

Teleopti AB Privacy Policy
Last Updated: August 14, 2019

Teleopti AB and its affiliates and subsidiaries (“Teleopti,” “we,” “us,” “our”) provides both cloud- and premise-based software solutions (the “Software”). The Software includes storage components and enables entities to manage information collected from customers to ensure quality customer experiences. This Privacy Policy (the “Policy”) describes the ways in which your information is received, collected, used, or accessed through our websites, as well as your rights with respect to your information, including your choices regarding the use, access, and correction of and to your information.

Teleopti is owned and operated by Calabrio, Inc. For more information about how Calabrio, Inc. processes Personal Information, please see [Calabrio’s Privacy Policy](#).

This Policy describes our general privacy and security policies and procedures. **By using our websites, you are consenting to the collection, use, disclosure, and transfer of your information as described in this Policy. If you do not consent to the collection, use, disclosure and transfer of your information as described in this Policy (and any Privacy Notices that apply to you), you may not use this website.** With respect to the Software, Teleopti has different privacy-related requirements detailed in our customer agreements and, as such, the customer agreement shall prevail over this Policy in the event of conflicting language.

Disclaimer

The Teleopti website and extranet may be operated on servers contained within the United States and, as such, any information you provide to us, including personal information (as defined below), may be transferred to and processed in the United States. Your access to and use of these websites shall be deemed to be your complete, unconditional consent to our transfer, processing, and use of such information in accordance with this Policy. Please note that if you are located outside of the United States and are purchasing our cloud services you will have the opportunity to select the utilization of cloud servers in an appropriate geographic region at the time your initial order is placed.

You can download a pdf version of the policy here *[insert link]*.

Collection of Personal Information

Personal information is any information from which you as an individual can either directly or indirectly be identified, including without limitation your name, address, telephone number, email address, company and/or job title, and login information, such as username, PIN, or other password.

While using our websites, we may request or require you to provide personal information in order to allow the download of documents, completion of contact information forms, access to the extranet, attendance at webinars, or registration for certain Teleopti events. We may use third-party services for collection of personal information and/or collection of payment for purchases made through our website or for registration to certain events, in which case, you will be redirected to a webpage hosted by such third party and not by Teleopti. Third parties who are provided with or who collect personal information will be contractually obligated to use the data pursuant to Teleopti’s instructions, which shall be consistent with

this Policy and which shall include requirements regarding the confidentiality of the information. Additionally, Teleopti may collect other information from you or your device through our websites, including information from your browser (such as your IP address). This information may be combined with information that identifies you or we may use it in the aggregate

Privacy Obligations for Minors

Teleopti does not knowingly collect personal information from minors under the age of 13 through its websites. If you are the parent or guardian of a minor under the age of 13 and you are or become aware that your child has provided us with personal information without your consent, please contact Teleopti using the contact information provided in this Policy, and Teleopti will work with you regarding your requests relating to such personal information, including your requests to delete the information. If Teleopti becomes aware that a minor under the age of 13 has provided us with personal information without consent from his or her parent or guardian, we will delete the information from our records.

Security of Personal Information

We have implemented security policies to protect against loss, misuse, or alteration of personal information that we have collected. We strive to ensure compliance with all laws, regulations, and widely accepted security standards that are applicable to personal information.

You understand that the internet is not secure and that your use of, or connection to, the internet provides the opportunity for unauthorized third parties to circumvent security measures taken by us. We cannot guarantee the privacy or security of any information transmitted over or stored in any system connected to the internet. You are fully responsible for maintaining the security and confidentiality of any personal information, including usernames and passwords utilized for our services. Questions regarding our security policies should be directed to the contacts listed in this Policy.

Scope and Use of Personal Information

Teleopti may store any information collected throughout our databases and reserves the right to use the information to:

- Provide the websites to you and to enable your use of the websites
- Improve the websites, including by the creation of new components or features thereof based on anonymized and aggregated information Teleopti collects pursuant to this Policy
- Send you information that may be of interest to you, including corporate announcements, information with respect to new products or enhancements, newsletters, educational materials, and event information
- Send you notices regarding the websites and our services

Disclosure of Personal Information

Except as disclosed in this Policy, Teleopti will not transfer any personal information to third parties, including through the sale, rental, or trading of personal information collected pursuant to this Policy. Notwithstanding the foregoing, Teleopti may co-sponsor webinars with partners whereby information

may be shared between the parties. All such co-sponsors will be identified on the registration page, including with information about who the co-sponsor is and what information may be shared. Teleopti may share information with third party service providers contracted by Teleopti to provide services in connection with the websites or any applicable services. Teleopti will use best efforts to ensure all third-party service providers are contractually bound to use information according to Teleopti's reasonable instruction and direction.

