

## IntelPeer Privacy Policy

IntelPeer (“**IntelPeer**,” “**we**” or “**us**”) understand the importance of privacy. This IntelPeer Privacy Policy (our “**Privacy Policy**” or “**Policy**”) explains our privacy and information practices and the rights and choices individuals have regarding their personal information that we collect.

### Overview of Our Collection and Use of Personal Information

We think transparency is important. In this overview, we summarize the personal information we collect and how we use it, which is further explained in our Privacy Policy below. Keep in mind that the actual personal information we collect and how we use it varies depending upon the nature of our relationship and interactions with you. Also, in some cases (such as where required by law), we ask for your consent or give you certain choices prior to collecting or using certain personal information.

**Categories of Personal Information Collected.** Generally, we collect the following types of personal information:

- *Identifiers*: includes direct identifiers, such as name, username, email address, phone number, address and other contact information; IP address and other online identifiers; and other similar identifiers.
- *Customer Records*: includes personal information, such as name, contact information, and financial or payment information, that individuals provide us in order to purchase or obtain our products and services. For example, this may include information collected when an individual registers for an account, purchases or orders our products and services, or enters into an agreement with us related to our products and services.
- *Commercial Information*: includes records of personal property, products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.
- *Usage Data*: includes browsing history, clickstream data, search history, access logs and other usage data and information regarding an individual’s interaction with our websites, Services, and our marketing emails and online ads.
- *Geolocation Data*: includes precise location information about a particular individual or device.
- *Audio, Video and Electronic Data*: includes audio, electronic, visual, thermal, olfactory, or similar information [such as, photographs and images (e.g., that you provide us or post to your profile) and call recordings (e.g., of customer support calls).
- *Professional information*: includes professional and employment-related information such as current employer, position(s), and business contact information.

**How we use personal information.** In general, we may use and disclose the personal information we collect for the following business and commercial purposes:

- Deliver, maintain, and monitor our quality Services and associated support to our Customers;
- Administer, operate, secure, manage and promote the Website and Services (including our Customer portal and our network and systems);
- Evaluate, support and enhance the performance and efficiency of our Services and Website;
- Conduct business transactions, including creating and sending contracts, confirmations and invoices, assessing and remitting taxes, and auditing our practices;
- Detect, prevent, investigate and resolve security incidents, fraud or other misuse of our Services;
- Protect the rights, property and safety of Customer, User, their users, customers or other related third parties, as well as of IntelPeer;
- Send our Customers or Users technical alerts, service updates, security notifications, and other administrative communications;
- Analyze and aggregate data for purposes of marketing our Services, identifying market trends and developing innovative solutions offered to our Customers;

- Respond to inquiries and requests for additional resources about IntelPeer and our Services;
- Comply with applicable laws relating to the Services and Website; and
- Perform any incidental statistical analysis of the Services for the benefit of all customers provided that there is no adverse impact on the level of protection of any personal information even after the termination or expiration of any services agreement you have with IntelPeer.

We may also use this information for other purposes for which you have authorized.

**California residents:** If you are a California resident, please refer to the California Residents' Rights section below for important information about the categories of personal information we collect and disclose, as well as your rights under California privacy laws, including to submit a "[Do Not Sell My Info](#)" request (to opt of the sale of your personal information by us).

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## **1.0 Introduction and Purpose**

IntelPeer understands the importance of privacy and security. We are committed to protecting the personal information we collect. In this Privacy Policy, “personal information” means any information that identifies or could be used to directly or indirectly identify a particular individual, as well as any information that is linked or reasonably linkable to a particular individual or household; it also includes “personal data,” “personal information” and other equivalent terms as defined under applicable privacy laws.

The purpose of this Privacy Policy is to explain our privacy and information practices and the rights and choices individuals have regarding their personal information that we collect. In this Privacy Policy, IntelPeer outlines our privacy practices, including how and why we collect, use and disclose personal information we collect on our own behalf, and the rights and choices individuals have regarding the personal information we collect about them. The Privacy Policy also explains our role when we process personal information on behalf of our clients.

