

Privacy Notice

Effective Date: December 12, 2023

Last Updated: December 12, 2023

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. Please read this notice in conjunction with the terms and conditions that apply to your use of Blueface’s products or services. This can be found at <https://www.blueface.com/terms-and-conditions-of-service/>. For the purposes of European data protection law, the data controller of the Sites is Blueface Limited. A data controller is responsible for determining why your data is collected and how it is processed. Our address is 193/94 North Wall Quay, North Dock, Dublin 1, D01 V8Y6 12th Floor.

The objective of this Privacy Notice is to inform the users of our services how we and our authorised partners, affiliates, and agents collect, use, disclose, retain, and protect your Personal Data. We ask that you read the following carefully to understand Blueface’s approach and practices regarding the handling and use of Personal Data. For purposes of this Privacy Notice, “Personal Data” is any information relating to an identified or identifiable natural person (including business contacts); 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.

Personal Data We Collect And How We Collect It

Personal Data you provide directly to us. You may provide your Personal Data in a variety of situations, including when you sign up for a Blueface account, contact us, sign up to receive communications from us, purchase a product or service, submit a customer service request, provide us feedback or survey responses, or otherwise use any of our services. Personal Data you provide may include:

- Identifiers and contact information, such as your or your business name, email address, mailing address, phone number, etc.
- Demographic information, such as your gender, birth date, and age;
- Billing and payment information, such as your or your business credit card number, bank details and billing address;
- Employment information, including your employer and job title and any information 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;
- Government identifiers, such as your passport, driver’s license, or other proof of address you may submit (e.g. utility bill);
- Blueface account information, including your user name, account number, and password;
- Voice recordings from calls that may be recorded with your consent and voicemail messages associated with your account;
- Your general location, using your ZIP code (or Eircode/Postcode) and IP address;
- Your marketing preferences;
- Other information that you submit, post, or otherwise choose to share with us;
- Your employee, contractor, and other workforce members’ name, extension number, direct inward dials, and email address which are used to configure and maintain the Blueface system;

- Information 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);
- Information 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 Personal 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.

Personal Data Collected Passively. Blueface, our business partners, and our service providers may use technologies that passively collect device, Internet, and network activity data, including information about how you interact with our services, emails, advertising, and content (“Usage Data”). Usage Data may include: (i) your device ID and IP address, which is a unique set of numbers assigned to your computer by your Internet Service Provider (“ISP”); (ii) the type of browser and operating system you use; (iii) your device identifiers, MAC address, and the IP address of your home router; and (iv) the physical location of your device (as determined, for example, using satellite, cell phone tower, and WiFi signals).

We may collect other information about your online session, such as the URL you came from to get to our Website(s) and the date and time you visited our Website(s), the sites you visit when you leave us, and the method you used to browse away from the page. We may also collect and record Website page and App interaction information and other electronic communications and content from your use of the Website and/or App. This might include the date, time, and location of your visit; the areas of the Website and App you visit and for how long; what search terms, contact information, or other data you enter; mouse movements; screen captures; and the products, content, or links you view and click. When we associate this information with you, we will treat it as your Personal Data.

Our Websites and Apps use certain tracking technologies, known as “cookies” to collect Personal Data, including Usage Data. We may combine Usage Data with other Personal Data we have about you. A cookie is a small text file that is stored on a user’s computer for record-keeping purposes. We use cookies to improve your experience on our Websites, such as to allow you to return to the Website more easily, save your language preferences, or target advertising to you. We may allow third parties to collect and combine information on our Websites and Apps this way. Cookies that categorized as necessary are stored on your browser as they are essential for the working of basic functionalities of the website. We also use third-party cookies that help us analyze and understand how you use this website and cookies that track your behaviour on the websites to provide more relevant advertising that is tailored to your interests as well as to measure the performance of advertising campaigns. These analytics and advertising cookies will be stored in your browser only with your consent. You also have the option to opt-out of these cookies, when you visit our website and select your cookie preferences. But opting out of some of these cookies may have an effect on your browsing experience.

Your Internet browser may provide you with the ability to delete cookies. If you limit or reject cookies, your ability to use our Websites may be limited. For more information regarding our use of cookies and how to opt-out of our use of certain cookies please click the Privacy and Cookies Policy tab at the bottom of our homepage.

Data provided from other parties. We may receive Personal Data about you from our vendors and other third-party sources, including commercially available sources, social media platforms, and providers of third-party products or services. We may combine Personal Data we receive from third parties with other Personal Data that we have collected.

Other information. We may de-identify or aggregate Personal Data and Usage Data to create Other Data. We use Other Data for a variety of purposes, including to understand our customers and improve our products and services.

How We Use The Data We Collect

Personal Data. We use Personal Data for our business purposes to: communicate with you; provide, administer, manage and support the products and services we are providing to you; promote the safety and security of our products and services by investigating any suspicious activities or violations of our policies; personalise your visit to our website; track your movement through our website to better understand and improve our site; notify you of competitions, ezines, or other promotions; provide you with marketing or product data; notify you of any changes to our products and services; 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.

We also use Personal Data with your consent to send marketing and to offer products and services. These offers may be customized for you based on your Personal Data, including your interests, preferences, and inferences about you. We may use Personal Data to serve you targeted ads about products and offers. We may also use your Personal Data to better understand what products and services interest you and in other ways we notify you about at the time we collect your Personal Data.

We also use Personal Data to comply with our legal obligations.