Teleopti may disclose information to third parties if Teleopti reasonably believes disclosure is necessary to adhere to legal requirements or comply with a legal process, to protect or defend Teleopti's property and/or intellectual property rights, to enforce this Policy and/or any other contractually binding agreements we have with you, or to protect other users and/or third parties. This may include disclosure of personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Teleopti may also disclose information to a third-party successor if, for example, we transfer the ownership or operation of this Site to another organization or if we merge with or are acquired by another organization or liquidate our assets. If such a transfer occurs, the successor organization's use of your information will still be subject to this Policy and the privacy preferences you have expressed to us.

Cookies, Web Beacons, and Other Similar Technologies

Cookies are small text files that are stored within your web browser that allows Teleopti to recognize you. If your browser is set to accept cookies, then it adds the text in a small file. Teleopti does not use cookies to read any other information on your hard drive. We use cookies to better understand your use of our website, including by: (a) tracking pages on our site you have visited, (b) identifying visitors to our website, (c) analyzing email campaigns, (d) tracking contact forms, and (e) tracking items you download from the websites. You can configure your browser to refuse cookies or to warn you before a cookie is placed. If you disable cookies, parts of our websites may not function properly or at all.

Teleopti uses web beacons to further assist in our understanding of the behavior and preferences of our users. Web beacons are transparent graphic images placed on our website or in our emails to establish an appreciation of the behavior of the website visitor or of the recipient of an email, including by allowing us to know when an email has been opened. While you are unable to opt out of our use of web beacons, your preferences with respect to cookies may limit our use of web beacons. Teleopti may use additional technologies that are similar to cookies and web beacons to further allow us to understand your use of our website, some of which may operate across all of your browsers.

Online Advertising and Remarketing

In addition to the cookies Teleopti delivers to your computer or mobile device through this Site, certain third parties may deliver cookies to you for a variety of reasons. For example, we use Google Analytics, a web analytics tool that helps us understand how visitors engage with our Sites. To learn more about Google Analytics, click [here](#).

Other third parties may deliver cookies to your computer or mobile device for the purpose of tracking your online behaviors across non-affiliated websites and delivering targeted advertisements either on our websites or on other websites.

You have choices about the collection of information by third parties on our websites. For example, if you don't want information about your visit to this Site sent to Google Analytics, you may download an Opt-out Browser Add-on by clicking [here](#). Please note that the Add-on does not prevent information from being sent to Teleopti. In addition, if you would like to opt out of having participating entities collect your online behavior for advertising purposes when you are browsing our websites, click [here](#) for a "Website Opt Out" or [here](#) to specifically opt out of Google's use of cookies. You will be directed to an industry-developed website that allows you to choose whether each listed entity may collect and use data for interest-based advertising purposes. It may be that some of the third parties that collect interest-based information on this Site do not participate in the Website Opt Out, in which case the best way to avoid third party tracking of your online behaviors may be through your browser settings and deletion of cookies.

The Website Opt Out described above works only on websites. To opt out of having participating entities track your behaviors for advertising purposes when you are using mobile apps, download and use the Digital Advertising Alliance's "App Choices" app. As with the Website Opt Out, the "Mobile App Opt Out" prevents tracking only by participating entities.

Please note that the Website Opt Out and Mobile App Opt Out are device specific. If you wish to opt out from having interest-based information collected by participating entities across all devices, you need take the steps outlined above from each device.

Your Choices

In General

We respect your right to make choices about the ways we collect, use, and disclose your information. This Policy describes some of your choices, such as your choice to opt out of receiving "cookies". We may ask you to indicate your choices at the time and on the page where you provide your information.

Email Preferences

We will include an "opt out" link in each electronic newsletter or promotional email we send you, so that you can inform us that you do not wish to receive such communications from us in the future.

