

## ALBEDO Commitments on Privacy

ALBEDO is committed to maintaining strong protections for our customers, products and company. We believe in building and maintaining trust, reducing risk and simply doing what is right.

This Statement is effective as of May 2018

-Your privacy is important to ALBEDO maintaining your trust is paramount to us-

This Statement discloses the information practices for Albedo's and our subsidiaries' websites, what type of information about our websites' users is gathered and tracked, and how the information is used, shared or otherwise processed off-line. It also describes how other technologies may be used in our services and software products.

### Purpose

Your privacy is important to us. In the regular course of doing business, ALBEDO acquires information from clients, consumers and third parties. To better protect your privacy, we provide this Privacy Statement to explain how your information is collected, processed, transferred (both on-line and off-line), stored, disclosed and the choices you have regarding the way your information is shared. To make this Statement easy to find, we make it available via a web link on our homepage.

### Scope

The ALBEDO Privacy Statement applies to all appliances, services and all of its corporate affiliates, including subsidiaries (referred to collectively in this Statement as "ALBEDO"). This Privacy Statement is applicable to all information received by ALBEDO from its clients, consumers, third parties and any other individuals in electronic or paper format, as part of ALBEDO's business operations, including information submitted and collected by, through, or via: (i) an ALBEDO website which includes a reference to this Privacy Statement on the applicable homepage; (ii) any software owned, developed, sold or marketed by ALBEDO; or (iii) any products or services offered by ALBEDO, whether hosted by ALBEDO or a third party (collectively, the "Channels" or individually, the "Channel"), and to information collected off-line by ALBEDO. ALBEDO does not sell or share the Personal Information (defined below) it collects from you with third parties, except as described in this Privacy Statement.

### Definitions

- *Data Subject* means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an on-line identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.
- *Personal Information* means any information that relates to a Data Subject that can be used to identify that individual on its own or in combination with other readily available data.

- *Processing* means any operation that is performed upon Personal Information.
- *Sensitive Personal Information* means Personal Information regarding an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health, sex life or sexual orientation.

### Data Collection

There are a number of ways in which ALBEDO may collect Personal Information from you in the course of doing business. Personal Information may be collected if you provide Personal Information in connection with using a Channel, including ordering a product or service, a webinar registration, Channel forms, faxes, surveys, product registrations, such as registrations associated with the installation of software, use of on-line tools or programs, responses to mailed materials, subscription to our newsletter and other publications, participation in contests, telephone calls, Channel forums and message boards, and in person, such as at trade shows or other events. Additionally, we may collect your name, address, contact phone numbers, and email address in order to make an inquiry. If you are making a purchase on-line, we will also require your credit/debit card information, expiration date, billing address, shipping address and related information. We may ask for your date of birth to register for on-line forums. You may provide additional Personal Information that you choose to include in an email that you send to us, via a Channel or through a resume you submit in connection with your interest in working for ALBEDO; however, we ask that you limit the amount of Personal Information you provide to ALBEDO in these instances to what is reasonably required. You may also provide certain information, that may include Personal Information, to us, such as the products you are using, your company name, your role with your company, and other information in connection with a support request for one of our products, or any other information that you provide to ALBEDO or we collect during the normal course of doing business. ALBEDO may collect aggregate information, that may include Personal Information, from the Channels that customers access or visit through the use of cookies, clear GIFs and website logs, as described below.

- *Cookies*: ALBEDO may collect information through the use of cookies. A cookie is a small file that a website puts on a user's computer or mobile device. This file identifies specific information about previous visits to the website. The cookie may store the user's country, language, an assigned random session ID, name and address information or the Internet Protocol (IP) address associated with a user's computer. ALBEDO may use cookies for a variety of purposes, including without limitation: (i) to track the number of users to an ALBEDO website over time; (ii) to recognize repeat visits to an ALBEDO website; (iii) to facilitate on-line navigation and on-line shopping; (iv) to track pages visited during a single on-line session, analyze trends and gather broad demographic information; (v) to adjust the presentation of an ALBEDO website to make it more effective; (vi) to store user preferences; (vii) to record session information, user-specific information (such as the pages the user accesses or visits) and past activity at an ALBEDO website; (viii) to alert users to new Channels that we think might be of value; and (ix) to market products and services to users. ALBEDO may link the non-Personal Information it collects by the use of cookies to specific Personal Information. Some of our partners may use cookies on the ALBEDO websites. However, we have no access to or control over those cookies. The length of time a cookie will remain on your computer or mobile device depends on whether it is a persistent or session cookie. Session cookies will only remain on your computer or mobile device until you stop browsing. Persistent cookies remain stay on your computer or mobile device until they expire or are deleted. You can manage your cookie settings via your web browser application which will allow you to block or limit the use of cookies, including clearing or removing cookies. Consult the help

menu of your browser application for details. If you block the use of cookies, you may not be able to use some of the features on an ALBEDO website. For additional information regarding ALBEDO's use of cookies, please refer to the applicable Cookie Policy of the site that you are visiting.

