

Pivotel California Consumer Privacy Notice

About this notice

This California Consumer Privacy Act Notice (“Notice”) is provided by Pivotel described below. Pivotel referred to in this Notice as “we” or “us.”

This Notice explains how we collect, use, and disclose personal information about California residents. The Notice also explains certain rights that California residents have under the California Consumer Privacy Act (“CCPA”). For example, this Notice explains how California residents can exercise their rights under the CCPA to request that we: (1) provide certain personal information that we have collected about them during the past 12 months, along with related information described below, or (2) delete certain personal information that we have collected from them.

The CCPA only applies to information about residents of California. If you are not a resident of California, you may submit a request and we will process it, as described in this Notice, even though the CCPA does not require us to do so. In accepting, processing, and responding to requests by individuals who are not California residents, we will apply all of the same limitations and exceptions under the CCPA to those requests as apply to requests made by California residents. We reserve the right to change or stop the practice of accepting requests from individuals who are not California residents at any time and without prior notice.

Under the CCPA, “personal information” is information that identifies, relates to, or could reasonably be linked with a particular California resident or household. This information is referred to in this Notice as “Personal Data.”

Categories of Personal Data that We Collect

We collect Personal Data in a variety of contexts. For example, we collect Personal Data to provide individual and commercial financial products and services, and for our employment and human resource purposes.

The Personal Data that we collect about a specific California resident will depend on, for example, our relationship or interaction with that individual. During the past 12 months, we have collected the following categories of Personal Data.

- 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
- Information you provide to us through surveys

- Employment Information — Professional or employment-related information, such as work history and prior employer

Why We Collect Personal Data and How We Use It

The purposes for which we collect and use Personal Data depend on, among other things, our relationship or interaction with a specific California resident. The following lists the purposes for which we collect and use Personal Data in different contexts.

- 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

Sources of Personal Data

The sources from which we collect Personal Data depend on, among other things, our relationship or interaction with a specific California resident. The information below lists the categories of sources from which we collect Personal Data in different contexts.

- From California residents directly, or other individuals acting on their behalf, through physical (e.g., paper application), audible (e.g., phone), or electronic (e.g., website, social media) sources.
- 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.
- 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.

When do we share your information?

We may share the Personal Data about a specific individual depend on, among other things, our relationship or interaction with a specific California resident during the past 12 months when:

- 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 and New Zealand. We take reasonable steps to make sure the overseas recipients of your personal information do not breach the privacy obligations relating to it.

California residents have the right to opt out of the sale of their information by businesses that sell Personal Data. The CCPA defines a “sale” as the disclosure of Personal Data for monetary or other valuable consideration. Pivotel does not offer an opt out from the sale of Personal Data because we do not and have not within at least the last 12 months sold Personal Data that is subject to the CCPA’s sale limitation. The CCPA also requires that we state that we have no actual knowledge that we have sold Personal Data of California residents 15 years of age and younger.

Requests under the CCPA

If you are a California resident, you have the right to request that we:

1. Disclose to you the following information covering the 12-month period prior to your request (“Access Request”):
 - a. The categories of Personal Data we collected about you and the categories of sources from which we collected the Personal Data;
 - b. The business or commercial purpose for collecting Personal Data about you;
 - c. The categories of third parties to whom we disclosed Personal Data about you, and the categories of Personal Data disclosed;
 - d. The specific pieces of Personal Data we collected about you; and
2. Delete Personal Data we collected from you (“Deletion Request”).

In addition, you have the right to be free from discrimination by a business for exercising your rights under the CCPA.

Responding to requests

Pivotel is a subject of various data privacy regulations. 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

Pivotel under no circumstances sells your data and performs only lawful processing of your personal data.

You have a wide array of rights that we respect. Among those the right to:

- Require access to your personal data;
- Require rectification of your personal data (this is less relevant since otherwise we could not provide you with the service);
- Require erasure of your personal data;
- Withdraw consent to the processing of your personal data, where applicable, otherwise we could not provide you with the service;
- Lodge a complaint with your national supervisory authority (in the EEA) if you believe that your privacy rights have been breached.

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.

How to make requests

If you are a California resident, you can make an Access Request or a Deletion Request by:

1. Contacting us at **1-954-763-8650**; or
2. support@pivotel.com

For all other individuals, we may ask you to provide the following information to identify yourself:

- Name, contact information, social security number, date of birth; and
- A copy of government issued photo ID. We accept your Driver’s license or State ID.

When you make a request, we will attempt to verify that you are who you say you are. For example, we will attempt to match information that you provide in making your request with other sources of similar information to reasonably verify identity.

Authorized Agents

If you are a California resident, you may authorize an agent to make an access or deletion request on your behalf. A California resident's authorized agent may make a request on behalf of the California resident by contacting us at the phone number or email listed above. As part of our verification process, we may request that you provide, as applicable:

- For an individual ("requestor") making a request on behalf of a California resident:
 - The requestor's name; contact information; social security; date of birth; and Driver's License, or State ID.
 - The name; contact information; social number; date of birth; and Driver's License, or State ID of the California resident on whose behalf the request is being made.
 - A document to confirm that the requestor is authorized to make the request. We accept as applicable, a copy of a power of attorney, legal guardianship or conservatorship order, or a birth certificate of a minor if the requestor is the custodial parent.
- For a company or organization ("legal entity requestor") making a request on behalf of a California resident:
 - The legal entity requestor's active registration with the California Secretary of State.
 - Proof that the California resident has authorized the legal entity requestor to make the request. We accept as applicable, a copy of power of attorney, or legal guardianship or conservatorship order.
 - The name; contact information; social security number; data of birth; and Driver's License, or State ID of the California resident on whose behalf the request is being made. From the individual who is acting on behalf of the legal entity requestor, proof that the individual is authorized by the legal entity requestor to make the request.

Changes to the notice

We will always notify you via email or otherwise should we update this notice 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.

Contact Information

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