Do Not Track Mechanisms

California law requires this Policy to address how we respond to any "Do-Not-Track ('DNT') signal" delivered by your browser. Because of the changing state of technology and indecision within the industry regarding the meaning of DNT signals, we currently do not make any guarantee that we will honor DNT signals.

Previously Expressed Preferences

You may change previously expressed preferences regarding how we use your information. If at any time you wish to be taken off our mailing lists, please contact us using the information provided below.

Additional Information for Users in the European Economic Area Only

For the purposes of European Union data protection laws the data controller is Teleopti AB. You may contact us with any questions or comments at privacy@Teleopti.com.

How and Why We Use Personal Information Collected

We will only use the personal information when the law allows us to. The scope and use of personal information by Teleopti is set out in “Scope and Use of Personal Information” above.

Our grounds for using your personal information include:

- Where we need to perform the contract that we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (i.e. we have a business or commercial reason for using your information), and your interests and your fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation; or
- Where you consent.

Generally, we do not rely on your consent as a ground for processing your personal information other than in relation to sending marketing communications. Where we rely on your consent as a legal ground for processing, you have the right to withdraw consent at any time.

Our legitimate interests may include:

- Being efficient about how we fulfil our legal and contractual duties.
- Providing high quality customer service.
- Complying with laws or regulations that apply to us.
- Developing the Software, our websites and other products and services, and what we charge for them.
- Defining types of customers for the Software and any new products or services.
- Contacting you in respect of our products and services.
- Developing and improving the network security, efficiency and technical specification of our IT systems and infrastructure.
- Providing our customers with our websites, and other high quality product and service features.
- Keeping the Software, our websites, and our other products and services updated and relevant.

Change of purpose

We will only use your personal information for the uses and purposes set out above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original uses and purposes. If we need to use your personal information for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do so.

Your Rights

Under European Union data protection laws you may have the following rights:

- **Right to withdraw consent at any time:** This applies where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Request access to your personal information:** This enables you to receive a copy of the personal information we hold about you and to check that it is accurate and that we are processing it lawfully.
- **Object to processing of your personal information:** This enables you to object to processing of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. We will provide you with appropriate choices to opt in or opt out as set out above in our Policy.
- **Request correction of your personal information:** This enables you to have any incomplete or inaccurate personal information we hold about you corrected, though we may need to verify the accuracy of the new personal information you provide to us.
- **Request erasure of your personal information:** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Request transfer of your personal information:** This enables you to request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Request restriction of processing:** This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the information's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the personal information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your personal information but we need to verify whether we have overriding legitimate grounds to use it.
- **Right not to be subject to a decision based on automated profiling:** This applies where the automated processing produces legal effects on you or similarly significantly affects you. Note, it does not apply if the decision (a) is necessary for the performance of a contract between you and

us, (b) is authorized by applicable law, or (c) is based on your explicit consent. However, where (a) or (c) applies, you have the right to obtain human intervention. You also have the right to be informed of the logic involved in such processes.

- **Make a complaint:** You have the right to make a complaint at any time to the relevant data protection supervisory authority in the EU member state in which you reside. Please see “Recourse” below.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Accountability for Onward Transfer

In the event Teleopti transfers personal information to a third party acting as a controller, we will do so in adherence to any notice provided to you and with your consent and only if the third party provides contractual assurances that it will (a) process personal information for the specific purposes to which you consented; (b) provide at least the same level of protection as is required by laws and regulations within the European Union and notify us if it cannot comply with such laws and regulations; and (c) stop processing personal information or take reasonable steps to remediate if it determines it cannot comply with the law and regulations within the European Union. If we have knowledge that a third party acting as a controller is processing personal information covered by this policy in a manner that is inconsistent with such laws or regulations or that is inconsistent with your consent, we will take reasonable measures to prevent or stop the processing of such personal information.

Teleopti will only transfer personal information to our agents if the transfer of information is necessary for the agent to deliver a requested product or service. In the event we make such a transfer of personal information, we will (a) limit the agent to ensure personal information is processed for the specific purposes necessary; (b) require the agent to provide at least the same level of protection as is required by all applicable laws and regulations within the European Union; (c) take reasonable measures to ensure the agent processes the personal information consistent with Teleopti’s responsibilities under this policy and all applicable laws and regulations within the European Union; and (d) require the agent to notify us if the agent determines it can no longer meet the obligations under such laws and regulations. In the event Teleopti receives a notification from an agent that the agent can no longer meet the obligations under the such laws and regulations, we will take reasonable measures to remediate and stop the unauthorized processing.

