

## 2RING PRIVACY POLICY

Updated March 8, 2023

2 Ring, spol. s r. o. and 2Ring America, Inc. (collectively, “2Ring”, the “Joint Controllers”, “us” or “we”) are committed to protecting and respecting your personal information. Please read the following carefully to understand our practices regarding the collection, use and disclosure of, any personal information or personal data (as such terms are understood under applicable law) we collect from you (“you” or “user”) or you provide to us when you visit our websites listed below or when we communicate with you in connection with our business.

This Privacy Policy applies to the following websites owned or operated by 2Ring (each, a “Site”):

\*.2ring.com, \*.2ring.cloud, \*.2ringcloud.com

If you are located in the European Economic Area (“EEA”), United Kingdom or Switzerland, certain additional rights, including under the European Union’s General Data Protection Regulation or “GDPR”, may be available to you. Please see [“EU, UK, and Swiss Residents”](#) under Section VIII below.

If you are a resident of California, certain additional rights under California law (including the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (the “CCPA”)) may be available to you. Please see [“California Privacy Rights”](#) under Section VIII below.

### I. Information we collect and how we use it

#### A. Site Visitors and General Interactions

Category of Personal Information	Type of Personal Information	Purpose of Collection
<b>Point of Collection: Browsing our Sites</b>		
Internet or other similar network activity information	Your browser type and version, language, the date and time you are accessing our Site, the referring website address, clickstream to, through and from our Site (including date and time), products and services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and the content of any undeleted cookies that your browser previously accepted from us.	<ul style="list-style-type: none"><li>• To understand your use of our Site and services.</li><li>• To improve the Site and services.</li><li>• To improve the effectiveness of our marketing.</li></ul>
Geolocation Data	Your IP address.	<ul style="list-style-type: none"><li>• For security purposes.</li><li>• If you have enabled cookies, the cookie may also collect this information. For information on cookies, please see the <a href="#">2Ring Cookie Declaration</a>.</li></ul>

Point of Collection: Demonstration Request or Free Trial Request Form		
Identifier	Your name, email and any other identifiers such as, your phone number that you may include in your form submission or follow up email.	<ul style="list-style-type: none"> <li>To communicate with you regarding the status or any follow-up regarding any demo or free trial request you have submitted to 2Ring.</li> <li>To communicate with you regarding the 2Ring license or subscription you have, or intend to, purchase.</li> <li>To communicate with you regarding new product features and product updates.</li> </ul>
Point of Collection: Email Communications You Send to Us		
Identifier	Your email and any other identifiers such as, your name, that you may include in your email.	<ul style="list-style-type: none"> <li>To respond to your email inquiry</li> <li>To use information you have provided in your email in accordance with any 2Ring agreement you accepted or this Privacy Policy.</li> <li>To communicate with you regarding the 2Ring license or subscription you have, or intend to, purchase.</li> <li>To communicate with you regarding the status or any follow-up regarding any job application you have submitted to 2Ring.</li> <li>To communicate with you regarding your request for technical support.</li> <li>To send you informational messages providing news and other information about 2Ring products and services, from which emails you may unsubscribe at any time by following the instructions included in such email.</li> </ul>
Other categories of personal information (e.g., professional or employment-related information)	Any other personal information you provide in your email.	
Point of Collection: Job Application		
Identifier	Your email and any other identifiers such as, your name and phone number that you may choose to include in your email when you contact us or click the "Apply for Job" link on our Sites.	<ul style="list-style-type: none"> <li>To communicate with you regarding the status or any follow-up (including, without limitation, interviews and background checks (performed with your consent)) regarding any job application you have submitted to 2Ring.</li> <li>To review your information, including your resume, in connection with the position you have applied for.</li> </ul>
Other categories of personal information (e.g., professional or employment-related information and education information)	Any other personal information you choose to provide in your email, including any resume you attach with your email.	

