



## **PRIVACY POLICY**

BCM One, Inc. ("BCM One") is committed to protecting our clients' privacy and security. We want you to know how we use information collected from our clients and from visitors to our websites. Below please find BCM One's complete Privacy Policy and although we encourage all clients to read the Privacy Policy in full, a summary is contained immediately below, followed by the full-length sections of each policy.

- **Information We Collect Through Our Websites** – BCM One collects some information automatically from all visitors to our website, including information about pages visited, each visitor's computer's IP address and browser type. This is non-personally identifiable information and we generally only use it for administrative purposes. We also collect personally identifiable information that each visitor voluntarily provide to us through our site.
- **Information We Collect from Our Clients** – BCM One collects personally identifiable information from our clients, including names, addresses, billing/payment information, phone numbers, email addresses, and other information for business administration and service. Additionally, in the course of providing telephony services to our clients, BCM One collects information about our client's use of the services, including type of service and calling activity; that information is known as "Client Proprietary Network Information" or CPNI and is subject to special rules. In the course of providing other services, including data, cloud and wireless services, BCM One also obtains information such as class or type of service, technical characteristics, billing records, location of service, IP address and other information.
- **Use of Personally Identifiable Information** – BCM One uses personally identifiable information to process client orders and to provide and bill for services. BCM One also uses personally identifiable information that has been provided to us by a website visitor to carry out the purpose or respond to the request for which it was given, such as a request for information about our services. In addition, BCM One may contact its clients and visitors to inform them about BCM One's products and services, or other related services offered by third parties with whom we have a relationship. Clients may opt out of such marketing communications at any time.
- **Exceptions and Limitations** – BCM One may disclose personally identifiable or other information to its suppliers and partners when necessary in the ordinary course of business, when required by law or in connection with the prevention of fraud or other illegal or harmful activities.
- **Directory Information and Caller ID** – We make subscriber information available to telephone directories and display Caller ID information where available.
- **Third Party Sites** – Our websites may contain links to other websites that are owned and operated by third parties. Some of our services also make third party services and material available directly to Clients. This Privacy Notice does not cover such third parties, their sites or their collection and use of information.
- **Non-US Website Visitors and Clients** – Our services and website are provided in the U.S. and are intended for use by U.S. domestic clients. If you are located outside of the United States, the transfer of your personal information to us in the United States is either necessary to the performance of our contracts with our clients or to respond to an inquiry you may make. By visiting our website or using our services, either as a retail or corporate client, you consent to the transfer of your personal information to us where we are based and to other locations where we operate.

- **Data Minimization and Access** – BCM One will take reasonable steps to collect the minimum amount of personal information necessary to accomplish the specific purpose for which it is collected and will provide reasonable access to individuals regarding the personal information we hold about them.
- **Security** – We take reasonable measures to protect the security of client and visitor information.
- **Protecting the Privacy of Children** – Because BCM One sites are designed for businesses, we do not knowingly collect information from children.
- **Questions About this Policy** – You may contact us with any questions about our Privacy Notice at [privacypolicy@bcmone.com](mailto:privacypolicy@bcmone.com).

## **Privacy Notice**

This Privacy Notice is intended for BCM One to explain to Clients how we collect and use information received from each Client and Visitors to our website. BCM One recognizes that as a Managed Solutions Provider, it must ensure the privacy of each client's information.

### **Information Collected from Visitors**

Non-Personal Information received from Visitors – BCM One automatically collects non-personally identifiable information from Visitors such as the IP address of the Visitor's computer, the type of web browser used by the Visitor, the number and frequency of Visitors, the pages visited within the BCM One website, as well as other information that does not specifically identify the Visitor, but may be used to identify the business entity to which the IP address is assigned.

Personal Information received from Visitors – Visitors may submit personally identifiable information in connection with certain activities or transactions. In cases where Visitors voluntarily respond to questions, submit comments, feedback or the like, BCM treats such submissions as non-confidential and non-proprietary, and any information contained therein is treated as BCM One's property. Accordingly this information can be used for any purpose and such use neither requires compensation nor protection.

