

## BROADNET CLIENT MANAGER PORTAL PRIVACY STATEMENT

Effective Date: August 14, 2018

Welcome to the Client Manager Portal. Broadnet Teleservices, LLC (“Broadnet,” “we,” “us” or “our”) provides this Client Manager Portal as a service to its client, which is your employer or another entity granting you authority to use the Client Manager Portal on its behalf.

This Privacy Statement describes how we collect, use and disclose information about you when you access or use our Client Manager Portal, located at <https://clientmanager.broadnet.us/bnts> (the “Services”).

### Scope of this Privacy Statement

This Privacy Statement only applies to Personal Information *about you* that we collect through the Services. “Personal Information” includes information that identifies you personally, alone or in combination with other information available to us. This Privacy Statement does not apply to the processing of Personal Information of third parties through your use of the Services. If you provide us with Personal Information of any third parties, including your customers, you (or your company) are responsible for providing any required notice to such individuals of your privacy practices.

This Privacy Statement applies only to Broadnet, even if the Client Manager Portal contains logos or other branding belonging to a Broadnet client. Please refer to any privacy statements provided by such Broadnet client for information on its practices concerning Personal Information.

### Collection and Use of Personal Information

As part of the standard operation of our Services, we collect Personal Information (1) provided by you or the company you work for; and (2) automatically through your use of our Services, including cookies. In each case, we only collect and use a limited amount of Personal Information as necessary to provide the Services to you.

- **Provided Information**

In order for you to use our Services, we collect your name, email address, and log-in credentials. We use this information to enable to you to securely log in to the Services, to send you Service-related notifications, and to administer your account.

- **Automatically Collected Information, including Cookies:**

When you use the Services, we keep logs relating to your activities on the Services (including, among others, changes you make to your account, event configurations, actions to launch broadcasts and Polls, URLs within the Services you visit, device and browser information, approximate geographic location of your device, and IP address) in order to help detect potential unauthorized use of your account and to help us troubleshoot any problems with our Services.

We also use cookies and similar technologies, which may include Personal Information, as necessary to maintain a secure log-in session. Most Internet browsers automatically accept cookies. You can decline cookies using your browser settings, but by doing so you will not be able to log into and use the Services.

### Sharing and Disclosure of Information

We will not disclose Personal Information, except as set forth in this Privacy Policy or with your consent. We may disclose Personal Information as follows:

(1) to our business customers in the course of providing services to them; (2) to our service providers, who may use it only on our behalf; (3) to comply with a law, regulation or legal request or if we believe that there has been a violation of our rights or the rights of any third party; (4) to respond to judicial process and governmental investigations, and to provide information to law enforcement agencies or in connection with an investigation on matters related to national security, public safety, or otherwise as required by law; and (5) as disclosed to you at the point of collection. In addition, if Broadnet is involved in a merger, acquisition, reorganization or sale of assets, Personal Information may be transferred as part of that transaction.

## Security

We take reasonable physical, electronic, contractual and administrative steps to protect the confidentiality, security and integrity of your personally identifiable information. However, no method of transmission over the Internet or method of electronic storage is completely secure, and we cannot guarantee its absolute security. Please notify us immediately at [security@broadnet.com](mailto:security@broadnet.com) of any actual or suspected unauthorized use or breach of security with respect to our Services.

## Retention of Personal Information

Unless otherwise instructed in accordance with our contractual obligations or required by applicable law, we retain Personal Information only as long as necessary to provide the Services to your organization, and then for up to 120 days thereafter in accordance with our data retention policy.

## Your Rights Relating to Personal Information

If you would like to access, amend, erase, export, object to, or restrict the processing of Personal Information, you may submit a request to [privacy@broadnet.com](mailto:privacy@broadnet.com) or contact us by mail at 1805 Shea Center Drive, Suite 160, Highlands Ranch, Colorado 80129. We will promptly review all such requests in accordance with applicable laws.

Depending on where you live, you may have a right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Information. We encourage you to first reach out to us at [privacy@broadnet.com](mailto:privacy@broadnet.com), so we have an opportunity to address your concerns directly before you do so.

## EU-U.S. Privacy Shield

Broadnet complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union to the United States. Broadnet has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles will govern. To learn more about the Privacy Shield program, and to view our certification, please visit [www.privacyshield.gov](http://www.privacyshield.gov). In compliance with the Privacy Shield Principles, Broadnet commits to resolve complaints about our collection or use of your personal information. European Union individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Broadnet at [privacy@broadnet.com](mailto:privacy@broadnet.com). Broadnet has further committed to refer unresolved Privacy Shield complaints to JAMS, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not resolved your complaint in a reasonable amount of time, please contact or visit JAMS at [www.jamsadr.com/eu-us-privacy-shield](http://www.jamsadr.com/eu-us-privacy-shield) for more information or to file a complaint. The services of JAMS are provided at no cost to you. Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy

Shield Panel. To find out more about the Privacy Shield's binding arbitration scheme, please see <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

The Federal Trade Commission has jurisdiction over Broadnet's compliance with the Privacy Shield. If we have received Personal Information about you under the Privacy Shield and subsequently transfer it to a third party service provider for processing, we will remain responsible if they process such Personal Information in a manner inconsistent with the Privacy Shield Principles, unless we are not responsible for the event giving rise to the damage.

## **GDPR**

Individuals from the EU may contact our EU representative according to Art. 27 GDPR regarding all requests related to data protection and privacy:

DP-Dock GmbH  
broadnet  
Ballindamm 39  
20095 Hamburg  
E-Mail: [broadnet@gdpr-rep.com](mailto:broadnet@gdpr-rep.com)

## **Children**

We do not direct our Services to, nor do we knowingly collect any Personal Information from, children. If we become aware that a child has provided us with Personal Information, we take commercially reasonable steps to remove such information.

## **Tracking**

We do not include any features on the Services that allow a third party to track you, in personally identifiable form, over time and across third party websites. Similarly, we do not track Services users over time and across third party websites. Accordingly, we do not currently respond or take any action on the Services with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of Personal Information about an individual consumer's online activities over time and across third-party web sites or online services.

## **Changes to this Privacy Statement**

We may revise and update this Privacy Statement from time to time and will post the updated Privacy Statement to the Services. If these changes are material (i.e., changes we believe you will find important), we will post notice of the changes on the Services. To the extent required by applicable law, we will obtain your consent. Unless otherwise indicated, any changes to this Privacy Statement will apply immediately upon posting to the Services.

## **Contact Us**

If you have any questions about this Privacy Statement, our practices, our Services, or dealings with the Company, please send us an email at [privacy@broadnet.com](mailto:privacy@broadnet.com) or contact us by mail at 1805 Shea Center Drive, Suite 160, Highlands Ranch, Colorado 80129.