



## PGi Privacy Policy

Premiere Global Services, Inc. and its 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 we collect and use 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 website, [www.pgi.com](http://www.pgi.com) (the “Website”), and explains how we use personal information of the users of the Website.
- **Section 2. Users of our business solutions** : this section applies if: (i) you work for an organisation which uses our business solutions, (ii) if you use the mobile applications (“Apps”) that interface with our business solutions or (iii) if you use our Website subdomains accessible only after login to a customer account (“Product Pages”), 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 to the users of our Website 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 information processed: (a) by other PGi websites that have their own privacy policy; (b) by third party websites to which our Website may link, and (c) 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 use our business solutions.

When using our Website, if you are a resident of North America, your relationship is with American Teleconferencing Services Ltd. 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 with respect to your personal information collected by PGI.

Our legal entity names and their contact details can be found in [www.pgi.com/contact](http://www.pgi.com/contact) under PGI worldwide locations.

## **1. Users of our Website**

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

### **1.1. Information we collect**

**Internet or electronic network activity** information as follows:

- Usage data, such as performance metrics related to your use of the website;
- Log data generated when you use the Website, including Internet Service Provider (“ISP”), browser type, referring/exit pages, the files viewed on our site, referrer URL, key words entered into a search engine, operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the Website;
- Device data, such as the configuration of your device.

**Identifiers** associated with cookies or other technologies that may uniquely identify your device or browser, your Internet Protocol (“IP”) address and your approximate location.

**Other identifiers**, including your name, company name, title, telephone number, email address and country.

**Inferences**, including your choices, behavior and preferences when you use the Website and when you open or click on a link in our emails.

**Commercial information** about the services you purchased or considered.

### **1.2. Sources of Information**

We may collect information from you from the following categories of sources:

- **Information you provide**, such as other identifiers and commercial information you provide when you communicate with us about or purchase our products and services or when you complete forms on our Website.
- **Information collected automatically**, such as internet and electronic network activity, identifiers and inferences when you use our Website.
- **Information from third parties**, such as internet and electronic network activity and commercial information, including from our business partners, data enrichment service providers, analytics and advertising vendors (as described in the ‘Use of Cookies and

Other Web Technologies' section), and social networking sites (as described in the 'Social Networking and Public Forums' section).

### **1.3. How and why we use personal information**

We collect, process, use and store your personal information for the following business and commercial purposes in accordance with our legitimate business interests and legal requirements or with your consent where required:

- a. to provide you with information in response to your requests;
- b. to maintain the accuracy of the information we collect;
- c. to help us develop new services, solutions or features that meet your needs;
- d. to manage language preferences and connect you with your nearest account manager;
- e. to maintain contact data about you or a third party (such as, your employer);
- f. where necessary to protect or conduct our business and pursue our, or our affiliates', legitimate business interests, which include the security of our systems and our operations and the exercise or defence of legal claims;
- g. to comply with privacy laws and other regulations such as to manage consent requirements;
- h. to give you a customized interactive experience;
- i. to measure interest in various PGI solutions and services;
- j. to inform you about new PGI solutions and services or features and functionalities;
- k. 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;
- l. to occasionally send you push notifications, which you may opt-out of by turning them off at the device level through your settings.

### **1.4. Lawful bases for processing personal information (applies only in the European Economic Area)**

PGI processes personal information where one or more of the following conditions that are set out in the General Data Protection Regulation (GDPR) 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.

## **1.5. Use of Cookies and Other Web Technologies**

### **1.5.1. Cookies**

PGi and our service providers use cookies or similar technologies to analyze trends, administer the Website, track users' movements around the Website, gather demographic information about our user base as a whole, and 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 drive 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 prefer, you can set your browser or device settings to limit certain tracking or to refuse cookies on our Website, but by doing so, you may not be able to use certain features of the Website or take full advantage of all of our offerings. Please refer to your browser's "Help" section or device's settings for more information on how to change these settings. Our system may not recognize "Do Not Track" requests or headers from some browsers. If you are accessing our Website from the EEA or Switzerland you can manage your cookie preferences directly through the provided tool. 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.