## B. 2Ring End Customers

Category of Personal Information	Type of Personal Information	Purpose of Collection
Point of Collection: 2Ring Cloud Account Registration		
Identifier	Your name, company name and address, title, business phone, and business email address when you purchase a subscription to 2Ring Cloud and login identifier after account provisioning. If you purchased the subscription from a 2Ring authorized reseller or distributor, you understand that such reseller or distributor may provide us	<ul style="list-style-type: none"> <li>To provision the 2Ring Cloud service.</li> <li>To authenticate and authorize your access to the 2Ring Cloud service.</li> <li>To provide you technical support for 2Ring Cloud.</li> <li>To provide you access to our support portal.</li> <li>To respond to your inquiries and communicate with you regarding the 2Ring Cloud service, including your subscription, product upgrades, new services, special offers, updates to our information and policies, via email, phone, Webex IM, chat or other communication media.</li> </ul>

Category of Personal Information	Type of Personal Information	Purpose of Collection
	this information.	<ul style="list-style-type: none"> <li>• To authenticate and authorize access to the 2Ring Cloud service, and to make 2Ring Cloud easier for you to use by not requiring you to enter your information more than once.</li> <li>• To send you our newsletter via email. When you receive our newsletter email, you may unsubscribe from newsletter emails at any time by following the instructions included in such email.</li> <li>• To perform market research or conduct surveys you have consented to.</li> </ul>
Geolocation Data	Your IP address	<ul style="list-style-type: none"> <li>• To create a record of your acceptance of the applicable 2Ring agreement.</li> <li>• For security purposes.</li> <li>• If you have enabled cookies, the cookie may also collect this information. For information on cookies, please see the <a href="#">2Ring Cookie Declaration</a>.</li> </ul>
Other categories of personal information (e.g., professional or employment-related information and education information)	Your company name, your role and work assignment.	<ul style="list-style-type: none"> <li>• To send you our newsletter via email – and based on the work assignment, to have the newsletter provide relevant information to your job role.</li> <li>• To contact the appropriate 2Ring end customer in relation to whom you were provided access to 2Ring Cloud, to report outages, renewals, upgrades, and other types of communication that is relevant to your use of 2Ring Cloud.</li> </ul>
<b>Point of Collection: 2Ring Cloud-Host and Usage Information</b>		
Internet or other similar network activity information	Your browser type and version, language, the date and time you are accessing 2Ring Cloud, the referring website address, features or functionality of 2Ring Cloud you used or looked up on 'Help', page response times, download errors, length of use of certain features or functionality of 2Ring Cloud, 2Ring Cloud interaction information (such as scrolling, clicks, and mouse-overs), and the content of any undeleted cookies that your browser previously accepted from us.	<ul style="list-style-type: none"> <li>• To understand your use of 2Ring Cloud.</li> <li>• To improve the 2Ring Cloud services.</li> <li>• To comply with legal requirements and to prevent activities that may violate our policies.</li> </ul>
<b>Point of Collection: Account Registration for other 2Ring Products (Self-Hosted)</b>		
Identifier	Your name, company name and address, title, business phone, and business email address when you purchase a license or subscription to self-hosted 2Ring products. If you purchased the license or subscription from a 2Ring authorized reseller or distributor, you understand that such reseller or distributor may provide us this information.	<ul style="list-style-type: none"> <li>• To provision the license key for your 2Ring Product.</li> <li>• To email you access information for downloading the 2Ring Product.</li> <li>• To provide you access to our support portal.</li> <li>• To provide you technical support for the 2Ring Product.</li> <li>• To communicate with you regarding the 2Ring Product, including any related license, subscription, product upgrades, services, or renewals you have purchased.</li> </ul>
Geolocation Data	Your IP address	<ul style="list-style-type: none"> <li>• To create a record of your acceptance of the applicable 2Ring agreement and your download of 2Ring packages and license files.</li> </ul>

