

## General Data Protection Regulation (GDPR) Privacy Policy

Pivotel ("we," "our," or "us") is committed to protecting the privacy of individuals and safeguarding their personal information. This General Data Protection Regulation (GDPR) Privacy Policy outlines our practices regarding the collection, use, disclosure, and retention of personal information when individuals visit our website at pivotel.com and engage with our services. This policy applies to all individuals accessing our services from the EU.

### What types of personal data does Pivotel collect?

We may collect the following types of personal information:

- Your name, date of birth, gender and contact details (which may include home address, billing address, email address and phone numbers)
- Payment information such as bank account and credit card details where relevant
- Information to prove your identity. This could be your driver's license or another approved form of ID Information relating to your credit worthiness
- Information about your products and services including your hardware model, unique device and service identifiers and serial numbers
- Information about how you use your products and services such as your network usage including time and duration of your calls, volume of data sent or received, called numbers, and expenditure
- Details about your account. This includes your password and username
- Personal preferences
- Contact histories
- Any content you voluntarily provide, such as reviews or comments on our website.

You might also need to provide personal information about other individuals to us (e.g. about your authorized representative). If so, we rely on you to have informed those individuals that you are giving their personal information to us, and to have advised them about this policy.

### How does Pivotel obtain personal data?

Pivotel may obtain personal data in a number of ways, There are three ways that we can collect your information.

1. **You give it to us** when you or your representative interacts with either us or one of our trusted partners. This might happen when you are setting up an account with us, using one of our products or services, or taking part in a competition, prize draw or survey.
2. **We collect information** when you use our networks, products and services including our call centers and online services. For example, we may use network tools to collect your call records.
3. **We obtain information from outside sources** like credit reports, marketing mailing lists, and public information, including public posts to social networking sites. This can also include information gained from our partners if you have

interacted with them. These partners include our dealer network, identity and fraud checking services, and credit reporting bodies.

We understand that you might not want to give us particular personal information. Just know that it may mean we are not able to provide you with the products or services you need.

### **How we store and protect your personal information**

We may store your information in hard copy or electronic format, and keep it in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers. We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorized access and disclosure.

We use account IDs and passwords to prevent unauthorized access to your account. You should update your password regularly and only share these details with people you authorize to access and manage your account. You can get help on how to use these tools by contacting us using the contact details below.

### **How we use your information**

We may use your personal information for several purposes connected with our business, including:

- Processing your order for our products and services
- Conducting credit checks and credit score activities
- Providing you with the products and services you have ordered from us
- Communicating with you on mediums such as emails, phone, SMS and social media
- Preparing and issuing your bills, and collecting the money you have spent on our products and services
- Updating and administering your account details
- Dealing with your requests, enquiries or complaints and any other customer care related activities
- Marketing our products, and carrying out market, product and service analysis activities generally
- Registering your details and fulfilling any requests or requirements you may have in relation to competitions, promotions, rewards, discounts, loyalty schemes or any other benefits available to you as a customer
- Carrying out any activity required by, or authorized by the government or any legal or regulatory authority in connection with our business generally, or specifically in connection with any legal proceedings, crime, fraud or other unlawful activity prevention, detection, investigation or prosecution

### **When do we share your information?**

We may share your information or receive personal information about you from:

- We may inquire and report information about your account(s) to credit bureaus and/or consumer reporting agencies
- Debt collection agencies regarding Late payments, missed payments, or other defaults on your account(s)
- Parties that assist us with fraud and identity checking including financial institutions and the Government agencies, to verify the validity of any Government issued documentation you provide as proof of identity i.e.: to check a Drivers Licence, Passport, etc.
- When legally required by a government agency
- Law enforcement agencies to assist in the prevention, detection, investigation or prosecution of criminal or other unlawful activities
- Other telecommunications companies for the purposes of dealing with unwelcome calls and number portability issues
- Our dealers, distributors and agents, our network carrier and mobile service partners, our billing, provisioning and mobile network portability service providers, or any other of our related companies for purposes that are connected with providing you with our products and services, and with which you would reasonably expect us to disclose, share or receive personal information about you.