In addition, IntelPeer has self-certified to the EU-U.S. Privacy Shield Framework administered by the U.S. Federal Trade Commission (“**EU-U.S. Privacy Shield**”) with respect to the personal information that we receive in the United States from the European Economic Area and the United Kingdom (together herein, the “**EU**”), related to Customers and Users of our Services and our Website (“**EU Data**”). For more information about our EU-U.S. Privacy Shield certification, please review Section 4.4 (Transfer of Information Internationally), below.

## **2.0 Customer Data**

In conjunction with the provision of our products and services, we may access or otherwise process personal information on behalf of our Customers (“**Customer Data**”). IntelPeer generally acts as a “service provider” or “processor” of Customer Data under applicable privacy and data protection laws, which means we will only process such information on behalf of and subject to the instructions of our Customers. Our Customers are the “data controllers” or “businesses” for the personal information we process on their behalf, and their respective privacy notices will apply to and control the processing of Customer Data.

We may also collect certain personal information related to the use our Services, for which we are controller, such as usage, access and activity logs, that are used to protect and secure our Services, administer and bill for Services, or prevent unauthorized access, use and activities within our Services; such information is not Customer Data as defined above.

## **3.0 Scope**

Except as otherwise expressly noted, this Policy applies to our collection, use and disclosure of personal information related to:

- current, former and prospective Customers and clients;
- users of our website at [www.intelepeer.ai](http://www.intelepeer.ai), including any features available to users our website (the “**Website**”);
- users of our products, services, applications, customer portal, platforms and application programming interfaces (“**Services**”); and
- individuals that register for or participate in our events; and
- others who contact us or with whom we communicate or interact.

Unless explicitly stated otherwise, this Privacy Policy does not govern Customer Data. As noted above, we are a service provider and data processor for Customer Data and will only process Customer Data on behalf of and subject to our respective agreements with our Customers. This Privacy Policy also does not apply to the personal information we collect from employees and other personnel, candidates and job

applicants, or contractors and non-employee workers, whose personal information is subject to separate privacy notices.

#### **4.0 Collection, Use and Disclosure of Personal Information**

##### **4.1 Collection of Information**

IntelePeer may collect information directly from individuals, from third parties, and also automatically related to how an individual uses our Website or Services.

IntelePeer may collect personal information from you or automatically from your device(s), when using our Website or Services:

- Depending on how you chose to use our Website or Services, this personal information could include names, job titles, postal addresses, telephone numbers, email addresses, employee names; log-in credentials, authentication data, identification numbers, location data, metadata, cookie identifiers, log data, types of Services used, credit application information, credit card information, payment information, instant messenger user name, and any communications, inquiries, contact or other information Customer or User generates or provides access to as a result of using the Website or Services.
- To continue to provide you quality Services, trouble-shoot any issues, and introduce new solutions, IntelePeer may track (i) information or activity to monitor our networks and systems; (ii) usage of our Website; (iii) performance metrics; and (iv) communications traffic and associated records for your communications, including without limitation the time, date, duration, and type of communication, the location of the device generating the communication, the source and destination of the communication and the content of the communication, such as texts, message bodies, voice and video media, images, and sound, containing or creating such data.
- IntelePeer will also collect personal information when you are completing online forms, contacting our Sales team, signing up for a newsletter or white papers, registering for an event, making requests to our APIs, or taking a survey.

When we obtain your personal information, we will only use this personal information for the reason(s) for which we collected it or notified you of when we collected it, or other compatible reasons.

**Special Categories of personal information:** IntelePeer does not intentionally collect or process any special categories of data in the provision of its Services or Website. However, special categories of data may from time to time be inadvertently processed by IntelePeer where the Customer or User choose to include this type of data within the communications transmitted using the Services or Website. As such, the Customer or User respectively has sole responsibility for ensuring the legality of any special categories of data it or its Users choose to process using the Services or Website including without limitation any personal information which is likely to result in high risk to the data protection rights and freedoms of the Data Subject as defined by the EU Regulation 2016/679 (“GDPR”), and to promptly inform and provide IntelePeer with reasonable and timely assistance as IntelePeer may require in order to conduct any requisite data protection impact assessment and consultation with any relevant data protection authority.

Our Services are for business enterprise customers and should not address or involve anyone under the age of 13 using our Website or Services, and we do not knowingly permit such usage. In the case we become aware that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to undertake necessary actions to address the situation.