Category of Personal Information	Type of Personal Information	Purpose of Collection
		<ul style="list-style-type: none"> <li>• For security purposes.</li> <li>• If you have enabled cookies, the cookie may also collect this information. For information on cookies, please see the <a href="#">2Ring Cookie Declaration</a>.</li> </ul>
Other categories of personal information (e.g., professional or employment-related information and education information)	Your company name, your role and work assignment.	<ul style="list-style-type: none"> <li>• To send you our newsletter via email – and based on the work assignment, to have the newsletter provide relevant information to your job role.</li> <li>• To contact the appropriate 2Ring end customer in relation to whom you were permitted use of the 2Ring Product, to report renewals, upgrades, and other types of communication that is relevant to your use of the 2Ring Product.</li> </ul>
<b>Point of Collection: Product Support Request by Email, Phone, the 2Ring Support Portal, or from Resellers/ Distributors</b>		
Identifier	Your name, company name, and business email when you request support by email.	<ul style="list-style-type: none"> <li>• To provide you technical support. We do not record any screen share session used to provide technical support without your consent .</li> <li>• To use the information you have provided in accordance with any 2Ring agreement you accepted or this Privacy Policy.</li> <li>• At your request, we may record training sessions to provide you with a copy of the training session video.</li> </ul>
Identifier	Your name, company name, business email and business phone when you request support by phone.	
Identifier	Your name, company name, business email and business phone when you submit a support request through the 2Ring Support Portal at <a href="https://apps.2Ring.com/SC">https://apps.2Ring.com/SC</a> or support form at: <a href="https://www.2ring.com/support/open-a-new-ticket/">https://www.2ring.com/support/open-a-new-ticket/</a> .	
Identifier	Your name, company name, business email and business phone when the reseller or distributor from whom you purchased a license or subscription to 2Ring products requests support on your behalf.	
Audio, electronic, visual, thermal, olfactory, or similar information	Information collected via screen share during support or by video recording when receiving training on the 2Ring Product.	
<b>Point of Collection: Your Completion of 2Ring's Form for Receiving 2Ring's Annual Holiday Gift</b>		
Identifier	Your name, mailing address, phone, and email address	<ul style="list-style-type: none"> <li>• To share this information with our third party gift delivery provider to send you a holiday gift.</li> </ul>
Geolocation Data	Your mailing address	

### C. 2Ring Resellers and Distributors

Category of Personal Information	Type of Personal Information	Purpose of Collection
<b>Point of Collection: Pre-Sales Onboarding Form &amp; Contract Administration</b>		
Identifier	Your name, company name and address, title, business phone, and business email address. We also ask you to provide the business email address for your company's legal contact and contract signatory, and the business phone and business email address for your company's accounts payable contact.	<ul style="list-style-type: none"> <li>For contract management purposes and to communicate with you.</li> <li>To use the information you have provided in accordance with 2Ring's agreement with your company or this Privacy Policy.</li> </ul>
<b>Point of Collection: Events &amp; Contests</b>		
Identifier	If you have participated in an 2Ring event or contest organized by our resale or distribution partner and you submitted your business card to our partner, as the event or contest sponsor, we may receive your name, company name, business email and business phone from our partner.	<ul style="list-style-type: none"> <li>To communicate with you regarding our products and services.</li> <li>To add your contact information to 2Ring's newsletter list. When you receive our newsletter email, you may unsubscribe from newsletter emails at any time by following the instructions included in such email.</li> </ul>
<b>Point of Collection: Your Completion of 2Ring's Form for Receiving 2Ring's Annual Holiday Gift</b>		
Identifier	Your name, mailing address, phone, and email address	<ul style="list-style-type: none"> <li>To share this information with our third party gift delivery provider to send you a holiday gift.</li> </ul>
Geolocation Data	Your mailing address	

### D. 2Ring Suppliers

Category of Personal Information	Type of Personal Information	Purpose of Collection
<b>Point of Collection: Contract Administration</b>		
Identifier	Your name, company name and address, title, business phone, and business email address. We also ask you to provide the business email address for your company's legal contact and contract signatory, and the business phone and business email address for your company's accounts payable contact.	<ul style="list-style-type: none"> <li>For contract management purposes and to communicate with you.</li> <li>To use the information you have provided in accordance with 2Ring's agreement with your company or this Privacy Policy.</li> </ul>

