

PRIVACY POLICY

Last updated August 2026

Trauma Free World, DBA Global Trauma Alliance, an Ohio non-profit corporation (collectively referred to herein as “Global Trauma Alliance”, “we”, “us”, or “our”) is committed to protecting your personal information. This “Privacy Policy” informs you about our practices regarding the treatment of information we collect from you online, through our mobile application, the kinds of information we collect, how that information is used, with whom we share it, and how you can opt-out of a use, or correct or change such information. TICCO is intended exclusively for individuals aged 18 and older. If you are under 18, please do not use TICCO or provide any personal information to us.

For ease of reference, this Privacy Policy is organized into the following sections:

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PLEASE READ THE ENTIRE PRIVACY POLICY CAREFULLY BEFORE YOU CONTINUE. BY ACCESSING THIS MOBILE APPLICATION OR USING ANY OF ITS FEATURES, YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY AND ARE DEEMED TO HAVE ACCEPTED THE TERMS OF THIS PRIVACY POLICY IN THEIR ENTIRETY. IF YOU DO NOT AGREE, PLEASE REDIRECT YOUR DEVICE AND EXIT THE APP.

1. Scope of the Privacy Policy

This Privacy Policy outlines how your personal information (your "User Information") is collected, used, and shared in connection with your access to and/or visitation or use of:

- Our mobile application, TICCO or Trauma-Informed Coach On-Demand ("TICCO"), and/or
- Any third-party application or third-party sites, social networks, or social media sites (such as Facebook, Twitter, Instagram, LinkedIn, Google, Discord, etc., collectively "Applications").

This Privacy Policy also describes your choices and rights regarding the use, access, and correction or deletion of your User Information held by us. When accessing and/or using TICCO, you may be asked to provide clear and unequivocal affirmative consent to the collection, processing, and sharing of your User Information via onboarding procedures and chat interactions. We also collect, process, and share your information in accordance with our legal bases for use of your data, which are more fully described in [Section 3](#).

The mobile application is owned and operated by Global Trauma Alliance, and this Privacy Policy only applies to User Information obtained by Global Trauma Alliance in connection with or related to your use of the mobile application, TICCO. This Privacy Policy does not apply to information collected by us offline or through any other means, including on any other app, or website, operated by us or any third party (including our affiliates and subsidiaries), including through any website, application or content (including advertisements) that may link to or be accessible from, or on, our mobile applications.

We process User Information, including sensitive personal data that may be voluntarily submitted during chat or voice interactions, in accordance with applicable legal bases and in alignment with major global data protection frameworks, including but not limited to the GDPR (Europe), LGPD (Brazil), CCPA/CPRA (California), PIPEDA (Canada), and similar laws in other jurisdictions.

TICCO does not actively solicit sensitive personal data. However, when such information is voluntarily disclosed by the user, it is processed solely within the context of that interaction and safeguarded accordingly.

Should TICCO introduce features in the future that collect sensitive data through structured prompts, such collection will require the user's explicit consent and will be governed by all legally mandated technical, organizational, and procedural safeguards under applicable data protection laws.

This Privacy Policy may change from time to time as further described in Section 7, and your continued use of TICCO means that you are agreeing to be bound by the most recently updated version of this Privacy Policy.

2. Data Collection: *General Information We Collect*

We collect User Information when you use our mobile application, TICCO. Sometimes you submit User Information to us yourself, other times your User Information is collected automatically. Our handling of your User Information is generally limited to registration, chat interactions, addressing issues, and handling and resolving general inquiries. You are not required to provide Global Trauma Alliance the data that we request, but if you choose not to do so, we may not be able to provide you with our services, or respond to any inquiries you have.

Information Collected When You Use Our Mobile Applications

The type or category of User Information collected varies based on how it was gathered. User Information we collect may include information by which you can be personally identified such as your name, email address, account information, and other information that you voluntarily submit (e.g., when you use the chat function to interact with TICCO). In general, your personally identifiable information means any User Information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you, your household, or your devices (your "PII"). PII does not include:

- publicly available information from government records;
- de-identified or aggregate information; or
- certain other personal data protected by other sector-specific state or federal law.

We automatically collect certain technical information about your usage of TICCO, which may include identifiers such as IP addresses used for security and operations, and information about you that third parties share with us if such third parties have previously received your consent to do so. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your Internet Protocol (IP) address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use TICCO and other technical information. This information is primarily needed to maintain the security and operation of TICCO, and for our internal analytics and reporting purposes.

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this time, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a uniform standard for online tracking is adopted that we must follow in the future, we will comply with such standard and will inform you about that practice in a revised version of this Privacy Policy.