### **1.5.2. Widgets**

To the extent our Website 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.

### **1.5.3. Other Third Party Tracking and Advertising**

We partner with third parties to display advertising on our Website or to manage our advertising on other sites. For our Website, 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 Website 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 [www.google.com/analytics](http://www.google.com/analytics). Google Analytics uses cookies to help us analyze how users use the Website. You can opt-out of Google Analytics for Display Advertising using the Google Analytics opt-out browser add-on available [tools.google.com/dlpage/gaoptout/](http://tools.google.com/dlpage/gaoptout/). Please note this does not opt you out of being served ads. You may continue to receive generic ads for PGI services.

#### **1.5.4. 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 collected data to other information we collect about you, we do so for reasons such as to improve PGI services we offer you and to improve marketing, analytics, or the Website's functionality.

#### **1.5.5. Framing**

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

#### **1.6. Testimonials**

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

#### **1.7. Social Networking and Public Forums**

To the extent PGI offers certain publicly accessible blogs and/or community forums on our Website, 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 policies and practices of the social media providers. 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.

### **1.8. 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.

### **1.9. Children**

We do not knowingly collect any personal information from children under 13 years old through our Website. 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 using the Privacy Contact Information provided at the end of this policy 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. We do not sell the personal information of minors aged 13 to 16.

### **1.10. 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 to 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.

### **1.11. Sharing personal information**

We do not sell, rent, or share your personal information except as described in this Policy. We may share personal information, including identifiers, internet and electronic network activity, inferences, and commercial information with:

- a. Affiliated companies which may use this personal information to offer our services or products to you consistent with the purposes identified in this Policy;
- b. Our third party service providers who we have appointed as data processors to perform functions and services on our behalf and who will be provided only with personal information necessary to perform the services on our behalf but are not authorised by us to use such data for any other purposes (e.g. providers of web hosting services, online chat and email services, marketing and advertising services, social networks, data analytic services and data enrichment services);
- c. 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;
- d. In the event of legal proceedings, claims, complaints and other enquiries: to courts, legal counsels or other parties where required in this context;
- e. In the event that our business is sold or integrated with another business: to our advisers and any prospective purchaser's adviser and the new owners of the business.

We do not sell the personal information of minors under the age of 16 years of age.

## **2. Users of our business solutions**

This section applies to you if you work for an organisation which uses our business solutions or when you use our business solutions through our mobile application interfaces ("Apps") that link to this Policy. The business solutions we provide include online meetings with audio, video and screen sharing and/or solutions for hosting interactive webinars or large-scale webcast events ("meeting and event solutions").

We use your personal information to manage our relationship with our customers – your employer – including for billing and contract management purposes, notifications related to software updates, upgrades, and system enhancements, or promote our business solutions where permitted.

We also use your information when we provide our business solutions services. When you use our meeting and event 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 personal data protection policy, this Policy does not apply.

### **2.1. Information we collect**

We will collect your name, professional contact details, your job role and/or your signature in order for us to manage our relationship with your business to perform the services agreement, manage the contract, bill or send you product notifications or information our business solutions.

We will also need to process the following information from users: name or username, contact details, IP address and access number. The following information will be generated by the services: usage and traffic information including duration of meeting or event, date and time, number of participants, web browser versions or bit rate to and from our servers and the content recorded of meeting or events and files uploaded to the platform.

## **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 customers, including to inform them 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. Lawful bases for processing personal information (applies only in the European Economic Area)**

PGI processes personal information where one or more of the following conditions that are set out in the General Data Protection Regulation (GDPR) 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 customers' representatives.

## **2.4. Sharing personal information**

We do not sell, share or rent personal information except as described in this Policy.

