

# Privacy policy

Convo Communications, LLC ("Convo") is committed to protecting your privacy. This privacy policy describes the information Convo collects from its customers through its Websites and through our other business functions, how we use and protect such information, and to whom and under what circumstances we disclose such information. By using our Websites and by disclosing information to us in furtherance of our business relationship, you signify your agreement to this Privacy Policy.

## What Information Do We Collect?

### Personal Information

Convo collects personal information from you for both our VRS and VRI services when you voluntarily provide it to us by (1) registering on any of our Websites; (2) signing up to enter a promotion, participate in an event or survey, receive newsletters or other literature; (3) making product or service inquiries; (4) contacting us (including our webmaster, customer service representatives, or other employees) by e-mail or Live Chat; or (5) providing other personal information to us in furtherance of our business relationship. In connection with these activities, we may collect personal information from you, including, but not limited to, your name, physical address, e-mail address, age, gender, telephone number, user name and/or password associated with the use of any of our Websites or web portal(s), occupation, whether you are a Convo customer, the type of product you are seeking, how you use VRS, how you use VRI, how you heard about Convo, or other information necessary to conduct business with you. Convo may also collect your status as a deaf, hard of hearing, deaf blind or speech impaired individual; and emergency address. Your name, emergency address, status as an eligible user, and emergency address are used to establish an account for eligible users to access VRS services. We do not allow third parties to collect personal information directly from the use of our Websites. The same information may be collected for a VRI account.

For a better experience while using our apps, you can allow the app to access and call your phone contacts; Convo does not store your phone's contacts anywhere.

## **Non-Personal Information**

As part of the standard operation of our Websites, we may collect/obtain certain non-personal information from you, including, but not limited to, your browser type (e.g., Chrome or Internet Explorer), operating system (e.g., Windows or Macintosh), Internet service provider, IP address, Websites visited, and the domain name from which you accessed the Websites (e.g., yahoo.com). In addition, we may collect information about your browsing behavior, such as the date and time you visit our Websites, the areas or pages of our Websites that you visit, the amount of time spent viewing our Websites, the number of times you return to our Websites, and other click-stream data. We may use cookies to collect this information, which may be combined with your personal information. A cookie is a small text file that may be stored on the hard drive of your computer that enables us to recognize your computer when you return to our Websites. You are always free to decline cookies, but in doing so you may not be able to use certain features on our Website. The "help" segment of the toolbar on most browsers explains how to configure a browser to not accept new cookies, how to have the browser inform a user when they receive a new cookie, and how to erase cookies from a computer's hard drive. Further, Convo may use tools like Google Analytics to measure traffic on Convo's website and apps and how users interact with both. No personally identifiable information may be collected through this software.

## **Information Collected by Convo During VRS Calls**

In order for your VRS calls to be eligible for reimbursement from the Interstate Telecommunications Relay Services (TRS) Fund, Convo collects, at a minimum, the following information: 1) the ten-digit number you used to make your call; 2) the time the call was connected; 3) the ten-digit number you called; 4) the time the call was disconnected; and 5) the Internet Protocol (IP) address used to make the call, if applicable. Convo submits the information collected during VRS calls to the TRS Fund Administrator in order to be reimbursed for those calls. Convo does not disseminate the information to any other party, except for TRS Fund billing purposes. Convo does not keep records of the content of any conversation relayed during a VRS call.

## **How Do We Use Your Information?**

Convo maintains the confidentiality of personal information collected from its registered users. From time to time, Convo may use your information we collect from you such as e-mail address or telephone or VRS number for any of the following purposes: (1) to get in touch with

you regarding your account or to provide you with updates regarding Convo's services; (2) to facilitate your use of our Websites and better understand your needs; (3) to fulfill your requests for information about certain products, services, and projects; (4) to send you information, promotional materials, and offers from our company, as well as from our subsidiaries and affiliates; (5) to contact visitors to our Websites when necessary; (6) to help address problems with our Websites; (7) to administer our Websites; (8) to conduct internal reviews of our Websites (e.g., to determine the number of visitors to specific pages within the site); (9) to help us better understand visitors' use of our Websites; (10) to protect the security or integrity of our Websites; (11) to conduct business with you (including obtaining and disclosing credit and billing information); and (12) for such other purposes provided in this Privacy Policy. Non-personal information will be used for these purposes, as well as to monitor our Websites and provide a greater online experience for our visitors. Convo will use, disclose or permit access to your information in strict compliance with all relevant privacy laws and Federal Communications Commission ("FCC") rules governing Customer Proprietary Network Information ("CPNI") see: <http://www.fcc.gov/guides/protecting-your-telephone-calling-records>.

## **Will We Disclose Information We Collect From You?**

Convo may transfer or otherwise disclose information collected from you to the following entities for the following purposes: (1) to Convo' employees, independent contractors, subsidiaries, affiliates, consultants, business associates, service providers, and suppliers, if the disclosure will enable that entity to perform a business, professional, or technical support function for Convo; (2) to employees, independent contractors, service providers, and suppliers of Convo to fulfill a product or service request; and (3) to respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law. As stated above, Convo will use, disclose or permit access to your information in strict compliance with laws and FCC rules governing CPNI.

Users of Convo's VRI services may also have information disclosed to the Sponsors of their VRI accounts; but such information will be strictly limited to duration and amount of use, name, date and time of session, and the username of the interpreter assigned to the session.

## **Do We Collect Information From Children?**

We do not direct our Websites to, nor do we knowingly collect any personal information from, children under the age of 13.

## **Does This Privacy Policy Cover Practices on Third-Party Websites?**

Our Websites may contain links to other third-party Websites, which may have privacy policies that differ from our own. We are not responsible for the activities and practices that take place on these Websites. Accordingly, we recommend that you review the privacy policy posted on any third-party Website that you may access through our Websites.

## **Your California Privacy Rights**

This section contains additional information about the personal information we collect of California consumers and the rights afforded to them under the California Consumer Privacy Act or “CCPA.” For details about the personal information we have collected over the last 12 months, including the types of information, please see the information contained above in “What Information Do We Collect?” and in “How Do We Use Your Information?”

Convo does not sell the personal information we collect in any state, and will not do so without providing a right to opt-out. Please note that we do use cookies, but only for the purposes described in “What Information Do We Collect?” Subject to certain limitations, the CCPA provides California consumers the right to request details about categories or specific pieces of personal information we collect (including how we may use or disclose this information), to delete their personal information, to opt-out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights. Please note, the only personal information collected by Convo is that which is required by the Federal Communications Commission.

California consumers may make a request pursuant to their rights under the CCPA by contacting Convo at **support@convorelay.com**. We will verify your request using the information associated with your account, including your email address. We may also require government identification to confirm your identity.

## **Will There Be Changes to This Privacy Policy in the Future?**

Privacy laws and guidelines are part of a constantly changing environment. We reserve the right, at our discretion, to change, modify, add, or remove portions of this Privacy Policy at any time. We recommend that you revisit this Privacy Policy periodically to ensure that you are aware of our current privacy practices. Your continued use of our services following any changes signifies your acceptance of these changes.

## **Can I Access My Information?**

If you would like to access or change any contact information such as the email address, emergency address, or VRS number you have provided to us, please contact us at **support@convorelay.com**. You may also change your information by using your videophone by calling us at (510) 629-5622.

## **How Can I Contact Convo?**

If you have questions or concerns about this Privacy Policy, you can contact us at **support@convorelay.com**.