TICCO does not use GPS or similar technologies to collect precise geolocation data. We may collect IP addresses for security, fraud prevention, and operational purposes, but we do not use IP addresses to derive or track your precise location. Users may voluntarily share geographic or language information during their interactions with the app.

Global Trauma Alliance does not intentionally solicit or require any data through TICCO regarding the following:

- Race or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union memberships;
- Genetic or biometric data;
- Health or mortality;
- Sexual activity or orientation; or
- Criminal convictions or offenses.

However, users may voluntarily share such information during their interactions with TICCO. In such cases, the information is processed only within the scope of user conversations and is

not profiled or used for automated analytics. Retention may occur as necessary to support moderation, feedback functionality, safety features, or user support.

We collect several categories of User Information from and about users of TICCO, including:

- ***Identity and Contact Information*** – We collect and/or use your first and last name, email address, account information, position/job title, preferred language, and country of residence.
- ***Technical Data and Unique Device Identifiers*** – We collect IP addresses, chat history, *feedback, usage metrics, operating system information, links clicked, pages visited, browser type, time zone setting, browser plug-in types, and referring apps of visitors to TICCO (when possible).*
- ***Non-Identifying Information*** – We collect information that is about you but does not individually identify you, such as aggregate information about pages visited, length of time spent on TICCO and its webpages, emergency data preferences, etc.

On TICCO, we collect your User Information through various means, including through:

- Contact forms such as registration forms, general inquiry forms, or when you email us directly;
- Interactions with the chat features;
- Responses to surveys we conduct from time to time;
- Social media plugins; and
- Web-tracking and app analytics technologies, such as cookies and web beacons.

Note: TICCO is primarily a mobile application. References to web-based tracking technologies (such as cookies and web beacons) apply to web-based features or our website. The mobile app primarily uses mobile SDKs and device identifiers for analytics and functionality.

The TICCO App uses artificial intelligence (AI) and voice technology to simulate trauma-informed conversational support. These technologies operate in real-time, and we do not permit providers to use your content to train their models, where available under provider terms and our configuration. User content processed by our third-party vendors is handled for the purpose of delivering the requested functionality, subject to each provider's applicable data handling terms. The AI features in TICCO simulate structured dialogue and do not perform diagnostic or therapeutic analysis. These features operate only during the session, and no voice or chat data is used to train external models. All AI interactions are context-sensitive and are handled under heightened data care.

TICCO uses limited tracking technologies such as cookies or similar tools strictly for essential technical purposes, including service functionality, security diagnostics, and aggregated usage analytics. We do not use cookies for behavioral advertising, cross-site tracking, or individual profiling.

The TICCO App may also use mobile SDKs (e.g., Firebase) for crash reports, usage trends, and app improvement. These tools do not collect personally identifiable information or track activity across third-party applications.

Development Support: Our development service provider may use AI-assisted development and debugging tools in connection with technical support activities. These tools are used exclusively in development environments and are not permitted to process production user data.

Your Voluntary Submission of Information

Global Trauma Alliance collects User Information that is voluntarily provided by you or with your permission. For example, we ask you for information, such as your name, and e-mail address when you register to use TICCO, interact with the chat function, or otherwise when you contact us. All information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such information. You always have the option not to provide the information **we request**. If you choose not to provide the information we request, you can still visit TICCO, but you may be required to provide your information by other means if it is needed to provide our services to you.

To review and change your User Information, please contact us in accordance with Section 8 of this Privacy Policy. If you have created a user account on TICCO, deleting your User Information will result in the deletion of your user account. We may not accommodate a request to change your User Information if we believe the change would violate any law or legal requirement or cause your User Information to be incorrect. Please review Section 6 concerning Privacy Rights and Considerations for more information concerning your rights regarding our collection and use of your User Information.

Our Third-Party Vendors Who Collect Your Information

- **Collection and processing of User Information by or in collaboration with our third-party vendors occurs when you use our mobile application:**
- **Authentication and Account Management:** We use Auth0 (Okta, Inc.) for secure user authentication and account management. For more information, please review Auth0's privacy policy at <https://auth0.com/privacy>.
- **Hosting and Database Services:** We collect and store certain User Information through TICCO via Microsoft Azure (Azure Cosmos DB), a multi-model database service offered by Microsoft Corporation, which provides secure and scalable storage. For more information, please review Microsoft's privacy statement at <https://privacy.microsoft.com/privacystatement>.
- **AI and Conversational Services:** We use OpenAI OpCo, LLC for AI-powered conversational assistance and Azure Cognitive Services (Microsoft) for additional AI processing. For more information, please review OpenAI's privacy policy at <https://openai.com/privacy> and Microsoft's privacy statement at <https://privacy.microsoft.com/privacystatement>.
- **Voice Processing:** If you use the voice recording feature, ElevenLabs processes your voice responses for real-time delivery. ElevenLabs does not use voice data to train external models. Data handling by ElevenLabs is subject to their applicable service terms. For more information, please refer to their Privacy Policy at <https://elevenlabs.io/privacy>.