## II. Purpose of processing your personal information

**A. General.** The legal basis for 2Ring processing your personal information will typically be one of the following, as further described in Sections I and II:

- for our and our customer's legitimate business interests or business purpose, including as necessary to fulfil any agreement that we have in place with you or the applicable end customer, reseller or distributor;
- your consent; or
- where the processing is necessary for compliance with our legal obligations.

**B. Customers.** 2Ring products are intended for enterprise end customers. When we process personal information as part of our services for enterprise end customers or to process end customer orders through our resellers and distributors, we collect your personal information only for the purpose of delivering services to the applicable end customer and the reseller or distributor processing the applicable order, solely in our role as a processor or sub-processor or service provider to the end customer, as such terms are understood under applicable law. You understand and acknowledge that we may process your personal information in accordance with this Privacy Policy and our agreement with the applicable end customer, reseller or distributor. You also understand and acknowledge that the use of your personal information by the applicable end customer, reseller or distributor is subject to that end customer's, reseller's or distributor's data privacy practices and privacy policy and not this Privacy Policy.

**C. Job Applicants; Work Contract.** 2Ring processes the personal data of job applicants for the purpose of recruitment and selection of candidates to ensure human resources for the implementation of 2Ring's and its affiliates' business activities. In addition to the processing of the personal information of job applicants described in Section I, if you become an employee of, or enter into any other work arrangement with, 2Ring or its affiliates (each, a "Work Contract", and such persons, "2Ring Personnel"), we may process your personal information for the following purposes: to prepare and enter into an full-time or part-time employment contract or ad-hoc work agreement, retain evidence of work statements and capacity, payment of wages, withholdings, performance of obligations to public authorities, work records, education records, records of issued mandates and confirmations /certificates, retain evidence of providing protective equipment, property or equipment, entering into agreements on material liability, the provision of employee benefits, providing employee benefits, work safety purposes, retain evidence of damages caused, by employees on the employer's property, catering, copying of documents necessary for the purpose of a labor or business relationship, as well as the fulfilment of other legal and contractual obligations. You agree to provide 2Ring or its applicable affiliate personal information to the extent reasonably requested by 2Ring in connection with the Work Contract, and you acknowledge that 2Ring or its affiliate may, without liability, withdraw the Work Contract offer if you fail to provide such information.

**D. Marketing.** As described in Section I above, we may use your contact details to provide you with information about 2Ring products and services which may be of interest to you. If you are a 2Ring customer, you can also expect to receive relevant email for other 2Ring publications, events, Sites and services. If you do not want us to use your information in this way, we will give you the opportunity to unsubscribe at any time by following the instructions included in our marketing email to you. Please note that if you unsubscribe from receiving marketing communications, we may still contact you about issues related to any 2Ring products or services you are using, such as where we make any changes to this Privacy Policy.

**E. Cookies.** 2Ring uses cookies. We use cookies to personalize content and ads, to provide social media features and to analyze our traffic. Please see the [2Ring Cookie Declaration](#) for additional information and to change or withdraw your cookie permissions.

**F. Sensitive Personal Information.** We do not collect sensitive personal information from your use of our Sites or the 2Ring products or services. If we collect sensitive personal information (for example, in connection with an existing or potential Work Contract with us), we will only process such personal information where we have obtained your consent, in accordance with applicable law, for the purposes for which it is collected by us.

**G. How Long We Keep your Personal Information.**

- If you do not, or the entity you work or worked with does not, have an ongoing relationship with 2Ring, 2Ring will retain your personal information for up to 2 years after the initial collection or receipt of such information in connection with the purpose for which such information was provided and the potential for a prospective relationship with you or the entity you work for, unless 2Ring has any other legitimate business purpose or legal requirement for longer retention of your personal information. You may, at any time, by written request to 2Ring, withdraw your consent to the processing of your personal information by or on behalf of 2Ring.

