



Copper Canyon Communications Privacy Policy

Updated April 11, 2024.

Copper Canyon Communications, Inc. (collectively "Copper Canyon Communications", "us", "we", "our") is committed to protecting your privacy while providing you with a positive experience on our website and in using our products and services.

This Privacy Notice ("Notice") explains our privacy protocols and details the procedures for collecting, utilizing, and disclosing your personal information in connection with our products and services. It encompasses interactions pertaining to our websites and associated sub-domains ("Website"), utilization of our desktop app, VoIP desk phone, or mobile application ("Apps"), as well as engagement with our hosted communications and collaborative solutions ("Services"). The Notice further outlines potential choices available to you concerning the access, deletion, and correction of your personal information.

Additional information on this practice may be provided in supplemental terms and conditions, supplemental privacy statements, or notices provided prior to or at the time of data collection.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal information when you actively provide it to us through your interactions with us.

We may automatically collect personal information from you as you use our Apps and Services or visit our Website(s) as a user or a participant, including recording communications, when enabled.

We may receive personal information about you from a business partner or another user of our Apps and Services.

WHAT PERSONAL INFORMATION WE COLLECT

Personal Information you actively provide to us, or we collect from third-parties, business partners, other users, and service providers.

Your Contact Information/Identifiers:

Name, username, email address, phone number, identity documents, IP address, and any other identifiers a user provides when accessing or using the Service.

Your payment information:

Billing name, address, and credit card or other payment information.

Other information:

Social-media profiles, LinkedIn URLs and custom profiles.

Personal information we collect through your interactions with us, our Websites, Apps and Services as a user or a participant.

Account information:

Account holders' usernames and account numbers, Copper Canyon Communications DID's (phone numbers), language preference, title, department.

Information about your use of non-Copper Canyon Communications Services through integrations with our Websites, Apps and Services or otherwise:

Social-media account information, single-sign-on service tokens, Google/Apple/Microsoft sign in tokens.

User content:

Files, any content of communication or other information you or another user or participant upload, provide, grant access to or otherwise implement.

Note: users and participants control the content they provide, and it may include any category of personal information.

Service Usage Data:

Internet Protocol ("IP ") address, MAC address, other device ID ("UDID"), device type, operating system type and version, client version, type of camera, microphone or speakers, connection type and other related information.

User feedback ratings, internal feature usage analytics, usage logs, cookie identifiers.

Traffic data about the communications that take place through our platform (such as chat, video conferencing), network monitoring data.

Call Activity Reports produced by a telephone call or other telecommunications transactions. The Call Activity Reports contain various attributes of the call, such as time, duration, completion status, source number and destination number.

Fraud data such as blacklist history and security logs.

Metadata such as session logs and join & leave time of participants.

Log data including IP address, Internet Service Provider ("ISP"), browser type, referring/exit pages, operating system, date/time stamp, and/or clickstream data.

Publicly available data from End User accounts.

Geolocation information:

Information about where you are located when using the Services.

Recordings:

A User hosting a phone or video conferencing meeting may choose to record the session, and if so, the Host is responsible for obtaining any required consent from you. Copper Canyon Communications helps Hosts obtain consent from other users by providing visual and audio cues to alert users of a recording.

As with all user content, recordings may contain personal data and may be stored with Copper Canyon Communications at the request of the meeting Host. A meeting Host may choose to store a recording of a meeting on the Host's local storage device, not with Copper Canyon Communications. When a Host chooses to do that, Copper Canyon Communications does not have any control over the recording. Transcripts, which may also contain personal data, are treated the same way as recordings.

Copper Canyon Communications may access or use the recording or transcripts stored with us as requested by the Host or Customer (such as providing technical support), to improve our Services, or as otherwise permitted by our agreement with the customer.

SMS messages:

Content of blocked SMS messages that violate our 10DLC Policy.

Inferred or derived data:

Inferred or derived data may include a summary of information included in recorded content processed by conversational intelligence. Users and participants control the content they provide.

Your communications with us:

Surveys, calls (including recordings), emails and messages, etc.

Other information:

Any personal information that a user or guest voluntarily provides about an individual through their use of the Services, including synchronizing contact information, or through integrations with other applications.

HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for the following objectives:

- Communication with you
- Identity verification to prevent fraud in accordance with relevant laws
- Account creation
- Provision of our Services, including responding to support inquiries
- Development and enhancement of the Services
- Order management and maintenance of Customer relationships
- Marketing and advertising our Services
- Conducting surveys
- Internal training purposes
- Enhancement and optimization of your interactions with our teams
- Facilitating your connection to and improving your experience with our Website, Apps, and Services
- Providing customer dashboards and reports
- Conducting fraud and threat analysis, and detecting and preventing spam, unlawful or abusive activity, or other violations of our Acceptable Use Policy (“AUP”)
- Monitoring performance of our data centers and networks
- Performing analytics to enhance the performance of Copper Canyon Communications’ Website, Apps, and Services
- Personalizing your experience with our Websites, Apps, and Services
- Compliance with applicable laws, including regulations regarding call activity records and billing for our Services.

Note: We may use artificial intelligence, machine learning, or other similar technology to provide, maintain, support, and improve our Services.

Limited Use for APIs

Copper Canyon Communications' use and transfer to any other app of information received from Google API's will adhere to Google API Services User Data Policy, including the Limited Use requirements.

COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar tracking technology (collectively, "Cookies") to collect and use personal information about you.