#### **4.2 Use of Information**

Subject to the terms of this Policy, IntelPeer may use the personal information we collect for the following business and commercial purposes:

- Deliver, maintain, and monitor our quality Services and associated support to our Customers;
- Administer, operate, secure, manage and promote the Website and Services (including our Customer portal and our network and systems);
- Evaluate, support and enhance the performance and efficiency of our Services and Website;
- Conduct business transactions, including creating and sending contracts, confirmations and invoices, assessing and remitting taxes, and auditing our practices;
- Detect, prevent, investigate and resolve security incidents, fraud or other misuse of our Services;
- Protect the rights, property and safety of Customer, User, their users, customers or other related third parties, as well as of IntelPeer;
- Notify our Customers or Users with technical alerts, service updates, security notifications, and other administrative communications;
- Analyze and aggregate data for purposes of marketing our Services, identifying market trends and developing innovative solutions offered to our Customers;
- Respond to inquiries and requests for additional resources about IntelPeer and our Services;
- Comply with applicable laws relating to the Services and Website; and
- Perform any incidental statistical analysis of the Services for the benefit of all customers provided that there is no adverse impact on the level of protection of any personal information even after the termination or expiration of any services agreement you have with IntelPeer.
- Use this information for other purposes for which you have authorized.

For any marketing materials sent, IntelPeer will only contact you pursuant to your marketing preference, you may unsubscribe from marketing and promotional communications at any time, as explained below in Section 4.6 (Choices about Personal Information).

IntelPeer will collect and process personal information from our Customers and Users when: (i) we need the personal information to perform our obligations under a contract for the provision of cloud communications services with connections primarily offered in the form of APIs, secured SIP trunking or dedicated circuits to or from other communications networks or storage facilities; (ii) we have obtained your consent to do so; (iii) required by law; (iv) our legitimate interests (as listed above or otherwise provided in writing) in doing so does not overridden by the data protection interests or fundamental rights and freedoms you have in the personal information. If personal information is required to comply with a legal requirement or enter into a contract, IntelPeer will advise you whether the provision of your personal information is mandatory and what the possible consequences are if the personal information is not made available.

#### **4.3 Disclosure of Information**

We may disclose personal information in order to provide and improve our services, reach users with more relevant information and offers and for other business and commercial purposes as set out below. IntelPeer may employ third-party entities and individuals, including business partners, contractors, vendors, and authorized third party agents to perform certain functions or features of our Website or Services. Specifically:

- To third parties that facilitate the provision of our Services, such as obtaining telephone numbers or messaging short codes, connecting and routing calls or messages to other over-the-top providers or the public switched telephone network (“PSTN”) or ;
- To third parties that perform services related to providing our Website and Services, such as entities providing customer service, email delivery, hosting our website, support or technical services, and payment or credit card processing;
- To third parties that assist us in analyzing how our Services are used;
- To third parties that send marketing and other communications related to our business;

- To third parties that enforce our contractual requirements or policies, including our Information Security Policies;
- To third parties for the purposes of detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; and
- To third parties that assist us in debugging and to identify and repair errors that impair existing intended functionality related to the Website or Services.

These third-party entities may have access to your personal information for the purposes of performing the tasks assigned to them on our behalf. Each of these third-parties are obligated contractually not to disclose or use the personal information for any other purpose. Subject to applicable laws, we may also disclose personal information:

- In connection with the planning, due diligence and implementation of commercial or corporate transactions, including a reorganization, merger, sale of all or a portion of our assets, a joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings) – in such cases, your personal information will be transferred to the acquiring entity.
- If we are required to disclose your personal information under applicable law or regulation, which may include laws outside your country of residence;
- In order to enforce or apply our terms of use and customer agreements, or to protect the rights, privacy, safety or property of IntelPeer, our Customers, Users, affiliates or other parties;
- To respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence; and
- In accordance with separate terms and conditions of use that may apply to you or with your explicit consent.