- If the entity you work or worked with does have an ongoing relationship with 2Ring, 2Ring will retain your personal information for the duration of that relationship and for 2 years after the relationship ends, unless 2Ring has any other legitimate business purpose or legal requirement for longer retention of your personal information. Notwithstanding the foregoing, where 2Ring is a “service provider” or a “processor” or “sub-processor”, as such terms are understood under applicable data protection laws, of your personal information on behalf of our end customer, who provided the information to us or on whose behalf we are collecting your personal information, we will comply with our end customer’s instructions to return or delete your personal information that is in our possession.

- 2Ring retains personal information of 2Ring Personnel for the duration of any pre-contract communications, the applicable Work Contract, and for such longer period as is required for any legitimate business purpose or legal requirement (which, for 2Ring’s California employees, is a minimum of 4 years, and for 2Ring’s Slovakian employees, up to the 70<sup>th</sup> year of the 2Ring Personnel’s life).

- 2Ring may retain your personal information for legitimate business purposes or legal requirements which may be for a duration longer than for the other purposes specified above, including for up to 10 years for fulfilling 2Ring’s tax-related and record-keeping obligations under applicable law.

- If it is not possible to delete your personal information as described above (for example, because your personal information has been stored in backup tapes or archives), 2Ring will securely store your personal information and isolate it from any further processing until deletion is possible.

- In some instances, 2Ring may choose to anonymize your personal information instead of deleting it, for statistical use, for instance. When 2Ring chooses to anonymize your personal information, 2Ring will make sure that the anonymized information cannot be linked back to you or any specific user.

### III. What We Provide to Third Parties

2Ring does not sell, rent, or trade user data. We disclose your personal information only in limited circumstances, such as:



**A. Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any other subsidiaries, joint venture partners or other companies within the Soitron Group that we control or that are under common control with us.

**B. Customers.** Please see Section II(B) above.

**C. Service Providers.** 2Ring may contract with other companies to provide services or functionality on our behalf. If we do so, we may share your information, including personal data, with such providers to the extent necessary for their engagement. In all such cases, the service providers' use of your information will be contractually limited to uses consistent with this Privacy Policy. Examples of such service providers are:

- Book-keeping and accounting solution providers for tracking and managing information related to purchase orders, including sending invoices and email communications related to delivery of products and services, to end customers, resellers and distributors.
- Data storage and hosting providers where we may store and backup your information. These third parties do not have the right to access or use your information without our permission.
- Service providers who develop and support the Site. These third parties do not have the right to access or use your information without our permission.
- Marketing agencies that design, manage and provide data analytics for 2Ring's online marketing campaigns. Please also see Section III(E) regarding 'Google Analytics' component integrated on our Sites. Please also see Section III(F) regarding 'Mailchimp' used to send and manage 2Ring's email campaigns across channels. Please also see Section III(G) regarding 'Albacross' web tracking services used by 2Ring to identify companies visiting the Site.
- For processing employee payroll, benefits and work performance, work safety, and other labor related matters, 2Ring Personnel information may be provided to health insurance companies, supplementary pension savings banks, pension managers, an entity providing statistics, guard service, educational agencies and trainers, companies providing work health services, occupational health assessments and health assessment, work safety training, management and investigation, entities providing postal services, document archiving entities, bodies providing development, administration and support of information technologies & systems, entities providing external audit performance, telecommunications service providers.
- Information regarding 2Ring's customers, suppliers and personnel may be provided to advisors and lawyers for advisory and contract management purposes and who are bound by a duty of confidentiality to 2Ring.

**D. Google Analytics.** 2Ring uses 'Google Analytics' component (with anonymization setting turned on) integrated on our Sites. Google Analytics, operated by Google or its affiliates ("Google"), is a web-analytics service that we use to collect, compile and analyze data about the behavior of visitors to our Sites. We primarily use this tool to optimize user experience of our Sites and understand the effectiveness of our advertising. For more information on the privacy practices of Google and how Google processes personal information, please visit the following Google information link: <https://support.google.com/analytics/answer/6004245?hl=en>.