- **Push Notifications:** We use Firebase Cloud Messaging (FCM), part of Google's Firebase suite, for push notifications. For more information, please review Google's Firebase privacy documentation at <https://firebase.google.com/support/privacy>.
- **Error Tracking and Crash Reporting:** We use Sentry (Functional Software, Inc.) for error tracking and crash reporting to maintain app stability and performance. Sentry is configured to capture unhandled technical errors only. It does not collect user identifiers, conversation content, or custom context, and IP logging is disabled. For more information, at <https://sentry.io/privacy/>.
- **Analytics:** We may also use analytics tools for event tracking, usage metrics, and device-level analytics. Where active, such tools are configured to operate within the scope of this Privacy Policy and applicable data protection requirements.
- **International Data Processing:** These third-party vendors may process your data outside your country of residence, including in the United States. We take steps to ensure appropriate technical and contractual safeguards are in place, including data processing agreements, security controls, and compliance with applicable data protection laws.

Third-Party Apps

The mobile application may contain links to apps not owned or controlled by Global Trauma Alliance ("Third-Party Apps"). If you choose to click on a link for a Third-Party App, that Third Party App may collect your personal information and/or information about your online activities over time and across different applications, websites, and other online services. We do not:

- have any control over Third-Party Apps;
- process any User Information submitted to Third-Party Apps; and
- endorse Third-Party Apps.

We encourage you to be aware of Third-Party Apps and their privacy policies, as we are not responsible for their privacy policies or processing activities and practices. Please review the privacy policy of each app you visit before you submit any personal information.

Web Beacons

The mobile pages on TICCO contain electronic images known as web beacons (invisible images often referred to as pixel tags or clear GIFs) that allow us to recognize users, assess traffic patterns, identify preferred content, and measure engagement with TICCO.

Web beacons may also be used by third-party service providers for essential technical and analytical purposes, such as assessing traffic patterns and measuring engagement with TICCO. We do not use web beacons for advertising campaigns or behavioral tracking.

Log Files

Our servers log information about your IP address, your device type, and the current page you are visiting. This information is always provided by your device and automatically logged.

These log files are stored in a secure location and used in our internal analysis of traffic patterns.

Cookies and Similar Tools

Like many businesses, we also collect information through cookies and similar technologies. A cookie is a small data file that is written to a device's hard drive by a browser or application. A cookie file can contain and/or automatically collect information, such as a user identification code or IP address that an app will use to track the pages and number of times you have visited. The data read from these cookies may be linked to PII and non-personally identifiable information ("non-PII"). Non-PII is limited to information that alone, or in combination with other information *cannot* be used to directly or indirectly identify an individual. We collect and use non-PII to help us improve our services, customize your experience, and analyze the use of our services. This Privacy Policy does not limit our use or disclosure of collected non-PII. We reserve the right to collect, use and disclose such non-PII to our partners, advertisers and other third parties at our sole discretion.

We use cookies and similar technologies on TICCO strictly for essential technical, functional, and analytical purposes, including:

- safeguarding against spam and malware;
- analyzing aggregate trends and app usage for internal improvement;
- remembering preferences and voluntarily submitted information such as your name, email, and login credentials; and
- supporting core app functionality and security diagnostics.

You may turn off cookies in your browser or have your browser warn you before accepting cookies. If you choose to turn off cookies, you may not be able to experience all of the features on TICCO.

Cookies fall into the following subcategories:

- ***Essential Cookies.*** Certain cookies are used for specific purposes that are essential to your secure use and navigation of TICCO. Without them, Global Trauma Alliance cannot provide core functions and features of TICCO to you. These cookies collect and use information such as your server preferences, single-session data and corresponding identifier, web beacons and log files, and other credential-related information. Essential cookies also help inform Global Trauma Alliance whether you require, or have already been served, an affirmative consent request in connection with our data policies and this Privacy Policy. Essential cookies also include analytics cookies, which provide us data that allows Global Trauma Alliance to better understand its users and improve TICCO based on what we have learned from that data.

- **Preference Cookies.** Other cookies are used to collect and process information about your preferences and similar choices in connection with TICCO in order to optimize your browsing experience. Preference cookies include social media cookies, which collect information about your social media usage and other data you provide in connection with such usage (if you access TICCO through a social media app or mobile application, you may have social media cookies). If you wish to modify or change your social media cookies, please visit the appropriate social media app, and review the settings related to your applicable social media account(s).

