HPBX Application Privacy Policy

Effective: July 31st, 2024

MTC HPBX Application Privacy Policy

Protecting your privacy is important to MTC. This Privacy Policy ("Policy") describes how MTC collects, uses, discloses and safeguards the personal information you provide on MTC mobile apps or other software- and Internet-enabled programs and services sponsored by MTC (the "Sites") as well as information collected when you otherwise communicate or interact with MTC. The obligations and responsibilities set out in the Privacy Policy are in addition to any other applicable policies or agreements entered with MTC and any applicable laws and/or regulations. MTC only uses personal information as outlined in this Policy.

Note that in general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you if and where this is permitted by applicable data protection laws. During our relationship with you, we may collect information other than what is detailed in this Privacy Notice. If we ask you to provide information voluntarily then the personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information. If we obtain the information from other sources, then we will only do so where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

General Statement

MTC is dedicated to the use of Voice over Internet Protocol (VoIP) and related technologies to improve the telecommunications industry and the lives of individuals in the USA.

MTC's goal is to deliver carrier-grade communications services to all its clients, at a reasonable price and to make available all the benefits that VoIP offers as broadly as possible. In order to achieve this goal, a Privacy Policy is necessary.

Data Processor

MTC provides a technology platform for hosted or "cloud" unified communications as a service offering (UCaaS). These Products merely act as a conduit for data transmitted by third parties and subscribers. MTC processes personal information that is controlled by or originated from other companies, such as our clients or other business partners. MTC also processes personal information in the course of providing support for MTC communications products. MTC shall protect personal information, comply with all laws that regulate the processing of such personal information, and process the information only as authorized by the data controller or the data subject. Accordingly, MTC relies on guidance and direction of the client (as the data controller), who determines the purposes of processing such personal information. In some cases, MTC may collect and process personal information for our own business purposes and shall comply with the applicable privacy laws concerning MTC processing.

While MTC does process data in its role of providing a technology platform, it does not own, control or direct the use of any of the personal information stored or processed by any client or subscriber. MTC only processes such personal information in order to provide and invoice for purchased and/or subscribed Products and Services.

Information Collection

Information Collected Automatically

Each time you visit the sites, we may automatically collect certain types of information. Some examples of automatic information we may collect are as follows:

We may record your internet service provider's address, your internet protocol or IP address, your MAC address, your operating system, the web page from which you came, your web browser software, the type of handheld or mobile device used to link to the web page, and the language and time zone settings on your web browser.

We may collect a record of your activity or your "clickstream" while visiting the sites

We may use "cookies" of different types to recognize your computer. A cookie is a small text file that a website, online application, or e-mail may save to your internet browser and/or your computer's hard drive for use in subsequent visits to the Sites or other sites.

We may use web beacons, match scripts, pixel tags, or similar technologies that allow us to know if a particular web page was visited, an e-mail opened, links in the email utilized, or if the advertisements on the Sites or other sites were effective. In some instances, these technologies may allow us to match activities with particular users. Our mobile applications also may collect geo-location information, including from the GPS function on your mobile device. We may use this information in a variety of ways, including to improve our mobile services, and to offer products and services to you. You can optout of sharing your geolocation information by changing the settings on your mobile device. If you choose to opt-out, it may disable certain features of our mobile applications; and we may collect any information you enter, share or that can be obtained from your use of our apps, solicitations, or promotions.

Information Collected when acting as a Data Processor

When MTC acts as a data processor with regard to indirect end user personal identifiable information and our clients act as the data controller of such data. In the course of MTC's processing and protection of such data, all use will be in conformity with the data controller's instructions.

Images can optionally be attached to Chat or MMS messages. Should a user choose to send an image, images are transmitted securely via the MTC API and may be stored as part of the user's message history. This is not a requirement; the user must opt in to allow permission to upload the images they explicitly select.

