



PRIVACY POLICY

Last Updated on March 2, 2021

Contel Communications Inc., our mission is to help our clients. We want you to understand how we handle your data. We also want you to know your rights and choices.

1. What information do we gather and collect about you?
2. What do we do with the information we collected?
3. With whom do we share the collected information?
4. What are your rights?
5. What about sensitive and personal information?
6. How long do you retain the information?
7. How do you protect the information?
8. Are there guidelines for the children?
9. How is the information transferred internationally?
10. What is our legal basis?
11. What about links to third party service providers?
12. How are changes to this Privacy Policy communicated?
13. How can you contact us?

This policy describes how we handle your data when you use the services of Contel's Web. This covers our website, apps, newsletter, and pages/ads on social media networks. Please refer to this **Privacy Policy** whenever we gather information from you.

How we handle information about you depends on which Contel's Web Services you use — and how you use them. Be aware that certain Contel's Web Services work differently.

What information do we gather and collect about you?

The information we gather about you depends on the context. By and large, it's information about you that can personally identify you — either on its own or when combined with other information.

The following describes the information we collect and how we obtain it.

Information collected through Contel's Web Services.

- a. For Billing:
To process payments or donations, we collect and use your payment information. This can include your name, your address, your telephone number, your email address, your credit or debit card information and any other relevant information.
- b. For User-Generated Content:
We offer you the ability to post content that other users can read (e.g., comments). Anyone can read, collect and use any personal information that accompanies your



posts. We do not have to publish any of your content. If the law requires us to take down, remove or edit your personal information, we will comply to the required extent.

c. For Contests and Special Offers:

When you sign up for these, you give us your name, email and any other required information.

d. For Reader Surveys, Research, Panels and Experience Programs:

We gather information through questionnaires, surveys and feedback programs. We also conduct similar research for advertisers. We ask you for your consent to use this information when you participate in these programs and events.

During Contact With Technical Support Providers:

We collect information from you.

a. Personal Contacts Data:

With your consent, we do comply with your requests to collect data about your friends, family or acquaintances (e.g., Refer a Friend campaigns).

b. Information Collected Automatically:

With Tracking Technologies in Your Browser and Mobile Apps: These technologies include cookies, web beacons, tags and scripts, software development kits (or SDKs) and beyond.

c. We track and store data about how you visit and use Contel's Web Services, particularly through our websites and apps. The items we log include:

- i. Your IP address
- ii. Your location
- iii. Your Operating System
- iv. Your browser
- v. Your browser language
- vi. The URLs of any pages you visit on our sites and apps
- vii. Device identifiers
- viii. Advertising identifiers
- ix. Other usage information.

We combine this data with other information we collect about you. If your browser doesn't accept our cookies, you can't access certain parts of our websites. Because the "Do Not Track" browser-based standard signal has yet to gain widespread acceptance, we don't currently respond to those signals.

With GPS Technologies:

Some of our apps can provide content based on your GPS location, if you enable this feature. You choose whether to enable GPS features when you first install the app. You can edit that setting on your device at any time. If you enable these features, your GPS location can be found by satellite, cell phone tower or Wi-Fi and used by the app. If you save a location-based search in your history, that data moves to our service provider's servers — see below for the definition of service provider.



If you do not enable GPS location-based services, or if a specific app does not have location-based features, we don't collect your precise GPS location. We do collect your IP address, which can establish your approximate location. Ads on our sites and apps may be targeted based on this approximate location, but are never targeted based on your GPS location.

Information Collected From Other Sources

Privately Owned Databases:

Marketing, data analytic and social media-owned databases give us access to a range of information — like public data, survey data and beyond. This data sometimes includes your mailing address, your gender, your age, your household income and other demographic data.

Social Media Platforms and Other Third-Party Services:

(Social media platforms include Facebook. Third-party services include Google, Kindle and Nook.) By linking the services, you authorize us to collect, store and use any information they may give us (e.g., your email address). We also receive information from you when you interact with our pages, groups, accounts or posts on social media platforms. This includes aggregate data on our followers (e.g., age, gender and location), engagement data (e.g., "likes," comments, shares, reposts and clicks), awareness data (e.g., number of impressions and reach) and individual users' public profiles.