You can opt out of having made your activity on our Sites and services available to Google Analytics by installing the Google Analytics opt-out browser add-on available at the following Google information link: <https://tools.google.com/dlpage/gaoptout>. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visit activity.

**E. *Mailchimp*.** 2Ring uses 'Mailchimp' operated by The Rocket Science Group LLC ("Rocket"), to send and manage 2Ring's email campaigns across channels. Mailchimp also provides 2Ring other related services, such as real-time data analytics and insights on our email campaigns (such as, but not limited to, who opened the email, who unsubscribed and where recipients clicked in our newsletters) to help us track and personalize our marketing activities. Any personal information collected in this manner will be used by 2Ring, in accordance with this Privacy Policy, and by Rocket, in accordance with Rocket's privacy practices. For more information on the privacy practices of Rocket for Mailchimp and how Rocket processes such personal information, please visit the following Rocket information link: <https://mailchimp.com/legal/privacy/>.

You can opt out of Mailchimp conducting data analytics processing on your personal information by writing to us, or emailing Mailchimp at [personaldatarequests@mailchimp.com](mailto:personaldatarequests@mailchimp.com) or by following the instructions on Mailchimp's information link: <https://mailchimp.com/privacy-rights/>.

**F. *Albacross*.** 2Ring uses 'Albacross' web tracking services for lead generation operated by Albacross Nordic AB ("Albacross"), to identify companies visiting the Site when you have enabled the relevant cookie. Albacross processes your IP address and other data from your visits to our Site in accordance with Albacross' Privacy Policy available at: <https://albacross.com/privacy-policy/>. Any personal information collected in this manner will be used by 2Ring, in accordance with this Privacy Policy, and by Albacross, in accordance with Albacross' Privacy Policy.

Please see the [2Ring Cookie Declaration](#) for additional information and to change or withdraw your cookie permissions.

**G. *Behavioral Remarketing*.** 2Ring collects certain information from and about visitors to its Sites, including directly from our web server logs, the information submitted by a visitor, and with cookies. We have enabled the following third party ad serving services on our Sites:

- ***Google Ads*.** Our Sites use 'Google Ads' (formerly Google AdWords) remarketing service to advertise on third party websites (including Google) to previous visitors on our Sites. 2Ring also uses Google Ads' free conversion tracking features on our Sites. Google Ads is operated by Google. Third party vendors, including Google, use cookies to serve ads based on a person's past visits to our Sites. Any personal information collected in this manner will be used by 2Ring, in accordance with this Privacy Policy, and by Google, in accordance with Google's privacy practices. For more information on the privacy practices of Google for Google Ads and how Google processes such personal information, please visit the following Google information link: <https://policies.google.com/privacy?hl=en>.

- ***Microsoft Advertising (Bing Ads)*.** We have 'Microsoft Advertising' (Bing Ads) services integrated on our Sites. We use Microsoft Advertising to promote our business online to visitors to our Sites. 2Ring also uses Microsoft Advertising's free conversion tracking features on our Sites. Microsoft Advertising is operated by Microsoft or its affiliates ("Microsoft"). Any personal information collected in this manner will

be used by 2Ring, in accordance with this Privacy Policy, and by Microsoft, in accordance with Microsoft's privacy practices for Microsoft Advertising. For more information on the privacy practices of Microsoft for Microsoft Advertising and how Microsoft processes such personal information, please visit the following Microsoft information link: <https://about.ads.microsoft.com/en-us/resources/policies/microsoft-advertising-privacy-policy>

**H. Legal Requirements.** We reserve the right to disclose your personal data and other information as required by law such as to comply with a subpoena, or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request. With respect to personal data collected from your use of our Sites, unless we are prohibited by law, we will attempt to notify you of any request to disclose your personal data to the authorities or any other party and, where appropriate, refer such requests directly to you. With respect to personal data collected from your use of 2Ring products or the 2Ring Cloud service, unless we are prohibited by law, we will attempt to notify the end customer that provided you access to the 2Ring products or 2Ring Cloud service of any request to disclose your personal data to the authorities.