Analytics Services

Services providing analytic tools (“Analytic Services”) are used with TICCO and transmit app traffic data to servers located within the United States. Analytic Services do not collect PII, identify individual users, or associate your IP address with any other data. We do not share any PII with our Analytic Services in connection with their performing of any services on TICCO. We use reports provided by Analytic Services to help us understand app traffic and webpage usage.

We collect non-PII, such as IP addresses, operating systems, links clicked, pages visited, browser type, time zone setting, browser plug-in types, and referring apps of visitors to TICCO. This information is collected for statistical analysis purposes such as:

- maintaining the security and operation of TICCO;
- determining web-traffic trends; and
- determining the effectiveness of our partnerships with other apps.

3. Data Usage: *How We Use Your Information*

We collect, process, and disclose your User Information only for specific and limited purposes. Our primary goal in collecting, using, and sharing User Information is to provide you with our services, enhance your experience on the mobile application, support the mobile application, and improve the mobile application features, performance, and other elements. We will not use your User Information without a valid legal basis to do so, and we will only process your User Information in a way that is compatible with and relevant to the purpose for which it was collected and authorized.

Legal Bases for Data Usage

In general, Global Trauma Alliance processes your User Information in accordance with the following the legal bases:

- **Consent** – Where you have given us consent to process your User Information for one or more specific purposes.
- **Legitimate Interests** – Where processing your User Information is reasonably necessary to achieve our legitimate business interests. For example, we may process your User Information to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, or in connection with, or during negotiations of, any merger, sale

of company assets, financing, or acquisition of all or a portion of our business to another company.

- ***Performance of a Contract*** – Where we have entered into a contract with you, or you have requested that we take steps prior to entering into a contract, we process your User Information to fulfill the terms of our contract.
- ***Legal Obligations*** – Where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process. For example, we may process your User Information in response to a subpoena, or in response to public authorities as necessary to comply with national security or law enforcement requirements.
- ***Vital Interests*** – Where processing your User Information is necessary to protect your vital interests or the vital interests of another natural person. For example, we may process your User Information where we believe it is necessary for humanitarian purposes such as monitoring epidemics or pandemics and their spread, or in situations of natural or human-caused disasters.
- ***Public Interest*** – Where processing your User Information is necessary for the performance of a task carried out in the public interest.

We collect and/or use your User Information for the purposes mentioned above and the purposes of this Privacy Policy, in existence and as amended. The potential disclosures outlined herein serve as a Notice at Collection under the California Privacy Rights Act and other applicable data privacy regulations. When required by applicable law, we will ask for your consent to use and/or disclose your User Information. Where you have given consent for processing activities, you have the right to withdraw your consent at any time.

In accordance with the legal bases for processing your User Information discussed above, Global Trauma Alliance collects, uses, and/or processes your User Information for the following purposes:

To Facilitate and Improve Our Services

In order to fulfill our contractual obligations to you, our legal obligations, and our legitimate interests in providing you with the best service, and understanding how we can improve our service based on your experience, we process your User Information in the following circumstances:

- To protect our business and your account from fraud and other illegal activities;
- To maintain, update and safeguard your account;
- To quickly identify and resolve any problems and protect the integrity of TICCO; and
- To present TICCO and their content to you, request feedback, and to develop, test and improve the systems, services and products we provide to you.

When our AI functionality detects indicators of a potential emotional crisis, TICCO may automatically display an emergency message with contact information for public crisis services (e.g., 911 or local support organizations). This automated response is purely informational, does not involve profiling, and does not constitute a clinical evaluation or legal decision under applicable law.

To Provide Communications to You

In accordance with our legal obligations, our legitimate interest to enhance your customer experience, or based on your consent, we process your User Information in the following circumstances:

- To send you communications required by law or which are necessary to inform you about the changes to the services we provide to you;
- When you provide us your email address in connection with registering an account, Global Trauma Alliance may send you email communications regarding your account. Each email will include a link providing you with the option to “Unsubscribe” from further communications regarding your account.

Certain TICCO features, such as user-submitted feedback, may collect a user’s email address along with associated chat content for the purposes of support, analysis, and service improvement. This information is not used for marketing or profiling and is handled with confidentiality.

When we collect information from you, you may inform us if you do not wish to be contacted for marketing/market research purposes. If you do not want to receive promotional information from us or our representatives, you may opt-out at any time by following the instructions included in each communication (usually in the form of an “unsubscribe” link), or contact us in accordance with Section 8 of this Privacy Policy to update your personal contact preferences. Please note, unsubscribing from our emails will not prevent you from receiving transactional emails relating to orders, warranties, support, or service requests.

