



Telpo Privacy Policy

Telpower Communication Co., Ltd



Organization: Telpower Communication Co.,Ltd. (Hereafter “Telpo”)

1. Purpose for data processing

Telpo provides MDM(Mobile Device Management) management platforms for customers’ needs, which help customers to manage data collected for and derived from device . **It shall be noted that Telpo will not access and process data retained by management platforms.**

2. Legal basis for process data

The legal basis to process personal data for the purpose of products marketing and maintenance is based on the contract between Telpo and data subjects and the consent of such data subjects.

3. Categories of personal data

Personal data processed by Telpo includes name, job title at data subject’s company, name of company the data subject works for, phone number and e-mail address and so on.

4. Source of personal data

Personal data retained by Telpo are provided by customers. Telpo neither mixes data collected from subcontractors or individuals, nor process personal data for profiling.

5. Data disclosure or sharing

Personal data will not be disclosed to or shared with subcontractors or individuals by Telpo.

6. Cross board transfer

If a company use the MDM management platform, data registered in such platform will be retained in data centers which located at Frankfurt. According Telpo’s data management policy and rules, **Telpo will maintain source codes of the management platform only, and will not access or download data registered in the platform.** Telpo will not transfer personal data to third countries, areas or organization without the consent of data subjects.

7. Data retention period

Telpo will delete personal data when the purposes for process data is disappeared, when a data subject requests Telpo to do so or when the deletion of data is required by local regulations.

8. Data subjects’ rights and the way to exercise their rights

A data subjects have the following rights according laws and he/she can exercise his/her rights by mailing

his/her requests to mike@telpo.com.

8.1 Verification of the identity of a data subject

When a data subject would like to exercise his/her rights according this article, Telpo will take reasonable measures to verify the identity of such data subject in order to confirm that the request is raised by the right person or the person with authorization from the data subject and thus ensure that personal data retained by Telpo will not be incorrectly disclosed to or shared with subcontractors or individuals, correct personal data will not be falsely rewrote, deleted or restricted and so on.

8.2 Right of access

A data subject can request Telpo to access his/her personal data without any fees. However, Telpo will reject such request if required by regulations or with other exceptional circumstances.

8.3 Right to rectification

A data subject can request Telpo to rectify incorrect personal data concerning him/her, and to have incomplete personal data completed, including by means of providing a supplementary statement. And, a data subject can restrict Telpo to process incorrect personal data concerning him/her at the meantime unless the uncompleted or incorrect data is rectified.

8.4 Right to restriction of processing

A data subject can request Telpo not to process his/her personal data under one of the following conditions and Telpo will not furtherly process the data accordingly although Telpo still retains the data.

- Personal data is incomplete or incorrect.
- Personal data is illegally processed.
- Telpo has no needs to process personal data, but retains personal data according to laws or regulations.
- A data subject the right to object has been exercised and processing is restricted pending a decision on the status of the processing.

8.5 Right to erasure

If the purpose for process personal data is disappeared, a data subject can request Telpo to erase his /her personal data. Telpo will take reasonable measures to ensure that the data is erased.

8.6 Right to object

A data subject can object to processing of personal data by Telpo under one of the following conditions :

- Where personal data are processed for direct marketing purpose.
- Where a decision is based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

8.7 Right to data portability

For those personal data processed based on the consent of a data subject, he/she can ask Telpo to provide him/her with the personal data concerning him or her in a structured, commonly used and machine-readable format.

8.8 Right to withdraw the consent

For those personal data processed based on the consent of a data subject, he/she can withdraw his/her consent at any time. Once receiving the request from the data subject, Telpo will not process the personal data concerning him or her anymore. However , it shall be noted that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

9. Security measures

Telpo take all of the necessary technical and organizational security measures in order to protect of personal data, and the data is stored in a secure operating environment which is not publicly accessible. And, encryption of personal data will be implemented before the data is transmitted if feasible.

However, it shall be well noted that no website, transmission, system or technology facilities are definitely secure, although Telpo will implement appropriate technical and organizational measures to ensure the security of personal data.

10. The impacts on Telpo's services when a data subject does not provide his/her personal data

If a data subject does not provide his /her personal data or provide incomplete personal data, Telpo may have to delay or cannot proceed the following operations.

10.1 News on latest products and revision of functions of products.

10.2 Business contact for product guarantee or maintenance.

10.3 Exercises rights mentioned in this policy, make a complaints or consult on personal data



process or protection.

11. Contact us

Please contact Telpo via [**mike@telpo.com**](mailto:mike@telpo.com) or the following information for proposing suggestions, making a complaint or consulting on this privacy policy or processing of personal data by Telpo.

Telpower Communication Co.,Ltd.

Mike Mai

TEL : 0086-757-86337898-382

12. For any suggestions, complaints or issues, Telpo will keep their confidentiality. However, Telpo would like to remind you that you can make a complaint to local privacy authority if you are not satisfied with the processing of personal data by Telpo or the way that Telpo deals with suggestions, complaints or issues, or your privacy right is or is to be invaded.

13. Revision of privacy policy

Telpo will take best effort to keep the integrity of this policy. If needed, Telpo will revise this privacy policy so Telpo remains a right to amend this privacy policy at any time and will not inform data subjects of its revision. And, we suggest data subjects to access this privacy policy at any time or regularly.

The privacy policy is last updated on 09 09 2020