

Pivotel Privacy Policy

Our Privacy Commitment

Your privacy is important to Pivotel. We developed this Privacy Policy to provide you with information on how we process your personal data.

"Personal data" is information relating to an identified or identifiable natural person. Additional information specific to your jurisdiction may be provided in a separate document. Please scroll to the "Your Rights" section to view our supplemental policies that may apply to you. The legal grounds for processing personal data specified in this Privacy Policy are based on the EU General Data Protection Regulation ("GDPR") and laws in other jurisdictions that have similar grounds. We are committed to protecting the privacy of your personal information.

What information do we 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
- Information you provide to us through surveys

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 we collect your information

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 centres 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 hold 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 do 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 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.

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

You can find out more about the credit reporting body we work with at 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 and the California Consumer Privacy Act. 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 sell 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.

California Residents Notice

If you are a California resident, you have rights under the California Consumer Privacy Act of 2018 ("the CCPA"). Below, we provide a description of your rights and disclosures about your personal information.

Right to know about the personal information we collect and share: The CCPA gives you the right to request that we disclose the specific pieces of personal information we have collected about you. The categories of personal information we collect about you and the sources from which we collect such personal information are described above. Pivotel does not sell, and has not sold, your personal information. However, we disclose and have disclosed in the past 12 months certain

categories of personal information for a specified business purpose to certain categories of third parties, all as described in the main Privacy Policy from which you were directed to this supplementary policy.

Right of deletion: You have the right to request that we delete your personal information, subject to certain exceptions.

How to exercise your rights: To request access to or deletion of your personal information, or to delete your Pivotel account, contact pivotel at support@pivotel.com or +1-(954)-763-8650. No one else can request access to or deletion of your personal information without providing sufficient evidence of your authorization.

Categories of information we collect and disclose for a business purpose: We collect the categories of personal information from you in connection with the Services, as defined in the CCPA, that are described above.

Nondiscrimination: will not discriminate against you for exercising any of your CCPA rights.

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.

Contact Information

Pivotel

2 Oakwood Blvd.

Suite 200

Hollywood, FL 33020

United States of America

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

Website: www.pivotel.com

Email: support@pivotel.com

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