



PGi Privacy Policy

Premiere Global Services, Inc. and our subsidiaries (collectively, "PGi", 'we' or 'us') recognize and respect the importance of protecting your privacy. To that end, we have adopted the principles set forth in this privacy policy (the "Policy") to govern our use and disclosure of your personal information. The following Policy describes how PGI collects and uses your personal information and describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the "Your rights" section. We recommend that you carefully review this Policy before providing us with your personal information.

Scope

This Policy consists of the following sections:

- **Section 1. Users of our website:** this section applies if you use the PGI websites and mobile GlobalMeet App that link to this Policy: www.pgi.com, www.globalmeet.com, www.readytalk.com, www.imeetcentral.com and www.800rollcall.com, (collectively, the "Websites") and explains how we use personal information of the users of these Websites;
- **Section 2. Users of our business solutions:** this section applies if you work for an organisation which uses our business solutions and explains how we use personal information in the course of providing our business solutions.
- **Section 3. Your rights and our data protection practices:** this section applies both to the users of our Websites and the users of our business solutions and sets out further information on PGI's data protection practices and your data protection rights.

This Policy does not apply to: (a) information processed by other PGI websites that have their own privacy policy or by third party websites to which our Websites may link, and (b) information processed on behalf of your employer in the context of our business solutions, where your employer has control over such information as further explained under Section 2 below.

'You' or 'your', in this Policy, means you as a natural person, rather than any legal entity which is our customer (such as your employer) which you may represent when you order a product or service from us via the Websites.

When using our Websites, if you are a resident of North America, your relationship is with American Teleconferencing Services Ltd. d/b/a Premiere Global Services or Premiere Conferencing Networks, Inc. d/b/a Premiere Global Services; if you reside in the European Union, your relationship is with Premiere Conferencing (Ireland) Ltd, which is the data controller.

When you are using our business solutions, the controller of this information is the PGI entity providing the relevant solutions.

Our legal entity names and their contact details can be found in the home page of each country Websites or alternatively in <https://www.pgi.com/contact/> under PGI worldwide locations.

1. Users of our Websites

This section applies to you if you are a user of our Websites and explains how we process your personal information when you use our Websites or submit queries through our Website.

1.1. Information we collect

We may collect the following personal information from you on our Websites: your name, company name, title, telephone number and email address when you provide this information to us. Also, your browser may tell us your IP address and the type of browser and device you used, which pages you searched and key words that you entered into a search engine. We collect information about your choices and preferences by using cookies and similar technologies. We also collect information on whether you opened our emails or clicked a link in our email by using web beacons.

1.2. How and why we use personal information

The purposes for which we collect personal information include, but are not limited to, the following: (a) to provide you with information in response to your requests, and to give you a customized interactive experience; (b) to measure interest in various PGI solutions and services; (c) to inform you about new PGI solutions and services or features and functionalities; (d) to help us develop new services, solutions or features that meet your needs, (e) to manage our relationship with and provide our services to our customers, and (f) where necessary to protect our legitimate business interests, which include the security of our systems and our operations and the exercise or defence of legal claims. We also may occasionally send you push notifications, which you may opt-out of by turning them off at the device level through your settings, and

when you download and use our mobile applications, we may automatically collect certain information such as the type of device you use, operating system version and app version.

1.3. Legal basis for using personal information

PGi processes personal information where one or more of the following conditions apply:

- a. Where it is necessary in order for us to conduct our business and pursue our, or our affiliates,' legitimate interests for internal administrative purposes. In particular, we collect, use and store your personal data: (i) to communicate and manage our relationship with our customers; (ii) to maintain contact data about you or a third party (such as, your employer); (iii) to inform you of products, services, marketing plan and other business related items from PGi or third parties which may be of interest to you; (iv) to ensure the security of our systems and our operations, and (v) where appropriate, to establish, exercise or defend legal claims.
- b. Where it is required by applicable privacy laws to obtain your consent: (i) PGi will send you direct marketing in relation to relevant products and services provided by PGi; (ii) PGi places cookies and uses similar technologies in accordance with the 'Use of Cookies and other Web Technologies' section of this Policy and the information provided to you when those technologies are used;
- c. Where it is necessary in order for us to comply with our legal obligations, such as requirements to process requests by government or law enforcement authorities.

1.4. Use of Cookies and other Web Technologies

1.4.1. Cookies

PGi and our service providers use cookies or similar technologies to analyze trends, administer the Websites, track users' movements around the Websites, to gather demographic information about our user base as a whole and to understand the urgency and nature of the need of our website visitors.

