

# **VOXSMART LIMITED**

## **PRIVACY POLICY**

### **1. Introduction**

VoxSmart Limited ("VoxSmart") is committed to respecting your privacy and the confidentiality of your personal data and communications content. This Privacy Policy applies to all information collected from or about you by VoxSmart. Our goal in this document is to help you understand what information is collected from or about you, how this information is used and protected, and what options you have with regard to this information.

### **2. Definitions**

"Information" means any and all information we receive from or about you. This may include (without limitation) information collected from you directly or indirectly, manually or otherwise, or via electronic, automatic or other means. Such information may include information (i) which you provide during your use of our software or services (the "Services") or our website (the "Site"), (ii) collected about you, your business, and the technology you are using, and (iii) which we receive about you from third parties or other sources.

Information is divided into two distinct categories:

- "Non-Personally Identifiable Information" means Information which does not personally identify you.
- "Personally Identifiable Information" means Information that is personally identifiable, such as names, addresses, e-mail addresses, and phone numbers, as well as other non-public information that is associated with the foregoing.

### **3. Acceptance of Terms**

We obtain and use Information in accordance with this Privacy Policy. We will not use Personally Identifiable Information in a manner other than as set out in this Privacy Policy without first asking for your consent.

BY USING OUR SERVICES OR VISITING OUR SITE OR SUBMITTING INFORMATION THROUGH THE SERVICES OR VIA OUR SITE, YOU EXPRESSLY CONSENT TO THE COLLECTION, PROCESSING, AND USE OF YOUR INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY.

### **4. Non-Personally Identifiable Information**

Non-Personally Identifiable Information may be collected, processed, and used in accordance with applicable law, for any and all purposes we deem fit. Generally, the information VoxSmart collects is used only for VoxSmart's own internal purposes, for example, to improve the Services and the Site, to improve VoxSmart's marketing and promotional efforts, to improve customer service,

and to improve VoxSmart content and Site offerings, and may also be used by VoxSmart to contact you to provide you with information VoxSmart believes may be useful to you. VoxSmart believes that these uses allow it to improve the Services and our Site and to better tailor them to meet customers' needs.

## **5. Use of Personally Identifiable Information**

In general, Personally Identifiable Information you submit to, or that is obtained by, us is used:

- to create and manage the business relationship,
- to provide you with the Services,
- to improve our Services,
- to communicate with you about our Services,
- to respond to requests that you make,
- to bill you and manage your account,
- to further new services or products, and
- to operate, maintain, and improve the features, functionality, and performance of our Site.

Furthermore, we may create anonymized information from Personally Identifiable Information by excluding information that makes the information personally identifiable to you. We may use this anonymized information for internal purposes, such as analyzing usage patterns, so that we may enhance the Services, and we also reserve the right to use and disclose such anonymized information at our discretion to third parties. Such anonymized information may be deemed to be Non-Personally Identifiable Information and used accordingly.

## **6. Data Protection Act**

We are aware and adhere to our responsibilities under the Data Protection Act 1998 (the "Act"). We endeavour to process all Personally Identifiable Information in accordance with the Act. Information may be processed in accordance with our Data Protection Registration. We shall not process your Personally Identifiable Information in any manner incompatible with those purposes or without your consent, unless required to do so by law. We shall not be requesting or processing any sensitive personal data about you. We shall not retain Information relating to you longer than is necessary for the purposes for which it is obtained.

## **7. Disclosure of Personally Identifiable Information**

Except as otherwise stated in this Privacy Policy, we will not disclose or share your Personally Identifiable Information with third parties, unless you ask or authorize us to do so.

However, we may provide your Personally Identifiable Information to business partners, third party service providers, and suppliers who work on our behalf (a) to provide you with some of the Services, (b) to help us communicate with our customers, and (c) to help us with our business and informational needs.

However, we do not grant these business partners, service providers, and suppliers any independent right to use this information except to help us provide the Services or for our legitimate business interests.

We may share some or all of your Personally Identifiable Information with any parent company, subsidiaries, joint ventures, or other companies under common control (collectively, "Affiliates"), in which case we will require our Affiliates to honor this Privacy Policy.

In the event VoxSmart goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personally Identifiable Information will likely be among the assets transferred. You acknowledge that such transfers may occur, and that any acquirer of VoxSmart, or a portion or all of its assets may continue to use your Personally Identifiable Information as set forth in this Privacy Policy.

We may disclose Personally Identifiable Information we have collected from and about you if we believe in good faith that such disclosure is necessary (a) to comply with relevant laws, (b) to respond to court orders, subpoenas, or warrants served on us, (c) to respond to an emergency, or (d) to protect and defend VoxSmart's rights or property.

## **8. Use of Cookies**

We never use cookies to retrieve information from your computer that has not already been voluntarily provided to us by you.

## **9. Contact Details**

VoxSmart uses your contact details for the purpose of enhancing message content and management, assisting with identifying contacts that are already users of the Services, and assisting with inviting contacts to the Services. VoxSmart stores your contact details, including email account information and mobile phone number, as secure information, which is password protected. Your contact details will not be passed on to third parties for their marketing purposes outside of VoxSmart without your explicit permission. VoxSmart does not use this information to market to or otherwise contact your contacts.

VoxSmart may use your contact details, including email account information and mobile phone number, to send you messages about faults and service issues or to contact you as a courtesy to ensure your experience is as good as it can be. VoxSmart may also use your contact details to keep you up to date with news about our Services and the organisation. If you do not wish to be contacted, please select the opt-out option in any communications or contact, [support@voxsmart.com](mailto:support@voxsmart.com).

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## **10. Voicemails and Missed Calls**

Any voicemail and missed calls stored at VoxSmart are stored as secure information, available only to you and only to you once you have successfully signed in to your account. If voicemail transcription is active, voicemails are transcribed from audio to text as part of a fully automated process, using a third party service provided by Nuance Communications, Inc.

## **11. Feedback**

We may, from time to time, use your email address to contact you regarding feedback. Any and all information voluntarily submitted to us is used for the purposes of improving our Services, Site, and communications. VoxSmart reserves the right to use anonymous information for our marketing purposes. VoxSmart may from time to time ask you for feedback which will be used to measure and improve the quality of our Services.

## **12. Security and Confidentiality**

VoxSmart has put in place commercially reasonable protections and procedures to safeguard and secure the Personally Identifiable Information we collect. However, even with these measures, we cannot guarantee the security of Personally Identifiable Information. By using our Services or our Site, you acknowledge and agree that we make no such guaranty.

## **13. Notification of Changes**

VoxSmart reserves the right to modify the provisions of this Privacy Policy if deemed necessary. You agree that your continued use of our Services or our Site shall constitute your acceptance of any modifications to this Privacy Policy.

## **14. How to access your information**

Along with other rights granted to you under the Data Protection Act 1998, you may at any time in writing or by email request a copy of your Personal Identifiable Information held by us. We will comply with this request, but only after you have given us information to satisfy ourselves as to your identity. We will charge a fee of £20 for providing this information and the information will be provided no later than one calendar month from when we receive your written request and payment of the fee.

## **15. Contacting VoxSmart**

If you have any questions about this Privacy Policy or the privacy of your Information, you may contact us at [support@voxsmart.com](mailto:support@voxsmart.com).

Data Protection Act 1998 Registration Number: [Z1059365]