- *Website Logs:* ALBEDO may collect information in the form of website logs (collectively "Logs"). These Logs are files that record activity on the Channels and gather statistics about users' activities, such as how many users have visited the Channels, how often, how many "hits" a particular web page has received, type and quality of the user's Internet connection to the Channels, and identification of the user's hardware and software. The entries comprising the Logs may contain IP addresses, user IDs, and identification of the Internet service provider that provides your connection to the Internet. Generally, we use the Logs to operate and improve the Channels, to identify the popularity of certain features, to assist with internal marketing and demographic studies, and to enable us to assess overall efficiency and activity on the Channels.
- *Communications Within the Channels:* ALBEDO may collect information that you submit when posting messages through a Channel forum. Any user communications within the Channels, such as on the forums, should not be considered private and such communications may be viewed and saved by others. ALBEDO is under no obligation to monitor user communications but reserves the right to act on reports of misconduct or abuse of communications privileges. Because communications may be widely viewed and/or heard, we caution users to avoid revealing any Personal Information on the Channel forums.

### **Purpose for Collection of Personal Information**

ALBEDO may process, collect, and disclose your Personal Information with your consent; however, there are several instances where ALBEDO can process and disclose your Personal Information without your explicit consent, including the following legal bases:

- The performance of a contract
- Where ALBEDO has a legitimate interest in processing the Personal Information
- The processing is necessary or legally required, conducted to protect the public interest, to protect your vital interest or to establish, exercise or defend a legal claim
- The processing of Personal Information that has been made public by the data subject
- The processing or transfer is required by law
- ALBEDO processes, collects, and discloses your Personal Information for purposes which may include, but are not limited to, the following:
  - Process an order you place for a product or service
  - Respond to your questions about a product or service
  - Provide technical or customer support for a product or service
  - Engage in marketing and sales
  - Create and maintain reseller partnerships
  - Conduct research and development
  - Undertake product development

## Disclosure of Personal Information to Third Parties

ALBEDO may share your information, including Personal Information, within ALBEDO or with any unaffiliated third party, including, for example, our payment processing providers, website analytics companies, and CRM service providers. In addition, ALBEDO may share such information with its partners, including independent vendors, suppliers, licensors, contractors, distributors, resellers, dealers, OEMs and other parties who have a business relationship or a potential business relationship with ALBEDO.

Fulfillment of Products and/or Services Provided by or for ALBEDO may retain other companies and individuals to perform certain functions on our behalf. Examples include, but are not limited to: (i) companies that host or help to administer the Channels; (ii) companies that help to process an order for a product, which may include completing the order, obtaining export clearance, or arranging for shipping and handling; (iii) companies that provide payment and billing services; (iv) companies that conduct surveys or assist ALBEDO in its promotional activities such as contacting you by email or over the telephone; (v) shipping companies that deliver products, third party advertisers or promotional partners who provide a product or service to you; (vi) customer support specialists; (vii) web hosting and Internet service providers; and (viii) data analysis firms. Any such third parties who are involved in these activities are authorized to use the information that is collected by and/or disclosed to them for purposes of fulfilling their contractual obligations to ALBEDO, fulfilling any obligations owed to you and to the other individuals who access and use the Channels or services, or as otherwise permitted in this Privacy Statement. ALBEDO requires that any such third parties protect the confidentiality of Personal Information they collect or have access to in the course of their engagement with ALBEDO.

**Marketing Materials:** From time to time, ALBEDO may share your Personal Information with other companies, so that these third parties may provide you with a special offer or promotion that we think you may find valuable. Unless you specifically tell us that you do not want to receive these special offers, we may share your Personal Information. See how you can opt-out below, to tell us that you do not want us to share your Personal Information for these purposes.

**Sale or Transfer of Information:** In the event of a merger, acquisition, spin-off or other transaction related to ALBEDO, an ALBEDO business unit or a portion of ALBEDO's assets, ALBEDO may transfer the information collected from you, including Personal Information, to the surviving party, acquiring party or other party related to the transaction.

