

## **EVE.calls Website Privacy Notice**

Last updated: 07/19/2024

EVE.calls Inc. (“Company,” “we,” “our,” or “us”) values your privacy and the protection of information we collect that can be used to identify you or that we can link to or associate with a you (“Personal Data”). This Privacy Notice (“Notice”) explains how we collect, store, use, share, transfer, delete, and otherwise process your Personal Data.

Please review this Notice carefully. To the extent permitted by law, by providing us your Personal Data or otherwise interacting with us, you are acknowledging this Notice. If you do not agree with our policies and practices, it is your choice not to use our Services or otherwise engage with us.

### **Purpose of this Privacy Notice**

This Notice describes the types of Personal Data that Company may collect or process, how we may use and disclose that Personal Data, how you may exercise any rights you may have regarding our processing of your Personal Data, and how you can contact us if you would like to exercise them or if you have any questions or concerns.

This Notice applies to Personal Data we collect or process through our website (<https://evecalls.com/>), when you contact us, or in any other circumstances where we provide you with this Notice (collectively, “Services”). Company may provide you with a different privacy notice in certain specific situations, in which case that privacy notice or policy will apply to the Personal Data collected or processed in that specific situation, rather than this one.

We may collect or process Personal Data as a service provider on behalf of our customers. In those instances, you should consult the customer’s applicable privacy notice or reach out to the customer for information regarding how they process your Personal Data.

If you provide us with Personal Data related to anyone other than yourself, please note that you are responsible for complying with all privacy and data protection laws prior to providing that information to Company (including obtaining consent, if required).

### **Personal Data Collected, Purposes, and Recipients**

We may collect or process your Personal Data when you (1) engage with online activities and services we offer through this and other of our websites, email, online channels, including through social media, and otherwise; (2) interact with our websites; (3) sign up for our newsletters or other informational or marketing materials; (4) contact us through phone (including AI calls), email, or otherwise; and/or (5) completing a survey or other online questionnaire or form.

*Examples of the types of Personal Data we collect or process (Personal Data that may be considered sensitive under some data protection laws is noted with a “^”)*

#### Identity and contact information, such as:

- username and password^
- first and last name or unique pseudonym

- honorifics and titles, preferred form of address
- employer / company
- email address
- postal address
- phone number

Video, Audio, and Recorded Information, such as:

- still images^
- video^
- recordings of online events^
- recordings of your interactions with our Services, whether through email or otherwise

Technical or electronic network activity information, such as:

- Internet Protocol (IP) addresses (which may identify your general geographic location or company)
- browser type and browser language
- device type
- date and time you use our Services
- Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving at and after leaving our Services
- activity and online behavior while on our Services and referring websites or applications, including forms and other information submitted, videos watched, your clicks on our site pages
- data collected from cookies or other similar technologies\*

*Where do we get your Personal Data?*

- you directly
- those you have authorized to provide Personal Data on your behalf
- your devices
- our security systems (including CCTV)
- business partners and other third parties that assist us in providing and improving our Services

*Why do we process your Personal Data?*

- to provide you with our Services
- to communicate with you
- to administer our relationship with your organization
- to identify and authenticate you
- to detect security incidents
- to protect against malicious, fraudulent, or illegal activity
- to ensure the appropriate use of our Services
- to improve our Services
- for short-term, transient use
- for administrative purposes

- for marketing, internal research, and development
- for quality assurance
- to comply with legal and regulatory obligations

*What are the Lawful or Legal Bases of Processing your Personal Data?\**

- for the purposes of our legitimate interests
- in preparation for or to perform a contract with you
- to comply with legal and regulatory obligations and to establish, exercise, or defend our legal claims and rights
- in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law

*Who may receive your Personal Data?*

- Company and our Affiliates
- your company / employer
- individuals or entities that you designate or instruct us to share your Personal Data with
- authorized representatives
- third parties who assist with fraud prevention, detection, and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs
- Company's lawyers, auditors, and consultants
- partners that assist us in providing or improving our Services or help us improve our marketing or administration\*\*\*

\* Please see our Cookie Notice available at [https://evecalls.com/downloads/legal/cookie\\_notice.pdf](https://evecalls.com/downloads/legal/cookie_notice.pdf) for more information on how we use cookies and similar technologies.

\*\* The legal bases relied upon by Company include those enumerated in Articles 6 and 9 of the European Union's General Data Protection Regulation (GDPR). When required and allowed, we will seek to obtain your consent or authorization to process your Personal Data and only process your Personal Data upon receiving such consent. In such circumstances, your refusal to provide consent or authorization will have no adverse consequence on you. However, in some circumstances where consent is required, it may be impossible for Company to manage its relationship with you or provide you with the Services absent your consent to process your Personal Data.

\*\*\* In limited circumstances, recipients may include, (1) in the event of a sale, assignment, merger, consolidation, corporate reorganization, or transfer, to the buyer, assignee, or transferee; and (2) government or regulatory officials, law enforcement, courts, public authorities, or others when permitted by this Notice or required by law.

### **Personal Data of Children**

Company does not knowingly collect, maintain, disclose, or otherwise process Personal Data from minors below the age of 16 without the permission of such minor's parents or legal guardians.