Other Data. We may use Other Data for any purpose, unless prohibited by law. Where Other Data is combined with Personal Data, we will treat this combined information as Personal Data as long as it stays combined.

Data Sharing

We may share Other Data with other parties for any purpose, unless prohibited by law. We may also share your Personal Data in the following circumstances:

- **With Our Service Providers and Vendors.** We may share your Personal Data with our service providers and vendors to enable them to provide services to us (such as data analysis, marketing, surveys, data hosting, information technology, payment or loan processing, customer support, advertising services, email delivery, and auditing).
- **With Business, Social Platforms, and Advertising Partners.** We may share your Personal Data with companies that market or provide products and services on our behalf, unless you opt out from our marketing communications or, where otherwise required by law, when you have consented. If you choose to log into a Blueface account through a social networking or authentication service, Blueface and that service may share certain information with each other about you and your activities. Additionally, with your consent, we may share your Personal Data with other parties to allow them to send you marketing communications about their own products and services. Cookies and tracking technologies may be used on our services, which allows us and advertising networks, social media companies, and other providers to place or display ads relevant to you on our services, as well as on other websites, apps, services, and devices you may use. Many social media and advertising platforms (including Google and Facebook) allow you to configure your ad settings through your account on their platforms. You may also opt out of our sharing for these purposes by contacting us using the information in the “Contact Us” section of this Privacy Notice.
- **Legal Disclosure.** We may use or disclose Personal Data or Other Data as we believe necessary: (1) if we determine a policy violation has occurred, to enforce our rights, or to enforce our Terms of Use; (2) if we believe such disclosure is necessary to identify, contact, or bring legal action regarding the rights and property of Blueface or its affiliates; (3) to enforce our rights or protect against unauthorized access to our systems or other inappropriate use of our services or products; (4) to comply with laws, regulations, court

orders and subpoenas or similar requests for information by authorities; (5) to protect your safety and the safety of others; and (6) to assist us in fraud prevention or investigation.

- **Business Transfer.** We may disclose Personal Data or Other Information in connection with a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

Personal 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. 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). Disclosure of Personal Data will only be made to third parties who are our agents or servants acting on our directions.

Under no circumstances will customer lists (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. Personal Data may be disclosed to our affiliates, servants or agents for legitimate purposes as described above. This may include the transfer of Personal Data to other jurisdictions for processing. In these circumstances, we will ensure that adequate contractual and technical safeguards are in place to protect your Personal Data.

For our Irish-based customers, where you have agreed to be included in our directory enquiry list, certain portions of your Personal Data will automatically be included in the National Directory Database (NDD) currently hosted by PortingXS (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 if you would like to amend this preference.

We are an international organization, and as a result, we may transfer your Personal Data to parties located in other countries (including the United States and other countries outside of the European Union). When we transfer your data to the United States or any other country that is not deemed "adequate" by the European Union or the UK's ICO, we do so using approved transfer mechanisms, including standard contractual clauses. As a subsidiary of Comcast Corporation, the BCR's enable Blueface and Comcast's other subsidiaries to make intra-organisational transfers of Personal Data across borders in compliance with EU data protection law

Your Individual Rights and Choices

Please note that you always have the right to request that we:

- Provide you information about how we use your Personal Data;
- Give you access to, and a copy of your Personal Data we hold in our systems;
- Stop contacting you;
- Correct, update or delete your Personal Data in our records;
- Stop using, and ensure that all of our service providers stop using, some or all of your Personal Data;
- Restrict the use of your Personal Data, in certain circumstances, or
- Note any violations of the Privacy Notice.

To initiate any of these actions please contact us at privacy@blueface.com; or following the removal or unsubscribe instructions in the communication that you receive.

Right to Lodge a Complaint. If you are in the EEA do not receive timely acknowledgment of your privacy-related request from us, or if we have not addressed your request to your satisfaction, please contact the appropriate Data Protection Authority in your jurisdiction for more information or to file a complaint. A list of the Data Protection Authorities can be found [here](#). The services of EU Data Protection Authorities are provided at no cost to you.

Data Security and Retention

We regularly review and enhance our technical, physical and managerial procedures and rules to protect your personal data from unauthorized 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.

We retain your Personal Data in accordance with applicable retention policies and for as long as it is reasonably necessary for the purposes for which the Personal Data was collected, or as otherwise required by law. The criteria used to determine our retention policies include the length of our relationship with you, your requests, ongoing obligations such as contracts and service offerings, and our legal obligations. As we operate a global business, we and some of our service providers may also access, process or store Personal Data outside of the country or state where you reside. As a result, this information may be subject to the law of that foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

Children's Privacy

We do not knowingly contact or collect Personal 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.

International Transfers

Our primary data centres are located in Europe We may transfer data to our affiliates in the USA. solely for security and other business purposes as described above. These data centres are used to store data that we receive from end-users. We comply with all applicable laws to protect the security of data during international transfer. Where applicable, we utilize the relevant data transfer mechanisms for all personal data received from European Union (EU) member countries, UK and Switzerland.

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 may appear as a be link on the Blueface website. 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

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 material changes to our Privacy Notice or intend to use your data for a new or different purpose than the purpose for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

Contact Us

If you have any questions about this Privacy Notice, please contact us by email at privacy@blueface.com, or please write to us at the following address:

Blueface Privacy Team
Blueface Limited
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North Dock, Dublin 1
D01 V8Y6