

Quality Control & Compliance Initiative

PRIVACY

POLICY

Author:	Phonovation Quality Control Group Gavin Carpenter
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Revised by:	Pedro Quintas
To:	All Phonovation Staff

This document is publicly available to any staff member on the following network path:

<File:\\srvadmdc00\dev & it\Quality Control\QC - Phonovation Privacy Policy.docx>

Privacy Policy

Phonovation SMS, IVR, Email, and WebSite Services (hereafter referred to as Phonovation) has created this privacy policy to demonstrate our commitment to the privacy of the users of our websites and services (front-office or back-office services). Please read the following to learn more about our privacy policy, and how we treat personally identifiable information collected from our visitors and users.

What this Privacy Policy Covers

- This privacy policy covers Phonovation's treatment of personally identifiable information collected by Phonovation through
 - a website owned and operated by Phonovation
 - an SMS gateway used to send and receive text messages and managed by Phonovation
 - an IVR system used to receive or make landline calls managed by Phonovation
 - an Email engine used to send or receive email messages and managed by Phonovation
 - a service, collector, API or any unattended service that automatically processes information that may contain private data and is managed by Phonovation
- This privacy policy does not apply to the practices of companies that Phonovation does not own or control, or of persons that Phonovation does not employ or manage, including any third-party content contributors bound by contract and any third-party websites to which Phonovation websites link.

Collection and Use of Personal Information

- You can visit the websites of Phonovation without revealing any personal information. However, Phonovation needs certain personal information if you wish to purchase our products, register for an affiliate account, receive Phonovation newsletter, or use certain Phonovation services.
- Where required, this information may include your personal contact information and/or your company contact information. Phonovation will use this information to reply to your inquiries, to provide you with requested products and services, to set up your member's account, and to contact you regarding new products and services or provide support.
- By accessing the services of Phonovation and voluntarily providing us with the requested personal information, you consent to the collection and use of the information in accordance with this privacy policy.

Collection and Use of Non-Personal Information

- Phonovation automatically receives and records non-personal information on our server logs from your browser including your IP address, cookie information and the page you requested. Phonovation may use this information to customize

the advertising and content you see and to fulfill your requests for certain products and services. However, Phonovation does not connect this non-personal data to any personal information collected from you.

- Third party cookie usage is subject to their own privacy policies, and Phonovation assumes no responsibility or liability for this usage.

Information Sharing and Disclosure

- Phonovation may disclose your personal information to third parties who work on behalf of Phonovation to provide products and services requested by you. We will share personal information for these purposes only with third parties whose privacy policies are consistent with ours or who agree to abide by our policies with respect to personal information
- Phonovation may otherwise disclose your personal information when:
 - We have your express consent to share the information for a specified purpose;
 - We need to respond to compliance and regulator queries, court orders or such other legal process;
 - We need to protect the personal safety of the users of our websites and services or defend the rights or property of Phonovation;
 - We find that your actions using our services or websites violate the Phonovation Terms of Use document or any of our usage guidelines for specific products or services.

Display Advertising

- Phonovation has implemented Display Advertising and uses Remarketing with Google Analytics to advertise online. It means that third-party vendors, including Google, show our ads on sites across the Internet.
- Phonovation along with third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on your past visits to our website.
- If you want to opt-out of Google Analytics for Display Advertising, just customize Google Display Network ads using the [Ads Settings](#) or using [Google Analytics Opt-out Browser Add-on](#) that will instruct the Google Analytics JavaScript not to send any information about the website visit to Google Analytics.

Consent

- If you do not consent to the collection, use or disclosure of your personal information as outlined in this policy, please do not provide any personal information to Phonovation. If you have provided personal information to Phonovation and no longer consent to its use or disclosure as outlined herein, please notify Phonovation at privacy@phonovation.com.

Security

- Unfortunately, no data transmission over the Internet can be considered 100% secure. However, your Phonovation Information is protected for your privacy and security. In certain areas of our websites and services, as identified on the site, Phonovation uses industry-standard SSL-encryption to protect data transmissions.
- We also safeguard your personal information from unauthorized access, through access control procedures, network firewalls and physical security measures.
- Further, Phonovation retains your personal information only as long as necessary to fulfil the purposes identified above or as required by law.

Changes to this Privacy Policy

- Phonovation may at any time, without notice to you and in its sole discretion, amend this policy from time to time. Please review this policy periodically. Your continued use of Phonovation services and websites after any such amendments signifies your acceptance thereof.

Questions or Suggestions

- If you have questions or suggestions about this privacy policy, or your own personal information, please e-mail us at privacy@phonovation.com.