Finally, IntelPeer will disclose personal information to third-parties who are governmental entities or authorized representatives, if IntelPeer reasonably believes that disclosure is compelled (i) by applicable law, regulation, legal process or a government request; (ii) by the need to protect ourselves, our Customer or the public from harm or illegal activities or to defend the rights, interests or property of ours, our Customers, or the public; (iii) by the desire to prevent or investigate wrongdoing in connection with the Website or our Services; or (iv) in response to an emergency which IntelPeer reasonably believes in good faith requires disclosure of the personal information to assist in preventing a death or serious bodily injury. The governmental entities may include law enforcement agencies, regulatory or legislative bodies, or other third parties in order to respond to legal process in a litigation matter.

If the materials for our Services contain links to other third-party websites, please note that these external sites are not operated by us. Therefore, IntelPeer strongly advises you to review the privacy policy associated with those websites. IntelPeer has no control over, and assume no responsibility for, the content, privacy policies, or practices of any third-party sites or services. Moreover, the inclusion of a link on the Website does not imply our endorsement of the linked site or service.

#### **4.4 Transfer of Information Internationally**

Your personal information collected outside the United States will be transferred to and stored on our servers in the United States, and potentially in other countries where our group companies and third-party service providers and partners operate. These countries may have data protection laws that are different from, and in some instances less protective than the laws in your country. However, your personal information will remain protected in accordance with this Policy and applicable laws.

***EU-U.S. Privacy Shield Certification.*** IntelPeer has certified its adherence to the EU-U.S. Privacy Shield Principles and is subject to the jurisdiction of the Federal Trade Commission. This Policy sets out

IntelPeer's practices with regard to the collection, use, retention and processing of EU Data that IntelPeer receives in the United States. Pursuant to our certification, we will collect, use disclose and otherwise process EU Data in accordance with the Privacy Shield Principles, including Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability, as applicable.

To the extent the EU Data includes Customer Data, we will only process such data on behalf of and subject to our Customers' respective instructions. Otherwise, we will not use such personal information for purposes that are materially different from those for which it was originally collected or subsequently authorized by the data subject, nor will we disclose such personal information to third parties (other than our third party agents), unless we are required to by applicable law or we provide clear, conspicuous, and readily available mechanisms to permit the data subject to opt out of such uses and disclosures. We will remain responsible and liable under the Privacy Shield Framework if any of our third party agents process EU Data in a manner inconsistent with the Privacy Shield Principles, unless we are able to prove that we are not responsible for the event giving rise to the damage.

In compliance with the Privacy Shield Principles, IntelPeer commits to resolve complaints about our collection or use of your personal information. IntelPeer has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield Complaints concerning data transferred from the EU. Filing such a complaint will be at no cost to you, except that each party will be responsible for its own attorneys' fees. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact IntelPeer at [infosec@intelepeer.com](mailto:infosec@intelepeer.com). If IntelPeer has not addressed your Privacy Shield complaint to your satisfaction, you may consult [ec.europa.eu/justice/data-protection/files/annexes\\_eu-us\\_privacy\\_shield\\_en.pdf](https://ec.europa.eu/justice/data-protection/files/annexes_eu-us_privacy_shield_en.pdf) for more information on how to file a complaint, provided that you have: (1) contacted IntelPeer and afforded us the opportunity to resolve the issue; and (2) contacted the U.S. Federal Trade Commission at [www.privacyshield.gov/assistance](http://www.privacyshield.gov/assistance) and afforded the Federal Trade Commission time to attempt to resolve the issue.

For EU Data Subjects, if neither IntelPeer nor our designated dispute resolution provider is able to resolve your complaint, you may have the possibility, under certain conditions, to engage in binding arbitration through the Privacy Shield Panel

**Please note:** On July 16, 2020, the European Court of Justice invalidated the EU-US Privacy Shield Program as an adequacy mechanism for transfers of personal data to the United States. IntelPeer will continue to comply with its Privacy Shield commitments for so long as it remains an active participant in the program. In addition, we will work with clients to implement additional adequacy measures where necessary under applicable data protection laws in the European Economic Area (EEA) and the United Kingdom (UK), such as the EU standard contractual clauses for the transfer of personal data to processors established in third countries ("Standard Contractual Clauses")

#### **4.5 Security and Retention of Information**

IntelPeer strives to use commercially acceptable measures for securing your personal information, through employing current industry standards and state-of-the-art technologies, based on the sensitivity of the personal information being protected and the likelihood of any risk associated with such personal information.

