

HIGH TECH DEV LTD

GDPR COMPLIANCE OVERVIEW

GENERAL INFORMATION

High Tech Dev Ltd

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Data Protection Officer: Alison Wallis (Alison@HTAir.tech)

Data Storage:

- EU – Frankfurt
- UK - London
- APAC – Singapore, Tokyo, Shanghai
- US – Virginia, California
- AU – Sidney

For more details please see the global architecture section

ABOUT US

High Tech Dev and HTAir.tech is a Live and VOD streaming service provider for market research industry. High Tech provides Mobile, in-home, in-facility, IoT solutions to simplify video content creation and delivery.

High Tech is a global video distribution provider with an integrated platform built on top of cloud content delivery system. We use EDGE IoT or nodes to process and distribute live and archive video across the globe with sub-second low latency.

High Tech focuses on automation of content creation and distribution. High Tech provides a full stack set of tools for the clients to self-manage their research and services. Facilities, Agencies and Clients are in full control of their content and data collection. High Tech does not collect or process user or respondent data.

PRODUCTS AND SERVICES

High Tech Dev Ltd provides the following products:

- **HT Arthur:** full stack, self-managed, facility streaming solution.
- **HT Anton:** mobile streaming and research for non facility-based research, with global reach.
- **HT Face:** full stack video conferencing platform.
- **HT HUB** participant management online community platform.

All of High Tech products are integrated and interconnected into one simple to use online platform that automates and streamlines the online experience.

High Tech global platform and products are architected and built on the same fundamentals required by trade commission for Wall Street trading floors.

High Tech has been created to meet all the required certification criteria for SSAE 18, GDPR and T CPA including the second revision of T CPA.

GLOBAL ARCHITECTURE – DATA SECURITY

The products and online global platform uses internally its own VPN with no public exposure. All products communicate directly via VPN to the Amazon AWS Geo located Private Cloud. The public areas of the portal are exposed through encrypted SSL connections and allow access only to permitted users.

There are currently no 3rd party systems that connect to our system. Upon client request there are times that we help stream line data for our clients' by pushing feeds. A separate contract and security evaluation is required.

Attached is the global reach that High Tech infrastructure uses.

Global Infrastructure



DATA OWNERSHIP

All research is managed and owned by our clients, dictating the governing controls of origin of the data. Furthermore, our clients control the content, data and access to every part of the research.

High Tech does not collect, store, process or sell any Pii information.

We use best practice security systems to access our platform, for all online viewers and content owners.

For security validation we rely on HT generated passwords

All online users are required to use a “nick name”. Only the nick name is used for any of the processes and displayed within information such as chat and logs.

HT Arthur:

HT Arthur provides local recording at the Facility, Conference, or its installation location. No internet is required for local processing.

All recordings are processed and stored locally.

Each recording requires a name and no other information.

Recordings are available and then automatically removed after 7 days.

If Live Streaming is required, the facility representative would have to access the self-service online portal and book the live stream, and stream from the Arthur internal device at the desired time.

HT Anton:

HT Anton provides global mobile streaming from anywhere in the world to anywhere.

All streams are transmitted to the closest available AWS Geo Node and then internally relayed to the designated processing Cloud Server. No data is required or collected in this transit.

No local mobile data or video is stored for any amount of time.

Encrypted authentication tokens are exchanged in order to identify the user and the research that the user can stream.

Research is stored in the country of origin dictated by the booking owner.

Research features are also set by the booking owner.

HT Online Booking form:

All booking information and controls are available in one central location.

No Private Personal Information is required collected in any part of the system. It is the booking and research owners' responsibility to ensure that all private data is retained within the guidelines.

The same booking form is used for any of HT Product line.

HOW DO WE GATHER CONSENT?

Potential online viewers, participants, moderators, and other, should be informed of their privacy information and they have the choice to opt out and not to participate to the invited research.

See context below:

“Privacy:

All our online services comply and adhere to all aspects of GDPR and TCPA privacy acts and we maintain all processes and procedures required to protect the privacy of respondents, online viewers, staff members for every study conducted.

Online Viewers: We do not display, share or use any information that would enable the identification of any private individual. We provide you with the ability to assign yourself a nickname of your choice, as well as the registration information of your choice.

For security reasons, encrypted token cookies are being used to track your activity through the research so we can allow or block access and report usage back to content owner or coordinator.

Never share your online access credentials, it can compromise research security.

Respondents: We do not use, store or process any of the respondent's information. If you have any questions about the study please refer to the content owner for details and advise.

Content: All content stored and distributed by the online services is highly encrypted and stored in private secure storage devices. Content access is only granted to users that are approved by owner and/or study participants. Content availability and permission is made based on the content owner's request, and if no such request is in place the system fallback on the strictest guidelines of GDPR and TCPA.”

If at any point the participant wants to withdraw from the research or have a recording deleted they may have taken part in, an email request to Support@htair.tech is sufficient and all the data related to the user will be removed. We will action such requests within GDPR mandated timeframes.

The withdraw request can be initiated by the content owner, as well as the individual that has the email account that is being requested.

Once request is received the High Tech DPO will confirm the receipt, validate request and confirm removal of any user related information.

PRIVACY POLICY

High Tech Dev and subsidiaries including HTAir.tech (or the “Company”) is strongly committed to protecting your privacy and providing a safe online experience for all of our users. Because we gather certain types of information about and from users so that we can fulfill your requests and better serve your needs, we feel you should fully understand the terms and conditions surrounding the collection and use of this information. This privacy statement discloses what information we gather, how we use it, how to correct or change it, and what steps we take to safeguard personal information provided to us both online and offline. We urge you to read the complete Privacy Policy below, as well as our Terms of Use, and contact us if you have any questions, but offer this short summary to highlight key points.