Cookies are pieces of information that a website transfers to your computer's hard disk for record-keeping purposes. Cookies can make a website more useful by storing information about your preferences for a particular site. Most browsers are initially set to accept cookies. If you are accessing to our Websites from the EEA or Switzerland you can manage your cookie preferences directly through the provided tool. If you prefer, you can set your browser to refuse cookies on our Websites. We treat any personal information that may be contained in cookies with the same level of protection as other personal information you provide to us. The information generated by our service providers relating to our website(s) is used to identify our visits and to

determine your interests mainly for sales and marketing purposes. To determine those interests, our service providers will track the visitors' behaviour on our website(s), and provide us with publicly available information about you such as social media profiles and information. Such information will not be shared with third parties, but may be stored on servers of other applications we use to serve you such as CRM systems.

1.4.2. Widgets

To the extent our Websites may include widgets, which are interactive mini-programs that run on our site to provide specific services from another company (e.g. displaying the news, opinions, music, etc.), personal information, such as your email address, may be collected through the widget and shared with the company that created it. Those third parties may further process and/or use your personal information in accordance with their privacy policies.

1.4.3. Other Third Party Tracking and Advertising

We partner with third parties to display advertising on our Websites or to manage our advertising on other sites. For our Websites, we may use web analytic cookies, including the use of Google Analytics, Remarketing with Google Analytics and Google Display Network Impression Reporting to advertise online. Websites and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on someone's past visits to a website. Our Websites also use third-party vendors, including Google and third-party cookies (such as the DoubleClick cookie) together to report how your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our Website. This helps us make our service to you better.

Google analytics is provided by Google, Inc. and you can find out more about this service at <http://www.google.com/analytics>. Google Analytics uses cookies to help the Websites analyze how users use the site. You can opt-out of Google Analytics for Display Advertising through your personal Google Preferences. Please note this does not opt you out of being served ads. You will continue to receive generic ads for PGI services.

1.4.4. Mobile Analytics

We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. To the extent we automatically link any collect data to other information we collect about you, we do so to for reasons such as to improve PGI services we offer you, to improve marketing, analytics, or Websites functionality.

1.4.5. Framing

To the extent we employ any framing techniques on our Websites, please be aware that you are providing your personal information to PGI and not to a third-party site.

1.5. Testimonials

To the extent PGI posts customer testimonials/comments/reviews on any of our Websites that contain personal information, we obtain any required consent(s) prior to posting the testimonial.

1.6. Social networking and Public Forums

To the extent PGI offers certain publicly accessible blogs and/or community forums on our Websites, you should be aware that any information you provide in these areas may be broadly available to others, and can be read, collected, and used by others who access them, potentially inside or outside PGI. When persons external to PGI access the information you choose to submit in such blogs or community forums, they will be responsible for how they use it and we do not have control of such use of your information. Also, please note that individual blogs and/or forums may have additional rules and conditions.

Collection and sharing of personal information on social media apps and websites is governed by the privacy policy and practices of the social media provider. PGI may collect information about you in connection with social networking sites in several ways, including:

- a. When you sign in to a PGI app or website using a social networking account;
 - b. When you use a PGI app on a social networking site or choose to join (or "like") a PGI page on a social networking site. In these situations, the social networking site may make some information about you available to PGI;
 - c. When you interact with a PGI social networking page or content, we may use cookies to learn which links you clicked;
 - d. When you make information publicly available on your social networking page
- We use this information for purposes described in this Policy.

1.7. Chat

We use a chat feature to help you with any questions or concerns. If our chat feature is offline we may still collect your name, email address and telephone number so that we may reply to your request.

1.8. Children

We do not knowingly collect any personal information from children under 13 years old through our Websites. However, if the parent or guardian of a child under 13 believes that the child has provided us with personal information, the parent or guardian of that child should contact us through the "Privacy" contact information provided further below if they want this information deleted from our files. If we obtain

knowledge that we have personal information about a child under 13 in retrievable form in our files, we will delete that information from our existing files.

1.9. Third Party Websites and Cookies

Our Websites may contain links to third-party websites, including social media websites. While we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices of any third-party websites. The use of cookies by these third parties on third parties' websites is not covered by this Policy. We do not have access or control over these cookies. For this reason, we encourage you to review the privacy policies of these websites before disclosing any personal information to or through them.

1.10. Sharing personal information

- a. We do not sell or rent personal information to unrelated third parties. We do not share your personal information with others for marketing purposes unless you agree to this. If you would prefer that we do not share your personal information with business partners for their direct marketing purposes, you may opt-out of this sharing by contacting us as described in this Privacy Notice. We have not sold the personal information of California residents in the preceding twelve months. We do not sell the personal information of minors under the age of 16 years of age.
- b. We share personal information with the following categories of third parties:
 - Our third-party service providers that help us run our business, who process it on behalf of PGI for the purposes identified above. They are not permitted to use your information for their own purposes. Such third parties include providers of website analytics, online chat service and online advertising;
 - Other PGI subsidiaries in the United States;
 - Judicial and government authorities or other law enforcement bodies and regulators, in the context of complying with our legal obligations and processing requests or orders received from those bodies;
 - In the event of legal proceedings, claims, complaints and other enquiries: courts, legal counsels or other parties where required in this context;
 - In the event that our business is sold or integrated with another business, our advisers and any prospective purchaser's adviser and the new owners of the business.