Specifically, only when enabled via system permission on a MTC HPBX Android or MTC HPBX iOS application, MTC collects and stores personal contacts/phone numbers. When the user sends an SMS message to one of his/her phone contacts, or when the user initiates a call to one of his/her phone contacts, the phone number is sent securely through the MTC API. MTC does not store this number with

any other PII, and it cannot be directly or indirectly attributed to any person or persons; MTC stores only the phone number and pertinent metadata so as to be compliant with all applicable state and federal laws, and MTC does not share this data with any advertisers or third parties under any circumstances. A user can revoke phone contact access on his/her mobile device at any time, and his/her app experience is not hindered or interrupted.

MTC HPBX Android and iOS apps also use Gravatar, only when enabled via System Settings, which is a service that provides avatar images linked to an encrypted version of the user's email address. This means that, only when Gravatar use is enabled, we encrypt each contact's email address and send it to Gravatar to try and retrieve an avatar image. Encrypted email addresses cannot be directly or indirectly attributed to any person or persons, and we only send it to Gravatar, email addresses are never transmitted in plain text. As with phone contacts, a user can revoke Gravatar access at any time in System Settings, and his/her app experience is not hindered or interrupted.

Information You Give to Us

Personal Information

For customers who are individuals, we may collect any information, such as your first and last name, credit card number, email address, postal address, and telephone number that you provide when you interact with MTC. Some examples are when you: Make an online request or purchase our service thru an authorized re-seller or directly from MTC.

Correspond or communicate with us by phone, e-mail, or otherwise.

Register or create an account on the Sites; Participate in an online survey; Use our mobile apps; Sign up for information; Sign up for email and/or SMS news and alerts; or Use social media to interact with us, or to share something from our Sites with others, we will receive information about what you share and other details that may be based on your social media privacy settings.

Business Contact Information:

MTC may collect and use personal information about individual contacts of clients and others who access MTC public websites, knowledge bases, forums, ticket systems, or provide personal information through other means. Such information may include but is not limited to account information, first/last name, company name, title, and responsibilities, work email address, work mailing address, telephone numbers, login information, device identifiers, as well as additional information provided by such individuals in the course of receiving Products and Services from MTC and/or requesting information about MTC. We will use such information for the purposes of providing Products and Services, support, conducting data analytics and product assessments and related activities, and providing information regarding MTC Products and Services.

Customer Proprietary Network Information (CPNI):

Customer Proprietary Network Information (CPNI) may include information regarding quantity, destination, technical configuration, location, amount of use and related billing information of telecommunications, interconnected and/or non-interconnected Voice over Internet Protocol (VoIP) services. This may include but is not limited to the phone numbers that you call or send messages to (or the phone numbers that you receive these calls and messages from) through our Products and

Services. The date, time and duration of the calls may also be collected. This data is used for billing and service level assurance.

MTC provides Products and Services that are primarily for the benefit of Clients and Subscribers in that MTC transmits, routes, switches or caches information. These Products and Services merely act as a conduit for data transmitted by third parties and Subscribers. MTC does not determine the purposes and means of processing this personal information. Except for Subscriber data provided by the Client (the Subscribers service provider) for which MTC is merely providing a conduit for transmission, the subscribed services are of such a nature that, in most instances, MTC requires and collects only essential CPNI and billing information; and opting out or declining to provide the requested data may hinder the provision or delivery of subscribed services. However, for CPNI data that is collected by MTC that is not subject to the control of others, MTC shall obtain consent from the user for the processing of this data.

MTC collects end-user CPNI in the course of providing Product support. This data may pertain to Clients of MTC or Subscribers (eg: end users of MTC VIP or other direct Clients). This data may include IP address, telephone number, email address, call detail records, call recordings and other information sufficient to identify an individual end user.

Indirect End User's CPNI:

MTC acts as a data processor with regard to indirect end user personal information and our clients act as the data controller of such data. In the course of MTC processing and protection of such data, all use will be in conformity with the data controller's instructions.

