

Privacy Statement

Date Effective: 2/1/2021

ConnectionsGRP, Inc. (“ConnectionsGRP”, “We”, “Us” or “Our”) is committed to protecting your privacy and ensuring you have a positive experience on our website and when you use our products and services. ConnectionsGRP owns and operates a proprietary communications technology platform (“ConnectionsGRP Platform”). ConnectionsGRP provides networks, advertisers, agencies, publishers, and other businesses (“Customers”), with communication platform services (the “Services”) using unique phone numbers combined with database management.

This “Privacy Statement” outlines how we collect, use, and disclose Personal Data. It covers all Personal Data that you affirmatively provide during your online and offline interactions with us, information that we passively collect when you interact with our products and services, and information that we collect about you from our Customers and third parties. The policy is applicable worldwide, and also describes the rights you may have to control our use of Personal Data and how to exercise those rights.

As used in this Privacy Statement, “Personal Data” means any information that can be used to identify or is reasonably linkable to a specific person or, in some cases, household. It may include, but is not limited to, name, email address, postal or other physical address, credit or debit card number, title, and other information linked to a persistent identifier assigned or linkable to the individual.

Categories of Data

ConnectionsGRP collects Personal Data directly from individuals (data subjects), from Customers, and from third parties on behalf of our Customers. ConnectionsGRP processes two broad categories of personal information when you use our services:

- Your personal information as a customer (or potential customer) of ConnectionsGRP’s services — information that we refer to as “Customer Account Data”, and



- The personal information of your end users who use or interact with your application on ConnectionsGRP's platform, like the people you communicate with by way of that application — this category contains both your "Customer Usage Data" (e.g., communications metadata) and your "Customer Content" (e.g., the contents of communications).

Customer Account Data we collect through the sign up and registration process and through cookies or similar technologies. We may gather the following types of Personal Data about you:

1. Information commonly used to identify you, such as your name, username, physical address, email address, phone numbers, and other similar identifiers
2. Information about your job, such as your title and employer
3. Credit/debit card or other payment information
4. General information about your product and service preferences and behavior
5. Information about your device, network, and internet connection, such as IP address(es), MAC address, other device ID (UDID), device type, operating system type and version, and client version
6. Information about usage of or other interaction with our Services, including actions taken, date and time, frequency, duration, quantity, performance information, and other feature usage information
7. Other information the Client uploads, provides, or creates while using the Services including, without limitation, call recordings, which may include Personal Data about consumers.

Customer Usage Data we collect on behalf of our Customers:

ConnectionsGRP, as part of our Services, collects or receives Personal Data from consumers who interact with our Customer's websites and assigned phone numbers. ConnectionsGRP cookies track where the web visitor navigated within the Customer's site, when and what went on during the session, and what other ConnectionsGRP

Customer's sites they have visited. Depending on how a Customer configures and uses the ConnectionsGRP Platform and Services, this may include the content of recorded telephone calls. This information, which we maintain exclusively on behalf and at the direction of our Customer, may include sensitive Personal Data including, without limitation, financial/credit card account data and/or health information. ConnectionsGRP provides tools to redact/prevent recording of medical and financial health information. ConnectionsGRP advises Customer to use such tools to prevent the collection and



maintenance of sensitive Personal Data, but cannot guarantee that Customer use these tools in all cases. Our Customer controls this Personal Data and its collection and use is governed by their respective privacy policies, which may differ from ConnectionsGRP's policy. We encourage consumers with questions or requests related to Personal Data collected by ConnectionsGRP's Customer to contact those entities directly, and we will refer any consumer requests for Personal Data maintained by ConnectionsGRP on behalf of a Customer to that Customer.

