

# Tempo Together Privacy Statement

Welcome to Tempo Together, a platform that allows people with disabilities to participate in managing their services, provides case managers with oversight, and measures vendor' services as they are delivered ("Services"). People are at the core of our Services and we are committed to protecting the personal information of individuals that we work with.

To make this Privacy Statement easier to understand, we have provided a summary to the left-hand side of each section. We also encourage you to contact us (see "How to Contact Us" below) if you have any questions or concerns.

Last Updated: October 3rd, 2024. For prior versions visit our [prior privacy policies page](#)

## 1. SCOPE OF THIS PRIVACY STATEMENT

This Privacy Statement applies to individuals who interact with us or use Tempo Together products and Services.

This Privacy Statement ("Statement") sets out how Tempo Together uses the information that we collect about you when you interact with us on our website ("Site") or when using our Services. This Statement also explains the choices that you can make about the way that we use your information and applies to all individuals who interact with us as customers or their employees, our partners and vendors, visitors to our Site, or our own prospective employees or employees. This Site is owned and operated by Tempo Together, which is based in the US.

Our Statement details the information we collect about you and how we use it, outlines the steps we take to protect the information you entrust to us, and describes your choices with respect to your information. By registering on this Site, submitting any information to Tempo Together on our Site or by otherwise accessing or using any of our systems or Services, you agree to the terms of this Statement and consent to the policies and practices described here.

Please remember that our [Terms of Use](#) ("Terms") may also govern your use of our Services.

## 2. YOUR RIGHTS AND PREFERENCES

Tempo Together allows you to exercise your privacy rights and manage how we use your information.

Privacy and data protection laws in different geographic regions give individuals certain rights in relation to their personal information. We conduct our privacy practices according to this Privacy Statement and the relevant laws of the geographic regions in which we interact with you. Tempo Together encourages you to become familiar with our privacy practices and to contact us to learn more about your privacy rights and how we collect and use your personal information. Unless we specifically disclose otherwise, you understand that we may use any of your collected personal information for any of the purposes described in this Statement (as permitted by applicable law).

## 3. INFORMATION WE COLLECT

We collect information that relates to you and your interactions with Tempo Together.

When used in this Statement, "personal information" means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual ("data subject"), and includes "personal data" or "personal information" as defined in applicable data protection laws. Data that cannot be associated with you, such as aggregated, de-identified, or anonymized information ("Anonymous Information"), is not personal information. Tempo Together commits to keep Anonymous Information in its de-identified state and will make no efforts to re-identify such data.

### A. Information Directly from You.

Tempo Together collects certain information from you to conduct business, including providing you with access to our Services, improving your

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experience, communicating with you in connection with or regarding our Services, and to enhance and improve our Site and operations based on insights we are able to obtain from your information, such as whether a given Site layout is convenient and accessible.

Tempo Together also collects personal information directly from you during the recruitment process and in the context as an employer. If you choose not to provide certain personal information, we may not be able to provide you with requested Services, or information. Additional privacy concerns related to Employment are addressed in our Employment Privacy Statement.

### B. Information Collected in the Course of Using Our Services.

Your use of our Services may cause us to generate or collect certain information in order to facilitate providing those Services and enabling them to be useful, including:

- Demographic data including date of birth, address, email, phone number and languages spoken, etc.
- Medical information such as medical and psychiatric diagnoses and testing, symptoms, medication, treatments etc.
- Goal setting and tracking information
- Vendor selection and scheduling
- Service outcomes
- Other information about actions you perform through our Services and that you upload or provide during your use of our Services

### C. Information from Third Parties.

We may obtain information about you from other sources, including through third party services and organizations to supplement information provided by you. For example, if you access our Services through a third-party application or site, such as an app store or a social networking site, we may collect information about you from that third-party site that you have made public via your privacy settings. This supplemental information allows us to verify information that you have provided to us and to enhance our ability to provide you with information about our business and Services. We may also collect details of your interactions with other users of our Services.

### D. Automatically Collected Information.

Tempo Together may automatically collect some usage information when you interact with us. We use cookies and other tracking technologies to automatically collect technical information, such as URL, cookie data, IP address, device type, unique device IDs, device attributes, network connection type (e.g., WiFi, 3G, LTE, Bluetooth) and provider, network and device performance, browser type, language, operating system, and Services information.

### E. Derived Information.

Tempo Together may use information we have about you to draw inferences and we may then use those inferences to gain a more complete understanding of your preferences. We use preference data to offer you

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potential choices, make recommendations, or to alert you to products or services that may be of interest to you.

