

Privacy Policy and Notice

This policy describes how Sorenson Communications, LLC and Captioncall, LLC (collectively “Sorenson”, “we,” or “us”) collects, uses, and shares your information. When you use our sites, products, or services or otherwise form a relationship with us, we may obtain data from you and the devices you use to interact with us.

This policy is designed to provide transparency into our privacy practices and principles in a format you can navigate, read, and understand.

We commit to treat your personal information with care and respect and give you methods to contact us should you have any questions or concerns about the use of your information.

Finally, you may have received additional privacy documentation from us when you used a specific site, product, or service from us. In that case, the documentation you received should be read in conjunction with this Notice.

This policy explains:

The Scope of this Policy

This Policy describes the processing of information provided or collected on our sites and applications where this privacy policy is posted. In some instances, we may provide additional data privacy notices specific to certain products, practices, or regions. Those terms should be read in conjunction with this policy.

If you provide information to us on a third-party site or platform, the information you provide may be separately collected by the third-party site or platform. That third-party site or platform’s privacy practices will govern the use of your information. Choices you make on that third-party platform will not apply to our use of the information we have collected through our sites, products, or services.

Your Privacy Rights

If you are a resident of certain states or countries, you may have the right to know, access, correct, transfer, restrict the processing of, and delete your personal information. If you choose to exercise any of these options, we will not discriminate against you for making that decision.

You can exercise your privacy rights by contacting us at privacy@sorenson.com.

There may be situations where we cannot grant your request. In such a situation, we will explain our reasoning to you if we deny your request.

Information Collected from You

We generally collect and share the information listed below with our business customers to provide services to those customers. We also use this information to secure, improve, and provide our services to our business customers as described below.

- Personal Identifiers: Full name, physical address, mailing address, phone number, email address, date of birth, account number, and last four digits of government identification number.

- Protected Class Information: Information relating to a customer's hearing loss, including self-certifications.
- Commercial information: User preferences, purchasing history, dates of service, date of last call, VRS/IP CTS provider name, and participation in promotional activities.
- Internet Data: IP address, device ID, operating or information system, machine type, cookies, and website interactions.
- Geolocation Data: Device location enabled services.

We also may collect nonidentifiable or aggregate information about your use of our Sorenson products and services and our business relationship with you when you interact with or use our Sorenson website, products or services, or respond to e-mails, newsletters, or promotional or other informational communications.

Legal Basis for Processing Personal Information

Some jurisdictions require us to disclose the legal basis on which we rely to process personal information. To the extent those laws apply, our legal basis may include one or all of the following:

- Legal Obligation: We may handle personal information to comply with state, federal, and international applicable laws and regulations.
- Consent: We may handle personal information based on your consent or valid consent made on your behalf.
- Contractual Obligations: We may handle personal information to meet our contractual obligations with you, or to take steps in anticipation of entering such a contract.
- Legitimate Business Interest: We may handle personal information to provide you with the Service and accomplish our legitimate business purposes.

Security of Information

Sorenson wants your Personal Information to remain secure. We maintain reasonable technical, physical, and administrative security measures to protect the security of your personal information against loss, misuse, unauthorized access, disclosure, or alteration. We periodically review our data collection, storage, and processing policies and implement additional security features as appropriate. In addition, we restrict access to Personal Information in Sorenson's possession to Sorenson employees, contractors, and agents who need to have access to that information to process it on our behalf. Those individuals are subject to Sorenson's privacy policy and confidentiality obligations.

Although we do our best to protect your personal data, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) the security, integrity, and privacy of all information and data exchanged between you and us through our websites and applications cannot be guaranteed. Please do your part in protecting your personal data against unauthorized

use. Keep your user account password safe and confidential, and be sure to sign off when finished using a shared computer or device.

How We Share Information

Sorenson does not rent or sell your information to third parties. However, we may disclose your information to our subsidiaries and affiliates, along with our service providers and third-party processors to provide services to you. We may also share your information with service providers and third parties when necessary to comply with laws and regulations (including government agencies and private entities responsible for overseeing or administering the Telecommunications Relay Fund and verifying eligibility for Sorenson services); respond to subpoenas and court orders; exercise our legal rights or defend against legal claims; investigate, prevent, or take action regarding illegal activities, suspected fraud, potential threats to our property or the physical safety of any person, or violations of our usage instructions and applicable terms and conditions; facilitate the financing or insuring of our business or a disposition of all or part of our business or assets, or as otherwise permitted or required by law. We may share anonymized or aggregated data at our discretion, in accordance with applicable laws.

We will share some or all of your information (and in the case of minors, the information of both the minor user and the parent) with third parties as required or permitted by law or regulation, including with government agencies and private entities responsible for overseeing or administering the Telecommunications Relay Fund and verifying eligibility for Sorenson services. For example, Sorenson will submit Sorenson users' information to the TRS User Registration Database, a database administered by a government contractor, as required by FCC regulations, and Sorenson will submit information about Sorenson users and their TRS usage to the Administrator of the TRS Fund and/or the FCC for billing purposes. We may also share your location or other information with third parties if you consent for us to do so from within one of our products or otherwise. For example, some of our products allow you to share your location with third parties in conjunction with performing searches. When you enable this feature, we seek your consent to share your location information. Sorenson has no control over such third parties, and third parties' use of your location information is not governed by this Privacy Policy. If you consent to share your location information with third parties, you acknowledge and agree that Sorenson is not responsible for third-party use of your location information.