We may also disclose your personal information to third parties: (a) to enforce any part of the agreements between you and us or our customers or to investigate potential breaches; or (b) to protect the rights, property or safety of us or our customers, or others; or (c) for the purpose you have permitted in this Privacy Policy or under the 2Ring agreement you accepted.

**I. Successors.** If 2Ring or any of its affiliates is involved in a merger, acquisition, or sale of all or a portion of its assets, your information, including personal data, may be disclosed and transferred in connection with that transaction. Such transfer would enable due diligence and/or allow the transferee to operate the business. You will be notified via email and/or a prominent notice on our Sites of any change in ownership or uses of your personal data by 2Ring or such transferee, as well as any choices 2Ring or such transferee makes available to you regarding your Information.

## IV. Where Data is Stored

Your data will be stored in secure Cloud based data servers in encrypted form. We will use reasonable security measures to protect your personal information against unauthorized access. 2Ring has implemented security measures that contain administrative, technical and physical controls that are designed to safeguard your personal information.

Your personal information may be collected, transferred to and stored by us in the United States and by our affiliates and third parties as described above that are located in other countries. **You acknowledge that in order for us to provide the Site, and our products and services to you, we may need to transfer, process, and store your personal information outside of your country of residence where data protection standards may be different.** Several countries, including those in the European Economic Area, have established data protection laws and regulations that place restrictions on the transfer of personal information across country borders. We are committed to complying with all of those laws and regulations, including ensuring that third party recipients of your personal information acting on our behalf offer an adequate level of protection and security, for instance by entering into the appropriate back-to-back agreements and, if required, standard contractual clauses or an alternative mechanism for the transfer of data (such as those approved by the European Commission (Art. 46 GDPR) or other applicable regulators or legislators). However, when you use our Sites or services and provide such personal information, you should do so in compliance with the applicable data protection laws and regulations in your country.

## V. Security

2Ring has implemented reasonable technical and organizational security measures to help protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of personal information. Unfortunately, no data transmission over the Internet can be guaranteed to be entirely secure, and 2Ring assumes no liability for any damage suffered by you caused by the interception, alteration, or misuse of information during transmission.

## VI. Children

The Sites and 2Ring's products and services are for professionals. 2Ring does not knowingly collect personal information from children without appropriate parental or guardian consent. If you believe that we may have collected personal information from someone under the applicable age of consent in your country without proper consent, please let us know at [privacy@2Ring.com](mailto:privacy@2Ring.com) and we will take appropriate measures to investigate and address the issue promptly.

## VII. Changes to the 2Ring Privacy Policy

This Privacy Policy may change from time to time, and we will post any changes to it on this page (we may also email you about any material changes to the Privacy Policy). Your continued use of this Site following such posts or notices will signal your acceptance of such changes. The date this Privacy Policy was last updated appears at the top.

## VIII. Your Rights and Access to Information

### A. EU, UK and Swiss Residents

If you are a European Union, UK or Swiss resident certain additional rights, including under the GDPR, may be available to you. To the extent established under applicable law, you may have the right, subject to preconditions or limitations under applicable law:

- to access, review, and update (including correcting any inaccuracies in) your personal information;
- to restrict our processing of your personal information;
- to request that we provide you a copy of, or access to, your personal information in structured, commonly used and machine-readable format (or that we transfer your personal information to another controller, when technically feasible);
- to withdraw your consent when our processing of your personal information is based on your consent (and not another legitimate basis);
- to request that we delete all of your personal information; and
- to lodge a complaint with the applicable supervisory authority in the country you live in, the country you work in, or the country where you believe your rights under applicable data

protection laws have been violated. Before you do this, we request that you contact us directly in order to give us an opportunity to work directly with you to resolve any concerns about your personal information.