Direct End User's CPNI:

MTC typically collects and processes direct end user (eg: Clients, vendors, and partners) personal information for the purposes of providing Products and Services, support, conducting data analytics and managing product performance.

Messaging, Voicemail, Video and Media Files:

MTC provides Products and Services that facilitate the recording and storage of audio and video by way of features such as but not limited to voicemail, call and conference recording. Users may elect to store or record personal information within these resources at their discretion.

Anonymized, Non-Identifying Voice and Traffic Data

MTC may use anonymized, non-identifying data collected from use of our MTC HPBX Products and Services. This anonymized, non-identifying data may be used to enhance such items, but is not limited to, voice activation, improve traffic analysis algorithms and techniques, and recognition algorithms. This processing is executed under applicable terms and supports MTC's legitimate interests in tuning, maintaining and enhancing these Products and Services.

Combined Information

Information you provide directly to MTC thru our sites or thru purchasing our services, as well as information about your interests and purchases we collect automatically. The information you provide to

MTC may also be combined with demographic and other information that is available from other sources in order to allow MTC to better communicate with you and enhance our customer experience and make relevant offers to you.

Other Sources

We may receive your personal information from other parties. From time to time, we may receive personal information about you from third party sources (including third party websites, data brokers, or credit reference agencies), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include biographical information about you/your company your job role or marketing information; we use the information we receive from these third parties to help us market our products and services to you, or otherwise develop and improve our products and services.

Do Not Track

Do Not Track (DNT) is a privacy preference that users can set in some web browsers, allowing users to opt-out of tracking by websites and online services. At the present time, the World Wide Web Consortium (W3C) has not yet established universal standards for recognizable DNT signals, and therefore, MTC does not recognize DNT.

Information Use

We may use information about you for purposes described in this Policy or disclose it to you on the Sites. For example, we may use information about you to:

Send you updates on the latest MTC news, including information about new products, services, and offers that may be of interest to you including co-branded offers and partner offers.

Process and manage your purchase and use of MTC products and services, including your accounts and program participation, to provide technical support and respond to Client inquiries, to prevent fraud or potentially illegal activities, enforce our other agreements with you.

Respond to your customer experience inquiries, post your comments or statements on any blog or other online forum maintained on our website and other websites, or take other actions in response to your inquiries or other website activities.

Communicate with you about your orders or purchases, your services, accounts and program participation, product recalls that may affect you, and your requests for information.

Learn more about our customers so that we can develop better products and services.

We participate in interest-based advertising and we or others may use information about you to deliver to you or allow you to see certain advertising based on your interests, searches you perform, the information you provide, or your activity on the Sites or other websites.

MTC may also use this information to analyze and manage its businesses. Aggregate or combined data is collected from online and offline facilities and may be used to enhance the ability of MTC to communicate with you and to support business functions such as internal business processes, marketing, authentication, customer experience, fraud prevention, and public safety and legal functions.

We will retain your information for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes, and enforce our agreements.

Opt-Out

If you provide us with your email or postal address or have done so in the past, we will ask you if we can use it to send you updates on the latest MTC news. If you do not want us to contact you, you can choose to "opt-out" when you submit your information from any form on our website or you can reach out to support@mtc4me.com, and MTC will respect your wishes.

If you opt-out of receiving promotional communications from us whether online or on your mobile device, we may still send you non-promotional communications such as emails about your MTC account, if you have one, or our ongoing business relations.

Sharing Your Personal Information

With Third Parties

Personal information collected by any part or department of MTC will be used in accordance with this Privacy Policy and may be shared with other parts or departments of MTC and with our business partners, including third parties, for use in accordance with this Privacy Policy.

MTC does not currently share your information but reserves the right to share your personal information with third parties, including as set forth below.

With Other Parts of our Business and our Business Partners

With our Service Providers MTC may share your personal information with companies that provide support services to us. Some examples of things service providers may do that may involve your personal information are: Authorization of credit card and check transactions, and cobranded or joint product and service promotions.

