

## Privacy Notice

Effective Date: 20 December 2019

Blueface Limited (hereinafter referred to as “Blueface” “us” “we” or “our”) is dedicated to bringing a superior IP telephony experience to its customers. In providing that experience, Blueface is committed to respecting your privacy and to complying with all applicable data protection and privacy laws.

We acknowledge that the users of our services like to be briefed on what we do with their personal data. As a result, we have implemented this Privacy Notice. The objective of this Privacy Notice is to inform the users of our services how we and our authorised partners, affiliates, and agents process and store data, particularly your Personal Data, that we receive from or about the users of our services. We ask that you read the following carefully to understand Blueface’s approach and practices regarding data we collect. For purposes of this Privacy Notice, “Personal Data” is any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### Data We Collect

We may collect the following types of data from you:

- All data you choose to provide Blueface (e.g., name, address, telephone number, email address, payment details, and images);
- Your employee names, extension numbers, direct inward dials, and email addresses which are used to configure and maintain the Blueface system;
- Data about how you use our services such as data generated when you or your employees use our services to make a phone call (e.g., voice data, contact details stored in your address books, location data, and the content of voicemails, call recordings and facsimile transmissions);
- Data needed to transfer your existing telephone numbers to us, including your existing account number from your existing carrier as well as copies of your telephone bills; and,
- All data that may be collected using cookies or other technology when you use, access or interact with us via our website or other online services that we provide.

## Acquisition of Data

- All data will be obtained in a lawful, transparent and fair manner. We will make you aware of all purposes for which we intend to use your data at the time of collection.
- Data will be acquired, processed and stored in a manner that respects your legal rights and the legal rights of all data subjects.
- Data will be obtained with your express consent and may be provided to us by a third party or your employer.
- In some cases, we collect data to fulfill legal or contractual obligations, including data provided about a data subject from the data subject's employer.
- Data will be as accurate and complete as necessary to carry out the purposes described in this Privacy Notice, and, where necessary, kept up to date.
- Data will be adequate, relevant, and not excessive in relation to the purposes for which it was obtained.
- All acquisition methods (e.g., written forms or online forms) will have a clear data piece explaining any intended purposes.
- We may collect about you in different ways, including:
  - From your direct communication with Blueface, e.g., via fax, email or instant message;
  - Directly from you, such as where you are receiving services from us, directly or through the use of our third party service providers;
  - From forms you complete and submit to us (online and on paper);
  - From calls that may be recorded with your consent;
  - From voicemail messages that you leave with us;
  - From your employer, if they provide us certain details to assist in the configuration of the services or to create a user account for you;
  - From visits to the Blueface website through our use of cookies or similar technology;
  - From third parties, such as authorised resellers, wholesalers, partners, service providers, or your appointed representatives.

## Use and Processing of the Data We Collect

- Purposes for which we hold your data:
  - To communicate with you;
  - To provide, administer, manage and support the products and services we are providing to you;
  - To promote the safety and security of our products and services by investigating any suspicious activities or violations of our policies;
  - To personalise your visit to our website;
  - To track your movement through our website to better understand and improve our site;
  - To notify you of competitions, ezines, or other promotions;

- To provide you with marketing or product data;
- To notify you of any changes to our products and services;
- To provide data to our advertisers and business partners;
- For the performance of any request by or contract with you;
- For improvements to our products and services;
- For training of our employees and to help ensure the quality of your experience when contacting us; and
- As permitted or required by any law applicable to us or arising from your interaction with us.
- All data will be processed fairly and
  - in keeping with the purposes for which it was obtained,
  - to comply with legal or regulatory purposes,
  - to protect individual interests or our legitimate business interests, except when those interfere with your fundamental rights and freedoms.
- All such processing will take place in full compliance with all applicable laws.

## Disclosure of Data

- Data will not be used, disclosed or processed in any manner incompatible with the purposes for which it was obtained or in violation of your legal rights as a data subject.
- Disclosure of data will only be made to third parties who are our agents or servants acting on our directions.
- No disclosure of your data will be made to our affiliates or third parties for that parties' purposes or use, except as required by law (e.g., criminal investigations).
- Under no circumstances will lists of customer data/information (i.e., mailing lists or database information) be disclosed to a third party for that third party's exploitation or use without your express permission. Data may be legitimately given to our affiliates, servants or agents for legitimate purposes as described above. This may include the transfer of data to other jurisdictions for processing. In these circumstances, we will ensure that adequate contractual and technical safeguards are in place to protect your data.
- If data has been obtained for a purpose without advising you of other compatible secondary purposes for which it is subsequently to be used, the data will not be so used without advising you.
- We may disclose your data if we are involved with a merger, acquisition, reorganization or sale of assets or in the event of our bankruptcy.
- For our Irish-based customers, where you have agreed to be included in our directory enquiry list, certain portions of your information will automatically be included in the National Directory Database (NDD) currently hosted by Eir (as nominated by the Commission for Communications Regulation (ComReg)). We will automatically list you as preferring to receive direct telemarketing from third

parties. Contact us at [privacy@blueface.com](mailto:privacy@blueface.com) if you would like to amend this preference.