### **Information Collected from BCM One Clients**

Except as indicated below, BCM One will not sell, give away, or rent its Client's personal information to any company outside of BCM One.

BCM One collects necessary information in its delivery of services to its Clients. This may include information regarding technology, as well as the name, address, telephone number and e-mail address of account administrators. BCM One may also request federal tax ID information, order numbers as well as information regarding the individuals responsible for account administration for account security, verification or tax purposes. Other information including the class or type of service, technical characteristics, billing records and location of services may also be requested by BCM One. This type of information is more commonly known as Client Proprietary Network Information ("CPNI"). CPNI does not include subscriber information – client's name, address and telephone number, none of which are subject to CPNI regulations.

Even though BCM One may use the foregoing information for service and account related matters, it may also use the collected information to seek client feedback, marketing and promotional purposes, statistical analysis and product development. Unless otherwise stated, client's personal information will not be sold or shared with third parties.

BCM One uses the information it collects to process orders and provision and/or bill for BCM One services. This information may also be shared with third party vendors in order to provision and/or properly bill for orders. BCM One or a BCM One authorized agent may also use this client information to market and sell BCM One products and services. BCM One will not sell or trade a client's personally identifiable information or CPNI unless BCM is authorized by the client to do so or in compliance with applicable law. Clients may request that BCM One refrain from using personally identifiable information for marketing purposes by contacting BCM One or clicking on the "unsubscribe" link that we include on all commercial emails sent by BCM One. Be advised that this restriction will not eliminate all BCM One marketing contacts.

### **Exceptions**

BCM One must disclose information when requested in order to comply with court rules, regulations, orders and subpoenas. BCM One will also share information in order to prevent the security, integrity and unlawful use of our services, to repair network outages and in emergency situations (e.g.: 911 calls). BCM may monitor calls for Client Care purposes. Finally, BCM One reserves the right to sell or transfer all information in connection with the sale or transfer of its business so long as the receiving party agrees to preserve the confidentiality of the information provided.

Client's name and number may also be transmitted and displayed on a Caller ID device unless Client has elected to block such information. Please note that Caller ID Blocking does not prevent the display of client's number when you dial certain business numbers, 911, 900 numbers, or toll-free 800, 888, 877 or 866 numbers.

If you link to a third party site from the BCM One site, any information you provide on that site and any use of that information is not under the control of BCM One and not subject to this Privacy Policy.

### **Cookies**

BCM One uses "cookies" which are small files that are stored on your computer and used to track certain information about your visit to our websites. User may set its browser to reject cookies, but this may limit some functionality. In addition, BCM One may not recognize the do-not-track headers from some or all browsers.

### **Security**

BCM One maintains and protects the security of our servers and Client personal information. To secure the information we collect from our website, to prevent unauthorized access, maintain data accuracy and ensure only appropriate use of information, BCM One has established appropriate physical, electronic and management safeguards, like user names and passwords to access sensitive data. Unless unencrypted transmission is authorized, BCM One will use industry encryption methods to protect data transmission. Note that no security practice is foolproof and BCM cannot guarantee the security of its systems or databases, nor will BCM One guarantee that information supplied by you will not be intercepted during transmission. BCM One is not responsible for the unlawful or unauthorized actions of third parties. BCM One suggests that Client backup all of its data on a regular basis.

### **Protecting Children**

BCM One's websites are not designed to attract anyone under the age of 13. BCM One does not knowingly collect personal information from children on our websites.

### **Updates and Changes to this Privacy Policy**

This Privacy Policy supersedes and replaces all previously posted Privacy Policies. Our Privacy Policy is regularly reviewed and revised to make sure we are in compliance with all laws, rules and regulations so that we can continue to serve the best interests of our clients. BCM One reserves the right, in its sole discretion, to update this Privacy Policy at any time.