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## NEC UNIVERGE® BLUE PRIVACY POLICY

In this Privacy Policy, NEC Canada, Inc. or the reseller of Services (“Office Connection Peterborough Ltd.”) means the entity that is providing you services and with whom you entered into the Master Service Agreement described below. Note that Office Connection Peterborough Ltd.’s licensors, vendors and service providers may act in Office Connection Peterborough Ltd.’s place with respect to any portion of this Privacy Policy.

### WHAT IS THE PURPOSE OF THIS PRIVACY POLICY?

Office Connection Peterborough Ltd. created this Privacy Policy to demonstrate our firm commitment to the privacy of our customers, private label resellers, affiliates and visitors to our websites and mobile applications. This Privacy Policy sets forth our practices regarding the gathering and dissemination of Personal Information (as defined below).

### HOW DOES OFFICE CONNECTION PETERBOROUGH LTD. DEFINE “PERSONAL INFORMATION” UNDER THIS PRIVACY POLICY?

In this Privacy Policy, “Personal Information” means any information about an identified or identifiable individual. Personal Information is collected, obtained or otherwise processed by Office Connection Peterborough Ltd. in the following situations:

- Through access to or use of Office Connection Peterborough Ltd.’s websites; and
- Through the submission of information by prospective customers, private label resellers or affiliates to Office Connection Peterborough Ltd. for purposes of receiving more information about our services; and
- When a new customer, customer ownership partner or affiliate of Office Connection Peterborough Ltd. creates a Office Connection Peterborough Ltd. account; and
- When a new customer, private label reseller or affiliate of Office Connection Peterborough Ltd. purchases our services (the “Services”), including as the term “Services” may be defined in your Master Service Agreement, Customer Ownership Partner Agreement, Agency Partner Agreement, Revenue Share Partner Agreement



- or other agreement with Office Connection Peterborough Ltd. (the “Agreement”); and
- When a current customer or affiliate of Office Connection Peterborough Ltd. uses our platform or Services or contacts our customer service or technical support team. Personal Information may include Data when defined in the Agreement.

We define “Personal Information” in accordance with applicable laws (including without limitation the California Consumer Privacy Act, or CCPA, or The Privacy Act (Canada)).

If you have an Agreement with Office Connection Peterborough Ltd., any conflict or inconsistency between this Privacy Policy and Office Connection Peterborough Ltd.’s confidentiality obligations to you under the Agreement shall be resolved in favor of the Agreement.

By visiting our websites, creating a Office Connection Peterborough Ltd. account, purchasing Services, or using our platform or Services, you accept the practices set forth in this Privacy Policy.

#### WHAT IS THE SCOPE OF THIS PRIVACY POLICY?

This Privacy Policy only covers Personal Information collected by Office Connection Peterborough Ltd.. Office Connection Peterborough Ltd.'s websites may contain links to third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that Office Connection Peterborough Ltd. does not accept any responsibility or liability for these policies. Please check the applicable third-party privacy policies before you submit any data to such third-party websites.

#### WHAT ARE Office Connection Peterborough Ltd.’S GUIDELINES REGARDING CHILDREN?

Office Connection Peterborough Ltd. requires that all account holders be 18 years of age or older. In addition, our websites and Services are not designed for or directed to children under the age of 13, and Office Connection Peterborough Ltd. does not knowingly collect or maintain Information about any person under the age of 13. If you believe Office Connection Peterborough Ltd. has collected any Information from or about any person under 13, please contact us via the contact information set forth on Office Connection Peterborough Ltd.’s website or in the Agreements.

#### WHAT ABOUT MY USE OF Office Connection Peterborough Ltd. FORUMS?



Office Connection Peterborough Ltd. may make chat rooms, forums, message boards, news groups and similar media, including social media, available to you. Please remember that any information that is disclosed in these areas may become public and you should exercise caution when deciding to disclose any Personal Information in any of these areas.

#### WHAT KIND OF INFORMATION DOES Office Connection Peterborough Ltd. COLLECT?

Office Connection Peterborough Ltd. may collect the following information, which may include Personal Information:

- Personal Information that you voluntarily provide when using our websites or Services, including contact information (e.g., email address, name, telephone number, home or work address, and ZIP code) and billing information (e.g., credit card number, bank account number and billing address);
- Personal Information that is generated through your actions by using our Services, which is collected, used and processed by Office Connection Peterborough Ltd. solely for the purpose of delivering the Service to you;
- Technical standard information sent by your browser during visits to our websites or your use of our Services, including IP address, the type of device being used, your device's operating system, location information, language preference and browser type;
- Information about general usage of our website collected by using a cookie file which is typically stored on the hard drive of your computer. Please see the "How Does Office Connection Peterborough Ltd. Use Cookies" section below for a further explanation; and
- Office Connection Peterborough Ltd. may collect one or more of the following categories of Personal Information (as such categories are defined or interpreted for purposes of the CCPA, The Privacy Act (Canada) or other applicable law): identifiers; customer records information; characteristics of protected classifications under Canadian law; commercial purchasing information; internet or network activity; geolocation data; professional or employment-related information; education information; and inferences drawn from Personal Information.