Sharing of Information as Necessary to Provide Information or Services

Based on our legitimate interest in operating TICCO and providing our services to you, we may share User Information you have voluntarily provided during your use of TICCO among Global Trauma Alliance and its affiliates, business partners, vendors, and other third parties. Affiliates include entities legally controlled by or under common control with Global Trauma Alliance. ‘Partners ’and ‘vendors ’include analytics providers (e.g., Firebase, Microsoft Azure), hosting services, and contracted support processors, all bound by data protection agreements.

Sharing of information as outlined in this section is to accomplish the following purposes:

- To provide hosting and other web-based services for Global Trauma Alliance and TICCO;
- To help us understand app traffic and webpage usage through our Analytic Services described in Section 2;
- To provide e-mail messaging, text messaging, and account management for TICCO;
- To provide limited services on our behalf, such as handling the processing of inquiries, or performing statistical analysis of our services in accordance with Section 2 of this Privacy Policy.

When you sign up for or request any such service, we will share your User Information as necessary for the affiliate or third party to provide that service. In some instances, these third

parties collect information directly from you and you will be notified of the involvement of the external service provider. Such third parties are subject to agreements that require them to maintain the confidentiality of your information and they are prohibited from using that information for any other purpose. We reserve the right not to track how you interact with any of the provided services. Please see Section 2 for additional information about our third-party vendors. If you do not want your User Information to be shared, you can choose not to allow the transfer of your User Information by not using that particular service offered through TICCO.

Pilot Program Participation Tracking

If you participate in a pilot program facilitated by a participating organization (such as a nonprofit, agency, or institution), that organization may receive limited information about your participation for the purposes of pilot coordination and program evaluation. This may include confirmation that you have registered for or are using TICCO, and may include your email address or other contact information the organization already maintains through its existing relationship with you. This information is shared only for pilot tracking purposes, is kept confidential by the receiving organization, and is deleted at exit if the organization discontinues participation or when pilot-only reporting is no longer needed. Organizations receiving this information are subject to documented data handling guidelines that require confidentiality and prohibit onward sharing. You may contact us at privacy@globaltraumaalliance.org with questions or requests related to pilot data sharing.

In the Event of Change in Ownership or Control

The ownership or control of Global Trauma Alliance may change at some point in the future. Should that occur, it is in our legitimate interest for TICCO and/or Global Trauma Alliance to be able to maintain a relationship with you. In the event of a change in ownership, merger, bankruptcy, or change in control of Global Trauma Alliance, your User Information may be shared with the person or business that owns or controls TICCO. You will be notified as described below in Section 7 of this Privacy Policy. Opting out of receiving information from third parties will not affect our right to transfer your User Information to a new owner, but your choices will continue to be respected regarding the use of your User Information.

As Required by Law

Global Trauma Alliance may process your User Information if required to do so by law, or to otherwise comply with our contractual or legal obligations to share data with law enforcement. For example, we may disclose your User Information to comply with a subpoena or in the good faith belief that such action is necessary to conform to applicable law, investigate fraud or comply with a judicial proceeding, court order, or legal process served on Global Trauma Alliance, or to protect and defend the rights or property of Global Trauma Alliance.

Use of AI Technologies and User Control

TICCO is a supportive, non-decisional tool. It does not make or influence placement decisions, case outcomes, or any determination with legal or significant effects on users. TICCO does not use your User Information for targeted advertising, profiling, or automated decision-making. Any AI-based processing is conducted to support user interactions and product safety only. Chat data may be retained for moderation or analysis purposes. TICCO does not build persistent user profiles.

4. Data Protection: *How We Protect Your Information*

Global Trauma Alliance takes the security of your User Information very seriously. We take every effort to protect your User Information from misuse, interference, loss, unauthorized access, modification or disclosure. Our measures include implementing appropriate access controls, investing in information security capabilities to protect the IT environments we leverage, and ensuring we encrypt and anonymize personal data wherever possible. Access to your User Information is only permitted among our employees and agents on a need-to-know basis, and subject to strict contractual confidentiality obligations when processed by third parties.

Your User Information may be stored on servers owned and operated by Global Trauma Alliance and our affiliates, by cloud/software service providers (“SaaS Services”) located in the United States, or in the United Kingdom in certain instances involving non-PII or with our third-party providers. Our SaaS Services are committed to using industry-standard physical, electronic, and organizational safeguards to protect information against loss or theft as well as unauthorized access and/or disclosure. To prevent unauthorized access or disclosure, to maintain data accuracy, and to allow only the appropriate use of your User Information, we utilize industry standard physical, technical, and administrative controls and procedures to safeguard the information we collect. To help ensure the integrity and privacy of the User Information that you provide to us, we encrypt that information using secure socket layering (“SSL”).