### **Marketing, Cookies, and Analytics**

To the extent permitted by law, including with your consent where required, we may engage in the following activities:

- We may use your contact details to contact you to determine whether you would like to initiate a business relationship with us or to send you marketing emails. If you do not wish to receive such marketing emails, you may opt out by declining to receive such emails when registering, in our subsequent communications by following opt-out or unsubscribe instructions included in the email, by contacting us, or at other information collection points while using the Services.
- We may collect Personal Data automatically through cookies and other technologies to provide functionality to our Services; to recognize you across devices when using our Services; in each case where this is justified under applicable data protection law for our legitimate business purposes or with consent, where required. These legitimate business purposes include evaluating information about the use of our Services and identifying trends; developing or enhancing our Services; providing an experience tailored to you when you use our Services; effecting certain security controls; and, identifying the advertisements and offers we think may interest you so that we may display them to you when you use our Services.
- We do not engage in profiling subject to the privacy laws using Personal Data.
- We do not “sell” your Personal Data or share it for the purposes of cross-context behavioral (i.e., “targeted”) advertising or profiling nor do we process your sensitive Personal Data to infer characteristics about you. We do allow certain third parties to collect information about the users of our Services to provide valuable services to us, such as fraud detection, reporting, and analytics. This may include sharing information about your interactions with our Services, including information searched for or viewed in connection with our Services for the purposes of providing you with information related to your searches, queries, or other interactions with our Services.
- We also perform statistical analyses of the users of our Services to improve the functionality, content, design, and navigation of our Services.

In addition, if you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. Visit <http://www.allaboutcookies.org/manage-cookies/index.html> for more information. If, however, you do not accept these cookies, you may experience some inconvenience in your use of the Services. For example, we may not be able to recognize your computer, and, where applicable, you may need to log in every time you visit.

### **Do-Not-Track Signals**

Certain web browsers and other programs may transmit “opt-out” signals, also called a Global Privacy Control (or GPC) signals or Do-Not-Track signals (GPC Signals), to websites with which the browser communicates. Please note that we do not have the ability to recognize or honor browser do-not-track or similar signals at this time. However, Company does not engage in targeted advertising or the sale of Personal Data.

## **Service Providers and Third Parties**

### ***Service Providers***

Service providers or vendors (or processors) acting on our behalf must execute agreements requiring them to maintain confidentiality and to process Personal Data only to provide the services to us and in a way that aligns with this Notice, other applicable privacy notices, and as explicitly permitted or required by applicable laws, rules, and regulations.

### ***Links to Other Websites***

Our Services may contain links to other websites, applications, or services that are not owned or operated by Company. Such links do not imply an endorsement with respect to any third party, any website, or the products or services provided thereby. You should carefully review the privacy policies and practices of other websites and services as we cannot control and are not responsible for privacy policies, notices, or practices of third-party websites, applications, and services.

## **Your Rights Regarding Your Personal Data**

Depending on where you live, you may have the following rights with respect to some or all of your Personal Data:

- to request information about or explain whether, and how, we process your Personal Data
- to request access to and a copy of your Personal Data, including to provide your Personal Data directly to another organization (called, in some locations, a right to data portability)
- to request that we correct or update your Personal Data
- to request that we delete your Personal Data
- to request that we restrict, suspend, block, or to object to or opt-out of the processing of your Personal Data, including your sensitive Personal Data, including withdrawing consent
- to appeal the denial of a request
- to lodge a complaint with the data protection authority in your jurisdiction.

To make a request, submit a complaint about how we process your Personal Data, or to appeal the denial of one of your requests, please contact us [support@evecalls.com](mailto:support@evecalls.com) using the information at the bottom of this Notice. Even if you make a complaint to us, you may also in some jurisdictions lodge a complaint with the relevant privacy or data protection authority in your location.

We will not discriminate against you for exercising any of the rights described above, although we may not be able to continue to provide you with certain Services or it may otherwise affect the way we are able to interact with you.

We will make reasonable efforts to respond promptly to your requests. We may, after receiving your request, require additional information from you to honor your request and verify your identity. Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

## **Safeguarding Personal Data**

Consistent with applicable laws and requirements, Company has put in place physical, technical, and administrative safeguards designed to protect Personal Data from loss, misuse, alteration, theft, unauthorized access, and unauthorized disclosure consistent with legal obligations and

industry practices. However, as is the case with all websites, applications, products, and services, we unfortunately are not able to guarantee security for data collected through our Services. In addition, it is your responsibility to safeguard any passwords, identification or ID numbers, or similar individual information associated with your use of the Services.

### **How Long Your Personal Data Will Be Kept**

We generally retain Personal Data for as long as needed for the specific purpose or purposes for which it was collected or obtained, and as outlined in this Notice. In some cases, we may be required to retain Personal Data for a longer period of time as required by law or for other necessary or required purposes. Whenever possible, we aim to de-identify or anonymize your Personal Data or otherwise remove some or all information that may identify you from records that we may need to keep for periods beyond the specified retention period. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject that affects the length of time we need to keep your Personal Data; and (iii) whether retention is determined to be necessary for Company due to limitation periods, litigation, or other legal or regulatory obligations. Company takes reasonable steps to securely dispose of Personal Data upon the expiration of retention periods, taking into consideration these litigation, legal, or regulatory obligations.

### **International Transfers of Personal Data**

We operate in various countries throughout the world, including, but not limited to: the United States, the United Kingdom, Switzerland, the European Union, the United Arab Emirates, Ukraine. Please be aware that Personal Data we collect and process may be transferred and maintained outside your state, province, country, or other jurisdiction, country, or location where the privacy laws may not be as protective as those in your location, including the United States. Company has put in place lawful transfer mechanisms and appropriate safeguards, in accordance with its legal requirements, to protect your Personal Data, including but not limited to Standard Contractual Clauses.

### **Changes to this Privacy Notice**

We reserve the right to change this Notice from time to time. We will alert you when changes have been made by indicating the date this Notice was last updated as the date the Notice became effective or as otherwise may be required by law. It is recommended that you periodically revisit this Notice to learn of any changes.

### **Contact Us**

If you have any questions about our practices or this Privacy Notice, please contact us at [support@evcalls.com](mailto:support@evcalls.com).