#### HOW DOES Office Connection Peterborough Ltd. USE COOKIES?



When you access our websites or our Services, we may send one or more cookies (and/or similar technologies) to your computer. By sending you cookies with values that are unique, we may be able to uniquely identify your web browser or device when you access our websites or our Services. We may use both “session” and “persistent” cookies to collect, store, and sometimes track various types of information. A session cookie is one that is intended to disappear after you close your browser. A persistent cookie remains after you close your browser (and may be used by your browser to identify itself when you later return to our websites or Services). Persistent cookies generally can be removed. We use cookies to retain your session states and to offer you a personalized experience on our websites and Services. You can review the “Help” file in your browsers or mobile devices to learn the proper way to modify your cookie settings. Please be aware, however, that the use of cookies is necessary for the use of the administrative control panels and certain other aspects of our websites and Services.

#### **INTEREST-BASED ADVERTISING**

When you visit one of our websites, advertising companies such as Google may place a cookie or similar technologies on your computer and may collect certain information about your use of our websites. These companies may use this information, as well as information they collect from your use of other websites, to display advertisements on the Internet about products and services they believe you may be interested in. You can learn more about this practice, and can learn about your choices with respect to the use of this information about you for customizing advertisements, at [www.aboutads.info/choices](http://www.aboutads.info/choices).

#### **“DO NOT TRACK” NOTICE**

There is no accepted standard on how to respond to Do Not Track (DNT) signals, and we do not respond to such signals. You can learn about DNT at [www.allaboutdnt.com](http://www.allaboutdnt.com).

#### **HOW DOES Office Connection Peterborough Ltd. USE, STORE AND RETAIN INFORMATION?**

Office Connection Peterborough Ltd. may use, store and retain information, which may include Personal Information, in the following ways:

- To provide you with information regarding the status of your account, to determine your tax status, and to bill you for our Services;



- To operate, provide and maintain the Services, including providing you with information and Services that you request from Office Connection Peterborough Ltd., delivering customer service or technical support, and carrying out Office Connection Peterborough Ltd.'s obligations arising from any agreement entered into between you and Office Connection Peterborough Ltd., including the Agreement;
- To manage our existing and prospective relationships with customers, resellers, distributors, vendors, service providers and affiliates, including accounting, auditing, billing and fee collection;
- To administer, test, analyze and improve Office Connection Peterborough Ltd.'s Services and to facilitate marketing services by Office Connection Peterborough Ltd. and its marketing partners, including providing you with information about available Services and related products and services;
- To gather broad demographic and statistical information, and other de-identified or aggregated information, which Office Connection Peterborough Ltd. may use for purposes such as understanding broad demographic trends and statistical information;
- To notify you about changes to the Services, welcome letters, billing reminders, technical notifications and security announcements;
- To comply with applicable legal requirements, industry standards and Office Connection Peterborough Ltd.'s procedures and policies, to enforce our Agreements, and to defend our legal rights; and
- For other purposes to which you may provide your consent.

#### HOW DOES Office Connection Peterborough Ltd. SHARE INFORMATION?

Office Connection Peterborough Ltd. may disclose your information, including Personal Information, as follows:

- To entities within the Office Connection Peterborough Ltd.'s group and third-party business partners, consistent with the purposes described above;



- Billing information to organizations such as VeriSign, PaymentTech, Signio, CyberCash, Forte and similar organizations, who process billing information on our behalf;
- In de-identified or aggregated form to third parties, such as usage information to our service and license providers for licensing compliance, licensing usage calculation, billing and support purposes; or
- To vendors and contractors retained in connection with the provision of the Services or support of Office Connection Peterborough Ltd.'s business. For example, Office Connection Peterborough Ltd. may use service providers to measure Service usage and Service performance metrics; monitor security aspects of our Services and infrastructure; provide data storage services; and deliver customer service or technical support. Office Connection Peterborough Ltd. will only release information that is needed to deliver the service for which the third-party vendor has been contracted. These vendors are required to maintain strict security and confidentiality of the information and are prohibited from using it for any other purposes other than in accordance with Office Connection Peterborough Ltd.'s instructions and policies.

