

BLUIP PRIVACY POLICY
LAST UPDATED: MAY 26, 2022

BluIP, Inc. ("BluIP") is committed to protecting your privacy and providing you with a secure experience through use of our products and services ("Solutions"). You can use much of BluIP's web sites and web pages ("Sites") without giving us any of your Personal Information. We do, however, collect information to provide services and/or information that you request. This statement of privacy ("Privacy Policy") explains data collection and use practices of BluIP. **This Privacy Policy applies to your use of the Sites, and your use of our Solutions. Please read this Privacy Policy carefully.**

Acceptance

By accessing and using any Site, Solution or other BluIP product or service, you accept and agree to this Privacy Policy. If you do not agree to this Privacy Policy, please do not use any Site or any Solution. For other terms and conditions that govern your use of BluIP's Solutions, Sites or other products or services, please review the other agreements to which you and BluIP are parties (if any), including other BluIP policies located at: <http://www.bluip.com/legal>. If you and BluIP are parties to any agreement(s), this Privacy Policy is a part of the agreements between you and BluIP; this Privacy Policy is effective without limiting, waiving and notwithstanding the provisions of any such agreement. This Privacy Policy will be read in connection with any such agreement. This Privacy Policy applies to you, even if you are not a party to an agreement with BluIP.

INFORMATION THAT MAY BE COLLECTED ABOUT YOU

We, or third-party providers may collect data, including Personal Information, about you in order for you to use, or as you use our Sites and Solutions and interact with us. "Personal information" is any information that can be used to identify an individual (i. e., personally identifiable information), and may include name, username, mailing address, email address, phone number, occupation, voicemail identifiers, location identifiers, occupation, login information (username, account number, password, profile picture), health information, language and other preferences, demographics, social media account information, and payment card numbers. For example, when you register or use a Solution, we may store the information you provide, along with any information you have provided during previous visits or as part of the personal profile that you have provided. This information may include: location, IP address, traffic data such as the phone numbers that you call and to which you send messages, and the phone numbers from which you receive calls and messages, the date, time, duration and cost of the calls and messages, the phone locations at the time you have made and/or received the communications, domain, browser, viewing data. We may receive Personal Information about you from other sources, including publicly available databases or third parties from whom we have purchased data, and combine this data with information we already have about you, in accordance with applicable laws. This helps us to update, expand and analyze our records, identify new customers, and provide products and services that may be of interest to you. We may collect Personal Information about you from other applications you may use if you choose to integrate or access our Solutions with or from other apps services or solutions.

Third Party Services and Your Information

If you use third party or sharing features that we host or otherwise provide, or if you access Solutions through a third party, you acknowledge that your interactions with these features, and the information you provide to such third parties, are governed by the privacy policy of the third party providing the features. You should check the privacy policies of these third-party services and your settings for more information. You further acknowledge that BluIP does not control and is not responsible for how such third-party sites handle personal information of users.

Location Information

When you use the Solutions, we may collect precise location data. For instance, if you allow the Solutions to access location services through the permission system used by your device's mobile operating system or browser, we may collect the precise location of your device. We use your location information to facilitate your use of the Solutions, and for analytics purposes. You can choose whether to enable the location tracking feature through the settings on your device or browser, or when prompted by the BluIP. We may also infer your general location information, for example by using your internet protocol (IP) address.

Log Information

When you use the Solutions, our servers will record information about your usage of the Solutions and information that is sent by your browser or device. Log information can include things like the IP address of your device, information about the browser, operating system and/or app you are using, unique device identifiers, pages to which you navigate and links that you click, searches that you run on the Solutions, and other ways you interact with the Solutions. If you are logged into the Solutions, this information is stored with your account information.

Cookies and Other Mechanisms

A cookie is placed on your machine (if you accept cookies) or is read if you have previously visited our Sites. All of this is done in accordance with applicable laws. These technologies may store registration information, host information, and/or usage information.

When you use the Solutions in your web browser, we use cookies, local storage, and other browser storage technologies to improve the Solutions, and to ensure that you can stay logged into the Solutions until you choose to log out.

If you choose to not have your browser accept cookies from our Sites, you will be able to view the text on the screens, however, you will not experience a personalized visit or be able to subscribe to the offerings on our Sites.