We will not disclose or share your personal information with third parties for any purpose other than those described above without your consent, or where there is no specified legal, law enforcement or public health and safety issue involved.

We will not share or disclose your personal information to third parties unless you have consented to us disclosing or sharing your personal information with them, or they have contracted with us to protect your personal information, or they are themselves obligated to protect your personal information.

In some cases, the organizations that we may disclose your information to may be based outside the location where the information is collected. For example, we may share your information with our third parties in Australia. We take reasonable steps to make sure the overseas recipients of your personal information do not breach the privacy obligations relating to it.

## **Marketing**

Pivotel would like to send you information about products and services of ours that we think you might like. If you have agreed to receive marketing, you may always opt out at a later date. You have the right at any time to stop Pivotel from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please visit:

<https://email.pivotel.com/hs/manage-preferences/unsubscribe-simple>

## **Credit reporting**

Sometimes, such as when we are checking your credit worthiness or assessing your credit situation, we might collect credit information from or give information to credit reporting bodies. Credit information can include:

- identification information
- details about information requests made about you to credit reporting bodies
- current and historical details about credit applications you have made and credit arrangements you have entered into
- information about overdue payments, default listings and about serious credit infringements and information about payments or subsequent arrangements in relation to either of these
- various publicly available information like bankruptcy and credit-related court judgments
- credit scores or risk assessments indicating an assessment of your credit worthiness

Credit information relates primarily to your dealings with other credit providers (for example, banks, other financial institutions, or other organizations that may provide you with credit in connection with their products or services). It may also include certain credit worthiness information that we derive from the data that we receive from a credit reporting body. Sometimes we may collect this information about you from other credit providers. We may disclose your credit information to credit reporting bodies. They in turn may include it in credit reporting information they provide to other credit providers to assist them to assess your credit worthiness.

We may use or disclose your credit information for purposes such as:

- processing credit-related applications and managing credit that we provide
- assisting you to avoid defaults
- collecting amounts you may owe us in relation to such credit and dealing with serious credit infringements
- participating in the credit reporting system
- dealing with complaints or regulatory matters relating to credit or credit reporting
- when required or authorized by another law

You have the right to request credit reporting bodies not to:

- use your credit eligibility information to determine your eligibility to receive direct marketing from credit providers; and
- use or disclose your credit eligibility information if you have been or are likely to be a victim of fraud
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You can find out more about the credit reporting body we work with at [www.equifax.com](http://www.equifax.com). Their websites give their contact details and their policies about the management of your personal information.

## Your Rights

Pivotel is a subject of various data privacy regulations including the General Data Protection Regulation. You are entitled to the full spectrum of the rights under those regulations. We will go out of our way to accommodate any valid request. You can either exercise your rights by deleting your account and all information associated with it from your device or by emailing us at [support@pivotel.com](mailto:support@pivotel.com)

Pivotel would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- **The right to access** – You have the right to request us for copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification** – You have the right to request that Pivotel correct any information you believe is inaccurate. You also have the right to request us to complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that we erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to Pivotel's processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request that Pivotel transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you.

If your personal data is erased at your request or in accordance with our information collection practice as stated above, We only retain such information that is necessary to protect our legitimate interests or to comply with a legal obligation.

## Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

## What types of cookies do we use?

Pivotel uses cookies in a range of ways to improve your experience on our website, including:

1. **Essential Cookies:** These cookies are necessary for the website to function properly. They enable basic functionalities like page navigation, access to secure areas, and ensuring the website's core features work as intended.