### F. Children’s Information.

Tempo Together Services are not intended for children under 13 years of age. If you are aware that we have unintentionally collected information from someone who is underage, please notify us immediately by sending an email to [privacy@tempotogether.com](mailto:privacy@tempotogether.com). By continuing to use our products and Services, you confirm that you are at least 18 years of age and are fully able and competent to enter into and accept the terms set forth in this Statement or that you have had a responsible parent or guardian do so on your behalf.

### Personal Information Collection and Disclosure Chart.

The following table applies to the personal information of data subjects that interact with Tempo Together and our Services:

Categories of personal information collected	Categories of individuals (data subjects)	Business and commercial uses of personal information	Categories of third parties to whom we disclose
<b>Identifiers</b> (such as name, email address, telephone number, business affiliation, and other contact information)	Customers, customer employees, partners, vendors, visitors  Prospective employees  Employees, former employees	Account registration and servicing  To communicate with you  To improve and develop new products and services  To provide our Services and operate our business	Third parties that assist us, such as payment processors, marketing providers, analytics providers, providers of technical services (e.g., providers of data storage, customer support, and CRM systems), and other subcontractors  Entities involved in dispute resolution (such as an arbitrator or an opposing party)  Entities involved in potential or actual significant corporate transactions or events  Governmental entities

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Categories of personal information collected	Categories of individuals (data subjects)	Business and commercial uses of personal information	Categories of third parties to whom we disclose
<b>Commercial information</b> , including products and services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Customers, customer employees, partners, vendors, visitors	To improve and develop new products and services  To provide our Services and operate our business	Same as above
<b>Financial data</b> (such as payment information, account or credit card information)	Customers, partners, vendors,  Employees, former employees	To provide our Services and operate our business	Same as above
<b>Internet or other network or device activity</b> (such as IP addresses, device identifiers, cookie data, device attributes, device usage information, browsing information, metadata, and other information described in Section 3. of our Privacy Statement)	Customers, customer employees, partners, vendors, visitors  Prospective employees  Employees, former employees	Account registration and servicing  To communicate with you  To improve and develop new products and services  To provide our Services and operate our business	Third parties that assist us, such as, marketing providers, analytics providers, providers of technical services (e.g., providers of data storage, customer support, and CRM systems), and other subcontractors
<b>Protected Classifications and Sensitive Personal Information</b> Marital status and dependent information, information about disability, your race, ethnicity, religion, veteran's status, or sexual orientation, health information, such as medical conditions and health and sickness records, background check information	Prospective employees  Employees, former employees	Business purposes  Administering payments and benefits  Security measures and complying with health and safety obligations  Compliance	Professional services consultants  Vendors that assist with employment processes  Data analytics services  Security vendors  IT vendors

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Categories of personal information collected	Categories of individuals (data subjects)	Business and commercial uses of personal information	Categories of third parties to whom we disclose
<p><b>Sensory data</b> including audio, electronic, visual, thermal, olfactory, or similar information. Photographs, video conferencing recordings, CCTV recordings, telephone calls, communications over electronic channels and applications We do not routinely collect any of your thermal, olfactory or similar biometric information, but reserve the right to do so for site security or if health and safety concerns require us to do so.</p>	<p>Customers, customer employees, partners, vendors, visitors</p> <p>Prospective employees</p> <p>Employees, former employees</p>	<p>Business purposes</p> <p>Compliance</p>	<p>IT vendors</p> <p>Security vendors</p> <p>Professional service providers</p>
<p><b>Professional or employment-related information</b> including wages, salary, compensation, annual leave, retirement, work performance, disciplinary actions, grievances, and/or internal investigations, job titles, salary history, work history, working hours, holidays, absences, training records, professional memberships, board memberships, and other professional activities or roles. Information from publicly available social media or networking sites or applications, and from other electronic search services.</p>	<p>Prospective employees</p> <p>Employees, former employees</p>	<p>Decisions related to employment</p> <p>Business purposes</p> <p>Compliance</p>	<p>Vendors that assist with employment processes</p>

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Categories of personal information collected	Categories of individuals (data subjects)	Business and commercial uses of personal information	Categories of third parties to whom we disclose
<b>Education records:</b> Grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Prospective employees  Employees, former employees	Decisions related to employment  Business purposes  Compliance	Vendors that assist with employment processes
<b>Inferences drawn from other personal information collected:</b> Information about additional skills that our systems infer that you may have.	Customer employees  Prospective employees  Employees, former employees	Decisions related to employment  Business purposes	Vendors that assist with employment processes
<b>Medical and psychiatric information such as diagnoses, test results, behavioral information, medication, etc.</b>	Customers, partners, vendors,  Employees	To provide our Services and operate our business	Governmental agencies
<b>Legal and Criminal Reports</b> <ul style="list-style-type: none"> <li>• <b>Contracts, agreements, deeds, wills, leases</b></li> <li>• <b>Legal judgments, decrees, filings</b></li> <li>• <b>Arbitration decisions</b></li> </ul>	Customers, customer family and friends  Employees	To provide our Services and operate our business	Governmental agencies and vendors serving the customer

#### 4. HOW WE USE YOUR INFORMATION

We use your personal information to develop and provide our

#### A. Delivering Services, including:

- Sending you an invitation to use our Services
- Providing you with access to the functionality and features of our Services

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Services, to personalize, improve and promote our interactions with you, to operate our business and to communicate with you.

