

## Privacy Policy

Effective: October 21, 2021

### Introduction

Simplicity VoIP and its subsidiaries and other affiliates (“Simplicity VoIP”) recognizes and supports the privacy rights of all persons, and we respect these rights when we collect and process personal information (“PI”). We have developed and adopted this Privacy Policy to describe our privacy values and guide our processing of personal information. By purchasing, subscribing to, or utilizing the Products and/or Services, or registering to attend, attending and/or participating in any Simplicity VoIP sponsored events or other events in which Simplicity VoIP participates, you agree to be bound to the terms and conditions of this Privacy Policy.

The obligations and responsibilities set out in this Privacy Policy are applicable to Simplicity VoIP and its personnel and will be made available on Simplicity VoIP’ website ([www.Simplicity VoIP.net/privacy-policy](http://www.SimplicityVoIP.net/privacy-policy)). The obligations and responsibilities set out in the Privacy Policy are in addition to any other applicable policies or agreements entered into with Simplicity VoIP and any applicable laws and/or regulations.

### General Statement

Simplicity VoIP is dedicated to the use of Voice over Internet Protocol (VoIP) and related technologies to improve the telecommunications industry and the lives of individuals throughout the world.

Simplicity VoIP’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.

### Scope

At Simplicity VoIP, privacy matters. Simplicity VoIP respects the privacy of its Clients and other individuals with whom Simplicity VoIP has business interactions

This policy is global, applying to all Simplicity VoIP locations. It applies to personal information regardless of format. For example, the policy applies to computerized records and electronic information as well as paper-based files.

It is also applicable to all personal information that is collected, maintained or processed by Simplicity VoIP. The concepts enumerated in this policy will guide Simplicity VoIP’s selection and expectations of its Clients, partners, agents and/or contractors to whom Simplicity VoIP transfers and relies on for processing of personal information.

Simplicity VoIP provides the technology platform for hosted or “cloud” unified communications as a service offerings (UCaaS). These Products merely act as a conduit for data transmitted by third parties and Subscribers. Simplicity VoIP processes personal information that is controlled by or originated from other companies, such as our Clients or other business partners. Simplicity VoIP also processes personal

information in the course of providing support for Simplicity VoIP communications products. Simplicity VoIP shall protect the 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, Simplicity VoIP relies on guidance and direction of the Client (as the data controller), who determines the purposes of processing such personal information. In some cases, Simplicity VoIP may collect and process personal information for our own business purposes and shall comply with the applicable privacy laws concerning Simplicity VoIP processing.

While Simplicity VoIP 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. Simplicity VoIP only processes such personal information in order to provide and invoice for purchased and/or subscribed Products and Services.

#### Data Processor

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#### What Information We Collect or Process

Simplicity VoIP processes and in certain situations collects personal information as needed to deliver its Products and Services and manage its business. When collecting personal information, Simplicity VoIP does so in a reasonable and lawful manner.

The types of information and the purposes for which Simplicity VoIP collects or processes personal information may include:

#### Indirect End User Phone Contact Information (Personal Identifiable Information)

Simplicity VoIP 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 Simplicity VoIP’s

processing and protection of such data, all use will be in conformity with the data controller's instructions.

Specifically, only when enabled via system permission on SimplicityGO Android and SimplicityGO iOS, Simplicity VoIP shows personal contacts within the respective application. 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 Simplicity VoIP' API. Simplicity VoIP does not store this number with any other PII, and it cannot be directly or indirectly attributed to any person or persons; Simplicity VoIP stores only the phone number and pertinent metadata so as to be compliant with all applicable state and federal laws, and Simplicity VoIP 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.

SimplicityGO Android and iOS also uses Gravatar, only when enabled via Settings and UIConfigs, which is a service that provides avatar images linked to the MD5 hash of the user's email address. This means that, only when Gravatar use is enabled, we hash each contact's email address and send it to Gravatar to try and retrieve an avatar image. MD5 hashes cannot be directly or indirectly attributed to any person or persons, and we only send the MD5 hash to Gravatar, never the email address in plain text. As with phone contacts, a user can revoke Gravatar access at any time in Settings or via UIConfig, and his/her app experience is not hindered or interrupted.

## CLIENTS

Simplicity VoIP uses such personal information only for relevant, appropriate, and customary purposes. Simplicity VoIP will not share or disclose personal information for purposes other than as described herein. Capitalized terms used in this Privacy Policy shall have the meaning as given in Client's Master Services Agreement (MSA). The following are examples of some of the personal information Simplicity VoIP may process.

### Business Contact Information:

Simplicity VoIP may collect and use personal information about individual contacts of Clients and others who access Simplicity VoIP 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 Simplicity VoIP and/or requesting information about Simplicity VoIP. 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 Simplicity VoIP 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.

Simplicity VoIP provides Products and Services that are primarily for the benefit of Clients and Subscribers in that Simplicity VoIP transmits, routes, switches or caches information. These Products and Services merely act as a conduit for data transmitted by third parties and Subscribers. Simplicity VoIP 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 Simplicity VoIP is merely providing a conduit for transmission, the subscribed services are of such a nature that, in most instances, Simplicity VoIP 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 Simplicity VoIP that is not subject to the control of others, Simplicity VoIP shall obtain consent from the user for the processing of this data.

Simplicity VoIP collects end-user CPNI in the course of providing Product support. This data may pertain to Clients of Simplicity VoIP or Subscribers (eg: end users of Simplicity VoIP' 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:

Simplicity VoIP 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 Simplicity VoIP' processing and protection of such data, all use will be in conformity with the data controller's instructions.

#### Direct End User's CPNI:

Simplicity VoIP 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:

Simplicity VoIP 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

Simplicity VoIP may use anonymized, non-identifying data collected from use of Simplicity VoIP 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 Simplicity VoIP' legitimate interests in tuning, maintaining and enhancing these Products and Services.

#### Cookies

Simplicity VoIP websites may use cookies to collect certain kinds of personal information about Subscribers or users. For more information on how Simplicity VoIP 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, Simplicity VoIP 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

Simplicity VoIP 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. Simplicity VoIP 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. Simplicity VoIP 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

Simplicity VoIP only collects credit card information in order to bill for purchased or subscribed to Products and Services. Simplicity VoIP 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.

#### Changes to Our Privacy Policy

Simplicity VoIP reserves the right to change this Privacy Policy at our discretion subject to business or legal requirements. You are advised to review and check this Privacy Policy from time to time and particularly before you provide personal information to Simplicity VoIP. Changes to this Privacy Policy are effective when they are posted on this page. By continuing to use our Products and/or Services you are agreeing to be bound by any changes or revisions made to this privacy policy.

#### Contacting Us

If you have any questions, comments, or concerns regarding our Privacy Policy or practices, please send an email to [info@simplicityvoip.net](mailto:info@simplicityvoip.net) or write to Simplicity VoIP at the following address:

Simplicity VoIP, Inc.  
1129 Gaskins Place, Suite 200  
Henrico, VA 23238

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