Here below you can find the <u>Privacy Policy</u> and the <u>Cookies Policy</u>

# **PRIVACY POLICY**

This page is intended to inform users about the management of this website as regards processing of their personal data, as required by art. 13 and 14 of the European Regulation n.679 / 2016 - General Data Protection Regulation.

This information respects and complies fully with the Recommendation no. 2/2001 that the European authorities for the protection of personal data, gathered in the Group established by art. 29 of the directive n. 95/46 / EC, adopted on 17 May 2001 to identify some minimum requirements for the collection of personal data online and, in particular, the arrangements, timing and nature of the information that the data controllers must provide to users when they link to web pages, regardless of the purpose of the link. By consulting this site, data relating to identified or identifiable persons may be processed.

The consent mechanisms will be evident, brief and easily understandable; if the original conditions for which consent was requested were to be changed, for example if the purpose of data processing changed, further consent will be required pursuant to European Regulation no. 679/2016. All the documents related to consents collected will be kept separate from any other corporate document.

Your personal data will not be disclosed and you are granted the exercise of the rights referred to in Articles. 11-20 of the European Regulation n. 679/2016 by writing to privacy@choruscall.com. The data controller is Chorus Call Inc., with registered office in 2420 Mosside Blvd., Monroeville, PA 15146, USA. Responsible for data protection contact <a href="mailto:dpo@choruscall.com">dpo@choruscall.com</a>.

The processing activities connected to the web services of this site take place at the aforementioned location and at the location of the service provider of the site and are only handled by company personnel, or by persons in charge of occasional maintenance operations.

All data collected through the online services offered can be communicated to parties that are functional to the provision of the service itself (such as mailing services) but will not in any case be communicated or disseminated to other parties unless expressly authorized by the user. The personal data provided by users who request dispatch of informative material (requests for information, etc.) are used only to perform the service or provision requested and are communicated to third parties only if it is necessary.

## Categories of processed data

## **Navigation data**

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols.

Such information is not collected in order to relate it to identified data subjects, however it might allow user identification per se after being processed and matched with data held by third parties.

This data category includes IP addresses and/or the domain names of the computers used by any user connecting with this web site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating system and computer environment.

These data are only used to extract anonymous statistical information on website use as well as to check its functioning; they are erased immediately after being processed. The data might be used to establish liability in case computer crimes are committed against the website and may be exhibited to the Judicial Authorities, if the latter makes an explicit request.

## Data provided voluntarily by users

Sending e-mail messages to the addresses mentioned on this website, which is done on the basis of a freely chosen, explicit, and voluntary option, entails acquisition of the sender's address, which is necessary in order to reply to any request, as well as of such additional personal data as is contained in the message, as well as for data collected through the data collection forms dedicated to online services offered by our company (such as audio or video conference services).

Personal data are processed with automated tools for the time strictly necessary to achieve the purposes for which they were collected.

Specific summary information notices will be shown and/or displayed on the pages that are used for providing services on demand.

#### What are cookies

Cookies are small text files that the sites visited by users send to their terminals, where they are stored to be re-transmitted to the same sites during subsequent visits. Cookies are used for different purposes, have different features, and can be used either by the owner of the site you are visiting, or by third parties.

Below you will find all the information on cookies installed through this site, and the necessary instructions on how to manage your preferences regarding them.

We use cookies in some areas of our site. Cookies allow this site to check if the user has already visited the site. Cookies allow us to see which pages are visited and for how long. Through these data we can make the site more relevant to user requests and easier navigation.

#### COOKIE POLICY

This Cookie Policy aims to explain the procedures followed for the collection, through cookies and / or other monitoring technologies, of the information provided by users when they visit the website www.choruscall.com.

The Data Controller of this website is Chorus Call Inc. and subsidiaries.

## GENERAL INFORMATION ON THE RULES REGARDING CONSENT TO USE OF COOKIES

The European Directive requires the operators of websites that use cookies or other monitoring technologies to inform the user about the types of cookies used by the site.

## **Technical cookies**

Technical cookies are used for the sole purpose of transmitting communications to an electronic communication network.

These are not used for any ulterior purposes and they are normally installed directly by the owner or the manager of the website.

These can be divided into browsing or session cookies, which guarantee normal navigation and use of the website (making it possible for example, to make purchases or be authenticated in order to access reserved areas); analytics cookies, assimilated by the technical cookies where they are used directly by the manager of the website to collect information, in an associated form, about the number of users and the manner in which they visit the website; functional cookies, that allow the user to navigate in relation to a series of selected criteria (for example, the language or the products selected for purchase) in order to improve the service provided.

The prior consent of the user is not requested in order to install these cookies.

## **Profiling cookies**

Profiling cookies are used to create profiles of the users and are employed for sending advertising messages according to the preferences shown by the same during their online navigation. Due to their particular invasiveness with regard to the users' private sphere, the regulation requires that users be adequately informed about the use of the same and are thus required to express their valid consent.