Such measures may include, as appropriate: (a) the pseudonymization or encryption of personal information; (b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services; (c) the ability to restore the availability and access to personal information in a timely manner in the event of a physical or technical incident; or (d) a process for

regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing. However, we cannot guarantee that unauthorized access, hacking, data loss or data breach will never occur, so Customers and Users must inform IntelPeer without undue delay upon becoming aware of a security issue and provide timely details and cooperation as IntelPeer may require in order for IntelPeer to address the issue and comply with all applicable data protection laws. Such details should include the possible cause and consequences, the categories of personal information involved, a summary of unauthorized recipients of the personal information and the anticipated mitigation measures.

To protect personal information, IntelPeer utilizes technical and organizational safeguards, internally and with third-party vendors, both during transmission and in storage from accidental or unlawful destruction, as well as loss, alteration, unauthorized disclosure of, or access to the personal information. Such safeguards will take into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing, the risk of varying likelihood and severity for the rights and freedoms of natural persons, and any technical progress or further developments of such. A detailed description of the technical and organizational security measures implemented by IntelPeer can be found at [www.intelepeer.ai/privacy/TOMs](http://www.intelepeer.ai/privacy/TOMs) (“Security Measures”), which IntelPeer reserves the right to modify the description and measures as needed, provided that such changes will not degrade the functionality and security of the Services. Customers and Users will be solely responsible for determining whether our Security Measures are suitable for their use, and implementing any additional safeguards necessary for their own adherence to applicable data protection laws. IntelPeer also will work diligently to remedy or mitigate the effects of any security incident, to keep impacted Customers and Users apprised of all developments in connection with the incident, and to treat information shared by Customers or Users in relation to incidents as confidential.

IntelPeer retains personal information for no longer than is necessary to fulfill the purposes for which the information was originally collected, unless a longer retention period is required pursuant to IntelPeer’s Record Retention Policy, or permitted for legal, tax or regulatory reasons, or other legitimate and lawful business purposes. The majority of the personal information associated with a Customer account will be stored for 7 years following the closure of the account, unless longer periods are required for accounting, tax, audit or other legal purposes. Any communications or interactions with our Support teams will be retained for 3 years. Where we have no ongoing legitimate business reasons or legal obligations to have your personal information, we will either delete or anonymize it for analytics purposes. We will not delete your personal information if doing so prevents IntelPeer from complying with applicable law or its Record Retention Policy for carrying out necessary business functions, like billing for our services, calculating taxes, or conducting required audits.

#### **4.6 Choices about Personal Information**

Where we process personal information for our own purposes, as a business or data controller, we provide individuals with the opportunity to access, review, modify, and request that we delete their personal information that we process; we will process such request subject to and as required by applicable laws.

**Customer Data.** If you are an individual and would like to make a request regarding your personal information we have collected on behalf our Customers (as a processor or service provider), you should direct your request to the relevant Customer. If we receive an individual request related to Customer Data, we will notify the relevant Customer (where it is possible for us to identify the relevant Customer) and provide reasonable assistance upon request to such Customer, as required by law, to enable them to respond to the request. Customers can also make various self-service choices about their Customer Data through our Customer portal.

If you are a Customer and request closure or deletion of your Customer account, this will result in you permanently losing access to your account and data in the account, subject to any requirements set forth in our applicable agreement(s) with and applicable laws.

You may also at any time ask us to remove you from our marketing lists for promotional communications by sending us an email at [unsubscribe@intelepeer.com](mailto:unsubscribe@intelepeer.com), and we will remove you from our lists in accordance with applicable laws. Please note that even if you opt out of promotional communications, IntelPeer may still send you non-promotional messages relating to updates to our terms of service or privacy notices, security alerts, and other notices relating to your access to or use of our Services. For any questions about this Policy, please contact IntelPeer at [infosec@intelepeer.com](mailto:infosec@intelepeer.com).