Developing, hosting, or maintaining the Sites on behalf of MTC.

Warehousing products, order fulfillment, and shipping services on behalf of MTC or on your behalf and at your request.

Aggregating customer information and/or improving customer experience. We may then share such aggregated information with prospective marketing partners and advertisers.

Marketing our products and services (such as email vendors).

These service providers could be granted access to some or all of your personal information as necessary and may use cookies (as defined above and below) or other automatic collection technology on our behalf. The service providers are contractually restricted in the ways they may use your personal information.

We may disclose or report information that individually identifies clients, subscribers or devices in certain circumstances, such as:

(i) if we have a good faith belief that we are required to disclose the information in response to a valid legal process (for example, a court order, search warrant or subpoena, or to defend or respond to legal actions, and as otherwise authorized by law, or in response to lawful requests by public authorities, including to meet national security or law enforcement requirements); (ii) to satisfy applicable laws, (iii) if we believe that the Products and Services are being used in an unauthorized, unlawful or abusive manner, such as to commit a crime, including to report such criminal activity or to exchange information with other companies and organizations for the purposes of fraud protection and credit risk reduction, (iv) if we have a good faith belief that there is an emergency that poses a threat to the health or safety of a person or the general public, (v) in order to protect the rights or property of MTC, including enforcement of our Intellectual Property Rights and terms of the Agreement(s), and (vi) for all other purposes with your consent. We may also provide your information to third party companies to perform services on our behalf, including but not limited to payment processing, data analysis, message delivery, hosting services, customer service, and marketing.

If MTC enters into a merger, acquisition or sale of all or a portion of its assets or business, Client and Subscriber information, including personal information, will also be transferred as part of or in connection with the transaction as per applicable law.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

Disclosure of Your Information for Third-Party Advertising. If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out when you submit your information from any form on our website or by sending us an email with your request to support@mtc4me.com.

Promotional Offers from the Company. If you do not wish to have your information used by the Company to promote our own or third parties' products or services, you can opt-out by when you submit your information from any form on our website or you or by sending us an email with your request to support@mtc4me.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.

Targeted Advertising. If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out when

you submit your information from any form on our website or by sending us an email with your request to support@mtc4me.com.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt-out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website thenai.org.

Security of Your Information

We implement security measures we believe are reasonable to protect your information. It is important that you protect and maintain the security of your account and you need to immediately notify us of any unauthorized use of your account. Remember, no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot and do not guarantee its absolute security.

Protecting Personal Information

To help protect the confidentiality of personal information, MTC employs security safeguards appropriate to the sensitivity of the information and in accordance with this Privacy Policy. These safeguards include reasonable administrative, technical and physical measures to safeguard the confidentiality and security of personal information against anticipated threats and unauthorized access to personal information. No transfer of your personal information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information. Additionally, we convey safeguard obligations to our agents who receive personal information from or on behalf of MTC in the course of their relationship with our organization as described above in the section titled External Disclosure.

Transfer of Data

Your information, including personal information, may be transferred to, and maintained on, computers, servers or other data storage located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you reside outside the United States and choose to provide information to MTC, please note that we transfer the data, including personal information, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Retention of Data

Personal information collected by MTC will be retained for as long as necessary and legally permitted for the purposes for which it was collected, to provide you with Products and Services, enforce our legal agreements and policies and to conduct our legitimate business interests or where otherwise required by law.

Cookies

MTC websites may use cookies to collect certain kinds of personal information about Subscribers or users. For more information on how MTC uses cookies and choices available to Subscribers and users please refer to the following section.

How We Collect Information

We collect information in various ways, including the following:

When you use one of our Products or Services, MTC collects, and stores certain information that you provide directly. We also collect information about your use of the Products and Services.