USE OF INFORMATION

When you provide Personal Information, we will only use this information for the specific reason for which it is provided. We collect Personal Information for limited reasons, such as to:

- ♦ create your account and process your order, including payment transactions (including credit inquiries, and payment and personally identifiable information verification);
- ♦ provision, facilitate and ease your use of the Sites and the Solutions;
- ♦ send Solution updates and upgrades, marketing and other communications;
- ♦ facilitate participation in our online communities;
- ♦ deliver, enable and Support and the use and/or testing of certain features of our Solutions (including emergency calling services);
- ♦ personalize your experience;
- ♦ comply with legal requirements and prevent activities that may violate our policies;
- ♦ provide customer service;
- ♦ prevention and detection of fraud and other unauthorized use;
- ♦ (where we have the appropriate permissions) to inform you of new products or services that will enhance BluIP's ability to provide service to you; however, we will not sell, rent, trade, lease, or disclose or make available any personal data to any third parties seeking to market products or services to you without your prior consent;
- ♦ manage a job application and/or,
- ♦ perform market research or to conduct surveys, unless you have requested that we not contact you for this purpose.

Our definition of personally identifiable information does not include "aggregate information"—data we collect about a group or category of services, users or customers, and from which individual user or customer identities have been removed. Aggregate information—for example, a report that indicates that a certain number of our customers reside in a particular state or region of the United States, or a report on how many of our customers visited particular pages of our Sites—aids us in understanding trends and customer needs. Aggregate information allows us to consider new services or tailor existing services to customer preferences, and to provide aggregate statistics (e.g., a Small Business VoIP Usage Index) to customers, potential customers and business partners.

In some instances, BluIP and the third parties it engages may automatically collect data through cookies, web logs, web beacons, and other similar applications. This information is used to better understand and improve the usability, performance, and effectiveness of websites and Solutions, and to help tailor content or offers for you. Please read the above section "Cookies and Other Web Technologies" for more information.

SHARING INFORMATION

We may share and disclose your information we collect, consistent with this Policy, with the following third parties: any BluIP affiliate, third party service provider or partner; we share your information with these parties (as further delineated below) for the limited purposes of data processing, providing the Sites and the Solutions, compliance with applicable laws, to help market and promote the Solutions or for billing purposes. Further examples of sharing information with third parties by BluIP include:

- ♦ supporting the uses mentioned above;
- ♦ processing of orders and credit card transactions, delivering Solutions, hosting Sites, Support and marketing options, Sites and Solutions analytics, and assisting with sales-related efforts or post-sales Support;
- ♦ responding to a request for information by a competent authority if we believe disclosure is in accordance with, or is otherwise required by any applicable law, regulation or legal process;
- ♦ protecting the rights, property, or safety of BluIP, its business partners, you, or others;
- ♦ during negotiations of, or in connection with any merger, reorganization, restructuring, consolidation, acquisition, financing, dissolution or sale of all or a portion of the business or financing, dissolution, or acquisition of all or a portion of our business by or to another company;
- ♦ sharing your information only if we otherwise notify you and you consent to the sharing; and/or,
- ♦ sharing non-personal or aggregate basis (please see the last paragraph of the above section, "USE OF INFORMATION").

You can opt-out of receiving promotional communications from BluIP by using the options included in the communication.

CONTROL OF YOUR INFORMATION

When you provide personal information to us, we will not share that information with unaffiliated third parties without your permission, other than in circumstances such as above. We may send out important notices informing you of changes to our Policies,

technical service issues related to a product or service, or other information that is essential to the use of our Sites and Solutions. You or we may post Feedback, blog or community postings, or other information on our Sites, which may include your name, industry, company, title, or other identifying information. Any postings that you make, or that we make with your consent, are made at your own risk, and we will not be liable for the posting or the distribution of the information contained in or associated with your posting. If you want such postings, by BluIP, removed, or wish to give or withdraw consent please contact us by clicking [here](#), or by emailing mydata@bluip.com.

You may encounter links to third-party sites (e.g., business partners) and, although a connection may be made to such sites, we are not responsible for their privacy policies. This Privacy Policy does not cover their practices.

SECURITY OF YOUR PERSONAL INFORMATION

We intend to protect the Personal Information entrusted to us and treat it securely in accordance with this Privacy Policy. BluIP implements safeguards designed to protect your Personal information from unauthorized access, use, or disclosure. We also contractually require that our suppliers protect such information from unauthorized access, use, and disclosure. We make good faith efforts to provide the security measures necessary to keep the integrity and confidentiality of your information safe. However, no system can be completely secure, and we do not ensure, guarantee or warrant that our security measures are impenetrable. The Internet, for example, cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any personal information you provide to us. Also, please be advised that BluIP has no control over or responsibility for the security or privacy policies or practices of other sites on the Internet you might visit, with which you interact, or from which you might buy products or services, even if you visit them using links from the Sites.

You also have a significant role in protecting your information. As an example, you should not share your password with anyone. If you believe that your password has been compromised, you should immediately change your password. You should also sign off when you've finished using a shared computer, and you should always log out of any website, including the Sites, after viewing personal account information, such as in the "Preferences" section of our Sites.