HOW, WHY, AND WHAT PERSONAL INFORMATION WE SHARE WITH THIRD PARTIES

We may share and disclose your personal information solely for legitimate business or legal purposes as described in this Notice and in accordance with applicable law, with the following third parties:

- Copper Canyon Communications or any of its affiliates.
- Business partners (e.g., resellers and other authorized third-party agents) to market or sell our Services, where permitted by law and only if you have not opted out of such communications.
- Third parties involved in corporate transactions, such as a sale, merger, acquisition, joint venture, financing, reorganization, bankruptcy, or receivership.
- Law enforcement agencies, regulatory or governmental bodies, or other third parties:
 - To comply with legal obligations or respond to legal processes;
 - To protect our rights, property, or interests (or those of others); or
 - To investigate or prevent fraud or other wrongdoing related to our Websites, Apps, or Services.
- Service providers, contractors, vendors, or agents who operate on our behalf to:

- Operate, maintain, improve, and customize our Websites, Apps, and Services;
 - Provide customer support and technical services;
 - Send transactional and operational communications;
 - Enforce our Acceptable Use Policy;
 - Conduct analytics to enhance user experience; and
 - Deliver personalized offers and advertisements based on your interests and interactions with us.
 - Other third parties with your explicit consent.
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Text Messaging and Mobile Information

We do not share mobile numbers, text messaging opt-in data, or consent with third parties or affiliates for marketing or promotional purposes. This information is used exclusively to provide requested services and communications, in accordance with your preferences.

HOW WE RESPECT YOUR PRIVACY RIGHTS

We provide you with the opportunity to access, review, modify, and delete your personal information that we process.

Your Additional Privacy Rights as a Resident of Certain U.S. states

The rights described in this section apply only if you are the resident of a state within the United States that has an applicable and effective privacy law providing for the below rights.

- **Data portability:** You can ask for a downloadable copy of your personal information in a CVS format. You can also request that we transmit the data to someone else where it's technically possible.
- **Knowledge and access:** You may have the right to know more about personal information that we have collected and disclosed in the preceding 12 months. You may be able to access, receive details on collection, the purpose of processing, and any

sharing that may have occurred.

- **Deletion:** You have the right to request that we delete the personal information we have collected about you under certain circumstances.
- **Non-discrimination for the exercise of your privacy rights:** You have the right to not receive discriminatory treatment by us for the exercise of your privacy rights.
- **Rectification:** If you believe that any personal information we are holding about you is incorrect or incomplete, you can request that we change, correct, or supplement the data. You can also correct some of this information directly by logging into your account, if you are a customer. Please contact us as soon as possible if you notice any inaccuracy or incompleteness.
- **No Automated Decision Making:** We do not undertake any decision making about you based solely on automated processing, including profiling; however, certain features of our Services could be used by our customers for decision-making purposes.

We will not share your personal information with third-parties for the third-parties' direct marketing purposes unless you have agreed to such disclosure.

We will verify your request using your name and email. Depending on the nature of your request, we may need additional information to verify your identity. You may authorize an agent to make a request on your behalf to exercise your privacy rights under applicable California privacy laws.

If you are a Colorado resident, you may have the right to appeal Copper Canyon Communications' denial of an individual rights request.

To exercise your rights or to allow your authorized agent to exercise your rights, please submit, or have your authorized agent submit, a ticket through our Support Ticket, or contact us at **9282636763** or **support@copperccaz.com**.

These choices do not apply to service notifications or other required communications that are considered part of certain Apps and Services, which you may receive periodically unless you stop using or cancel the App or Service in accordance with its terms and conditions.

HOW WE KEEP YOUR PERSONAL INFORMATION SECURED

Keeping your information secure is important to us. We have taken appropriate steps designed to reduce the risk that your personal information may be subject to loss, misuse, unauthorized access, disclosure, alteration or destruction.

HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

We will keep your personal information only as long as necessary to fulfill the original purposes for its collection, unless mandated by law or for legitimate business reasons such as legal, tax, regulatory requirements, or other lawful purposes.

Where we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it.

INTERNATIONAL DATA TRANSFERS

Copper Canyon Communications will not knowingly transfer your personal information to countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws in the US (and in some cases, may not be as proactive).

Data processed and purposes of data processing

Please see the relevant sections of this Notice for information regarding the data categories processed by us as a controller on our behalf.

As a processor to our customers, we process personal data that customers choose to submit to the services as customer-generated content, call activity records, usage data, and account information. The purposes for such processing is the provision, maintenance, support, and improvement of the Services.

Type of third parties to which Copper Canyon Communications discloses personal data and purposes

Please see the relevant section of this Notice for more information regarding the type of third parties to which Copper Canyon Communications discloses personal data and for what purposes.

Individual rights to access and to limit use and disclosure

Please see the relevant section in this Notice for information regarding how individuals can exercise their rights to access their personal data and to limit the use and disclosure of their personal data.

CHILDREN'S PRIVACY

Copper Canyon Communications does not knowingly provide products or services directly to children under the age of 18, or knowingly collect or solicit personal information from or about children under the age of 18.

THIRD-PARTY SITES

This Notice does not apply to, nor are we responsible for, the privacy, information or other practices of any third parties, including any third-party operating any site or service to which the Website or Apps link including but not limited to social-media sites. The inclusion of a link on the Website or Apps does not imply our endorsement of the linked site or service. You should check the privacy notices of those sites before providing your personal information to them.

BLOGS

Our Website offers publicly accessible blogs. You should be aware that any information you provide in these areas is public and may be read, collected, and used by others who access them and may remain on the public forum indefinitely. To request removal of your personal information from our blog or community forum, you can submit a request through our online portal. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why. We encourage all users to exercise caution when providing personal information in blogs and community forums.

UPDATES TO THIS NOTICE

We may update this Notice from time to time in response to changing legal, technical, or business developments. If we make changes to our Notice, we will post those changes on this page in addition to updating the "Last Updated" or effective date at the top of this webpage. If we make material changes, we will notify you either by emailing you or by posting a notice of such changes prominently on this page prior to such material changes taking effect.