

TOMS LLC Privacy Policy

1. Introduction

Technical Operations and Maintenance Solutions (“**TOMS LLC**,” “**Company**,” “**we**,” “**our**,” or “**us**”) operates a digital platform that connects EV charger owners with service contractors and service partners for maintenance, repair, and operational services (the “**Platform**”).

Because our Platform operates nationwide, personal data may be processed in accordance with applicable federal and state laws, which may vary depending on your location.

This Privacy Policy explains how we collect, use, disclose, and protect personal data in compliance with:

- U.S. federal and state privacy laws (including CCPA/CPRA and other state laws)
- General Data Protection Regulation (GDPR), where applicable

2. Categories of Personal Data Collected

We collect:

A. Identifiers

- Name, email, phone number, address
- Account credentials

B. Commercial & Transaction Data

- Work orders, job history
- Billing and payment information

C. Professional/Business Data

- Contractor licenses, certifications
- Insurance documentation
- Employer or business affiliations

D. Technical & Device Data

- IP address, device type, OS
- Usage logs and analytics

E. Location Data

- Charger locations
- Real-time or approximate location (if enabled)

F. Communications

- Messages between platform participants

G. EV Charger Telemetry & IoT Data

- Charger diagnostics
- Performance metrics
- Fault/error codes
- API
- Maintenance logs and uptime data

3. Legal Basis for Processing (GDPR)

We process data based on:

- Contractual necessity (platform services)
- Legitimate business interests
- Legal obligations
- User consent (when required)

4. How We Use Your Data

We use personal data to:

- Operate and maintain the Platform
- Match Charger Owners with Service Contractors
- Facilitate job assignment, approval, and fulfillment
- Enable Service Partners to perform and track services
- Process payments and invoices
- Provide notifications and updates
- Monitor system performance and reliability
- Detect fraud and ensure compliance

5. Sharing and Disclosure

A. Platform Participants

Data is shared between:

- Charger Owners
- Service Contractors
- Service Partners

Only as necessary to complete work orders.

B. Service Providers

- Payment processors
- Cloud hosting providers
- Analytics tools
- Communication platforms

C. Legal Authorities

We may disclose data:

- To comply with law or legal processes
- To protect safety, rights, or property

D. Business Transfers

Data may transfer in mergers, acquisitions, or restructuring.

6. Nationwide Operations & Cross-State Data Use


TOMS LLC operates across the United States. By using the Platform:

- Your data may be accessed by authorized users in different states
- Work orders and service records may be shared across jurisdictions
- Data systems may store and process information nationally

7. U.S. State Privacy Rights

Residents of states including California, Virginia, Colorado, Connecticut, Utah, Texas, and others may have rights to:

- Access personal data
- Correct inaccurate data
- Request deletion
- Obtain data copies (portability)
- Opt out of targeted advertising or profiling

 Contact: customerservice@tomslc.org

We do **not sell personal data**.

8. GDPR Data Subject Rights

Where applicable, you may:

- Access your data
- Request correction or deletion
- Restrict or object to processing
- Request portability
- Withdraw consent at any time

You may lodge complaints with a supervisory authority.

9. Data Retention

We retain data:

- As long as necessary for service delivery
- To meet legal obligations
- For dispute resolution and auditing

10. Data Security

We implement:

- Encryption
- Access controls
- Secure infrastructure
- Monitoring systems

No system guarantees complete security.

11. EV Charger Telemetry & IoT Data

Because TOMS LLC operates EV infrastructure services:

- The Platform collects charger telemetry, diagnostics, and performance data
- This data is used to:
 - Optimize maintenance
 - Improve system reliability
 - Support service operations
- Such data may be shared with authorized service personnel as needed

12. Work Order Transparency & Logging

- Job details are visible to relevant parties
- Service history and interactions are recorded
- Logs may be used for:
 - Compliance
 - Dispute resolution
 - Performance tracking

13. Contractor Data, Compliance & Liability

A. Contractor Information

We collect and verify:

- Licenses
- Certifications
- Insurance coverage

B. Data Sharing

Contractor information may be shared with:

- Charger Owners
- Service Partners for job fulfillment

C. Insurance & Compliance

Contractors may be required to:

- Maintain active insurance
- Meet regulatory requirements

D. Liability

TOMS LLC operates as a platform and:

- Does not directly perform services
- Is not responsible for contractor performance
- Does not guarantee service outcomes

Contractors are responsible for:

- Their work
- Compliance with laws
- Safety and regulatory adherence

14. Data Processing Addendum (DPA)

For enterprise clients, TOMS LLC offers a **Data Processing Addendum (DPA)** governing:

- Data processing roles (Controller/Processor)
- Security obligations
- Subprocessor use
- Cross-border transfers
- Breach notification procedures

To request a DPA:

 customerservice@tomsllc.org

15. Cookies & Tracking

We use cookies and similar technologies for:

- Platform functionality
- Analytics
- Performance monitoring

Users may manage preferences via device settings.

16. Children's Privacy

The Platform is not intended for individuals under 18.

We do not knowingly collect data from minors.

17. International Data Transfers

Data may be transferred to the U.S. and other jurisdictions.

We use safeguards such as:

- Standard Contractual Clauses (SCCs)

18. No Sale of Personal Information

TOMS LLC does not:

- Sell personal data
- Participate in data brokerage

19. Policy Updates

We may update this Privacy Policy periodically.

Changes will be reflected in the “Last Updated” date.

20. Contact Information

Technical Operations and Maintenance Solutions (TOMS LLC)

[Insert Address]

 Email: customerservice@tomslc.org