ACCESS TO YOUR INFORMATION

We can provide you with access to your active Personal Information that we have collected so you can edit or update your Personal Information. You may have the ability to view or edit some of your Personal Information online. Profiles created on our Sites may be kept at different locations on different services; you may have to review and update the information in multiple locations. You may review and update this information or request deletions of any and all of your Personal Information at any time [here](#), or by contacting mydata@bluip.com.

Disclosure for California Residents: These additional disclosures for California residents apply only to individuals who reside in California. The California Consumer Privacy Act of 2018 ("CCPA") provides additional rights to know, delete and opt out of a party's sale of your personal information. The words used in this section have the meanings given to them in the CCPA, which may be broader than their common meaning. For example, the definition of "personal information" under the CCPA includes your name, and also more general information like your age.

BluIP does not sell your personal information (as understood under the CCPA) and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law.

Right to Know and Delete.

Once, every 12 months, qualifying California residents have the right to have deleted, the personal information BluIP has collected from them, and the right to know certain information about our data practices in the preceding twelve (12) months. In particular, you have the right to request the following from us:

- the categories of personal information we have collected about you;
- the categories of sources from which the personal information was collected;
- the categories of personal information about you we disclosed for a business purpose or sold (See, "Shine the Light" below);
- the categories of third parties to whom the personal information was disclosed for a business purpose or sold;
- the business or commercial purpose for collecting or selling the personal information; and
- the specific pieces of personal information we have collected about you.

If you would like to download or delete your personal information, you can do so [here](#), or email us at mydata@bluip.com. In the request, please specify which right you are seeking to exercise and the scope of the request. We will confirm receipt of your request within 10 days. We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity, we may deny your requests to know or delete.

Right to Opt-Out.

We do not sell information as the term “sell” is traditionally understood. However, if and to the extent “sale” under the CCPA is interpreted to include advertising technology activities such as those implemented specifically for interest-based advertising, we will comply with applicable law as to such activity.

Authorized Agent

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent’s permission to do so and verify your identity directly.

Right to Non-Discrimination

You have the right not to receive non-discriminatory treatment by us for the exercise of any your rights.

Financial Incentives

Financial incentives are programs, benefits, or other offerings, including payments to consumers as compensation, for the disclosure, deletion, or sale of personal information about them. Any promotion or other incentive, in which you participate, will be governed by a written contract between you and BluIP. Your intentional participation in any such programs, benefits, or other similar offerings will be interpreted as affirmative consent to the terms of such incentive.

Shine the Light

If you are a California resident, you may ask BluIP for a notice describing what categories of personal information BluIP shares with third parties or affiliates for those third parties or affiliates’ direct marketing purposes. You may further ask BluIP to identify the name and address of the third parties that received such personal information. Please submit a written request to the address provided below and specify you want a copy of your California Shine the Light Notice. We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.

Consumer Affairs

Under California Civil Code Section 1789.3, California residents are entitled to the following specific consumer rights notice: If you have a question or complaint regarding the Website, please send an email to legalnotice@bluip.com. You may also contact us by writing to us at the address provided below under the Section entitled “CONTACT INFORMATION.” California residents may reach the Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs may be contacted in writing at 400 R Street, Suite 1080, Sacramento, California 95814, or by telephone at (916) 445-1254 or (800) 952-5210.

Disclosure of Nevada Residents

BluIP does not sell your personal information and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law. A sale under Nevada law is the exchange of personal information for monetary consideration by the business to a third party for the third party to license or sell the personal information to other third parties. If you are a Nevada resident, you may ask BluIP to add you to its opt-out list for possible future sales of certain information we have collected or will collect about you. To submit such a request, please contact our designated request email address: mydata@bluip.com.

Disclosure for Canadian Residents

BluIP is located in the United States and some of its service providers (including affiliates acting in this capacity) are located in the United States or elsewhere outside of Canada. As a result, your personal information may be processed and stored outside of Canada for the purposes described in this Privacy Policy. While outside of Canada, personal information will be subject to applicable local laws, which may permit government and national security authorities in those jurisdictions to access your personal information in certain circumstances.

You may request access to or correction of your personal information, or withdraw consent to our collection, use or disclosure of your personal information, by writing to our Global Privacy Team at the below address or at mydata@bluip.com. These rights are subject to applicable contractual and legal restrictions and reasonable notice. We may take reasonable steps to verify your identity before honoring any such requests.

Disclosures for EEA Residents

If you are a resident of the European Economic Area, you have the following data protection rights.

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the “CONTACT INFORMATION” section below.
- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “CONTACT INFORMATION” section below.

- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided under the “CONTACT INFORMATION” section below.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

Contact details for data protection authorities in the European Economic Area, are available here, or accessible via:

https://edpb.europa.eu/about-edpb/board/members_en

Switzerland and Canada are accessible as follows:

Switzerland: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>

Canada: <https://www.priv.gc.ca/en/report-a-concern/>

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Legal basis for processing personal information (EEA and Switzerland only)

If you are from the European Economic Area (EEA), our legal basis for collecting and using the personal information described above will depend on the Personal Information concerned and the specific context in which we collect it.

However, we will normally collect Personal Information from you only where we have your consent to do so, where we need the Personal Information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect the Personal Information in question.

If we ask you to provide Personal Information to comply with a legal requirement or enter into a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal information is mandatory or not (as well as of the possible consequences if you do not provide your Personal Information).

Similarly, if we collect and use your Personal Information in reliance on our or a third party's legitimate interests and those interests are not already listed above (see "SHARING INFORMATION" section), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided under the "CONTACT INFORMATION" section below.

Transfer of Your Information Across Border

Your information may be stored and processed in the United States or any other country in which BluIP or its vendors maintain facilities. By using our Sites, you consent to any transfer, storage, or processing of information outside of your country. Several countries, including those in the European Economic Area, have established data protection laws and regulations that place restrictions on the transfer of personal information across country borders. We are committed to complying with all of those laws and regulations and have taken appropriate safeguards to require that your information will remain protected in accordance with this Privacy Policy. These measures include requiring adherence to this Privacy Policy in our contracts, and strict enforcement of such adherence. Some countries, however, may not have the same or substantially similar privacy laws as those set out in this Privacy Policy. We may not require organizations to which we disclose personal information in those countries to comply with similar privacy laws, and accordingly your Personal Information may not receive the same protections that it would under the applicable laws where you are located. *You may request that we not to transfer your personal outside of the United States, but if you do so request, we may not be able to provide the Sites, Solutions or products you have purchased, or otherwise lawfully obtained from us.* To make such a request, please write us at legalnotice@bluip.com.

When you use our Sites and Solutions and provide Personal Information, you should do so in compliance with the applicable data protection laws and regulations in your country.

DATA RETENTION

We retain Personal Information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible

(for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

CHILDREN'S INFORMATION

The Sites are not intended for use by individuals under the age of 13. We do not knowingly collect personal data from, nor send requests for personal data to individuals under the age of 13. If we obtain actual knowledge that any information we collect has been provided by a child under the age of 13, we will delete that information to the extent required by applicable laws.

We do not knowingly “sell,” as that term is defined under the California Consumer Protect Act (“CCPA”), the personal information of minors under 16 years old who are California residents.

THIRD PARTIES

The Service may link to third party-controlled websites, like a business’s URL. Except as stated in this Privacy Policy, we do not share your personal information with them, and are not responsible for their privacy practices.

Some of our web pages utilize framing techniques to serve content to you from our third-party partners, while preserving the look and feel of the Solutions. In such cases, please note that the information you provide may be transmitted directly to the identified third-party partner.

We have no direct relationship with the individuals, if any, whose personal data you receive, and/or store through Sites or the Solutions or the individuals, if any, whom you contact through the Sites or the Solutions. If you choose to provide BluIP with a third party's Personal Information (such as name, email, and phone number), you represent that you have the third party's permission to do so.

If you are an individual who is being contacted by one of our customers or partners through the Sites or the Solutions and would no longer like to be contacted by such customer or partner through such services, please contact such contacting party directly.

Any individual, whose personal data is included in the communications sent, received, and/or stored by one of our customers or partners through a Solution or a Site, who seeks access to correct, amend, or delete any inaccurate data should direct their request to that customer or partner directly. The customer/partner is the controller of such data and may provide such access to such data or may perform any correction, amendment, or deletion thereof.

BluIP is not responsible for any action or inaction by any of its customers, partners or any third party under this Privacy Policy.

Business Transfers: We share information from or about you with our parent companies, subsidiaries, joint ventures, or other companies under common control, and require them to also honor this Privacy Policy. If another company acquires or all or substantially all of our assets, that company will possess the same information, and will collect, use, and disclose the information only as described in this Privacy Policy.

MODIFICATIONS TO THIS PRIVACY POLICY

BluIP may update and make changes to this Privacy Policy at any time. When we do so, we will also revise the date at the bottom of this page and at the top of the first page of this Privacy Policy. When we make material changes to this Privacy Policy, we will notify you by placing prominent notice on the Sites.

CONTACT INFORMATION

You may unsubscribe from any future communication by contacting legalnotice@bluip.com. If you have any questions about this Privacy Policy, please contact us at legalnotice@bluip.com.

Corporate Headquarters

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Read more at: <http://www.bluip.com/company>

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