2. **Performance Cookies:** These cookies collect information about how visitors use the website, such as which pages are most visited, how long users stay on a page, and if they encounter error messages. This data helps improve the website's performance and user experience.
3. **Functional Cookies:** Functional cookies allow the website to remember choices you make (such as language preferences or region) and provide enhanced, personalized features.
4. **Advertising and Marketing Cookies:** These cookies are used to track users' online behavior and interests to serve them relevant advertisements. They may also help measure the effectiveness of ad campaigns.
5. **Analytics Cookies:** Analytics cookies collect data on how users interact with the website, helping website owners understand traffic patterns, user preferences, and popular content.
6. **Social Media Cookies:** Social media cookies allow users to share content from the website on their social media platforms. They may also track users' interactions with social media widgets embedded on the site.
7. **Targeting or Third-Party Cookies:** These cookies are often used by third-party advertisers to display personalized ads based on users' interests and browsing history. They can also be used for website analytics by third-party services.
8. **Session Cookies:** Session cookies are temporary and are deleted from your device when you close your browser. They are typically used to maintain session information (e.g., shopping carts) and do not store personal data.
9. **Persistent Cookies:** Persistent cookies remain on your device for a specified period, even after you close your browser. They can be used for purposes like recognizing you on subsequent visits or storing login credentials.
10. **Security Cookies:** Security cookies help protect the website and user data from security threats, such as unauthorized access or fraudulent activities.
11. **Authentication Cookies:** Authentication cookies are used to identify and verify users when they log in to a website or use online services, ensuring secure access to user accounts.
12. **Cookie Consent and Preferences:** These cookies store a user's preferences for cookie usage, such as whether they have consented to the use of cookies on the website.
13. **Cross-Site Tracking Cookies:** These cookies are used by third parties to track users across different websites for various purposes, including ad targeting and behavior analysis.
14. **First-Party and Third-Party Cookies:** Differentiate between cookies set by your website (first-party cookies) and those set by external domains (third-party cookies) to provide transparency on data collection sources.
15. **Opt-Out or Do-Not-Track (DNT) Mechanisms:** Explain if your website honors users' browser settings, such as "Do Not Track" requests, and how this affects cookie usage.

### **How to manage cookies**

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

### **Privacy policies of other websites**

The Pivotel website contains links to other partner and third party websites. Our privacy policy applies only to our website(s), so if you click on a link to another website, you should read their privacy policy.

### **Children's Privacy**

We request individuals under the age of 13 in the U.S. and under the age of 16 in the rest of the world not provide personal data to Pivotel. If we learn that we have collected personal data from a child under the age of 13 in the U.S. or under 16 in the rest of the world, we will take steps to delete the information as soon as possible.

### **Our Commitment**

- We will only collect and use your data where We have a legal basis to do so.
- We will always be transparent and tell you about how we use your information.
- When We collect your data for a particular purpose, we will not use it for anything else without your consent, unless other legal basis applies
- We will not ask for more data than needed for the purposes of providing our services.
- We will adhere to the data retention policies and ensure that your information is securely disposed of at the end of such retention period.
- We will observe and respect Your rights by ensuring that queries relating to privacy issues are dealt with promptly and transparently.
- We will keep our staff trained in privacy and security obligations.
- We will ensure to have appropriate technological and organizational measures in place to protect your data regardless of where it is held.
- We will also ensure that all our data processors have appropriate security measures in place with contractual provisions requiring them to comply with Our Commitment.
- We will obtain your consent and ensure that suitable safeguards are in place before personal data is transferred to other countries.

### **Changes to the Privacy Policy**

We will always notify you via email or otherwise should we update this privacy policy. We will update the "last modified" date at the bottom of this privacy policy to indicate the latest revision, as well as the changes were made.

**How to contact us****Pivotel**

2 Oakwood Blvd.

Suite 200

Hollywood, FL 33020

United States of America

Phone: +1-(954)-763-8650

Website: [www.pivotel.com](http://www.pivotel.com)

Email: [support@pivotel.com](mailto:support@pivotel.com)

**How to contact the appropriate authority**

Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office at <https://ico.org.uk/global/contact-us/contact-us-public/>

**Last modified Date**

October 5, 2023