2. Users of our business solutions

This section applies to you if you work for an organisation which uses our business solutions. The business solutions we provide include audio, video and web-conferencing services ("meeting solutions"); in some instances, our business solutions

also include voice, telephony and messaging services ("electronic communication services"), for example, when our customers purchase and assign work telephone numbers to their employees.

We use your information to manage our relationship with our clients – for example, for billing and contract management purposes and to promote our services.

We also use your information when we provide our business solutions services. When you use regulated electronic communication services, for example when you use the telephone numbers assigned to you by your employer, we control how we use some of your personal information and we will be responsible for such use. In this section we explain what information we collect in this context and how we use it.

When you use our meeting solutions, your employer controls what information we process about you and how this is processed, and they will be responsible for the use of your information. If you require further information or wish to address requests about the use of your information in this context, you are advised to contact your employer directly and to review their privacy policy. This Policy does not apply.

2.1. Information we collect

We will collect your name and professional contact details and your job role in order for us to manage our relationship with your employer.

We are also required to process the following information: name and contact details, traffic information (for example, information on the duration, timing and routing of the calls you make or the texts you send using our services in order to enable your communications and for billing purposes), location information when you are using our emergency call services, IP address when you use web services, passcodes to access the service and any other information that is necessary for those purposes.

2.2. How and why we use personal information

We collect and use personal information for the following purposes: (a) to manage our relationship with our clients, including to inform our customers about new PGI solutions and services, features and functionalities, (b) where necessary to protect our legitimate business interests, which include the security of our systems and our operations, accounting, billing and audit purposes, and the exercise or defence of legal claims, (c) to enable your communications over the network and where necessary, to provide emergency call services and (d) to comply with our legal obligations (for example, our obligations under telecommunication laws).

2.3. Legal basis for using personal information

PGi processes personal information where one or more of the following conditions apply:

- a. Where it is necessary in order for us to conduct our business and pursue our, or our affiliates' legitimate interests for internal administrative purposes. .In particular, we collect, use and store your personal data: to communicate and manage our relationship with our customers; to allow our customers to use our services, to ensure the security and proper performance of our systems and our operations, for accounting, billing and audit purposes, and for the establishment, exercise or defence of legal claims.
- b. Where it is necessary in order for us to comply with our legal obligations, such as obligations under telecommunication laws, which include requirements to process requests by government or law enforcement authorities, to enable you to call emergency call numbers, or in some countries to verify the identity of our subscribers' representatives.

2.4. Sharing personal information

- a. We do not sell or rent personal information to unrelated third parties.
- b. We share personal information with the following categories of third parties:
 - Our third-party service providers that help us run our business, who process it on behalf of PGi for the purposes identified above, for example, our IT support provider or our advertising agency. These providers are not permitted to use your information for their own purposes;
 - Other PGi subsidiaries in the United States;
 - Your employer, to the extent this is required in order for us to perform the services and comply with our contractual obligations towards them;
 - Judicial and government authorities or other law enforcement bodies and regulators, in the context of complying with our legal obligations and processing requests or orders received from those bodies;
 - In the event of legal proceedings, claims, complaints and other enquiries: courts, legal counsels or other parties where required in this context;
 - In the event that our business is sold or integrated with another business, our advisers and any prospective purchaser's adviser and the new owners of the business.