We follow generally accepted industry standards to protect User Information submitted to us, both during transmission of such information and during storage once we receive such information. However, it must be noted that “perfect security” does not exist today. If you are concerned that your privacy may have been breached, please contact us using the contact information provided in Section 8 of this Privacy Policy.

The safety and security of your User Information also depends on you. Where we have given you (or where you have chosen) login credentials, including a password, for access to certain parts of TICCO, you are responsible for keeping your credentials and the password confidential. We ask you not to share your credentials and password with anyone. Any transmission of User Information by you is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on TICCO.

Data processed through AI interactions is handled by third-party service providers subject to their applicable data handling terms. No training of external machine learning models occurs with your content. These providers are required to process information in compliance with applicable data protection obligations and the terms governing our use of their services.

5. Data Retention: *How Long We Keep Your User Information*

We will only keep your User Information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by applicable law (such as tax, accounting, or other legal requirements). No purpose in this Privacy Policy will require us to keep your User Information for longer than reasonably necessary.

When we have no ongoing legitimate business need to process your User Information, we will either delete or anonymize such information, or, if this is not possible (for example, because your User Information has been stored in backup archives), then we will securely store your User Information and isolate it from any further processing until deletion is possible. We will actively review the User Information we hold and delete it securely, or in some cases, anonymize it when there is no longer a legal, business, or consumer need for it to be retained.

Users may request the deletion of their personal data at any time by contacting our support team using the methods described in Section 8. Deletion is handled manually by our compliance team, and confirmation is provided once the request is completed.

In test-phase deployments, user data is retained only for the duration of the evaluation. After that period, data is deleted or anonymized unless the user has provided explicit, informed consent for continued use.

Content Disclaimer: The information provided by TICCO is intended solely for general informational and educational purposes and is not a substitute for professional advice, diagnosis, or treatment. TICCO is not a licensed healthcare provider, and nothing in this application should be interpreted as medical, mental health, or other professional advice. You should always seek the advice of your physician, therapist, or another qualified professional regarding any questions or concerns you may have. Reliance on any information provided by TICCO is solely at your own risk, and TICCO and its affiliates shall not be liable for any damages arising from your use or misuse of this information.

6. Privacy Rights and Considerations

Applicability of Third-Party Policies

You should review the privacy policies of any third parties before you provide any personal information or complete any transaction with such parties. Please contact each third-party provider directly if you have any questions about their privacy policies or the information they require for you to complete any transaction.

TICCO maintains internal documentation of its data processing activities, which is reviewed and updated as the platform evolves. This supports timely, transparent, and legally compliant responses in the jurisdictions where TICCO operates.

Residents of the European Economic Area

Global Trauma Alliance does not actively target or market to any member state in the European Economic Area (the “EEA”). However, we may engage with some customer companies who have or maintain a presence in the EEA or who have customers and data subjects in the EEA, any of which may be covered under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the “General Data Protection Regulation” or “GDPR”). If you are a resident of the EEA, or are accessing TICCO while physically located in the EEA, even if not a resident of the EEA, you have specific rights concerning your User Information under GDPR. Further information and advice about your rights concerning your User Information can be obtained from the supervisory authority in your country that is responsible for monitoring the application of GDPR.

If you are a resident of the EEA, under GDPR, you have the right to:

- Request Global Trauma Alliance inform you of, or allow you to access, your personal data that we process;
- Request Global Trauma Alliance change or modify the personal data it processes about you when you believe the data is incorrect, out of date, or incomplete;
- Request Global Trauma Alliance erase any personal data about you that we have collected, in specific circumstances, where we no longer have a legitimate overriding interest or the purpose for which we process your personal data has expired;
- Request Global Trauma Alliance restrict the processing of your personal data, under certain conditions, generally while we are deciding on an objection you have made;
- Request Global Trauma Alliance deliver the personal data it holds about you in a commonly used format and request that such data be transmitted to another controller;
- Request Global Trauma Alliance cease processing your personal data based on your objection to such processing for reasons related to your individual circumstances or where you have withdrawn consent; and
- Request Global Trauma Alliance not subject you to a decision based solely on automated processing.

In some instances, Global Trauma Alliance requires explicit consent from you to process certain personal data. In such instances, you will receive a direct request from Global Trauma Alliance for your permission to collect and/or process your personal data and you will be required to provide affirmative consent. In any event, Global Trauma Alliance will clearly explain what personal data is being collected and/or processed and how it will be used. Global Trauma Alliance only collects the minimum amount of personal data necessary to perform its services. **Explicit consent may always be retracted at any time by a data subject covered under GDPR.**

If you are a resident of the EEA, or accessed TICCO while physically located in the EEA, and you believe we are unlawfully processing your personal data, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en

If you are a resident in Switzerland, the contact details for the data protection supervisory authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>

Global Trauma Alliance's ability to fulfill a request to exercise your rights, as outlined above, is subject to certain restrictions and circumstances outlined in GDPR. If you would like to exercise any of your rights under GDPR, or if you have any questions concerning the exercise of your rights, you may contact us in accordance with Section 8 of this Privacy Policy.

