

Sorenson Privacy Policy

Last Updated: January 1, 2021

Sorenson Communications, LLC (“Sorenson,” “we,” or “us”) is committed to protecting your privacy. This Privacy Policy (“Privacy Policy” or “Policy”) explains how we collect and use information about you and your use of our websites, applications, products and services (collectively the “Services”). This Privacy Policy applies to any personal information you or any entity on your behalf provides to us, or that we collect through our Services. By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

Notwithstanding any other provision of this Policy, to the extent you use any Sorenson website to place a telecommunications relay service call, your privacy rights and Sorenson's obligations with regard to any information generated by that call shall be governed by applicable law, including relevant sections of the Communications Act of 1934, as amended, and any applicable implementation rules and orders.

Collection of Information

What Information We Collect

We collect personal information from you (1) when you choose to use, apply for, or register for a Sorenson service or product, (2) when you choose to send an e-mail, participate in surveys, or engage in other transactions or interactions with Sorenson, or (3) when you visit Sorenson’s websites. Through these interactions we may collect the following personal information:

- **Personal Identifiers:** Full name, physical address, mailing address, phone number, email address, date of birth, account number, and last four digits of government identification number.
- **Protected Class Information:** Information relating to the customer’s hearing loss, including self-certifications.
- **Commercial information:** User preferences, purchasing history, dates of service, date of last call, VRS/IP CTS provider name, and participation in promotional activities.
- **Internet Data:** IP address, device ID, operating or information system, machine type, cookies, and website interactions.
- **Geolocation Data:** Device location enabled services.

We also may collect nonidentifiable or aggregate information about your use of our Sorenson products and services and our business relationship with you when you interact with or use

our Sorenson website, products or services, or respond to e-mails, newsletters, or promotional or other informational communications.

Cookies and Similar Technologies

Cookies are small files stored on your devices that tell websites who you are. If you prefer not to use cookies, you may shut them off by changing the appropriate setting in your browser. Without cookies, however, we cannot accomplish many of the basic functions needed to provide you with our Services. We recommend you keep cookies activated. We have broken up our cookies into categories to help you understand what they do.

- **Essential:** These cookies are required to use our Services. For example, they are necessary to view the text on our websites and login to your account.
- **Performance & Functionality:** These cookies let us know which pages on our website load slowly and help us make visiting our website easier. We use this information to make improvements to our user experience and retain information on your browser and language preferences.
- **Analytics:** These cookies allow us to analyze how visitors use and interact with our websites.
- **Marketing:** These cookies help us create targeted advertising experiences on our websites.

For more information about our use of Cookies, please review our Cookie Notice.

Use of Information

Sorenson uses the collected personal information for various purposes, including but not limited to the following:

- To initiate or provide Sorenson products or services;
- To provide you with customer service and support;
- To monitor, analyze, improve and develop our Services and to create and test new Service features;
- To determine eligibility for the Services and our partners' programs;
- To provide a more customized user experience;
- For internal marketing and promotional purposes;
- To generate anonymized, aggregated data containing only de-identified, non-personal information that we may use for research purposes;
- To enforce applicable provisions of Sorenson's Service and Product Agreements
- To detect, prevent, or otherwise address fraud, identity theft, security, or other technical issues; or
- To protect the rights, property, or safety of Sorenson, our employees or users, or the public as required or permitted by law.

- To comply with legal requirements such as a law, regulation, search warrant, subpoena, or court order;
- To respond to 911 calls or other emergencies;
- For any other purpose for which you expressly authorize us to use your information.

We do not use your personal information for automated decision-making or profiling.