3. Your rights and our data protection practices

3.1. Your rights

- a. In some countries, and in particular if you reside in the European Union, you have the right to ask us whether we hold any of your personal information and to obtain a copy of your personal information; you have the right to correct any incorrect or incomplete personal information; in some circumstances, you have the right to delete personal information or restrict (stop any active) processing of your personal information; and you have the right to obtain the personal information you provide to us with your consent in a structured, machine readable format, and to ask us to share (port) this information to another controller. If you reside in California, USA, you have the right to request that we disclose what personal information we have collected, used, disclosed to others, and sold over the last twelve months (NOTE: PGI does not sell your personal information, as defined under California law). If you are a California resident, in some circumstances you have the right to be forgotten and to request your personal information be deleted; you also have the right to request a copy of the information in a readily usable format. For California residents, you can submit a verifiable consumer request to request the deletion of your personal information. We will be able to respond to your request upon verification of your identity through a series of questions based upon information that you have previously provided to PGI. You also have the right not to receive discriminatory treatment by PGI for the exercise of the privacy rights conferred by the California Consumer Privacy Act.
- b. In addition, if you reside in the European Union, you can object to the processing of your personal information in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).
- c. To the extent PGI contacts you with any promotional and advertising materials, you can opt-out or update your email preferences through any email sent from us, or you can send an email to emailunsubscribe@pgi.com confirming your email address and we can make appropriate changes.
- d. These rights may be limited, for example if fulfilling your request would reveal personal information about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.
- e. To exercise any of these rights or to obtain other information, you can get in touch with us using the "Privacy" contact details set out below. For California residents, you can submit a verifiable consumer request to request what personal information we collect, use, or disclose about you (as stated above, we do not sell your personal information as that term is defined under California law) via the contact details provided at the end of this Policy. We will be able to respond to your request upon verification of your identity based upon information that you have previously provided to PGI. Note that only you, or someone legally authorized to act on your behalf, may

make a verifiable consumer request related to your personal information. An authorized agent may make a request based on (a) your written permission authorizing the agent to submit the request and the agent verifying their identity in accordance with the verification process; or (b) providing the agent with power of attorney to act on your behalf.

- f. If you have further queries or you have a concern in relation to how we use your personal information and satisfy your rights, please let us know by using the contact details at the end of this Policy. Alternatively, if you reside in the European Union, you also have the right to complain to an EU data protection authority.

3.2. Communication Preferences

You can select your communication permissions in our PGI Marketing Preference Center, update your contact information or opt-out from receiving any further communication through any email sent from us, or you can send an email to emailunsubscribe@pgi.com confirming your email address and we can make appropriate changes. These choices do not apply to transactional service communications that are part of the PGI services or informational communications that have their own unsubscribe option included in the message.

3.3. Retention of Personal Information

- a. Where we process personal information of our customers' employees to manage our relationship with our customers, we do this for as long as we provide our products and services to our customer and for a maximum period of fourteen (14) months after this.
- b. Where we process personal information for marketing or business analytic purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data so that we can respect your request in future.
- c. In all other cases, we will retain your personal information for as long as this is required to fulfill the purposes for which it was collected and for such further period required in order to resolve disputes, to enforce our agreements, or to comply with our legal, regulatory or contractual obligations.

3.4. Security

We provide reasonable technical and organizational security controls to protect your personal information. However, despite our efforts, no security controls are fully effective and PGI cannot ensure or warrant the security of your personal information. We recommend you to take every precaution in protecting your personal information

when you are on the Internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and make sure you use a secure browser.

3.5. Transfers of personal information

Your personal information is stored on PGI's servers and the servers of our service providers located in different parts of the world. Where information is transferred outside the EEA or Switzerland, to a non-EEA country which is not recognised by the EU Commission as providing an adequate level of data protection, we rely on one or more of the following legal mechanisms: EU Commission approved standard contractual clauses, EU-US Privacy Shield and Swiss-US Privacy Shield. In some instances, where these mechanisms do not apply, we may still transfer personal information to third parties outside the EEA after we have obtained the explicit consent of the individual for such transfer, where the transfer is necessary in order for us to provide services under a contract for the interest of the individual, to exercise or defend legal claims, or to fulfil compelling legitimate interests in accordance with data protection laws. A copy of the relevant mechanism can be provided for your review on request to the contact details contained in our Privacy Contact Information section below.

3.6. EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield

PGi participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. Except where PGI processes personal data in its capacity as an electronic communications service provider, PGI is committed to subjecting personal data received from European Union (EU) member countries and Switzerland, respectively, in reliance on each Privacy Shield Frameworks, to the Framework's applicable Principles. To learn more about the Privacy Shield Frameworks, and to view our certification, visit the U.S. Department of Commerce's Privacy Shield List. <https://www.privacyshield.gov>. Where PGI Processes personal data in its capacity as controller, the Controller Standard Contractual Clauses approved by the EU Commission shall apply.

PGi is responsible for the processing of personal data it receives, under each Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. PGI complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, PGI is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

3.7. Review of Compliance

We review our compliance with this Policy on a periodic basis, and we reserve the right to update this Policy to reflect changes to our information practices. Please check this Policy on our Websites periodically for changes. If we make any material changes, we will also post a notification on our Websites or, where appropriate contact you via email to let you know about those changes prior to change becoming effective.

3.8. Privacy Contact Information

Should you have any privacy-related questions or comments relating to this Policy or the way we process your personal information, please contact us through the contact information provided below: Email: Privacy@pgi.com or Europe.Privacy@pgi.com

Contact Office: Premiere Global Services, Inc.

2300 Lakeview Parkway

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