- Providing you with customer or technical support (e.g., by contacting you via email address)
- Facilitating interactions between you and providers of disability services and case management organizations
- Notifying you of future changes and improvements to our Services
- Managing our relationship with you and to manage the payment and recovery of amounts payable to us by you

### B. Business and Internal Operations Purposes, Including:

- Analyzing data to ensure appropriate service levels are being achieved
- Enabling us to operate, maintain and improve the functionality and features of our Services
- Enabling us to conduct our business generally, such as notifying our insurers, quality assurance, internal teaching and data processing and handling and in connection with any potential sale of our business and for other purposes which are reasonably necessary in connection with our normal functions and activities
- For our internal management purposes as a business and as an employer

### C. Our Employment/Contract Application Process, Including:

- Assessing and determining your eligibility or suitability for a job or contract with us
- To, with your permission, contact professional or other reference(s) you have provided in connection with a job application to discuss your experience/employment

## 5. HOW WE SHARE YOUR INFORMATION

We will only share your personal information as we have described in this Privacy Statement.

### A. Vendors and Other Third Parties.

We may authorize vendors and other third-party companies to provide certain services. We provide these companies with only the information they need to perform their services and work closely with them to ensure that your privacy is respected and protected. These companies are prohibited by contract from using this information for their own marketing purposes or from sharing this information with anyone other than us. The services provided include:

1. Information Technology Providers
  - Hosting and operation of the Site and other platforms
  - Processing transactions and payments
  - Digital marketing and advertising
2. Marketing, Advertising, and Customer Service
  - Marketing or promotional assistance
  - Advertising, such as:
    - Participating in or administering our promotions or surveys
    - Providing customer service

### B. In Connection with Your Job Application or in Connection with a Job or Contract With Us

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- Disclosure to any professional or personal references you provide in connection with your job or contract application to the extent necessary for us to consider your application
- Disclosure to vendors that assist with employment processes such as payroll providers, benefits providers and IT service providers

### C. Following the Law and Protecting Tempo Together

We may share your information with courts, law enforcement or regulatory agencies, or other government bodies when we have a good faith belief we are required or permitted to do so by applicable law, regulation, or legal process. We may also disclose your information if we believe it is appropriate to enforce our Terms, to protect the rights, property or safety of Tempo Together, our Services, our people, or to protect or assist others as required by law or contract.

### D. Sale of Our Business.

If we sell, merge, or transfer any part of our business, information about you may be shared, sold or transferred as part of that transaction. We may also share your information with current or future corporate parents, to our subsidiaries, between our brands, or with our affiliates.

### E. De-identified or Aggregated Data.

We may de-identify or aggregate your information, alone or in combination with information from other individuals. Such de-identified or aggregated information will not contain personal information and may be shared freely by Tempo Together.

### F. With your Consent.

Other than as set out above, we may also share your personal information and your other information for additional purposes with your consent or at your direction.

## 6. Cookies and Similar Tracking Technologies

We use cookies and other related technologies to receive and store certain types of information whenever you interact with us or use our Services through your computer or mobile device.

### A. Cookies.

We may use cookies, web beacons, pixels, local shared objects, device identifiers, and other similar technologies ("Cookies") to collect information about you. We use this information to improve your experiences when you interact with us. You have control over some of the data we collect from Cookies and how we use it. For additional information, please refer to our Cookie Policy, available at <https://tempotogether.com/cookie-policy>.

### B. Do Not Track.

Like most other companies, Tempo Together is not currently configured to respond to browser "Do Not Track" signals because, at this time, no formal "Do Not Track" standard has been adopted.

### C. Social Media Features.

Tempo Together or our authorized third parties may use social media features to gather certain information about you. These features may



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collect your IP address, log which pages you are visiting, and may set a Cookie to enable features to function properly. Your interactions with these social media features are governed by the privacy policies and practices of the providing company and not by Tempo Together.

### 7. SECURITY OF YOUR INFORMATION

We provide reasonable and appropriate security measures in connection with securing your personal information

Keeping your personal information safe is important to us. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. At Tempo Together, we:

- Work to review and update our security practices and implement accepted methods to protect your personal information.
- Store personal information on our secure servers behind firewalls and securely transmit such.
- Comply with applicable laws and security standards.
- Train applicable employees and contractors on data privacy and require them to safeguard your data.