#### **4.7 Data Subject Rights under the GDPR**

Individuals from the EU (“EU Data Subjects”) have the right to request:

- Access and further information concerning the processing of your personal data;
- Correction, rectification, completion, erasure or restriction of the processing of your personal data;
- A copy of the personal data that we process relating to you;
- Portability of the personal data if the processing is based on the legal grounds consent or fulfilment of contract, which means that you can receive the personal data you provided to us, in a structured, commonly used and machine-readable format, and transfer such data to another data controllers;
- Objection to the processing of your personal data for direct marketing or to recall your prior given consent, which will not affect the lawfulness of the processing based on the consent before its withdrawal.
- For any personal information that we process based on your consent, you can withdraw such consent at any time, though withdrawing your consent will not affect the lawfulness of any processing IntelPeer conducted prior to your withdrawal, or in reliance on lawful processing grounds other than consent.

Any users, including EU Data Subjects, may also at any time ask us to remove you from our marketing lists for promotional communications by sending us an email at [unsubscribe@intelepeer.com](mailto:unsubscribe@intelepeer.com), and we will remove you from our lists in accordance with applicable laws. Please note that even if you opt out of, or withdraw consent for, promotional communications, IntelPeer may still send you non-promotional messages relating to updates to our services, security alerts, and other notices relating to your access to or use of our Services, or may continue processing your personal data based on other legal grounds, except for direct marketing.

EU Data Subjects may also exercise additional rights to make a complaint to a competent [data protection supervisory authority](#) or commence proceedings in a court of competent jurisdiction in accordance with applicable data protection laws, or to engage an independent dispute resolution provider, at no cost to you, as part of our Privacy Shield [\(as further explained above\)](#).

Please note that making any changes pursuant to this Section may take up to thirty (30) days from the date of request. For any questions about this Policy, please contact IntelPeer at [infosec@intelepeer.com](mailto:infosec@intelepeer.com).

#### **4.8 Cookies and Similar Technologies; Website Analytics**

IntelPeer uses log data, cookies, web beacons, and associated metadata of the Users of the Website, along with any personal information shared by Users in webforms on our Website such as physical address, email address, telephone number and type of industry the User is in.

The log data may include your IP address, browser type and version, pages or materials of our Website viewed, the time and date of your visit, the time spent on those pages, the referring or exiting pages, your internet service provider, your operating system, and other analytical information IntelPeer may use to introduce Users to new solutions or improve the navigational experience on our Website.

IntelPeer also uses cookies which are files with a small amount of data used as an anonymous unique identifier, which are sent to your browser from the Website when you visit and are stored on your computer's hard drive. Our Website uses these cookies to maintain sessions, remember preferences in form field values, collect other information, and to improve our Website and Services. You have the right to accept or refuse these cookies, and to know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to access some portions of our Website associated with our provisioning of Services. You may also manage your cookie preferences on our Website

***Analytics.*** IntelPeer also use cookies and other first party and third party technologies to implement analytics tools, including Google Analytics, that help us understand how the Services are performing, how you engage with the Services, and how you interact with our advertisements and communications. The information we collect using Google Analytics, which may be shared with Google, doesn't include names or contact information, but may include IP addresses and activity on the Services. For more information on your privacy choices in connection with Google Analytics, including the Google Analytics Browser Opt-Out Add On, please visit the Google website at: [www.google.com/policies/privacy/](http://www.google.com/policies/privacy/).

***Cookie Preferences on our Website.*** You can also manage your preferences for most cookies on our Website, by using [our preference manager](#). Your settings are browser and device specific—so, if you come back our Website from a different device or browser, or you delete cookies on your current browser, you will need to apply these settings again.

#### **4.9 Internet Based Advertising**

For the Website, we may work with third-party ad networks, analytics companies, measurement services and others (“third-party ad companies”) to display advertising on our Website and to manage our advertising on third-party sites, mobile apps and online services. We and these third-party ad companies may use cookies, pixels tags and other tools to collect information on our Website (and on third-party sites and services), such as browsing history, IP address, device ID, cookie and advertising IDs, and other identifiers, general location information and, with your consent, your device's geolocation information; we and these third-party ad companies use this information to provide you more relevant ads and content and to evaluate the success of such ads and content.

***Ad Preferences on our Website.*** You can manage your preferences for targeting cookies and tags on our Website by using [our preference manager](#). Your settings are browser and device specific—so, if you come back our Website from a different device or browser, or you delete cookies on your current browser, you will need to apply these settings again.