Disclosure of Personal Information to Third Parties

Sorenson does not rent or sell your Personal Information to third parties. However, we may engage third party service providers to perform tasks on our behalf and need to share your information with them to provide products or services to you. We may also share your information with third parties when necessary to comply with laws and regulations (including government agencies and private entities responsible for overseeing or administering the Telecommunications Relay Fund and verifying eligibility for Sorenson services); respond to subpoenas and court orders; exercise our legal rights or defend against legal claims; investigate, prevent, or take action regarding illegal activities, suspected fraud, potential threats to our property or the physical safety of any person, or violations of our usage instructions and applicable terms and conditions; facilitate the financing or insuring of our business or a disposition or sale of all or part of our business or assets, or as otherwise permitted or required by law.

We will share some or all of your information (and in the case of minors, the information of both the minor user and the parent) with third parties as required or permitted by law or regulation, including with government agencies and private entities responsible for overseeing or administering the Telecommunications Relay Fund and verifying eligibility for Sorenson services. For example, Sorenson will submit Sorenson users' information to the TRS User Registration Database, a database administered by a government contractor, as required by FCC regulations, and Sorenson will submit information about Sorenson users and their TRS usage to the Administrator of the TRS Fund and/or the FCC for billing purposes. We may also share your location or other information with third parties if you consent for us to do so from within one of our products or otherwise. For example, some of our products allow you to share your location with third parties in conjunction with performing searches. When you enable this feature, we seek your consent to share your location information. Sorenson has no control over such third parties, and third parties' use of your location information is not governed by this Privacy Policy. If you consent to share your location information with third parties, you acknowledge and agree that Sorenson is not responsible for third-party use of your location information.

Links to Third-Party Websites and Applications

Our Services may contain links to other sites or provide you with the ability to download third party applications that are not operated by us. If you click on a link to a third-party site

or download a third party application, you will be directed away from Sorenson's websites. We have no control over these third party websites or applications and assume no responsibility for the content, privacy policies or practices of these third parties. We strongly advise you to review the privacy policy of every website you visit or application you download.

Marketing Activities

We may use your personal information to contact you regarding our products, services, promotions, newsletters, and other marketing activities in accordance with applicable law. You may opt out of receiving these promotional emails at any time by clicking the unsubscribe button located at the bottom of our marketing communications or emailing privacy@Sorenson.com. If you opt out, we may still send you non-promotional emails relating to your use of our Services or our ongoing business relationship with you.

Legal Basis for Processing Personal Information

Some jurisdictions require us to disclose the legal basis on which we rely to process personal information. To the extent those laws apply, our legal basis may include one or all of the following:

- **Legal Obligation:** We may handle personal information to comply with state, federal, and international applicable laws and regulations.
- **Consent:** We may handle personal information based on your consent or valid consent made on your behalf.
- **Contractual Obligations:** We may handle personal information to meet our contractual obligations with you, or to take steps in anticipation of entering into such a contract.
- **Legitimate Business Interest:** We may handle personal information in order to provide you with the Service and accomplish our legitimate business purposes.

Retention of Personal Information

We will retain personal information for as long as necessary to fulfil the purposes described in this Privacy Policy, unless otherwise required by contract or law. Anonymous and aggregated information may be stored indefinitely.

International Transfer of Personal Information

We may transfer your personal information to other countries outside of the United States for the purposes describe in this Privacy Policy. We will take all the steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy and no transfer of personal information will take place to an organization or

a country unless there are adequate controls in place including the security of data and other personal information.

Online Privacy for Children

We do not knowingly collect Personal Information from anyone under the age of 13 through Sorenson products, services, or websites unless we first obtain permission from that child's parent or legal guardian. We obtain parental consent by either:

- Providing you with a notice of our privacy practices, asking whether you consent to these practices, and having you verify your identity by showing a valid, government-issued form of identification; or
- Sending you a written notice of our privacy practices, which you would have the option of consenting to and returning a signed copy by mail.