Residents of the United Kingdom : If you are a resident of the United Kingdom, your personal data is processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. You have the same rights described above for EEA residents, including the rights to access, rectification, erasure, restriction, portability, and objection. The supervisory authority in the United Kingdom is the Information Commissioner's Office (ICO), available at <https://ico.org.uk>. To exercise your rights or submit a complaint, please contact us at privacy@globaltraumaalliance.org.

Children's Online Privacy Information

TICCO is intended exclusively for individuals aged 18 and older. Use by minors is not permitted, and we do not knowingly collect personal information from children or adolescents. If you believe we may have inadvertently collected information from someone under 18, please contact us in accordance with Section 8 of this Privacy Policy so we can investigate and delete it.

Residents of California

Global Trauma Alliance does not sell any personal data it collects about you to third parties. Global Trauma Alliance shares data related to Log Files, Web Beacons, and Analytic Services with third parties in connection with maintaining and improving TICCO. If you are a resident of California, under the California Consumer Privacy Act ("CCPA"), you have the right to:

- Request Global Trauma Alliance disclose the categories and specific personal data that it has collected;
- Request Global Trauma Alliance provide you with a copy of your personal data that it has collected;
- Request Global Trauma Alliance delete any personal data about you that it has collected;
- Request Global Trauma Alliance not share your personal data at any time (the "right to opt-out");
- Request Global Trauma Alliance correct any inaccurate personal data it maintains about you; and
- Request Global Trauma Alliance restrict its use and disclosure of your sensitive personal data.

If you would like to exercise your rights under the CCPA, you may contact Global Trauma Alliance as outlined in Section 8 of this Privacy Policy. Global Trauma Alliance will not discriminate against you if you exercise any of your rights under the CCPA. Please note that California law requires us to verify the requests we receive from you when you exercise certain rights listed above. We may ask you to provide additional information to us in order for us to verify the request.

California's "Shine the Light" law (California Civil Code §1798.83), permits users of TICCO who are California residents to request certain information regarding our disclosure of User Information (if any) to third parties for direct marketing purposes. If you are a California resident and would like to make such a request, please submit your request in writing in accordance with Section 8 of this Privacy Policy.

Residents of Nevada

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request by contacting us in accordance with Section 8 of this Privacy Policy. However, please know we do not currently sell data triggering that statute's opt-out requirements.

Residents of Canada

If you are a resident of Canada, under the Personal Information Protection and Electronic Documents Act ("PIPEDA"), you have the right to:

- Request Global Trauma Alliance provide you with access to the personal data we hold about you;
- Request Global Trauma Alliance correct any inaccurate or outdated personal data we hold about you;
- Request Global Trauma Alliance delete any inaccurate personal data we hold about you; and
- Request Global Trauma Alliance withdraw your consent to any activities or processing of your personal data for which you have previously consented.

When we collect information from you, you may inform us if you do not wish to be contacted for marketing/market research purposes in accordance with Canadian Anti-Spam Legislation. If you do not want to receive promotional information from us or our representatives, please use the unsubscribe option in your user account or the email you received, or contact us in accordance with Section 8 of this Privacy Policy to update your personal contact preferences. Note that unsubscribing from our emails will not prevent you from receiving transactional emails relating to orders, warranties, support, or service requests.

If you would like to exercise your rights under PIPEDA, you may contact Global Trauma Alliance in accordance with Section 8 of this Privacy Policy. Global Trauma Alliance will not discriminate against you if you exercise any of your rights under PIPEDA.

Residents of Mexico

If you are a resident of Mexico, under the Federal Law on Protection of Personal Data Held by Private Parties ("FLPPD"), you have certain access, rectification, cancellation, or opposition ("ARCO") rights to:

- Request Global Trauma Alliance provide you access to your personal data that we process;

- Request Global Trauma Alliance rectify/correct your personal data if it is inaccurate, incomplete, or out of date;
- Request Global Trauma Alliance cancel or delete your personal data, subject to certain exceptions;
- Request Global Trauma Alliance observe and respond appropriately to your objection to the processing of your personal data for a legitimate reason;
- Request Global Trauma Alliance inform you, prior to collecting your personal data, of the characteristics of the processing;
- Request Global Trauma Alliance limit the use and disclosure of your personal data; and
- Request Global Trauma Alliance acknowledge and respond appropriately to your revocation of consent to the processing of your personal data.