You may also opt-out of many third party ad networks and obtain more information about targeted advertising at the industry websites below:

- Canada: [www.youradchoices.ca](http://www.youradchoices.ca)
- EU: [www.youronlinechoices.eu](http://www.youronlinechoices.eu)
- U.S.: [www.aboutads.info](http://www.aboutads.info)

#### **5.0 Contacting IntelPeer About Privacy**

Any requests pursuant to Section 4.5 may be submitted by completing the [request form](#). If you have any questions, concerns or complaints related to this Policy, you can contact us at [infosec@intelepeer.com](mailto:infosec@intelepeer.com).

VeraSafe has been appointed as IntelPeer’s representative in the European Union for data protection matters, pursuant to Article 27 of the GDPR of the European Union. VeraSafe can be contacted in on matters related to our processing of personal data subject to the GDPR. You may contact VeraSafe using this contact form: <https://www.verasafe.com/privacy-services/contact-article-27-representative> or via telephone at: +420 228 881 031. Alternatively, VeraSafe can be contacted at:

**VeraSafe Ireland Ltd.**

Unit 3D North Point House  
North Point Business Park  
New Mallow Road Cork T23AT2P  
Ireland

**6.0 Updates to this Policy**

IntelPeer can update our Privacy Policy from time to time. For this reason, we encourage you to review the Policy periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page with an updated revision date for when the terms became effective. If we make material changes to this Policy, we will endeavor to provide notice in advance of such changes taking place, such as by notifying your email address on file with us or posting prominent notice on our Website or within our Services.

**7.0 Definitions**

In case you are unsure what certain terms mean within this Policy, we outline some definitions for you to reference. The following definitions apply for this Policy:

- **Customers:** The customers of IntelPeer, along with their users or customers.
- **Services:** Our products, services, applications, customer portal, platforms and application programming interfaces as our Customer, their customers or users.
- **Customer Data:** Any personal information processed on behalf of our Customers, in conjunction with the provision of our products and services. This generally includes any communications, inquiries, contact or other information Customer or User generates or provides access to as a result of using the Website or Services; information or activity about the configurations of the Customer’s systems, networks or devices; and the communications traffic and associated records for your communications, including without limitation the time, date, duration, and type of communication, the location of the device generating the communication, the source and destination of the communication and the content of the communication, such as texts, message bodies, voice and video media, images, and sound, containing or creating such data.
- **Users:** All other individuals who are not our Customers but use the IntelPeer Services or Website for some legitimate purpose.
- **Website:** The IntelPeer website at [intelepeer.ai](https://intelepeer.ai).

**8.0 Additional Information for California Residents**

In this section, we provide additional information to California residents about how we handle their personal information, as required under California privacy laws including the California Consumer Privacy Act (“CCPA”). This section does not address or apply to our handling of publicly available information lawfully made available by state or federal government records or other personal information that is exempt under the CCPA.

**8.1 Categories of Personal Information Under the CCPA (Last Updated: July 2020)**

While our collection, use and disclosure of personal information varies based upon our relationship and interactions with you, in this section we describe, generally, how we have collected and disclosed personal information about California consumers in the prior 12 months (from the Last Updated date above).

**Categories of Personal Information Collected and Disclosed.** The table below identifies the categories of personal information (as defined by the CCPA) we have collected about consumers, as well as how we have disclosed such information for a business purpose. For more information about the business and commercial purposes for which we collect, use and disclose personal information, please see Sections 4.2 (Use of Information) and 4.3 (Disclosure/sharing of Information) above.

