:
- The specific pieces of your personal information Toloka holds;
- The categories of personal information collected about You, sold to third parties, or disclosed to third parties for business purposes;
- The categories of personal information sold within the last 12 months;
- The categories of sources from which personal information is collected;
- The business or commercial purpose for collecting or selling personal information; and
- The categories of third parties with whom personal information is shared, sold, or disclosed for a business purpose.

Right to Opt-Out of the Sale of Personal Information:

California residents have the right to opt-out of the sale of their personal information under certain circumstances.

Right to Non-Discrimination

As defined under relevant law, You have a right to non-discrimination in Toloka services or quality of services You receive from us for exercising your rights.
Please contact us with the use of contact details specified in section 1 of this Privacy Notice in relation to exercising these rights. Note that we may ask you to verify your identity - such as by requiring you to provide information about yourself - before responding to such requests.

Submitting a Verifiable Request under the CCPA

California residents have certain rights regarding their personal information under the California Consumer Privacy Act of 2018 ("**CCPA**"). Toloka will respond to an individual's "verifiable request" to exercise his or her rights under the CCPA - that is, where Toloka has received a request purporting to be from a particular individual, and Toloka has been able to verify the individual's identity. The need to verify an individual's identity is critical to protecting your information, and to ensuring that your information is not shared with anyone pretending to be you or someone who is not authorized to act on your behalf.
You may submit a verifiable request with the use of contact details specified in section 1 of this Privacy Notice. We will ask you to provide information about yourself so that we can verify your identity as part of this process. This information may include your name, address, whether you have an account with Toloka, and other information deemed necessary by us to reasonably verify your identity. Once we have your submission, we will compare the information you provided to the information we have about you to verify your identity. If necessary, we may ask for additional information if we have difficulty confirming your identity. We will not share your information or honor other requests in those situations where we are unable to confirm that a request for your information is a "verifiable request". We will not be able process your request if we cannot verify your identity.

Submitting a request through an authorized agent.

Under California law a California resident can appoint an "authorized agent" to make certain verifiable requests upon their behalf, such as the right to know what information we collect about the consumer or to request deletion of the consumer's information. An authorized agent may submit a request by following the steps outlined above. An authorized agent must identify the consumer he or she is submitting a request on behalf of, and provide the information requested by Toloka to verify the consumer's identity. We will also require the purported authorized agent to submit proof that he or she has been authorized by the consumer to act on the consumer's behalf.
Because the security and privacy of your information is paramount, we will ask that you identify and provide permission in writing for such persons to act as your authorized agent and exercise your applicable rights under California law in such situations. This may require us to contact you directly and alert you that an individual has claimed to be your agent and is attempting to access or delete your information. We will also independently verify your identity to ensure that an unauthorized person is not attempting to impersonate you and exercise your rights without authorization. We will not share your information or honor any other requests in those situations where you cannot or do not grant permission in writing for an identified authorized agent to act on your behalf, or where we cannot independently verify your identity.

Submitting a Request for Removal of Minor Information.

To request the removal of information about a minor by Toloka, parents or guardians may submit a request with the subject line "Removal of Minor Information". Such requests must come from the minor's parents or guardian; minors may not submit information to us via email. Your submission should include the following information:
- the nature of your request;
- the identity of the content or information to be removed;
- whether such content or information is found on Toloka Platform;
- the location on content or information on Toloka Platform (e.g., providing the URL for the specific web page the content or information is found on);
- that the request is related to the "Removal of Minor Information"; and
- your name, street address, city, state, zip code, and e-mail address.

If we become aware that a minor has provided us personal data or otherwise used Toloka Platform in violation of the Privacy Notice, we will take steps to remove that information.

Our Policy on "Do Not Track" Signals under the California Online Protection Act

We do not support Do Not Track. Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable "Do Not Track" by visiting the "Preferences" or "Settings" page of your web browser.
Third parties may collect data that relates to you. We cannot control third parties' responses to do-not-track signals or other such mechanisms. Third parties' use of data relating to you and responsiveness to do-not-track signals is governed by their respective privacy policies.

B. Privacy Information for Residents of Colorado, Utah, Virginia, and Nevada:

Unless that contradicts to the law of the state of your residence, provisions of the Chapter A "Privacy Information for California Residents" will apply to the processing of your data. Please contact us whenever you have questions related to your rights or any other questions under this Privacy Notice by either of the methods set forth in the Section 1.

16. Toloka Affiliates

TOLOKA AI AG (SWITZERLAND), registration number: CHE - 132.532.069, registered address: Werftestrasse 4, 6005 Luzern, Switzerland
TOLOKA AI INC. (USA), identification number: 5938185, registered address: 10 State street, Newburyport, MA 01950, United States
TOLOKA D.O.O. BEOGRAD (SRB), registration number: 21804126, registered address: Starine Novaka 23, Sprat 4, Belgrade (Palilula). 11000, Belgrade, Serbia

Previous versions of the document: https://toloka.ai/privacy-notice-march-20

Previous versions of the document: https://toloka.ai/privacy-notice/28082023

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