If you would like to exercise your rights under the FLPPD, you may contact Global Trauma Alliance in accordance with Section 8 of this Privacy Policy.

Other International and State Privacy Laws

Many other countries have comprehensive privacy laws, which may be similar to GDPR or PIPEDA, and provide their residents with specific rights to the privacy and management of their personal data and information. Additionally, many states in the United States have independently adopted comprehensive privacy laws, such as the CCPA, which provide their residents with specific rights with respect to their personal data and information. Many of these international and domestic laws include rights such as:

- Request Global Trauma Alliance to confirm whether we process your personal data;
- Request Global Trauma Alliance to allow you to access personal data we hold about you;
- Request Global Trauma Alliance to delete personal data we hold about you, in certain circumstances;
- Request Global Trauma Alliance to correct inaccuracies in your personal data;
- Request Global Trauma Alliance to provide personal data held about you in a format that is portable, readily usable, and transferable;
- Request Global Trauma Alliance withdraw your consent to any activities or processing of your personal data for which you have previously consented;
- Request Global Trauma Alliance to allow you to opt-out of personal data processing for targeted advertising, sales, or profiling in furtherance of decisions that produce legal or similarly significant effects; and
- Request Global Trauma Alliance to either limit or require consent to process sensitive personal data.

Designation of Local Representatives

TICCO has designated, or will designate as required, local privacy representatives or points of contact in jurisdictions where this is legally mandated. Their contact information will be made available at globaltraumaalliance.org/ticco-privacy-annexes.

The exact scope of your rights varies depending on the country or state of your residence. To exercise any of your rights under the laws in your country or state of residence, please contact us in accordance with Section 8 of this Privacy Policy. To appeal a decision regarding a

request you have made to exercise your privacy rights, please contact us in accordance with [Section 8](#) of this Privacy Policy.

Expansion to Other Jurisdictions and Cross-Border Transfers

TICCO is committed to compliance with international data transfer requirements. Where User Information is transferred outside of your country of residence, we implement appropriate legal safeguards, including Standard Contractual Clauses (SCCs) where applicable under European law, adequacy decisions, and other appropriate safeguards as required by local law. We maintain internal documentation of our data governance practices, which is reviewed and updated as the platform evolves, along with procedures for responding to Data Subject Access Requests (DSARs). Where required by applicable law (e.g., Article 27 GDPR), we will designate local representatives in the relevant jurisdictions and disclose their contact details through our application or on our website.

Data subject requests are received and managed by our internal compliance contact, designated to oversee privacy rights operations. Requests are acknowledged and processed in accordance with applicable legal deadlines.

Data Processing Locations

User Information may be processed in the United States and other locations where our third-party service providers operate. If you use TICCO from outside the United States, your information may be transferred to and processed in other countries, including the United States, where data protection laws may differ from those in your jurisdiction.

We implement appropriate safeguards for international data transfers, including:

- Data processing agreements with vendors that include security and confidentiality obligations
- Technical and organizational security measures (encryption, access controls, monitoring)
- Regular security assessments and compliance reviews
- Compliance with applicable cross-border data transfer requirements

For users in jurisdictions with specific cross-border transfer requirements, we ensure processing arrangements comply with applicable local law.

7. Revisions and Updates to Privacy Policy

We may revise and update this Privacy Policy from time to time, as we deem necessary for any purpose, including to reflect customer feedback, changes in our services, and changes in the law. The updated version will be indicated by a revised “*Last updated*” date and will be effective as soon as it is posted to the mobile application. If we make any material changes to this Privacy Policy, we will notify you by means of a notice on TICCO prior to the change becoming effective. We reserve the right to amend this Privacy Policy at our discretion and at any time. We encourage you to periodically review this page for the latest information on our privacy practices and to review our most current Privacy Policy. Your continued use of TICCO following the posting of changes constitutes your acceptance of such changes.

8. How You Can Contact Us

To request to review, update, delete your User Information and personal data, or exercise any of your rights in accordance with this Privacy Policy, or if you have any questions regarding this Privacy Policy or how to remove or modify your User Information or related consents, please feel free to contact us by the e-mail or the mailing address below:

Global Trauma Alliance

PO Box 70,

Mason, OH 45040

Attention: PRIVACY TEAM

By Email: privacy@globaltraumaalliance.org

Global Trauma Alliance will use commercially reasonable efforts to promptly respond and resolve any problem or question.

TICCO is committed to aligning its privacy practices with the core principles and requirements of applicable local data protection laws. Additional country-specific privacy annexes may be made available at globaltraumaalliance.org/ticco-privacy-annexes, where required.

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