How We Use Personal Data

ConnectionsGRP processes Personal Data with consent and/or as reasonably necessary to provide our Platform and Services, operate our business, and provide the Platform and Services on behalf and at the direction of our, and for other legitimate commercial and business purposes including but not limited to the following:

1. To provide, run, personalize, improve, operate, maintain, and, in some cases, market the ConnectionsGRP Platform and our Services
2. As a service provider, to facilitate access to and use of that information by our Customer in pursuit of their individual commercial and business purposes and subject to their privacy policies
3. For accounting, auditing, and performance reporting
4. To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity
5. To understand website usage, administer the website, determine the relevance of content, fix bugs, and conduct internal research in order to enhance the ConnectionsGRP Platform and Services
6. To keep you up to date on the latest ConnectionsGRP Platform and Services announcements, special offers, and other information
7. To comply with our legal obligations, protect our rights and the rights of third parties

Disclosure and Sharing of Personal Data

ConnectionsGRP does not “sell” Personal Data. ConnectionsGRP may disclose Personal Data to affiliated entities and thirdparty service providers to help us do all of these things. We forbid our service providers from selling Personal Data they receive from us or otherwise collect or process on our behalf, and we limit their use of that Personal Data to that which is necessary to perform the services we have asked of them, or as otherwise required by law.

Below are the different scenarios under which we may share your data with third parties:

- Telephony operators as necessary for proper routing and connectivity. ConnectionsGRP provides an easier way for developers to build applications that make use of the publicly switched telephone network (PSTN) to send communications. Therefore, communications-related data is shared with and received from telephony operators as necessary to route and connect those communications from the sender to the intended recipient. How those telephony operators handle this data is generally determined by those operators’ own policies and local regulations.
- Other communications service providers for proper routing and connectivity. ConnectionsGRP also enables sending or receiving communications through communications service providers that do not use the PSTN, such as Viber and Facebook Messenger (referred to as Over-the-Top (OTT) communications service providers). If you choose to use ConnectionsGRP to send or receive communications by way of these providers, ConnectionsGRP will share communications data with these providers as necessary to route and connect those communications from the sender to the intended recipient. How those OTT communications service providers handle this data is determined by their own policies
- Third-party service providers or consultants. ConnectionsGRP engages certain third-party service providers to carry out certain data processing functions on our behalf. These providers are limited to only accessing or using this data to provide services to us and must provide reasonable assurances they will appropriately safeguard the data.
- Sub-processors. We may share Customer Content with sub-processors who assist in providing the ConnectionsGRP services, like our infrastructure provider, or as necessary to provide optional functionality like transcriptions. An up-to-date list of sub-processors for the ConnectionsGRP Services is available upon request.

- **Add-on Partners.** Add-ons are additional features, functionality or services offered by ConnectionsGRP's Add-on Partners (third parties not affiliated with ConnectionsGRP). ConnectionsGRP may make Add-ons available through the ConnectionsGRP Marketplace. Some Add-ons may need to access or collect some of your information, including personal information. If you choose to use an Add-on, ConnectionsGRP will share your information with the Add-on Partner so you can use the Add-on. ConnectionsGRP does not control Add-on Partners' use of your information and their use of your information will be in accordance with their own policies. If you do not want your information to be shared with an Add-on Partner, then you should not use the Add-on.
- **Compliance with Legal Obligations.** We may disclose your or your end users' personal information to a third party if (i) we reasonably believe that disclosure is compelled by applicable law, regulation, legal process, or a government request (including to meet national security, emergency services, or law enforcement requirements), (ii) to enforce our agreements and policies, (iii) to protect the security or integrity of our services and products, (iv) to protect ourselves, our other customers, or the public from harm or illegal activities, or (v) to respond to an emergency which we believe in good faith requires us to disclose data to assist in preventing a death or serious bodily injury. If ConnectionsGRP is required by law to disclose any personal information of you or your end user, we will notify you of the disclosure requirement, unless prohibited by law. Further, we object to requests we do not believe were issued properly.
- **ConnectionsGRP's Platform and Services** are hosted and operated in the United States ("U.S.") through ConnectionsGRP and its service providers. We may transfer your Personal Data to the U.S., to any ConnectionsGRP affiliate worldwide, or to third parties acting on our behalf for the purposes of processing or storage. By using our Platform or Services or providing any Personal Data for any of the purposes stated above, you consent to the transfer and storage of your Personal Data, whether provided by you or obtained through a third party, to the U.S. as set forth herein, including the hosting of such Personal Data on U.S. servers.
- **Business transfers.** If we go through a corporate sale, merger, reorganization, dissolution or similar event, data we gather from you may be part of the assets transferred or shared in connection with the due diligence for any such transaction. In that situation, and that situation only, we might transfer your data in a way that constitutes a sale under applicable law. If we do, we'll let you know ahead of time, and any acquirer or successor of ConnectionsGRP may continue to process data consistent with this notice.