- We are an international organization, and as a result, we may transfer your data to parties located in other countries (including the United States and other countries outside of the European Union). By visiting our website, using our products or services, communicating with us in any manner, you consent to the collection, use, processing, and disclosure of your data in Ireland and the transfer of your data to other countries for use, processing, and disclosure of your data, but in all cases in a manner consistent with the terms of this Privacy Notice and applicable law.

## Retention of Data

- Data will be kept only for clearly stated and lawful purposes.
- Data will be kept, and in a manner that respects your legal rights as a data subject.
- Data will be kept for no longer than is necessary for the primary purpose for which it was obtained.
- Data will be retained for the period required or permitted by law.
- Some data that is not otherwise subject to retention for normal reasons may be retained for longer periods in exceptional circumstances, such as litigation or government investigation.

## Cookies

- We make use of cookies and other technologies when you are using our online services (e.g., Blueface Website / Blueface portal). For security purposes, cookies are used to maintain current session details (e.g., username, site preferences). These cookies reside in the temporary internet file of your device and are set to expire 30 minutes after your last action or when you elect to log off. Cookies with longer expiry dates may occasionally be used to store your display preferences.
- Depending on the type of browser you are using, you may be able to configure your browser so that: (i) you are prompted to accept or reject cookies on an individual basis or (ii) to prevent your browser from accepting any cookies at all. You should refer to the supplier or manufacturer of the web browser for specific details about cookie security.

## Access to your Data

- As provided by applicable law, you are entitled to copies of your data kept by us. Requests must be in writing and must be addressed to Blueface Privacy Team, Blueface Limited, 93/94 North Wall Quay, North Dock, Dublin 1, D01 V8Y6. Please quote your name, address and your Blueface Account Number (if applicable) when making such a request. We will take all reasonable steps to confirm your identity

before releasing the requested data. Upon your written request, we will undertake to supply copies of your data in user-friendly form.

- You can withdraw your consent to our processing of your data at any time. To “opt-out” of (a) any consents previously given to us by you, (b) receiving communications from us, or c) having personal data disclosed to third parties, please send an email to [privacy@blueface.com](mailto:privacy@blueface.com). Please quote your name, address and your Blueface Account Number (if applicable) when making such a request.
- Notwithstanding the above, Blueface retains the right to collect, maintain, and process data provided by you and collected about you on and through our website, and disclose this data to the extent required to comply with our reasonable business and legal obligations, including to provide our products and services.
- If you choose not to provide certain data to us, we might not be able to provide you with the products or services you require, or it may impact our ability to respond to your needs.
- Any complaints may be directed to the Data Protection Commissioner. Further information on your data privacy rights is located at [www.dataprotection.ie](http://www.dataprotection.ie).

## Data Security

- We are constantly reviewing and enhancing our technical, physical and managerial procedures and rules to protect your personal data from unauthorised access, accidental loss and/or destruction. We use industry standard secure sockets layer (SSL) technology, for example, to encrypt data we deem sensitive, such as your credit card and other financial data.
- Please be aware that communications over the Internet, such as emails or instant messages, are not secure unless they have been encrypted. For example, your emails or instant messages may route through a number of countries before being delivered – this is the nature of the Internet. We cannot accept responsibility for any unauthorised access or loss of personal data that is beyond our control.

## Children’s Privacy

- We care about the safety and privacy of children online. Accordingly, we comply with the Children’s Online Privacy Protection Act of 1998 (COPPA). COPPA, and its accompanying regulations, protect the privacy of children using the internet. We do not knowingly contact or collect data from persons under the age of 18. Our website is not intended to solicit data of any kind from persons under the age of 18.



- It is possible that we could receive data pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the data, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that data or, if we are unable to obtain such parental consent, we will delete the data from our servers. If you would like to notify us of our receipt of data about persons under the age of 18, please do so by sending an email to [privacy@blueface.com](mailto:privacy@blueface.com) or by sending a written request to the Blueface Privacy Team, Blueface Limited, 93/94 North Wall Quay, North Dock, Dublin 1, D01 V8Y6. Please quote your name, address and name of the person under the age of 18 when making such a request.

## Links to External Websites

- Our website may contain links to websites run by others. Our privacy notice applies only to the Blueface website and not to those to which we may link. Those websites are not controlled by us and may have their own privacy notices. We are not responsible for these external Websites and their privacy policies and practices. It is recommended that you check the privacy notice of that external site before you decide to view or use it.

## General

- If you have any query about Blueface's Privacy Notice or practices, please write to Blueface Privacy Team, Blueface Limited, 193/94 North Wall Quay, North Dock, Dublin 1, D01 V8Y6 or send an email to [privacy@blueface.com](mailto:privacy@blueface.com).
- This notice should be read in conjunction with the terms and conditions that apply to your use of Blueface's products or services where more details of the use we make of your data are outlined. This can be found at <https://www.blueface.com/terms-and-conditions-of-service/>.

## Changes to our Privacy Notice

- We may update and amend our Privacy Notice from time to time.
- Where we make minor changes to our Privacy Notice, we will update our Privacy Notice with a new effective date stated at the beginning of the notice. Our processing of your data will be governed by the practices set out in that new version of the Privacy Notice from its effective date onwards.
- Where we make major changes to our Privacy Notice or intend to use your data for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