You may exercise any of the above rights by contacting us through any of the methods listed at the end of this Privacy Policy. If you contact us to exercise any of the foregoing rights, we may ask you for additional information to verify your identity. Some of these rights may be subject to certain restrictions or limitations under applicable law. Additionally, we reserve the right to limit or deny your request if you have failed to provide sufficient information to verify your identity.

Note that we will only be able to directly process the above requests in situations where we are the “data controller”, that is, the entity that controls the relevant personal information and its processing. This includes some situations where you provided the relevant information directly to us. However, in many cases we are instead the data “processor” or “sub-processor”, that is, we are processing personal information on behalf of our end customer, who provided the information to us or on whose behalf we are collecting your personal information, and our end customer acts as the “data controller”. In those situations where we are acting as the processor or sub-processor, we will refer your request to the applicable data controller instead.

## **B. California Privacy Rights**

California law (including the CCPA) entitles California residents to certain additional protections regarding personal information. For purposes of this section alone, “personal information” shall have the meaning given to such term in the CCPA.

If you are a California resident, you have the right to request:

- information regarding your personal information we have collected in the past 12 months (including the categories of personal information we have collected, the categories of sources of such information, and the business or commercial purposes for collecting or, if applicable, selling such information);
- notice of whether we have disclosed or sold your personal information to third parties in the past 12 months (and if so, what categories of information we have disclosed or sold, and what categories of third parties we have disclosed or sold it to);
- a copy of your personal information collected by us in the past 12 months; and
- that your personal information be deleted.

We will not discriminate against you if you choose to exercise any of these rights. To make any of the above requests, please contact us as set forth at the end of this Section. We will need to verify your identity before processing your request. In order to verify your identity, we will generally require the matching of sufficient information you provide us to the information we maintain about you in our systems. Although we try to limit the personal information collected in connection with a request to exercise the right to know and/or the right to deletion, certain requests may require us to obtain additional personal information from you. In certain circumstances, we may decline a request to exercise the right to know and/or right to deletion, particularly where we are unable to verify your identity. In certain instances, we may be permitted by law to decline some or all of your requests.

Note that we will not be able to directly process the above requests under the CCPA because we do not exceed the minimum threshold requirements for the applicability of the term “business” under the CCPA, which refers to the entity that determines the purpose and means of information processing. This includes some situations where you provided the relevant information directly to us. However, in many cases we are instead a “service provider” under the CCPA and are processing personal information on behalf of our customer, who provided the information to us or on whose behalf we are collecting your personal information, and where such end customer acts as the “business” under the CCPA because our end customer exceeds the minimum threshold requirements for the applicability of the CCPA. In situations where we are acting as a service provider, we will refer your request to the applicable end customer instead.

We will handle any request to exercise your rights in accordance with applicable law. If you wish to exercise any of the rights described above please contact us in one of the following ways:

- (1) Email us at [privacy@2Ring.com](mailto:privacy@2Ring.com) with the subject line “Privacy Rights Request” or “Consent Withdrawal”, as applicable;
- (2) Call us at: +1 (916) 426-3790 or +421 (2) 5822-4550; or
- (3) Send us mail at the applicable 2Ring address below marking it “Attention:” followed by “Privacy Rights Request” or “Consent Withdrawal”, as applicable.

<b>User’s Country of Primary Residence</b>	<b>2Ring</b>
North and South America, APAC	2Ring America, Inc. 3626 Fair Oaks Blvd. Suite 100 Sacramento, CA 95864, USA
Rest of the World (i.e., outside North and South America, APAC)	2 Ring, spol s.r.o. Plynarenska 5 821 09 Bratislava 2 Slovak Republic

## IX. Questions?

If you have any questions on our Privacy Policy, you can contact us at: [privacy@2Ring.com](mailto:privacy@2Ring.com).