When you apply for Sorenson Services on behalf of your child, we may collect the information listed in this Policy from you about your child. We may also collect certain information about you (the parent), as required by law or regulation, and for administrative and billing purposes. After we receive your permission to provide Sorenson Services to your child, we will collect, store, and disclose information necessary to provide those Sorenson products and services to your child as more fully described in this Policy. Sorenson may share information about your child and your child's use of Sorenson products and services with third parties for billing and administrative purposes and otherwise, as required or permitted by law or regulation, including with government agencies and private entities responsible for administering or overseeing the Telecommunications Relay Service Fund and verifying eligibility for Sorenson services. For example, Sorenson may submit your and your child's information to the TRS User Registration Database, a database administered by a government contractor, as required by FCC regulations, and Sorenson will submit information about your and your child's TRS usage to the Administrator of the TRS Fund and/or the FCC for billing purposes.

Sorenson may also share your child's name, image (if your child uploads an image), and video phone number(s) with other Sorenson users in your child's contact list. Sorenson may also share information about your child's location with emergency services if your child calls 911 from a Sorenson mobile device.

You may review, delete, or prohibit further collection of your child's information at any time. If you have further questions or requests related to Sorenson's online collection of information from children, please contact: privacy@sorenson.com

Security of Information

Sorenson wants your Personal Information to remain secure. We maintain reasonable technical, physical and administrative security measures to protect the security of your personal information against loss, misuse, unauthorized access, disclosure, or alteration.

We periodically review our data collection, storage, and processing policies and implement additional security features as appropriate. In addition, we restrict access to Personal Information in Sorenson's possession to Sorenson employees, contractors, and agents who need to have access to that information to process it on our behalf. Those individuals are subject to Sorenson's privacy policy and confidentiality obligations.

Although we do our best to protect your personal data, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) the security, integrity and privacy of any and all information and data exchanged between you and us through our websites and applications cannot be guaranteed. Please do your part in protecting your personal data against unauthorized use. Keep your user account password safe and confidential, and be sure to sign off when finished using a shared computer or device.

By using our Services or otherwise providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our websites, products, and services. If we learn of a security breach involving your personal data, we may attempt to notify you electronically by sending an email to you. To withdraw your consent to receive electronic notice of a data breach, please email us at Privacy@Sorenson.com.

Do Not Track Policy

Some browsers have a "do not track" feature that lets you tell websites and applications that you do not want to have your online activities tracked. We currently do not respond to browser "do not track" signals.

Your Data Protection Rights

If you are a resident of certain states or countries, you may have the right to:

- Obtain information regarding the collection, processing, and sharing of your personal information;
- Access the personal information we have obtained about you, if any;
- Correct your personal information;
- Delete your personal information; and/or
- Object to or opt-out of the use of your personal information for certain purposes.

To submit a privacy request, please contact us at Privacy@Sorenson.com. For more information about your state or country specific privacy notice and rights please see the state/country notices listed at the top of this page. We will not discriminate against individuals who exercise these rights.

We will make good faith efforts to accommodate such requests. However, we reserve the right to deny or limit requests (to the maximum extent allowed by applicable law) that:

- Conflict with Sorenson's legal, contractual, or regulatory obligations,
- Conflict with Sorenson's interests in protecting the rights, property, or safety of Sorenson, our employees or users, or the public,
- Are unreasonably repetitive or complicated,
- Require disproportionate effort to fulfil,
- Jeopardize the privacy or safety of others, or
- Sorenson determines in its sole discretion are otherwise inappropriate.

Changes to this Privacy Policy

If we make any material changes to how we treat your personal information, we will notify you via email, if available, or through a notice on our website's home page. You are responsible for ensuring we have an up-to-date email address to contact you. We advise you to review this Privacy Policy periodically for any changes. Your continued use of our services after such modifications will constitute your acknowledgment of the modified Privacy Policy and your agreement to abide and be bound by the modified Policy. Changes to this Privacy Policy are effective when they are posted on this page.

Questions

If you have any questions or concerns about this Privacy Policy, you may contact us at

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Taylorsville, UT 84123
1-(877)-595-4011
Privacy@Sorenson.com