Cookies and Similar Collection Methods

MTC also collects technical information about your usage of the Products and Services, and we use various technologies to collect information about cookies, IP addresses, device type and device identifiers, application state and the date and time of activity with our Products and Services, and other similar information. MTC may associate this information with your user identification and/or account number for our internal use.

Other Passive Site Tracking

Websites may also utilize Internet Protocol (IP) addresses and log files to identify network and server concerns and problems. MTC also utilizes web beacons and other passive tracking mechanisms to perform standard website traffic analysis in a similar manner to how we utilize cookies.

Credit Card Information

MTC only collects credit card information in order to bill for purchased or subscribed to Products and Services. MTC utilizes third-party credit card payment processing agents (where these agents are required to implement reasonable and appropriate measures to protect and secure this information from loss or misuse) solely for the purpose of processing payments for those Products and Services purchased or subscribed to. These payment processors use of your personal information is governed by their privacy policies, as well as adhering to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like American Express, Visa, Mastercard, and Discover.

HOW DOES MTC UTILIZE COOKIES

General Information about Cookies

A cookie (also known as an HTTP cookie, web cookie, or browser cookie) is a small piece of data sent from a website and stored in a user's web browser while the user is browsing that website. Every time the user loads the website, the browser sends the cookie back to the server to notify the website of the user's previous activity. Cookies were designed to be a reliable mechanism for websites to remember useful information (such as items in a shopping cart) or to record the user's browsing activity (including clicking particular or specific buttons, logging in or recording which pages were visited by the user as far back as months or years ago).

Utilization of Cookies

A visit to a page on MTC HPBX (or other MTC website) may generate the following types of cookie(s):

Anonymous Analytics Cookies

Every time a user visits a MTC website, software provided by another organization (such as Google Analytics) generates an 'anonymous analytics cookie'. These cookies can tell us whether you have visited the site before. Your browser will inform us if you have these cookies and, if you don't, our website generates new ones. This allows MTC to track how many individual users we have and how often they visit the site. Unless you are signed in to hpbx.mtc4me.com (or any other MTC website), we cannot use these cookies to identify individuals. We use these cookies to gather statistics: for example, the number of visits to a page. If you are logged in to the MTC website, we will also be provided the details you gave to us for this, such as but not limited to your username and email address.

Registration Cookies

When you register with a MTC website, such as hpbx.mtc4me.com, MTC generates cookies that inform us whether you are signed in or not. Our servers use these cookies to determine which account you are signed in with and whether you are allowed access to a particular Product or Service.

Advertising (Ad) Cookies

These cookies allow MTC to know whether you've seen a specific ad or the type of ad, and for how long you have viewed it. We also utilize cookies to help us direct targeted advertising.

Other Third-Party Cookies

On some pages of our websites, other organizations may also set their own anonymous cookies. They do this to track the success of their products and/or services, or to customize the experience for you. Because of how cookies function, our websites cannot access these Third-Party cookies, nor can the other organization access the data in cookies MTC uses on our websites. For example, when you share an article or post using a social media sharing button (Facebook, LinkedIn or other social media outlets) on crexendo.com, the social network that has created the button will record that you have done this.

How Do I Turn Cookies Off

It is usually possible to stop your browser accepting cookies, or to stop it accepting cookies from a specific website. Most modern browsers allow you to change your cookie settings. You can usually find these settings in the 'options' or 'preferences' menu of your browser. To understand these settings, you can use the 'Help' option in your browser for more details. It is solely your responsibility to stop cookies in your browser.

Note: If you block the use of cookies, then this will limit the service that we are able to provide to you and may affect your visitor/user experience.

VENDORS, SUPPLIERS AND SUBCONTRACTORS

MTC may collect personal information about individuals who are employed by our suppliers and vendors. This business contact and payment information are strictly used to administer existing and future business arrangements.

