

This Privacy Statement governs how Upchurch Telecom and Data, Inc., U Communications LLC, and its affiliates ("UPTEL", "UCOM," "Company" "us," "our" or "we") may collect, use, and disclose information that we obtain through our products, services, websites and mobile applications ("app" or "apps") (the "Services"). By accessing this website, using our apps, or ordering or registering to use the Services, you consent to the collection, use, and disclosure of that information in accordance with this Privacy Statement. Please be sure to read this entire Privacy Statement before using or submitting information to our Services. This Privacy Statement is incorporated into the Company's Terms of Service. The Company's Terms of Service are incorporated by reference into this Statement.

Information We May Collect

When you interact with us through the Company's Services, we collect personal information and other information from you, each as defined and as further described below:

Information We Collect Directly From You. We collect information from you when, for example, you create an account, make a purchase, join a video call, post on our Site, or otherwise contact us. The type of information that we collect varies based on your interaction with our Site, Apps, and services. When you create an account, we will collect your name, username, email address, password, and your general location. If you use our UVoice mobile app, we will collect your login credentials for your SIP or VOIP service provider account so you can make and receive calls. If you contact us for customer service purposes, we will collect your name, contact information, password, and information about your service ticket. When you submit a form on our Site requesting communication with our representatives, sign up for a subscription such as a blog or newsletter or download content on our products and services, we collect your contact information such as name, email, country, region, phone number, or any other identifying information. We will never process or collect any personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Cookies, Automatic Data Collection, and Related Technologies. When you access or use our Services, we and third parties that may provide certain functionality on our behalf, such as social media, advertising networks, or automation software, may engage, receive, collect, and store certain types of information through automatic data collection tools including cookies, pixel tags, web beacons, embedded web links, and similar technology. Information collected by us or other third parties through these technologies is referred to for the purposes of this Privacy Statement as "Automatically Collected Information." The various information collection technologies that we and others may employ may collect information including, but not limited to, information such as your Internet Protocol (IP)

address, browser type, the date and time that you use our Services, referring/exit pages and URLs, number of clicks, online activities within Upchurch Telecom and Data, Inc. Site, and cookies that may uniquely identify your browser. When you use any of our apps, we automatically collect your mobile device ID; location and language information; device name and model; operating system type, name, and version; your activities within the application; and the length of time that you are logged into our application.

When using our UVoice application, with your permission, we may access your mobile device's contact list so you may place calls to your contacts through UVoice. The UVoice application may also, with your permission, access your mobile device's camera to scan QR codes to help you log in to your UCM account(s). When you set up an Upchurch Telecom and Data, Inc. IP phone, we collect the phone's IP address to help you set up the phone's language and location settings.

Cookies. In operating our Services, we may use cookies. Additionally, third-party widgets may install cookies depending on their configuration. We may (and we may allow third party service providers to) use cookies or similar technologies to collect information about your browsing activities over time and across different websites following your use of our Service. Our cookies help provide additional functionality and help us analyze Services usage more accurately. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the features of our Services.

Clear GIFs (Web Beacons/Web Bugs), Pixel Tags and Other Technologies. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags), in connection with our Services to, among other things, track the activities of website visitors and application users, help us manage content, and compile statistics about website and application usage. We and our third-party service providers also use clear GIFs in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

Third Party Analytics. We use automated devices and applications, such as Google Analytics and HubSpot, to evaluate usage of our Site and, to the extent permitted, our apps. We also may use other analytic means to evaluate our Services. We use these tools to help us improve our Services, performance, and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your personal information with these third parties.

Managing Cookies and Do Not Track:

Our Services currently do not respond to "Do Not Track" (DNT) signals and operate as described in this Privacy Statement whether or not a DNT signal is received.