#### FEATURES OF COOKIES USED BY THIS WEB SITE

For each type of cookie is described:

- Name of the cookie
- · Function explained by the cookie
- Indication if the cookie is first-party or third-party

Below there are the instructions on how to block cookies. Please note that any blocking of technical cookies could compromise the functionality of this website.

#### LINKS TO OTHER WEBSITES

This site may contain links or references for access to other websites.

Chorus Call Inc and subsidiaries does not control cookies / monitoring technologies of other websites to which this Cookie Policy does not apply.

#### **USE OF COOKIES**

The following list illustrates the cookies currently used on the Chorus Call Inc. and subsidiaries website and their purpose:

#### **PHPSESSID**

It is a native PHP cookie and allows websites to store data about the user's current browsing session.

It is activated at the access to the web page to communicate the status data through a temporary cookie and is removed when you leave the site. It doesn't store any kind of personally identifiable information.

## cc\_local

This cookie is used to keep track of the language in which a page is displayed (whether the language is set by default or in which language is chosen from the selection menu). It is necessary to show errors related to the forms in the right language. It does not detect information that makes the visitor identifiable, but only a code related to the language.

#### Google Analytics

The website uses Google Analytics. The cookies placed by Google Analytics are used to gather information on the use of the site by visitors in order to improve it. Google Analytics cookies collect information anonymously.

## \_utma

Typically, this cookie is written in the browser at the time of the first visit to the site from that particular browser. If the cookie has been deleted by the browser operator and then the browser visits the site again, a new cookie \_utma is written and marked with another unique ID. This cookie is used to establish unambiguously who are the visitors of the site are and is updated at each page view. Moreover, it is marked by a unique ID that Google Analytics uses as an additional measure of protection to ensure both the validity and the accessibility of the cookie.

#### utmb

This cookie is used to establish and continue a user session with the site. When a user views a site page, the Google Analytics code attempts to update the cookie. If it does not find it, it writes a new one and establishes a new session. Whenever a user visits another page of the site, the cookie is updated with a 30-minute expiration, thus continuing a one-time session of the user's activity at 30-minute intervals. The cookie expires when a user pauses on a page of the site for more than 30 minutes. To change the default length of a user session, you can use the \_setSessionCookieTimeout method.

#### utmc

This cookie was used by the ga.js tracking code to determine the session status.

#### utmz

This cookie stores information on the referral used by the visitor to reach the site, for example a direct method, a referral link, a search within the site or a campaign such as an advertisement or a link in an e-mail message. It is used to calculate search engine traffic, advertising campaigns and page navigation within the site. The cookie is updated at every page view within the site.

## \_utmt

This cookie stores information to determine the type of the request. It lasts 10 minutes.

### \_ga

The javascript library Google Universal Analytics uses cookies to distinguish anonymously single users and to manage the frequency of requests to the server. Duration: 1 year from set / update.

To disable Google Analytics cookies visit this page: thttps://tools.google.com/dlpage/gaoptout?hl=en

For an appropriate information on the use of cookies by Google, the service provider / dealer, we suggest you visit the following link: <a href="https://support.google.com/analytics/answer/6004245?hl=en">https://support.google.com/analytics/answer/6004245?hl=en</a>

Google Inc. provides a plugin for some browsers that prevents detection of the cookies of Google Analytics service. For more information visit the link: <a href="https://tools.google.com/dlpage/gaoptout?hl=en">https://tools.google.com/dlpage/gaoptout?hl=en</a>

#### **HOW CAN YOU CHECK COOKIES?**

If you don't want that websites store cookies in your electronic device, you can block all or some cookies or even delete cookies already set from the device.

#### How to delete from the electronic device already set cookies?

You can change your browser settings so you can accept or decline the storage of cookies or delete those stored on your hard drive. Most browsers allow users to control most cookies by changing their settings.

If you want more information on the possibilities to change your browser settings, on the display and management of cookies already set in the device or on the elimination of cookies, consult the website at: <a href="https://www.aboutcookies.org">www.aboutcookies.org</a> - section "How to delete cookies".

To see how you can disable cookies, depending on the browser used (Internet Explorer, Mozilla, Safari, Chrome) you can also visit the following pages:

- Chrome: <a href="https://support.google.com/chrome/answer/95647?hl=en">https://support.google.com/chrome/answer/95647?hl=en</a>
- Firefox: https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer
- Internet Explorer: <a href="https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies">https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies</a>
- Opera: <a href="http://help.opera.com/Windows/10.00/en/cookies.html">http://help.opera.com/Windows/10.00/en/cookies.html</a>
- Safari: <a href="https://support.apple.com/en-us/HT201265">https://support.apple.com/en-us/HT201265</a>