

ONLINE PRIVACY POLICY

Effective Date: May 25, 2018

1. Your Privacy

At Clear-Com LLC and HME Clear-Com Ltd. ("Clear-Com", "we" or "us"), we believe that you have a right to know our practices regarding the information we collect when you visit our websites and what type of information is collected. The statements contained herein apply to your visits to any of our websites or online access points such as widgets and mobile applications operated by Clear-Com (collectively, the "Site"), which includes www.clearcom.com.

While Clear-Com does not generally require that you provide us with personally identifiable information in order to visit and use the Site, in order to participate in some activities it will be necessary for you to provide this information.

For the purposes of the EU General Data Protection Regulation 2016 (the "GDPR") the Data Controller is Clear-Com LLC, whose registered office is at 1301 Marina Village Parkway, Suite 105, Alameda, California 94501, USA.

If you have any questions or concerns about this Privacy Policy, please contact us using the [Contact Us](#) section on our Site.

2. Collection of Information: Cookies; Personal Information

When you visit the Site, Clear-Com servers automatically receive and record information on our server logs from your browser or mobile platform, including but not limited to your IP address, cookie information and the page you requested. We do not treat this data as personally identifiable information, except where we are required to do otherwise under applicable law. Unless otherwise stated in this Privacy Policy, Clear-Com only uses this data in aggregate form to understand visitor traffic patterns through the Site for the purposes of enhancing its usability.

The Site stores "cookies" for analytical purposes, in order to be able to offer you a more comprehensive function range and make the use of the Site more convenient. "Cookies" are small files stored on your computer with the aid of your browser. When you access the Site from certain jurisdictions you will receive a clear notice advising you that we intend to use "cookies" and your continued use of the Site will constitute your agreement to us placing those cookies described in the [Cookies Policy](#).

Additionally, Clear-Com will ask you to provide "personal information," meaning individually identifiable information such as your e-mail address, name, mailing address, telephone number, fax number or persistent identifier (such as a customer number held in a cookie) associated with individually identifiable information, to enable you to participate in contests, to complete a registration form or to order products and services using the Site. Clear-Com may combine the personal information you provide on the Site with other personal information we collect from you offline or from third parties so that we can more effectively tailor the Site, our products and services and our offerings to you.

If you provide Clear-Com with personal information, you have the right, on reasonable prior notice, to inspect, change, amend or delete such personal information. Instructions on how to update personal information will be given at the point of data collection.

Unless you instruct us otherwise, Clear-Com will provide you information about Clear-Com products, services, promotions, contests or other activities or offerings that may be of interest to you. You can instruct us whether or not you wish to be contacted by e-mail request.

Unless you have requested or agreed otherwise, Clear-Com will not share your personal information with any other parties, except: (a) with your consent; (b) as is required by law or court order; (c) to persons or companies with whom Clear-Com contracts to carry out the operations of the Site or our business; or (d) under exigent circumstances, to protect the personal safety or property of our users, the public or ourselves.

3. Security

Clear-Com takes steps to maintain the security of your personal information and prevent unauthorized access to it through the use of appropriate technology and internal procedures, but Clear-Com cannot guarantee that unauthorized access will never occur.

4. Children's Privacy

Clear-Com does not knowingly collect personal information from children under the age of 13. If we learn that we have collected personal information of a child under the age of 13, we will delete that data from our systems.

5. Consent to Processing

By providing personal information to Clear-Com, you fully understand and unambiguously consent to the collection, transfer, processing and storage of such information outside of your country of residence where data protection standards may differ from those in your country of residence.

The personal information that we collect from you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff will be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal information, you agree to this transfer, storing or processing.

6. Special Information for Clear-Com Agent-IC App (the "App")

Certain features of the App can and do access data from the mobile device's microphone. Such data is not captured or stored by Clear-Com or the App, but such audio data is typically sent to another device through the App's functionality; however, such audio data could be captured or stored by third party equipment to the extent such equipment is connected to the applicable audio ports. Audio data that is transmitted by the App will be encrypted using the AES-128 technology for added security. While certain other features of the App may have access to other personal or sensitive user data from your mobile device, neither Clear-Com nor the App collects, transmits, stores or otherwise uses such data.

7. Links

The Site contains links to other Internet sites on the World Wide Web. Clear-Com provides such links for your convenience only, and Clear-Com is not responsible for the content of any website linked to or from the Site. Links from the Site to any other website do not mean that Clear-Com approves of, endorses or recommends that website. Clear-Com disclaims all

warranties, express or implied, as to the accuracy, legality, reliability or validity of any content on any other website.

8. California Privacy Rights

Residents of California have the right under California law to request from any company conducting business in California a list of all third parties to which the company has disclosed personal information during the preceding year for direct marketing purposes. If, however, the company has a privacy policy that gives either an opt-out or opt-in choice for use of your personal information by third parties (such as advertisers) for marketing purposes, the company may instead provide you with information on how to exercise your disclosure choice options.

Clear-Com qualifies for the alternative option. We have a comprehensive privacy statement, and you may opt-out regarding the use of your personal information by third parties for direct marketing purposes by sending us an e-mail so stating. Therefore, we are not required to maintain or disclose a list of the third parties that received your personal information for marketing purposes during the preceding year.

9. European Privacy Rights

Under EU law, individuals within the European Economic Area (“EEA”) have the right to ask us not to process your personal information for marketing purposes. We will inform you (before collecting your personal information) if we intend to use your personal information for such purposes or if we intend to disclose your personal information to any third parties for such purposes.

You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your personal information or by sending us an e-mail at clearcommarketing@clearcom.com.

Under the GDPR, in certain circumstances, you have the right to: (a) request access to any personal information we hold about you and related information, (b) obtain without undue delay the rectification of any inaccurate personal information, (c) request that your personal information is deleted provided the personal information is not required by Clear-Com for compliance with a legal obligation under European Union or Member State law or for the establishment, exercise or defense of a legal claim, (d) under certain circumstances prevent or restrict processing of your personal information, except to the extent processing is required for the establishment, exercise or defense of legal claims, and (e) under certain circumstances, request transfer of your personal information directly to a third party where this is technically feasible.

In addition, where you believe that Clear-Com has not complied with its obligation under this Privacy Policy or European law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner’s Office.

You can exercise any of these rights by contacting us via e-mail at clearcommarketing@clearcom.com.

10. Retention of Personal Information

We will only retain your personal information, in a form which permits us to identify you, for as long as necessary to fulfil the purposes we collected it for. We will retain and use your personal information as necessary to satisfy any legal, accounting or reporting requirements, to resolve disputes or to enforce our agreements and rights. In line with this Privacy Policy, we will either securely delete or anonymize your personal information so that it cannot be linked back to you.

11. Policy Governs Use; Changes to Privacy Policy

This Privacy Policy governs the use of any information collected on the Site while it is in place. Clear-Com reserves the right to change this Privacy Policy at any time, so please revisit this page as often as you wish. In case of any material change, we will make a notation near the "Privacy Policy" link on the home page of the Site. Changes to this Privacy Policy are effective at the time they are posted to the Site, and your continued use of this Site after posting will constitute acceptance of, and agreement to be bound by, those changes.

12. Questions

If you have any questions or comments about our personal information practices or about this Privacy Policy or any statements herein, please feel free to send us an e-mail at clearcommarketing@clearcom.com.

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