1. We do not collect personal and non-personal information from you unless there are issues providing the service. We then aim to provide information and service and to conduct our business and may combine it with information we receive from third parties.
2. We may share personal and non-personal information about you with third parties in the circumstances described in this policy.
3. We use cookies, web beacons and other technologies to authenticate our registered users, and to provide certain functionalities.
4. We reserve the right to share information to satisfy a legal request, protect people or property, or in connection with a transfer of our business.
5. We adopt reasonable procedures to protect the personal information you send to us. However, we provide no guarantees that your data will always be secure.

The Company may, but is not obligated to, update this Privacy Policy from time to time. You should review this Privacy Policy periodically to familiarize yourself with the most current version. If we decide to change our Privacy Policy, we will post those changes to our Website so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. Material changes to this Privacy Policy will be posted on this Website 5 days prior to their becoming effective.

If you have questions or concerns regarding your privacy or this Privacy Policy, or wish to review and request changes to any information you may have previously provided, you should contact the Company at:

By Telephone: UK: +44 1625 836-307

By Email: Support@HTAir.tech

Collection and Use of Personally Identifiable Information

In the course of using the services of the Company, we may collect and maintain certain non-public personal information that will help us to efficiently perform various transactions. We will use commercially reasonable efforts to ensure that our service providers do not use any personal information for any purpose other than delivery of our services.

Our Website automatically collects certain information, such as your IP address, browser type, domain name, access times and referring website address.

We do not collect personal information (such as names, addresses, phone numbers, or email addresses) about you, except when you specifically provide the information on a voluntary basis, such as when you become a registered user of one or more of the Company's services;

We use your personally identifiable information for several purposes:

1. **Service/Account Communications:**

Whenever you register for one or more of the Company's services, we will use your personal information to provide our services to you, to provide you with service notifications, to respond to your service.

We may contact you regarding the status of your account, your registration information, support issues regarding our service, and changes to our service or the terms under which it is offered.

2. **Additionally, we may share your personally identifiable information in the following circumstances:**

We may disclose your personally identifiable information when required by law. Specifically, we may disclose this information to unrelated parties in special cases when we have reason to believe that our disclosure is necessary to identify, contact or bring legal action against a person or persons who may be causing injury to, or interference with, the rights or property of the Company (including our website), computer users accessing our website, or any third party. In addition, we may disclose information about individuals who access our website to law enforcement agencies, judicial or government authorities or to other individuals or entities in response to subpoenas, court orders or other legal processes.

In the event that the Company goes through a business transition, such as a merger, an acquisition by another company, or a sale of all or a portion of its assets, your and other users' personal information will, in most instances, be part of the assets transferred. If as a result of the business transition, your personal information will be used in a manner different from that stated at the time of collection, you will be given the option to continue sharing the information consistent with our notification of changes section. Nothing in this Privacy Policy is intended to interfere with the ability of the Company to transfer all or part of its business and/or assets (including the website) for any purposes, without limitation. The Company specifically reserves the right to transfer or share a copy of personally identifiable information collected from this website to the buyer of that portion of its business relating to that information.

If you are a registered user of the Company's services, we may retain your information as long as you maintain your registered status and thereafter in accordance with our customer or other business requirements.

Links To/From Other Sites

Our Website may contain links to other Internet websites which we do not operate and, conversely, other Internet websites may contain links to our Website. We are not aware of and are not responsible for the privacy policies, practices or content of such other websites. We encourage visitors to read and become familiar with the privacy policies maintained by such other websites.

Use of Cookies

Your Web browser offers so-called "cookies" which, if you allow their use, store small amounts of data on your computer when you visit a website. Cookies do not contain any personally identifiable information about you and therefore cannot be used to identify you personally. Cookies allow us to authenticate our registered users and to assist us in tracking which of our Website pages you have viewed. You have the ability to accept or decline cookies by modifying your browser and our Website is viewable even if you disable the cookie function on your browser. However, if you disable cookies, you will not be able to access your account and some of our other services will not be available to you.

Do-Not Track-Signals

Currently, (i) other parties (e.g. third-party advertising networks and analytics providers) may not collect personal information about your online activities over time and across different websites when you use our website or services, and (ii) we do not respond to, or take any specific action in connection with the receipt of, Do-Not-Track signals or other similar mechanisms regarding the collection of personally identifiable information about an individual's online activities over time and across third-party websites or online services.

Security

High Tech Dev & HTAir.tech uses industry standard efforts to safeguard the confidentiality of your personal identifiable information, such as data encryption, firewalls, system security measures and Secure Socket Layers (SSL). This means that any information you send us is protected by encryption. We transmit and store your personal information using SSL encryption. The registration pages, where you enter your personal information, are secure and are protected by the password you created when you registered on our Website. It is your obligation to protect the confidentiality of your password. If you lose control of your password, you may lose substantial control over your personally identifiable information and may be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason, you should immediately change your password.

Notwithstanding the precautions that we take to safeguard your personal information in our system, you are advised that perfect security does not exist in commercial Internet applications and that such security measures may not prevent all loss, misuse or alteration of information on our Website. Therefore, although we work very hard to protect your privacy, we do not promise and you should not expect, that your personal information or private communications will always remain private.