If you post your information or content to our online forums or media sites, this information is public on the Internet. We are unable to prevent or control further use of this information and refer you to the third-party sites' privacy policies and terms of use to learn more about their privacy practices.

We will retain personal information for as long as necessary to fulfil the purposes described in this Privacy Policy, unless otherwise required by contract or law. Anonymous and aggregated information may be stored indefinitely.

Your Controls and Choices

We may use your personal information to contact you regarding our products, services, promotions, newsletters, and other marketing activities in accordance with applicable law. You may opt out of receiving these promotional emails at any time by clicking the unsubscribe button located at the bottom of our marketing communications or emailing privacy@sorenson.com. If

you opt out, we may still send you non-promotional emails relating to your use of our Services or our ongoing business relationship with you.

You can control how and when you want to receive marketing emails from Sorenson by clicking on the “unsubscribe” link located at the bottom of our email communications to you. This will not affect your receipt of administrative emails (for example, emails about your account, transactions, or policy changes) for your registered account.

Our Commitment to Protecting Information Belonging to Children

We do not knowingly collect Personal Information from anyone under the age of 13 through Sorenson products, services, or websites unless we first obtain permission from that child’s parent or legal guardian. We obtain parental consent by either:

- Providing you with a notice of our privacy practices, asking whether you consent to these practices, and having you verify your identity by showing a valid, government- issued form of identification; or
- Sending you a written notice of our privacy practices, which you would have the option of consenting to and returning a signed copy by mail.

When you apply for Sorenson Services on behalf of your child, we may collect the information listed in this Policy from you about your child. We may also collect certain information about you (the parent), as required by law or regulation, and for administrative and billing purposes. After we receive your permission to provide Sorenson Services to your child, we will collect, store, and disclose information necessary to provide those Sorenson products and services to your child as more fully described in this Policy. Sorenson may share information about your child and your child’s use of Sorenson products and services with third parties for billing and administrative purposes and otherwise, as required or permitted by law or regulation, including with government agencies and private entities responsible for administering or overseeing the Telecommunications Relay Service Fund and verifying eligibility for Sorenson services. For example, Sorenson may submit your and your child’s information to the TRS User Registration Database, a database administered by a government contractor, as required by FCC regulations, and Sorenson will submit information about your and your child’s TRS usage to the Administrator of the TRS Fund and/or the FCC for billing purposes.

Sorenson may also share your child’s name, image (if your child uploads an image), and video phone number(s) with other Sorenson users in your child’s contact list. Sorenson may also share information about your child’s location with emergency services if your child calls 911 from a Sorenson mobile device.

You may review, delete, or prohibit further collection of your child’s information at any time. If you have further questions or requests related to Sorenson’s online collection of information from children, please contact: privacy@sorenson.com

Cookies and Other Technologies

Cookies are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device's acceptance of cookies, but this may prevent you from taking advantage of some of our features. We recommend you keep cookies activated. We have broken up our cookies into categories to help you understand what they do.

- **Necessary:** These cookies are required to use our services. For example, they are necessary to access our website and login to your account.
- **Performance:** These cookies track how you interact with our website. For example, these cookies let us know which pages on our website load slowly or are not optimized for mobile use. We use this information to make improvements to our user experience.
- **Functionality:** These cookies track information about you to make using our website easier. For example, we may retain information such as your login status and viewing preferences.
- **Marketing and Analytics:** These cookies help us create targeted advertising experiences on our websites.
- **Advertising:** Although we do not generally use these cookies, if we decide to use these cookies in the future, they will provide visitors with relevant ads and marketing campaigns.

You can manage your cookie preferences on our cookie banner that pops up when you first visit our website.

Our Global Data Transfer Practices

We store and process your personal information on our servers located within the United States but may transfer your personal information to other countries outside of the United States for the purposes describe in this Privacy Policy. When required by law, we transfer information pursuant to appropriate transfer mechanisms such as Standard Contractual Clauses.

By using our websites, products, or services, you agree to the global transfer, process, and storage of your personal information.

Contacting Supervisory Authorities

If you would like to lodge a complaint against us, you may contact your local privacy regulator. If you have trouble locating a privacy regulator, please contact our privacy office at privacy@sorenson.com and they will help you contact the appropriate enforcement agency.