Your communications containing personal information may be unlawfully intercepted or accessed by third parties and our Site may be subject to network attacks or malfunctions. We cannot and do not guarantee the security of any information transmitted over the Internet. Once we receive your personal information, we take steps that we believe are reasonable to limit access to your personal information to only those employees and service providers whom we determine need access to the personal information to provide the requested Services, offers or opportunities that may be of interest to you or that you have ordered, or that we may otherwise disclose. However, even after we receive your personal information, we cannot and do not guarantee that your personal information will not be accessed, disclosed, altered, or destroyed as a result of a breach of our security efforts or as a result of any other event beyond our reasonable control. Accordingly, we cannot and do not guarantee that your personal information or any other information is completely secure and safe from any risk.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain of our Services (such as our Sites or your customer account), you are responsible for keeping this password confidential. You should not share your password with anyone. We urge you to be careful about giving out information in public areas, like message boards or social media.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee its security during transmission to us. Any transmission of your information to us is at your own risk. Tempo Together is not responsible for circumvention by a third party of any privacy settings or security measures.

### 8. YOUR DATA ACCESS RIGHTS

You may have the right to exercise certain data protection

We recognize and implement high standards for privacy rights compliance. Tempo Together is based in the US, where there are many state-specific privacy laws. The California CCPA, and as of January 1, 2023, the California CPRA, are generally regarded as the most comprehensive in the US, so we model our privacy practices according to California regulations.

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rights regarding your personal information.

Tempo Together will not discriminate against you for exercising your privacy rights.

**Our Processing of Personal Information:** Tempo Together collects and has collected in the last 12 months all of the information described in Section 3 of our Privacy Statement from and about US residents. You should refer to that section for more detail, but this information generally falls into the categories listed in the chart in Section 3 to the extent it is personally identifiable. The chart also indicates the individuals whose personal information we collect, the purposes of processing, and the categories of third parties to whom we recently disclosed the data leading up to the effective date of this Statement.

Tempo Together does not receive any monetary compensation for data it shares with vendors or service providers. Tempo Together shares or “sold” (as that term is defined under applicable US privacy regulations) “identifiers” (like IP addresses), “internet or other electronic network activity information” (like information regarding an individual’s browsing interactions on a website), and “commercial information” (like the fact that a browser visited our webpage,) to third parties that assist us, such as marketing or analytics providers. Tempo Together may receive compensation for de-identified data it sells to third parties.

**US Privacy Rights:** Under applicable US law, you have the right to:

- Request access to your personal information as it is processed and stored by us;
- Correct or delete your personal information that we hold unless Tempo Together is legally required to retain it;
- Restrict or object to our processing of your personal information;
- Lodge a complaint; and
- Opt out of “sale” of your personal information.

**Cookies and online tracker opt-out:** Tempo Together does not engage in CPRA “sales or sharing” through Cookies and related technologies. For additional information about Cookies, please refer to our Cookie Policy, available at <https://tempotogether.com/cookie-policy>.

**Contact:** Please contact us for more information or to exercise a request regarding your US privacy rights.

### **Supervisory Authority:**

If you are concerned about Tempo Together’s compliance with US laws relating to the privacy of your personal information, you may contact your Attorney General’s Office.

**List of Attorneys General:** <https://www.naag.org/find-my-ag/>

### **9. CHANGES TO OUR PRIVACY STATEMENT**

We may make changes to our Privacy Statement or our supporting privacy

From time to time, we may change or update this Privacy Statement. We reserve the right to make changes or updates at any time and without prior notice to you.

If we make material changes to the way we process your personal information, we will provide you notice by posting the most current version of this Statement on our Sites and we may also advise you of changes via our Services information, or by other communication channels, such as by

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procedures at any time.

email, newsletters or community post. Please review any changes carefully.

If you object to any changes and no longer wish to use our Services, you may close your accounts and cease use of our Services. All changes to our Statement are effective immediately upon posting and your continued interaction with us or your use of our Services after a posting of an updated Statement constitutes your consent to all changes.

### 10. HOW TO CONTACT US

If you have questions or comments about this Statement, you may contact us by email, direct mail or phone.

A. Via Email: [contact@tempotogether.com](mailto:contact@tempotogether.com)

This is the fastest and most-preferred way to reach us with your data management or privacy-related questions and concerns.

B. Via Direct Mail:

Tempo Together  
Plaza West, 3031 Tisch Way #110  
San Jose, CA 95128

C. Via Phone: 855-227-0370