In addition, Office Connection Peterborough Ltd. may access and release your information, including Personal Information, under the following circumstances:

- In response to subpoenas, warrants, government inquiries, court orders, or legal process, including to meet national security or law enforcement requirements; or to establish or exercise our rights to defend against legal claims, in each case if Office Connection Peterborough Ltd. believes doing so is required or appropriate;
- If we obtain your consent or permission to disclose or release your information, which we may obtain in various ways. For example, Office Connection Peterborough Ltd. may present you with an "opt-in" prompt when you access our websites or Services (including our administrative control panel);
- If we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, safety of person or property, violation of our policies, or as otherwise required by law (this includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction); and



- If Office Connection Peterborough Ltd., any of its websites or Services or a related asset or line of business is acquired by, transferred to, or merged with another company.

## IS MY PERSONAL INFORMATION SECURE?

Office Connection Peterborough Ltd. takes reasonable steps in an effort to ensure that your Personal Information is treated securely and in accordance with this Privacy Policy and requires its suppliers to do the same. Office Connection Peterborough Ltd. maintains administrative, technical and physical safeguards that are intended to appropriately protect Personal Information against accidental or unlawful destruction, accidental loss, unauthorized alteration or access, misuse, and any other unlawful form of processing of the Personal Information in our possession. Your contact and financial information is submitted via a secure (HTTPS) connection and stored in the Office Connection Peterborough Ltd. database protected by a firewall. Any payment transactions will be encrypted using SSL technology.

Although Office Connection Peterborough Ltd. uses reasonable efforts to protect your Personal Information, transmission via the Internet is not completely secure. Therefore, Office Connection Peterborough Ltd. cannot guarantee the security of your Personal Information transmitted using our websites or Services, and any transmission is at your own risk.

## YOUR RIGHTS AND CHOICES

You have the right to request that Office Connection Peterborough Ltd. not contact you or use your Personal Information for purposes which are not reasonably necessary for the administration of our websites and/or the provision of Services. If you wish to exercise this opt-out right or to terminate your account, please contact Office Connection Peterborough Ltd. by e-mail (at such address as is provided on Office Connection Peterborough Ltd.'s website or in the Agreement) or access any available termination or opt-out features in the administrative control panel for your Account.

Where required under applicable law, we will only send you marketing communications with your consent. When you receive marketing communications from us, you may indicate a preference to stop receiving further communications from us, and you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the communication you receive.



Please note that you cannot unsubscribe from certain correspondence from us regarding our provision of Services to you, including messages relating to your Account, unless you stop using our Services. In addition, certain information may be required in order to use our websites or Services; as such, the only practicable method to opt out of providing information in connection with the use of those websites or Services would be to refrain from subscribing to or using those websites or Services.

If you have any questions about this Privacy Policy, the privacy practices of our websites or Services, or your dealings with our websites or Services, please feel free to contact us.

You may also revise your contact and financial information or terminate your account through the administrative control panel for your Account.

#### YOUR DATA PROTECTION RIGHTS (CALIFORNIA)

If you are a California resident, you may submit a verifiable request for information, no more than twice within a 12-month period, regarding the: (1) categories of Personal Information collected, transferred, or disclosed by us; (2) purposes for which categories of Personal Information are collected or transferred by us; (3) categories of sources from which we collect Personal Information; and (4) specific pieces of Personal Information we have collected about you during the past twelve months. In order to receive such a report, or to access, change, or delete any Personal Information, please contact Office Connection Peterborough Ltd. by phone, e-mail or mail or through our website (at such toll-free number, e-mail address, mailing address or web contact form as is provided on Office Connection Peterborough Ltd.'s website or in the Agreement).

#### QUESTIONS REGARDING THIS PRIVACY POLICY

For inquiries or complaints regarding this Privacy Policy, please contact Office Connection Peterborough Ltd. by e-mail or mail (in either case, at such address as is provided on Office Connection Peterborough Ltd.'s website or in the Agreement).

#### HOW IS THIS PRIVACY POLICY UPDATED?

Office Connection Peterborough Ltd. reserves the right to change this Privacy Policy at any time. Any changes to the Privacy Policy will be posted to at least one of our websites, including at <https://www.univerge.blue/legal>.





In the event that the changes materially alter your rights or obligations under this Privacy Policy, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address, if we have one on file, or generate a pop-up or similar notification when you access our Services or administrative control panel for the first time after such material changes are made. In addition, we will obtain your consent prior to any new uses of your Personal Information, as may be required by law.

Your continued use of our Services constitutes your acceptance of the terms of the Privacy Policy as amended or revised by us from time to time.

This document provides very important information about emergency 911 calling using the Internet phone service of Office Connection (“Office Connection Peterborough Ltd.”) as part of UNIVERGE BLUE® CONNECT. This document also describes the steps that you, as a customer of this service (“You”), should take to ensure Your safety and the safety of Your employees and visitors.

Capitalized terms used in this document but not otherwise defined have their respective meanings set forth in the Master Service Agreement between You and Office Connection Peterborough Ltd.. Note that this document is incorporated into the terms of Your Master Service Agreement and creates a legally binding obligation on You.