

Telcentris, Inc. is committed to building a trusted relationship with the company's Customers. This privacy policy (the "Policy") covers how Telcentris treats the personal information that the company collects and receives, when the Customer registers for and uses "Telcentris" software and services ("the Services"). Along with Customer Proprietary Network Information ("CPNI") compliance, this Policy explains the practices that apply to the collection and use of the Customer's personal information with the Services.

### **Collection of Your Personal Information**

#### **Registration Data**

In order to provide the Services, Telcentris must have the Customer's personal phone number so that Telcentris can identify the Customer, when they interact with Telcentris' system, and to route communications from other users to Customer's phone. Telcentris acquires Customer's phone number when:

- Customer enters their number in the Telcentris browser for registration or the Telcentris Web Portal
- Customer makes a call using their phone number via the Telcentris network

When Customer calls a phone number, Telcentris collects the personal phone number using caller ID. If Customer is registered, the phone number at which Customer receives calls is verified with the phone number Customer entered during registration to ensure that the person providing the phone number is in possession of the phone.

Telcentris may also collect the Customer's e-mail address in order to provide certain Services. Telcentris collects e-mail address when:

- Customer enters e-mail in the Telcentris browser for registration or the Telcentris Web Portal
- Another user enters Customer's email into our website

Verification of Customer's email also allows Customer to receive voicemail messages and faxes from other users attempting to contact Customer.

As part of the registration process, Customer may be asked to create a username and password to be associated with Customer's personal data for security. Telcentris may also collect Customer's name, country, or time zone to enhance security/facilitate Services.

#### **CPNI**

In the course of providing Services to Customer's, or via Telcentris Websites for quote requests and/or marketing campaigns, Telcentris collects and maintains certain CPNI, which includes the types of Services Customer currently purchases, related usage and billing information for those Services. Customer's telephone number, name and address are not CPNI. Accordingly, Telcentris does not sell, trade, or share Customer's CPNI outside of the Telcentris family of companies or with anyone not authorized to offer Telcentris' products or services. Generally, Telcentris may use Customer's CPNI to offer additional Services and for billing and collections purposes. Telcentris may also use CPNI to investigate fraud and to prevent violation of the Terms of Service and unlawful use of the Telcentris network, Services, and other customers.

#### **Automatic Tracking**

Telcentris is able to and may track certain non-personally-identifiable information about Customer and their correspondence, when Customer uses Telcentris' website. This information from the website may include the Universal Record Locator ("URL") from which Customer arrived, the browser, and/or the IP Address.

Telcentris may use cookies, web beacons or similar technologies to enhance and personalize the Customer's experience with Telcentris. This includes helping authenticate Customer's identity when the Customer uses the Services; remembering the Customer's preferences and registration information; and measuring and researching the effectiveness of any the Services.

#### **Invitations and Other Communications to Non-members**

Users of Telcentris' Services can invite other people to join the service by sending invitation emails and instant messages via our automated invitation system. Telcentris does not sell these email addresses or use them to send any other communication besides invitations and invitation reminders. Recipients of invitations may contact Telcentris directly. (see below for contact details) to request the removal of their information from Telcentris' database.

**How Customer's Personal Information Is Used**

Customer's information is used to operate to the Services to personalize the Services provided to Customer, and to communicate with Customer and respond to their inquiries.

Customer's information submitted by users of the Services will be displayed to their contacts, as well as other contacts that belong to the networks with which Customer allows access.

Customer's information will not be shared with any commercially-interested third parties, except to provide the Services. In order to provide the Services, Telcentris selects technology from selected 3<sup>rd</sup> party telecom providers. These partners are required to protect Customer's information in a manner consistent with this Policy and do not have any independent right to share Customer's information. Telcentris works with third party advertiser/cookies that may use information about the Customer's visit to the Telcentris browser and web portal to provide them with ads.

Telcentris' Services and network may not be used for illegal activity. In the event legal authorities deem it necessary to investigate a Customer's activity, by way of legal processes (court order, search warrant or subpoena), Telcentris will comply, as required by law. Telcentris may also disclose Customer's CPNI for legal or regulatory reasons, including responses to subpoenas and court orders.

**Disclosure of Customer's Personal Information in the Event of a Merger or Sale of Telcentris**

Telcentris may merge or be acquired by another business entity or may sell all or substantially all – this statement doesn't make sense – what does Substantially All mean? of its assets to an acquirer. In the event of such merger, acquisition or sale, Telcentris may share some or all of Customer's information with the acquiring company in order to continue service and provide Services to Customer.

**Telcentris Branded Websites**

Certain information or Services may be offered or provided by Telcentris, from time to time, on any Telcentris Branded Websites. Telcentris may gather personally identifiable information from anyone accessing these websites and Telcentris will control any such information collected from one of these Websites. Such information may be used by Telcentris to provide marketing for products and services provided by Telcentris. Telcentris will not rent, sell, or disclose any of Customer's personally identifiable information to third parties without prior consent by the Customer.

**Co-branded and Other Affiliated Sites**

Certain information or Services offered or provided through Telcentris, from time to time, may be provided on or through other websites operated by or in conjunction with third party providers ("Partners"). Although Telcentris will continue to control any personally identifiable information collected about Customer from one of these sites, such information may be shared by Telcentris with that Partner in order to further facilitate the Services. However, a Partner will not rent, sell, or disclose any of Customer's personally identifiable information to third parties without prior consent by the Customer.

**Phone Communications**

Customer may use Services or the network to initiate or receive phone calls which are partly or fully handled by Telcentris' telecommunications partners. Accordingly, any information communicated during such phone calls, including any personal information, shall not be deemed private. Telcentris cannot guarantee the security of such information

**Telcentris' Commitment to Security**

Telcentris is committed to keeping Customer's information private. Telcentris will use the information to improve the Services. Telcentris has put in place physical, electronic, and managerial procedures to safeguard and secure the information the company collects from the Customer and Telcentris will continue to enhance its security procedures as new technology becomes available.

**How to Contact Us**

If there are any questions or concerns about this Policy, please send an email to [privacy@Telcentris.com](mailto:privacy@Telcentris.com) or send mail to the following address: Telcentris, Inc., Inc. Attn: Privacy 10180 Telesis Court, Suite 150 San Diego, CA 92121.

**Changes to this Privacy Policy**

Changes to this Privacy Policy will be posted online at [www.telcentris.com/smb/terms](http://www.telcentris.com/smb/terms).