What do we do with the information we collected?

- a. We provide Contel's Web Services. We use your information to help you use Contel's Web Services, such as:
 - i. Arranging access to your account
 - ii. Providing customer service
 - iii. Responding to your inquiries, requests, suggestions or complaints
 - iv. Completing your payments and transactions
 - v. Sending service-related messages (e.g., a change in our terms and conditions)
- b. We Personalize Your Experience. When applicable, we track your interests and reading habits.
- c. We Allow You to Share User-Generated Content. Any information you disclose in your content becomes public — along with your chosen screen name and uploaded photo.
- d. We Develop Products and Services, and Do Analysis. We analyze data on our users' subscription, purchase and usage behaviors. This helps us make business and marketing decisions.
- e. We Carry Out Administrative Tasks.
 - i. For auditing: We verify that our internal processes work as intended and comply with legal, regulatory and contractual requirements.
 - ii. For fraud and security monitoring: We detect and prevent cyberattacks or unauthorized robot activities.
 - iii. For customer satisfaction: We assess users' satisfaction with Codennected Services and our customer care team.

The above activities can involve outside companies, agents or contractors (“service providers”) with whom we share your personal information for these purposes (discussed further below).

- f. We Offer Contests and Other Promotions. You can take part in our sweepstakes, contests and other promotions. Some might have additional rules about how we use and disclose your personal information.
- g. We Allow for Personalized Advertising on Contel’s Web Services and Create Audiences for Third Party Advertisers. We gather data and work with third parties to show you personalized ads. This data comes from ad tracking technologies set by us or the third party (e.g., cookies), the information you provide (e.g., your email address), your use of Contel’s Web Services (e.g., your history), information from advertisers or advertising vendors (e.g., demographic data) and anything inferred from any of this information. We only use or share this information in a manner that does not reveal your identity. For example, Google uses cookies or unique device identifiers, in combination with their own data, to show you ads based on you visiting our site and other sites. You can opt out of the use of the Google cookie by visiting the related Google privacy policy. We also create specific audiences that allow us to serve you personalized advertising on our sites and apps, on behalf of advertisers. To do this, we combine information we collect through surveys (from subscribers, registered users and non-registered visitors) with information we collect automatically using tracking technologies as you use the Contel’s Web Services. This combined information is used to build models for measuring users against demographic and interest-based attributes. With the help of service providers, these measurements are then transformed into pools of users grouped by common attributes. Third parties sometimes use other services in order to serve ads; check their privacy policies for more details. For further information on tracking technologies and your rights and choices regarding them, see the applicable cookie policies.
- h. We Advertise Contel’s Web Services to You. We market our services to you. Sometimes we use marketing vendors to do this. We serve ads through websites, locations, platforms and services operated and owned by third parties. Often these ads are targeted at people who have visited or registered Contel’s Web Service but have not subscribed or purchased anything. The ads are also targeted at people with similar traits or behaviors to our subscribers or customers. We target our advertising to these users by uploading an encrypted customer list to a third party, or by incorporating a tracking technology from a third party onto our Contel’s Web Service. The third party then matches individuals who appear in both our data and their data. Because of how this matching process works, the third party can’t read our encrypted customer list if they don’t already have it.
- i. We Aggregate (or De-identify) Personal Information Into Larger Findings. Sometimes we aggregate or de-identify information so that it can no longer identify you, under applicable laws. This helps us better understand and represent our users, such as when we measure ad performance, create advertising interest-based segments or compile survey results. We can use and disclose this aggregated or de-identified information for any purpose, unless an applicable law says otherwise.



company

With whom do we share the collected information?

a. Within the **Contel Communications Inc.**

Company:

We share your information with our affiliates for the purposes listed here.

b. With Service Providers:

We work with service providers, as defined above, to carry out certain tasks:

- i. Processing your payments
- ii. Fulfilling your orders
- iii. Maintaining technology and related infrastructure
- iv. Offering you customer service
- v. Serving and targeting ads
- vi. Measuring ad performance
- vii. Presenting surveys
- viii. Shipping you products and mailings
- ix. Distributing emails
- x. List processing and analytics
- xi. Managing and analyzing research
- xii. Managing promotions

When performing these tasks, service providers often have access to your personal information. We sometimes allow them to use aggregated or de-identified information for other purposes, in accordance with applicable laws

c. With Other Third Parties:

There are situations when we share your information with third parties beyond our service providers. We never share your email address with these third parties without your consent, except in encrypted form to engage in the matched ads process described above. We may share your name and mailing address (among other information) with other reputable companies that want to market to you by mail. We share information about our live event and conference attendees (e.g., your name, your company or your job title) with the event sponsors. In those cases we notify you when you provide us the information. We share information about participants in our sweepstakes, contests and similar promotions with the promotions' sponsors. In those cases we notify you when you provide us the information.

We process payments you make through Contel's Web Services with external services. There are two ways this can happen:

- I. We collect your information and share it with the third-party service for processing. The third-party service collects your information for processing.
- II. In the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), we would have a legitimate interest in disclosing or transferring your information to a third party — such as an acquiring entity and its advisers.

We can preserve or share personal information if the law requires us to do so. We can

also preserve or share personal information if we believe it would be necessary to:

- I. Comply with the law or with legal process
- II. Protect and defend our rights and property
- III. Protect against misuse or unauthorized use of the Contel's Web Services
- IV. Protect the safety or property of our users or the general public (e.g., if you provide false information or attempt to pose as someone else, we could share your information to help investigations into your actions)
- V. Cooperate with government authorities, which could be outside your country of residence.

We disclose public activities in our RSS feeds, APIs and other distribution formats. Your public activities could thus appear on other websites, blogs or feeds.

What are your rights?

- a. How do I opt out of email, Phone, mail and push notifications?

The opt-out methods described below are limited to the email address, phone or device used. They won't affect subsequent subscriptions.

- I. *Email:* We offer a variety of commercial emails and email newsletters. You can unsubscribe from them by following the "unsubscribe" instructions near the bottom of the email. You can also email us. You can manage your newsletter preferences.
- II. *Mail or Telephone Promotions:* You can ask us to unsubscribe from our mail or telephone solicitations. You can also ask us to not share your information with third parties for marketing purposes. To do so, email us. You can write to us. Please include your account number and phone number in the body of the letter.
- III. *Push Notifications:* You can opt out any time by adjusting your device settings, or uninstalling our app.
- IV. *Text Messages:* You can opt out of text alerts any time. We complete any opt-out request as quickly as we can. This opt-out request won't prohibit us from sending you important non-marketing notices.

- b. How do you access, change, delete, update or exercise your other rights in relation to your personal information?

In some parts of the world, you have the right to:

- I. Access, modify, or delete the personal information we have about you
- II. Receive an electronic copy of the personal information we have about you, for data portability
- III. Restrict, or object to, how we process personal information about you
- IV. Not receive discriminatory treatment by us for the exercise of your privacy rights.

You have the right to object to the processing of your personal information based on our legitimate interest or that of a third party — unless we demonstrate compelling legitimate grounds for the processing of, or the keeping of, your personal information for the establishment, exercise or defense of legal claims. If you'd like to exercise any of the above rights, contact us via email or by calling us. In your request, please be specific. State the information you want changed, whether you'd like your information suppressed from our database or whether there are limitations you'd like us to put on how we use your personal information. To verify your identity, we will email the email address you provide us, and which matches our records, and wait for your response. In some instances we may also ask for additional information. This is how we verify your identity before complying.