We may share personal information with the following categories of third parties:



- a. Our third-party service providers that help us run our business, who process it on behalf of PGI for the purposes identified above. These providers are listed in our “Sub-processors and Subcontractors” list available the same from a link, as this is, at the bottom of this Policy. These providers are not permitted to use your information for their own purposes;
- b. Other PGI subsidiaries listed in our Sub-processors and Subcontractors list available from a link at the bottom of this Policy;
- c. Your employer, to the extent this is required in order for us to perform the services and comply with our contractual obligations towards them;
- d. 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;
- e. In the event of legal proceedings, claims, complaints and other enquiries: to courts, legal counsels or other parties where required in this context;
- f. In the event that our business is sold or integrated with another business: to 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**

You may have specific rights based on where you live. In particular, if you are resident of the European Union or California, USA, you have particular rights, as described below. If you have queries or 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.

##### **3.1.1. European Union Residents**

If you are a resident of 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. In addition, you can object to the processing of your personal information in some circumstances (in particular, where we do not have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing). 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. 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. You also have the right to complain to an EU data protection authority.

##### **3.1.2. California Residents**

If you are a resident of California, USA, and a user of our Website, you have the right to:

- Request, up to two times each year, that we disclose to you the categories of personal information that we have collected about you, the categories of sources from which your personal information is collected, the business or commercial purpose for collecting your personal information, the categories of personal information that we disclosed for a business purpose, the categories of personal information (if any) that we sold about you, the categories of third parties with whom we have shared your personal information, and, if applicable, the business or commercial purpose for selling or disclosing your personal information.
- Request your personal information be deleted, subject to certain exceptions.
- Request a copy of the specific pieces of information we have collected about you in a readily usable format.

You can submit a verifiable request to exercise the above privacy rights using the Privacy Contact Information set out below. 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. Note that only you, or someone legally authorized to act on your behalf, may make a verifiable request related to your personal information. An authorized agent may make a request on your behalf if: (a) the agent is registered with the California Secretary of State to conduct business in California, has your written permission to submit the request, and verifies their identity in accordance with the verification process; or (b) you have provided the agent with power of attorney to act on your behalf. We will respond to your request within 45 calendar days, after proper verification, unless we need additional time, in which case we will let you know. You will not receive discriminatory treatment by PGI for exercising the privacy rights conferred by the California Consumer Privacy Act. Specifically, we will not: (i) deny access to our business solutions; (ii) charge a different rate for the use of our business solutions; or (iii) provide a different quality of service. The above rights do not apply to users of our business solutions; those users should direct their requests to the businesses on whose behalf we provided services.

We do not share your Personal Information with third parties for their direct marketing purposes.

### **3.2. Communication Preferences**

You can set and modify your communication permissions or update your contact information using our PGI Marketing Preference Center, accessible from any email we send you, or by emailing us at [emailunsubscribe@pgi.com](mailto:emailunsubscribe@pgi.com) using the email address we have associated with you. You can also opt-out or further update your email preferences through any promotional or marketing email sent from us. These choices do not apply to transactional service communications that are part of the PGI business solutions 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 business solutions 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 the 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 that you 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, numbers, and symbols 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 from residents in the EEA, Switzerland or the United Kingdom is transferred to, or accessed remotely in, a non-EEA country that is not recognised by the EU Commission as providing an adequate level of data protection, we rely on the EU Commission approved standard contractual clauses. In some instances, where this mechanism does not apply, we may still transfer personal information to third parties outside the EEA after we have obtained your explicit consent for such transfer, where the transfer is necessary in order for us to provide services under a contract for your interest, to exercise or defend legal claims, to respond to lawful requests by public authorities, including to meet national security or law enforcement requirements, 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. Review of Compliance and Policy Changes**

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 Website periodically for changes. If we make any material changes, we will also post a notification on our

Website or, where appropriate, contact you via email to let you know about those changes prior the changes becoming effective.

### **3.7. 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](mailto:Privacy@pgi.com) or [Europe.Privacy@pgi.com](mailto:Europe.Privacy@pgi.com)

Contact Office:       Premiere Global Services, Inc.  
                              2300 Lakeview Parkway  
                              Alpharetta, GA 30009

Date Last Revised: April 12<sup>th</sup> , 2021