**Compliance with Law and Fraud Protection:** ALBEDO reserves the right to disclose the information it collects from you if ALBEDO believes in good faith that such disclosure is necessary to comply with applicable law or a legal process, to avoid liability for ALBEDO and/or its agents and partners, and/or to protect the rights and property (including intellectual property) of ALBEDO and others, including ALBEDO's agents, partners and customers. Further, ALBEDO may disclose the information it collects if ALBEDO suspects that an individual or entity has provided fraudulent or illegal information, has committed an illegal, fraudulent or wrongful act or omission, has attempted to pose as someone else, or has attempted an unauthorized use or access of any computer system or website.

**Accountability for Onward Transfers:** ALBEDO will acquire assurances from partners, service providers and third parties to ensure that they apply the same level of safeguards to protect Personal Information consistent with this Privacy Statement.

## How You Can Opt-Out

You have choices about how your Personal Information is used by ALBEDO and shared with third parties. For any commercial emails that you receive from ALBEDO, you have the option to unsubscribe from those messages by following the instructions in the applicable email. You may also opt-out by sending an email to [info@albedo.biz](mailto:info@albedo.biz) by including in the subject line of your message, "Remove me". Please note that if you unsubscribe, but later request to receive commercial emails from ALBEDO, you will receive these commercial emails and be subject to this Privacy Statement, but will continue to have the right to unsubscribe again if you desire.

If you do not want ALBEDO to share your Personal Information with third parties so that they may send you information concerning products or services that we believe may be of interest, you may opt-out by sending an email to [info.telecom@albedo.biz](mailto:info.telecom@albedo.biz) by including in the subject line of your message, "Remove Third Parties".

Please note that your opt-out rights only apply as described above. ALBEDO may still process and disclose your information as described in this Privacy Statement. In addition, if your information already has been shared with a third party, like an ALBEDO partner, and you no longer wish to receive commercial emails from that party, you must follow the unsubscribe instructions from the applicable third party. Please reference the section titled, Disclosure of Personal Information to Third Parties above for more information.

## Security

While ALBEDO cannot guarantee complete security of the information we collect from you, we have implemented technical and organizational measures to aid in the prevention of unauthorized access to, and improper use of, loss, disclosure, alteration or destruction of the information we collect from you and to aid in the accurate maintenance of this information. You should be aware, however, that ALBEDO has no control over the security of other websites or services on the Internet that you might visit even when a link may appear to direct you to websites and services from ALBEDO. We want you to feel confident using the Channels; however, no system can be completely secure. Therefore, although we take commercially reasonable steps to secure your information, we do not promise, and you should not expect, that your Personal Information, other communications or content always will remain secure.

## Data Integrity and Purpose Limitation

ALBEDO will use Personal Information only for the purpose in which it was collected from you. ALBEDO will have steps in place to ensure that the Personal Information is used for its intended use, and is accurate, complete and up to date. ALBEDO will also ensure that the Personal Information is only stored for the time needed to fulfill its purpose. This obligation does not prevent ALBEDO from processing Personal Information for longer periods for the time and to the extent such processing reasonably serves the purposes of archiving in the public interest, journalism, literature and art, scientific or historical research, and statistical analysis.

## Individual Rights

The information that ALBEDO collects from you may be collected, transferred to, stored and processed in the United States, Europe, Asia, Brazil and other country or region in which ALBEDO and its agents and partners maintain facilities.

Where required by law, ALBEDO will grant individuals access to their Personal Information and/or amend, delete, correct or provide access their Personal Information if it is inaccurate or being processed in violation of law. If you would like to contact ALBEDO to make a request or to file a complaint please contact us at the following:

Email: [info.telecom@albedo.biz](mailto:info.telecom@albedo.biz)

Mailing Address:

ALBEDO TELECOM inc.

1110 Brickell Avenue

Miami, FL 33131

Please enter in the subject line, "Data Subject Request". ALBEDO is committed to responding to requests within 45 days.

You may correct factual errors in your Personal Information by sending us a request that credibly shows error. ALBEDO reserves the right to verify your identity before granting access to Personal Information or making corrections and reserves the right to deny access to anyone who does not confirm their identity to ALBEDO's satisfaction.

### Privacy Statement Updates

ALBEDO may revise its Privacy Statement from time to time. Please revisit this site on a regular basis to check for any revisions and ALBEDO's then-current Privacy Statement. When we post changes to this Privacy Statement, we will revise the updated date at the bottom of this Privacy Statement.