You can designate an authorized agent to make a request on your behalf. In order to do that, please provide the agent with written permission, signed by you, authorizing the agent to submit the request on your behalf. The agent must submit that written permission along with the request. We will contact you to verify your identity — and the authorized agent's permission — before a response to the request is sent. We'll respond to your request in a manner consistent with applicable law. We might need to keep certain information for recordkeeping purposes, or to complete a transaction you began prior to requesting a change or deletion (e.g., if you make a purchase or enter a promotion, you might not be able to change or delete the personal information provided until after the completion of the purchase or promotion).

In some cases, your request doesn't ensure complete removal of the content or information (e.g., if another user has reposted your content).

If you'd like, you can lodge a complaint with a data protection authority.

c. **How Do You Manage Accounts?**

You can update your account information. If you need assistance, call our number.

What about sensitive and personal information?

We generally don't want to gather any sensitive information about you. This includes:

- I. Your social security number
- II. Your racial or ethnic origin
- III. Your political opinions
- IV. Your religion or other beliefs
- V. Your health, biometric or genetic characteristics
- VI. Any trade union membership
- VII. Any criminal background

There are rare situations when we request this information (e.g., a reader survey asks about your political leanings), but you can decline to answer. Outside those situations we would prefer you never share that information with us.

How long do you retain the information?

It depends. We store your personal information for as long as needed, or permitted, based on the reason why we obtained it (consistent with applicable law). This means we might retain your personal information even after you close your account with us.

When deciding how long to keep your information, we consider:

How long we've had a relationship with you or provided Contel's Web Service to you whether we are subject to any legal obligations (e.g., any laws that require us to keep transaction records for a certain period of time before we can delete them) whether we have taken any legal positions (e.g., in connection with any statutes of limitation). Rather than delete your data, we might de-identify it by removing identifying details.

How do you protect the information?

We protect your personal information with a series of organizational, technological and physical safeguards — but we cannot guarantee its absolute security. We recommend that you use complex and unique passwords for your accounts and for third-party accounts linked to them. Do not share your password with anyone. If you have reason to believe your interaction with us is no longer secure, notify us immediately.

Are there guidelines for the children?

If you are a parent or guardian and you believe we have collected information from your child in a manner not permitted by law, contact us by email. We will remove the data to the extent required by applicable laws.

How is the information transferred internationally?

The Company is headquartered in the Philippines. In certain situations, the courts, law enforcement agencies, regulatory agencies or security authorities in other countries might be entitled to access your personal information.

What is our legal basis?

We only collect, use or share information about you when we have a valid reason. This is called "lawful basis." Specifically, this is one of the following:

- I. The consent you provide to us at the point of collection of your information
- II. The performance of the contract we have with you
- III. The compliance of a legal obligation to which we are subject or
- IV. The legitimate interests of the Company, a third party or yourself.
- V. There are good reasons for the processing of your personal information, and that we take measures to minimize the impact on your privacy rights and interests. "Legitimate interest" also refers to our use of your data in ways you would reasonably expect and that have a minimal privacy impact.

We have a legitimate interest in gathering and processing personal information, for example: (1) to ensure that our networks and information are secure; (2) to administer and generally conduct business within the Company; (3) to prevent fraud; and (4) to conduct our marketing activities.



Links to third party service providers?

Some Contel's Web Services contain links to third-party websites, resources, vendors and advertisers. These third parties are not Contel's Web Services. We do not control (and are not responsible for) third party content or privacy practices. Any personal data you provide to them is not covered by this Privacy Policy.

How are changes to this Privacy Policy communicated?

We periodically update this Privacy Policy. We will post any changes on this page by updating this policy. If we make a significant or material change in the way we collect, use or share your personal information, we will notify you at least 30 days prior to the changes taking effect. We will do this via email or prominent notice within Contel's Web Services. If you object to any change, you can stop using the Contel's Web Services. After we post any changes on this page, your continued use of the Contel's Web Services is subject to the updated Privacy Policy.

How can you contact us?

If you have any questions, email or write to us. We can also be reached by phone. Certain Contel's Web Services operate as independent controllers of your personal information. If you have any questions regarding them, email or write to us.