Social Media

We maintain a social media presence, such as a MTC Facebook page. You can interact with us through social media, posting content, sharing material from the MTC HPBX website, and using our social media plug-ins. When you interact with us using social media, we may receive information such as your user ID, your profile picture, photos you post, and similar information, which is often determined by your privacy settings on the various social media sites. We may use the information received from social media interactions for the same types of purposes we describe throughout this Privacy Policy. Your use of social media sites is primarily governed by the site operators' privacy policies and terms of service, and the information you share with us and with others is largely controlled by the privacy settings you have established at those sites.

Network and Interest-Based Advertising

We may also enter into agreements with third parties that possess technology that allows the Sites to use targeting or advertising cookies to see which areas and features are popular, count visits to our Sites, and customize the advertising and marketing messages you receive on the Sites. This information may be shared with these third parties for this purpose. The Sites may use Google Analytics and the third-party cookie DoubleClick to optimize our Sites based on the traffic we receive and assist with marketing. To learn more about Google Analytics, including options for opting out and/or managing the ads you may see online please visit www.google.com/policies/privacy/partners.

We also provide interest-based advertising about our products and services on other parties' websites. We may use third-party advertising companies that use tracking technologies to serve our advertisements across the Internet. These companies may collect information about your visits to the Sites and other websites and your interaction with our advertising and other communications. These advertising companies serve ads on behalf of us and others on non-affiliated sites, and some of those ads may be personalized, meaning that they are intended to be relevant to you based on information collected about your visits to the Sites and elsewhere over time. Other companies may also use such technology to advertise on our Sites. You have the choice to tell us not to collect and use this information.

Updates or Changes to Your Information

You may update or change your personal, shipping, or billing information by emailing us at support@mtc4me.com.

Children's Privacy

The Sites do not knowingly solicit or collect personally identifiable information online from children under the age of 18 without prior verifiable parental consent. If MTC learns that a child under the age of 18 has submitted personally identifiable information online without parental consent, it will take all reasonable measures to delete such information from its databases and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law). If you become aware of any personally identifiable information we have collected from children under 18, please call us at 877-216-995.

Health Insurance Portability and Accountability Act

The Health Insurance Portability and Accountability Act of 1996 ("HIPAA") is United States legislation that provides data privacy and security provisions for safeguarding medical information. Client acknowledges and agrees that unless the MTC Products and Services description expressly states otherwise, the Products and Services do not comply with the requirements of the Health Insurance Portability and Accountability Act, as amended, and its implemented regulations. Unless the Products and Services description expressly states otherwise, Client agrees that it will not use the Products and Services to create, receive, transmit, maintain, store, use, disclose, or otherwise cause the Products and Services to handle Protected Health Information ("PHI") as defined under HIPAA. Client retains complete and full responsibility to ensure that the Products and Services are only applied to use-case scenarios where the Products and Services do provide the necessary level of security and privacy protections. CLIENT'S AGREEMENT TO THIS PROVISION IS A MATERIAL CONDITION OF MAKING THE PRODUCTS AND SERVICES AVAILABLE TO CLIENT. In addition to any indemnity requirements in these Terms, Client shall indemnify, defend and hold harmless Company, Company Affiliates and all of the directors, officers, managers, partners, employees, agents, representatives, heirs, successors and assigns of Company and each of Company's Affiliates against all actions, claims, losses, penalties, fines, assessments, administrative costs, credit protection costs, damages and expenses (including reasonable attorneys' fees) arising out of Client's violation of the provisions of this section, caused in whole or in part by any act or omission of Client, or of anyone employed by or acting as a subcontractor, representative or agent of Client. Any limitation on liability set forth in the terms of the Master Services Agreement or any other agreement between Company or its Affiliates and Client shall not apply to Client's liability under this provision.

Company Commitment to Privacy

This MTC privacy policy is subject to change at any time and without notice. For updates, please return here. You agree that the information that we gather now will be subject to the Privacy Policy in effect at the time of use.

Contact Us

If you have questions or concerns about this Privacy Policy, please feel free to contact us at support@mtc4me.com
620-897-6200
620-897-6211 fax

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