How to Contact Us

If you have any questions about how we process your information, you can contact us at:

Sorenson Communications, LLC
4192 S, Riverboat Road

Taylorsville, UT 84123
 1-(877)-595-4011
 Privacy@Sorenson.com

Relationship-Specific Details
 Employee/Recruit/Prospect/Candidate/Contractor

Description	Personal data gathered through the recruitment, employment, or contracting process.
Categories of Information	<p>Personal identifiers such as name, title, and email address</p> <p>Social information such as address and phone number</p> <p>History such as work experience, prior employment, education, and information provided by your resume</p> <p>Commercial information such as banking account information, bank routing numbers</p> <p>Internet Data such as cookies if cookies are allowed on a device</p> <p>In limited situations, Sorenson’s clients may ask you to provide information pursuant to a background check, security check, or in-depth personal history review. In such a situation, the client will direct that process and Sorenson will not ask for copies of the information you have provided.</p>
Category of Data Subjects	Sorenson gathers this data directly from employees, candidate, prospects, and recruits.
Purpose of Processing	Sorenson processes this information to evaluate whether to form an employment relationship with prospects.
Legal Basis for Processing	Sorenson gathers this information to enter, or for the performance of, a contract.
Automated Processing or Profiling	<p>Does this product/service/process use automated processing:</p> <p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>If yes, the general methods and logic used are: Automated processing is used to make sure applications are provided to Sorenson’s HR department. Sorenson does not use automated processing or profiling to make HR decisions such as whether to hire, promote, or take disciplinary action.</p> <p>Does the automated processing affect the rights of data subjects? No.</p>

	Categories of Recipients	Description of Business Purpose	Sale or Sharing
Data Sharing	Cloud infrastructure Employment benefits providers Payroll management and processing entities Office management software IT/Security services	Sorenson uses global information management systems to process this information.	Sorenson shares this information with service providers for a business purpose.
Whether Personal Information is Transferred Internationally	Not applicable.		

Customer

Description	Information gathered from customers who use products and services from Sorenson.
Categories of Information	Personal Identifiers such as full name, physical address, mailing address, phone number, email address, date of birth, account number, and last four digits of government identification number. Internet data such as IP address, device ID, operating or information system, machine type, cookies, and website interactions. Commercial information such as user preferences, purchasing history, dates of service, date of last call, VRS/IP CTS provider name, and participation in promotional activities. Geolocation data such as device location enabled services. Information about hearing loss.
Category of Data Subjects	Sorenson's customer and service users.

Purpose of Processing	<p>This information is processed to provide products and services to Sorenson.</p> <p>Sorenson also uses this information to communicate with customers regarding Sorenson’s products, services, updates, promotions, special offers, or deliver content or advertising that may be of interest to customers.</p> <p>Sorenson also gathers this information in compliance with regulations from the Federal Communications Commission’s User Registration Database reporting requirements.</p>		
Legal Basis for Processing	<p>This information is gathered pursuant to the commercial relationship between Sorenson and its customers.</p> <p>This information is also gathered pursuant to applicable state and federal law.</p>		
Automated Processing or Profiling	<p>Does this product/service/process use automated processing: Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> <p>If yes, the general methods and logic used are:</p> <p>Does the automated processing affect the rights of data subjects?</p>		
Data Sharing	Categories of Recipients	Description Business Purpose	Sale or Sharing
	Subsidiaries and affiliates Service providers Independent contractors Government Agencies Business operations management IT cloud infrastructure	Performing services on behalf of the business or service provider including maintaining or servicing accounts; providing customer service; processing or fulfilling orders and transactions; verifying customer information; processing payments; providing financing; providing advertising or marketing services; providing analytic	Sorenson shares this information with Service Providers for business purposes and government entities (as required by law).

		services; or providing similar services on behalf of the business or service provider	
Whether Personal Information is Transferred Internationally	Not applicable.		

Web User

Description	Data gathered from web users who visit Sorenson's websites.		
Categories of Information	<p>Personal Identifiers such as full name, physical address, mailing address, phone number, email address, date of birth, and account number.</p> <p>Internet data such as IP address, device ID, operating or information system, machine type, cookies, and website interactions.</p>		
Category of Data Subjects	This data is gathered from people who browse Sorenson's websites.		
Purpose of Processing	The organization uses the internet data to improve website visitors' user experience, to ensure the organizations' products, services, and websites function properly and remain secure, and to investigate, prevent, or act on any illegal activities or violations of the organization's service and product agreements.		
Legal Basis for Processing	This information is gathered pursuant to Sorenson's legitimate business interests.		
Automated Processing or Profiling	<p>Does this product/service/process use automated processing: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If yes, the general methods and logic used are: Programs use this information to gather statistics about Sorenson's website, whether content appropriately meets customers' interests, and help Sorenson to determine how to manage its website.</p> <p>Does the automated processing affect the rights of data subjects? No.</p>		
Data Sharing	Categories of Recipients	Description of Business Purpose	Sale or Sharing

	Subsidiaries and affiliates Service providers Independent contractors Government Agencies Business operations management IT cloud infrastructure	Performing services on behalf of the business or service provider including maintaining or servicing accounts; providing customer service; processing or fulfilling orders and transactions; verifying customer information; processing payments; providing financing; providing advertising or marketing services; providing analytic services; or providing similar services on behalf of the business or service provider	Sorenson shares this information with service providers for a business purpose.
Whether Personal Information is Transferred Internationally	Not applicable.		

This Privacy Policy and Notice was last revised on 9/27/2022.