Teleopti retains liability if a third party acting as a controller or an agent processes personal information in a manner that is inconsistent with applicable laws and regulations within the European Union or inconsistent with your consent to the extent Teleopti is responsible or partially responsible for the event giving rise to the damage.

Data Transfers outside the European Economic Area

The personal information that we collect from you may be transferred to, and stored at, a destination in the United States. It may also be processed by staff operating in the United States who work for us or for one of our suppliers. By submitting your personal information, you agree to this transfer, storing or processing.

Where we transfer personal information to the United States, we ensure the protection of your personal information by complying with all applicable laws and regulations within the European Union.

Opt-in and Opt-out

In relation to marketing communications, we may provide you with an “opt-in” or “opt-out” mechanism depending on where you are located when we collect your personal information. An “opt-in” mechanism will provide you the opportunity to positively indicate that you would like or do not object to our sending you such further communications, and we will not send you any unless you have “opted in”. An “opt-out” mechanism will provide you the opportunity to indicate that you do not want us to send you such further communications, and if you “opt out” we will not send you any. Either way, opting- in or opting out will be up to you.

Links to Third Party Websites

Our website contains links to third party websites that are not owned, managed, or controlled by Teleopti and who may have privacy policies with different standards than those contained herein. Teleopti is not responsible for the privacy practices or the content of such websites. We encourage you to read the privacy policies of any third party website, specifically those that may collect personal information. This Policy is solely applicable to Teleopti and the information we collect on our website(s) and/or services.

Community Forums

Teleopti may provide you the opportunity to join community forums (the “Forums”) that can be used in connection with our extranet. The Forums may allow you to provide your personal information and create a user profile. This information may be read, collected, and used by others who access them and will be regularly monitored by Teleopti. By posting information on the Forums, you agree that the information may be accessed by individuals both internally at and externally of Teleopti. Comments and discussions will be monitored and may be accessed and deleted for technical or other reasons. Comments posted on the Forum reflect the opinions of the individual poster and should not be deemed to be the opinion of Teleopti. You may delete your own posts to the Forum or you may request Teleopti to delete posts by emailing privacy@Teleopti.com or contacting us via the Contact Information section below.

Social Media

Teleopti websites include or may include social media features, including without limitation YouTube videos and links to Facebook, Twitter, and LinkedIn. These features may collect your IP address, which page you are visiting on our website, and may use cookies to allow the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with and use of these social media features shall be governed by the privacy policies of the company providing the feature.

Opt-Out, Amendment, and Retention of Data

If your personal information changes or if you no longer desire to use and access our websites, you may submit a request that includes the updated or modified information (or the request for deletion of the information) to privacy@Teleopti.com or to the address listed in the Contact Information section of this Policy. Teleopti will strive to respond to these requests within 30 days of our receipt of the request. In the event Teleopti disagrees with the request, we will provide you with notification that includes any reason for disagreement.

Teleopti will retain your information as long as your account is active or as needed to provide you services or as permitted by applicable law. If you wish to cancel your account or request that we no longer use your information to provide you services, please contact us and we will consider your request along with the requirements of applicable law.

Privacy Policy Modifications

Teleopti may, in its sole discretion and providing any notice required under applicable law, modify the terms and conditions contained within this Policy and, as such, Teleopti encourages you to review this Policy on an ongoing basis for any changes. Changes shall take effect as soon as they are posted to this website. Your access to and use of this website following any such modifications shall be deemed to be your acceptance of such terms.

Contact Information

Any questions about this Policy or Teleopti's use of information collected from this website should be directed to privacy@Teleopti.com or by mail to:

Teleopti AB
Attn: Legal Department
Linnegatan 87D
104 51 Stockholm, Sweden
United States

Recourse

Teleopti commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Policy should first contact Teleopti at privacy@Teleopti.com or at:

Teleopti AB
Attn: Legal Department
Linnegatan 87D
104 51 Stockholm, Sweden
United States

You may also bring disputes or complaints to the applicable data protection authorities within the EU/EEA.