- Aggregated or de-identified data. We might also share data with third parties if the data has been de-identified or aggregated in a way so it cannot be used to identify you or your end users. You may request a list of who we share aggregated or de-identified data with.

Data Retention

How long we retain your Personal Data depends on the type of data and the purpose for which we process the data. We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.

Security of Personal Data

ConnectionsGRP takes appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure, exfiltration, or destruction of data. ConnectionsGRP restricts access to personal information to those employees or third parties who have a need to know such information for the purpose of effectively delivering ConnectionsGRP Services by means of user login and password requirements. ConnectionsGRP routinely evaluates its data security practices to identify security threats or opportunities for improvement. No transmission of data over the Internet or the phones is guaranteed to be completely secure. It may be possible for third parties not under the control of ConnectionsGRP to intercept or access transmissions or private communications unlawfully. While ConnectionsGRP strives to protect personal information, it cannot ensure or warrant the security of any information a user transmits.

California Residents

As required by the California Consumer Privacy Act (CCPA), this Privacy Policy describes the categories of Personal Data collected, processed, and disclosed by ConnectionsGRP, the categories of sources for that data, and the business or commercial purposes for which that data is collected, processed, and disclosed.

If you are a California resident, you may have the right to receive a free, yearly accounting of the following information for the preceding calendar year: (1) information identifying each third-party company to whom we may have disclosed, within the past year, personally identifiable information



about you for direct marketing purposes; and (2) a description of the categories of personally identifiable information disclosed.

Commencing on January 1, 2020, if you are a resident of California, you may have additional rights.

You may have a *right to know* about personal information about you that we have collected, disclosed, or sold, including:

1. The categories of personal information about you that we have collected in the preceding 12 months and the categories of sources of that information,
2. The categories of sources from which we have collected that information in the preceding 12 months,
3. The commercial or business reason(s) we have collected, used, or disclosed that information, and
4. The categories of third parties to whom we have disclosed that information in the preceding 12 months.

Please note that ConnectionsGRP does not collect, use, or sell personal information about minors between 13 and 16 years of age without their affirmative authorization, and we do not collect, use, or disclose personal information about children under 13 without verifiable parental permission.

In addition, upon receipt of a verifiable request from you establishing your identity, you may have the *right to know about the specific pieces* of personal information that we have collected about you and/or shared with third parties in the preceding 12 months.

You may also have the *right to request deletion* of personal information about your that we have collected or maintain, which we will honor subject to certain limitations set forth in California law.

Prior to honoring a request to know information about specific pieces of information or a request to delete Personal Information, ConnectionsGRP will verify your identity. If you have a password protected account, we will verify your identity using that account. Otherwise, ConnectionsGRP will ask you to provide one or two pieces of information (e.g., proof of name, address, or phone number) to protect your privacy.



To view or redact please reach – ccpa@ConnectionsGRP.com

Lawful Basis; Controller and Processor Arrangements

ConnectionsGRP processes Personal Data about Customer and consumers in the EEA and Switzerland as a Controller on its own behalf and as a Processor on behalf and at the direction of our Customer. In each case, our processing of Personal Data is based on the legitimate and proportionate interests of ConnectionsGRP and/or its Customer. In certain cases, such as where Personal Data may be used for marketing purposes, we will seek your consent for processing, and that consent may be withdrawn at any time.

Changes to this Privacy Policy

We may change our Privacy Notice from time to time. If we make changes, we'll revise the "Effective" date at the top of this notice, and we may provide additional notice such as on the ConnectionsGRP website homepage, account portal sign-in page, or via the email address we have on file for you. We will comply with applicable law with respect to any changes we make to this notice and seek your consent to any material changes if this is required by applicable law.

Contact Us

If you have any privacy-related questions or comments related to this privacy policy, please send an email to support@ConnectionsGRP.com

You can also contact us by writing to this address:

ConnectionsGRP, LLC.

Attention: Privacy

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