

Cloud Services Privacy Notice

ComputerTalk is committed to protecting your privacy and managing your data following applicable data protection laws. This privacy notice applies to Computer Talk Technology Inc. and Computer Talk Global Corp. and outlines our role as a data processor. Our goal is to be clear, concise, and transparent about collecting, storing, and using personal data.

Who We Are

ComputerTalk is a company incorporated in Canada. Its principal business place is 150 Commerce Valley Drive West, Suite 800, Markham, Ontario, Canada, L3T 7Z3. We are a global provider of enterprise-class contact center solutions and advanced interactive voice response (IVR) technologies, powered by our proprietary ice software platform and application designer tool.

What Data We Collect About You

When customers use our cloud services, personal data may be captured or introduced into the system. The specific types and amount of data are determined solely by the Customer and may include, but are not limited to, the following categories:

- a) Contact information (e.g., full name, business or personal address, phone number, email address)
- b) Connection data (e.g., IP address, device ID)
- c) Contact records for voice, chat, email, or other media channels as directed by the Customer
- d) Demographic information (e.g., gender, date of birth, country)
- e) Professional or employment-related information (e.g., company affiliation, department, role)
- f) Any other personal data that the Customer chooses to include within the Services following their configuration or use of the platform

How We Collect Your Data

Personal data is collected through direct interaction with the Customer's solution or is otherwise made available or introduced into the platform at the direction of the Customer. Data may be gathered from end users, agents, or system integrations, depending on how the Customer configures and utilizes the service.

How We Use Your Data and The Legal Basis for Processing

As part of the commercial agreement with ComputerTalk, customers consent to collecting and processing data about their staff and end users. This processing is strictly for fulfilling the contract and is based on legitimate business interests, including:

- a) **Service Management and Operation:** The Customer authorizes specific staff or agents to access the services by entering information specific to such individuals into the ice administration interface.
- b) **Statistics and Reporting:** ice provides various statistical data on contact patterns, including tracking user interactions or endpoints for the Customer's operational management of the services.
- c) **Service Tracking and Contact Management:** ice provides tools for users to search for previous interactions with the system based on the contact originator or destination, allowing them to follow up on previous interactions.
- d) **Customer-Driven Archival Requirements:** Complete records of contact interactions may be retained and archived for periods specified by the Customer to fulfill legal requirements for the legitimate purpose of their business.
- e) **Support and Troubleshooting:** Retention of carrier data can be used to troubleshoot voice quality and messaging connectivity issues. This processing is necessary to facilitate and improve our services.

How We Store Your Data

Customer Data is securely stored in colocation data centers in Canada and the United States. This approach ensures data residency by storing Canadian data within Canada and U.S. data within the United States. All third-party service providers involved in data processing are carefully selected and contractually obligated to comply with data sovereignty requirements. We implement robust technical and organizational security measures to prevent unauthorized access, loss, modification, destruction, or disclosure of Customer Data.

How Long Do We Retain Your Data

We retain Customer Data only for as long as necessary to meet contractual obligations or legal requirements. By default, voice recordings are archived for 90 days and then purged. Contact detail records and email messages are retained for one year. Retaining other contact records, such as web chat, is optional and configurable. All data retention intervals can be adjusted according to customer needs.

Once a retention period expires, ComputerTalk follows industry-standard procedures for securely deleting obsolete or unneeded Customer Data. Additionally, within 30 calendar days of service termination, all associated Customer Data, including websites, configuration files, and

other solution components, is securely deleted, unless the Customer provides alternative instructions.

Who We Share Your Data With

ComputerTalk does not access or use Customer Data except as required to provide services or as instructed by the Customer. We do not disclose Customer Data to third parties unless compelled by law or in response to a valid and binding legal order, such as a subpoena or court order.

In some cases, we may transfer data to our affiliates or engage carefully vetted service providers to perform limited functions on our behalf, such as customer support. These entities are allowed access only to the data necessary to fulfill their specific tasks and are subject to contractual obligations that require confidentiality and compliance with data protection laws.

Transferring Personal Data

Customers acknowledge that the delivery of cloud services may involve the transfer of personal data outside their own country or region. Where data is transferred outside the European Economic Area (EEA), including onward transfers, ComputerTalk ensures adequate safeguards are in place. This includes adherence to the European Commission's Standard Contractual Clauses for countries not recognized as providing adequate data protection.

Your Data Protection Rights

ComputerTalk wants to ensure you are fully aware of your data protection rights. Every user is entitled to the following:

- a) **The Right to Be Informed:** You have the right to know what data is being collected, how it is being used, how long it will be kept, and whether it will be shared with any third parties. We do this through this privacy notice.
- b) **The Right of Access:** You have the right to request ComputerTalk for copies of your data. This is called a subject access request. We must respond to your request within one month.
- c) **The Right to Rectification:** You have the right to request that ComputerTalk update any inaccurate or incomplete data.
- d) **The Right to Erasure:** You have the right to request that ComputerTalk erase your data under certain circumstances.
- e) **The Right to Restrict Processing:** You have the right to request that ComputerTalk restrict the processing of your data under certain circumstances.

- f) **The Right to Data Portability:** You have the right to request that ComputerTalk transfer the data we have collected to another organization or directly to you under certain conditions.
- g) **The Right to Object to Processing:** You have the right to object to ComputerTalk's processing of your data under certain conditions.
- h) **The Rights in Relation to Automated Decision-Making, Including Profiling:** You have the right to object to having decisions made about you by automated processes or profiling.

Requests to exercise any of these rights should be sent to dataprivacy@computer-talk.com. We review and respond to such requests following applicable data protection regulations.

Changes to Our Privacy Notice

We regularly review and update this privacy notice to ensure continued accuracy and transparency. Any updates will be posted on our website. We encourage customers to review this notice periodically to stay informed about how their data is handled.

Data Protection Officer

ComputerTalk's Data Protection Officer is Jennifer Sutcliffe. She is responsible for overseeing our data protection strategy and compliance. If you have any questions or concerns about how we use your personal data, you may contact us by emailing dataprivacy@computer-talk.com.

How to Contact ComputerTalk

If you have any questions about this privacy notice, or about the collection, storage, or processing of your personal data, or if you wish to exercise any of your data protection rights, please contact us at:

Computer Talk Technology Inc.

150 Commerce Valley Drive West, Suite 800

Markham, Ontario, Canada, L3T 7Z3

Telephone: 905-882-5000

Email: dataprivacy@computer-talk.com

How to Contact the Appropriate Authority

If you wish to raise a concern or feel that your data protection rights have not been appropriately addressed by ComputerTalk, you may contact the Information Commissioner's

Office (ICO) in the United Kingdom. Complaints can be submitted online at <https://ico.org.uk/make-a-complaint/> or by calling 0303 123 1113.