Personal Information Collected		Do We Disclose this Information?	Categories of Third Parties to Whom We May Disclose or Sell this Information
Categories	Description		
<i>Identifiers</i>	Includes direct identifiers, such as name, username, email address, phone number, address and other contact information; IP address and other online identifiers; and other similar identifiers.	YES	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• government entities and law enforcement</li> <li>• advertising networks</li> <li>• data analytics providers</li> <li>• social networks</li> <li>• internet service providers</li> <li>• operating systems and platforms</li> <li>• business customer/client</li> </ul>
<i>Customer Records</i>	Includes personal information, such as name, contact information, and financial or payment information, that individuals provide us in order to purchase or obtain our products and services. For example, this may include information collected when an individual registers for an account, purchases or orders our products and services, or enters into an agreement with us related to our products and services.	YES	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• government entities and law enforcement</li> <li>• internet service providers</li> <li>• operating systems and platforms</li> <li>• business customer/client</li> </ul>
<i>Commercial Information</i>	Includes records of personal property, products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.	YES	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• government entities and law enforcement</li> <li>• internet service providers</li> <li>• operating systems and platforms</li> <li>• business customer/client</li> </ul>
<i>Usage Data</i>	Includes browsing history, clickstream data, search history, access logs and other usage data and information regarding an individual's interaction with our websites, Services, and our marketing emails and online ads.	YES	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• government entities and law enforcement</li> <li>• advertising networks</li> <li>• data analytics providers</li> <li>• internet service providers</li> <li>• operating systems and platforms</li> </ul>
<i>Audio, Video and</i>	Includes audio, electronic, visual, thermal, olfactory, or similar information [such as, photographs	YES	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> </ul>

<i>Electronic Data</i>	and images (e.g., that you provide us or post to your profile) and call recordings (e.g., of customer support calls).		<ul style="list-style-type: none"> <li>• government entities and law enforcement</li> <li>• internet service providers</li> <li>• operating systems and platforms</li> </ul>
<i>Professional information</i>	Includes professional and employment-related information such as current employer, position(s), and business contact information.	YES	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• government entities and law enforcement</li> <li>• internet service providers</li> <li>• operating systems and platforms</li> <li>• business customer/client</li> </ul>
<i>Inferences and profiles</i>	Includes browsing history, clickstream data, search history, access logs and other usage data and information regarding an individual’s interaction with our websites, Services, and our marketing emails and online ads.	YES	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• government entities and law enforcement</li> <li>• internet service providers</li> <li>• operating systems and platforms</li> </ul>

**Do We “Sell” Personal Information?** Under the CCPA, a “sale” includes disclosing or making available personal information to a third-party in exchange for monetary or other benefits or value. While we do not disclose personal information to third parties in exchange for monetary compensation, we may disclose or make available certain categories of personal information to third parties in order to obtain a service or benefit, such as when we make browsing information available to third party ad companies (through third party tags on our Sites) in order to improve and measure our ad campaigns and reach customers and potential customers with more relevant ads and content. As defined by the CCPA, we may “sell” Usage Data and Identifiers to third party advertising networks, social networks and data analytics providers.

**8.2 California Residents’ Rights**

**CCPA Rights.** In general, California residents have the following rights with respect to their personal information:

- **Do-not-sell (right to opt-out):** to opt-out of our sale of their personal information. While we may “sell” personal information as defined by the CCPA, we do not sell personal information about California consumers who we know are younger than 16 years old.
- **Right of deletion:** to request deletion of their personal information that we have collected about them and to have such personal information deleted (without charge), subject to certain exceptions.
- **Right to know:** with respect to the personal information we have collected about them in the prior 12 months, to require that we disclose the following to them (up to twice per year and subject to certain exemptions):
  - categories of personal information collected;
  - categories of sources of personal information;
  - categories of personal information we have disclosed or shared with a third party for a business purpose;
  - categories of third parties to whom we have sold their personal information and for each the specific categories of personal information sold;
  - the business or commercial purposes for collecting or selling personal information; and

- a copy of the specific pieces of personal information we have collected about them.
- Right to non-discrimination: the right not to be subject to discriminatory treatment for exercising their rights under the CCPA.

***Submitting CCPA Requests.*** California residents may submit CCPA requests to us regarding their personal information through our online [request form](#), available here. You may also contact us by phone at 833-451-6733 (toll free).

California residents may opt out of “sales” of their personal information by us by using [our preference manager](#) (to opt out of “sales” via third party tags and cookies on our Websites).

When you submit a request to know or a request to delete, we will take steps to verify your request by matching the information you provided with the information we have in our records. You must complete all required fields on our webform to verify your request. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify the requestor. Authorized agents may initiate a request on behalf of another individual by contacting us at [infosec@intelepeer.com](mailto:infosec@intelepeer.com), and will be required to provide proof of their authorization. We may also require that the relevant individuals directly verify their identity and the authority of the authorized agent.

You may contact IntelPeer at [infosec@intelepeer.com](mailto:infosec@intelepeer.com) with any questions regarding our privacy practices or this Policy.