How We May Use Your Information

We use your information, including your personal information, for the following purposes:

- We use your information to provide our Services to you, to communicate with you about your use of our Services, to respond to your inquiries, to fulfill your orders, and for other customer service purposes.
- We may also use your information collected through the Services to help us improve the content and functionality of the Services, to better understand our users and to improve our Services.
- We use information, including personal information, for internal and service-related purposes only and may provide it to third parties to allow us to facilitate the Services. We may use and retain any data we collect to provide and improve the Services.
- We may contact you using the contact information you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, or system maintenance.
- We may use your personal information and other information to communicate with you by email or push notification on a daily, weekly, or monthly basis to provide you with information we think may be of interest to you. You may opt out of marketing emails at any time by using the opt-out link in an email. You can also request permanent deletion of your records by submitting a request to service@uptel.com. We do not rent, sell, or share information about you with other people or nonaffiliated companies for their direct marketing purposes. We also do not provide any personal information to any third-party ad networks.
- We may de-identify and aggregate data collected through our Services and use it for any purpose.

Credit Card Information

When you give us your credit card information, you are authorizing us to check your financial qualifications and/or collect payments from you solely. We use third-party service providers that manage and collect payments from you and this service is not allowed to store, retain or use your information other than to process credit card payments on our behalf.

How We May Share Your Information

App users. When you use our Apps, we may share your name, phone number, and email address with your call or conference participants.

Vendors and Service Providers. We may share any information, including personal information, that we receive with vendors and service providers retained by us.

As Required By Law and Similar Disclosures. We may access, preserve, and disclose your personal information, other account information, and content if we believe doing so is required or appropriate to: comply with law enforcement requests and legal process, such as a court order or subpoena; respond to your requests; or protect yours, ours, or others' rights, property, or safety.

Merger, Sale, or Other Asset Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. We cannot control how such entities may use or disclose such information.

Third Party Websites & Applications

This Privacy Statement applies only to our Services. The Services may contain links to other websites not operated or controlled by us (the "**Third Party Sites**"). We do not own, control, or operate such linked sites, and we are not responsible for the privacy policies or practices of such linked sites. Privacy policies and practices for such linked sites may differ from this Privacy Statement and our practices. We encourage you to read the privacy policies of such linked sites before disclosing your personal information on such sites, as those privacy policies will apply to information collected through those third-party websites.

Children's Privacy

We do not knowingly collect, maintain, or use personal information from children under the age of 13. If you are under the age of 13, please do not submit any personal information through our Services. If you have reason to believe that a child under the age of 13 has provided personal information to us through the Company's Services, please contact us, and we will endeavor to delete that information from our databases.

Security Of Your Information

We take steps to ensure that your information is treated securely and in accordance with this Privacy Statement and have a set of procedures and best practices set up to handle your personal information as listed below.

- Data will not be disclosed to unauthorized personnel, either within the company or externally.
- Data will be regularly reviewed and updated if found to be out of date.
- Data access will be protected with strong complex passwords by authorized personnel only and will never be shared. Data stored on physical media will be kept securely locked when not in use.
- Data will only be stored on designated drives and servers and should only be uploaded to approved cloud computing services. Servers containing personal data will be sited in a secure location, away from general office space.
- Data is backed up frequently following standard backup procedures.
- All devices containing data are protected by approved software and hardware used for security purposes.
- All websites that have access to personal data will use SSL encryption from a trusted certificate authority.

In the event of a data breach, we will notify you immediately upon discovery, but no later than 72 hours after its discovery. Despite our security measures, we cannot guarantee the Internet to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

International Users

Information collected through our Services may be stored and processed in the United States or other countries in which we or our affiliates, subsidiaries or service providers maintain facilities, which may not provide the same level of protection for your Personal Information as your home country. By submitting any Personal Information or by using the Services and without limitation to any other rights or obligations we have, you consent to such transfer to, and processing in, the United States and these other countries, and acknowledge that your information may be subject to access by law enforcement and other government entities, including courts and tribunals, in accordance with laws applicable in those jurisdictions.

Update Your Information

If you would like to update or modify any information you have provided us, you can do so by emailing us at service@uptel.com. You also reserve the right to request a copy of your personal information from our database and/or request permanent deletion of your records by submitting a request to service@uptel.com. If you wish to withdraw your consent on all items outlined on this Privacy Statement, you can do so by contacting us at service@uptel.com. For any further questions or concerns about this Privacy Statement or the use of your information, please contact us at service@uptel.com.

Changes To Our Privacy Statement And Practices

We may update this Privacy Statement to reflect changes to our information practices. If we make any change in how we use personal information, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on the Services prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.