

# Bridge Communications' Privacy Notice

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Last updated on: November 30, 2022

## Introduction

Bridge Communications LLC ("**Bridge Communications**", "**we**", "**us**", "**our**") takes the protection of personal data ("**Personal Data**") very seriously. Please read this privacy notice ("**Notice**") to learn what we are doing with your Personal Data, how we protect it, and what privacy rights you may have under applicable data protection and privacy laws, such as the European Union General Data Protection Regulation ("**GDPR**") and UK General Data Protection Regulation ("**UK GDPR**") and UK Data Protection Act.

## What is Covered by this Notice and What is Bridge Communications' Controllorship Role?

This Notice is designed to assist you, the data subject, to understand how we process your Personal Data when:

- you use or browse our website;
- you receive support services from us ("**Services**");
- you provide us with feedback, testimonials, and reviews about your experience and use of our Operator Console and Services;
- we market or sell our Operator Console and Services to you; and
- we conduct the day-to-day management of our business including the fulfilment of legal, financial, and human resource functions.

In these cases, we decide why and how your Personal Data will be processed and therefore we are a "data controller" of this Personal Data.

## What is Not Covered by this Notice and is Not Personal Data?

If we do not maintain information in a manner that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular individual or household, such information is not considered Personal Data and this Notice does not apply to our processing of that information. For example, the Operator Console does not process Personal Data and is therefore not covered in this Notice. But when we provide our Services or communicate with our customers' representatives for any other reasons, we process their Personal Data and that is covered by this Notice.

This Notice does not cover other data collection or processing not expressly listed in this Notice, including the data which our customers may process for their clients when they use the Operator Console.

**Lawful Bases for Processing**

We must have a valid reason to use your Personal Data. This is called the "lawful basis for processing". When we act as a data controller, we may process your Personal Data on the basis of:

- your consent;
- the need to perform in terms of a contract with you, or take steps at your request prior to entering into a contract;
- our legitimate interests, such as our interest in marketing our Operator Console or Services, or to institute or defend legal claims, or assess the suitability of a candidate for employment;
- the need to comply with the law; or
- any other ground, as required or permitted by law.

Where we process your Personal Data based on your consent, you may withdraw it at any time. However, this will not affect the lawfulness of our processing before you withdrew your consent. It will also not affect the validity of our processing of Personal Data performed on other lawful grounds.

Where we receive your Personal Data as part of providing our Services to you to fulfill a contract, we require such Personal Data to be able to carry out the contract. Without that necessary Personal Data, we will not be able to provide the Services to you.

When we rely on legitimate interests as a lawful basis of processing, you have the right to ask us more about how we decided to choose this legal basis. To do so, please use our contact details at the end of this Notice.

**What Personal Data Do We Process and How Do We Obtain It?**

The table below describes the categories of Personal Data we have collected about you in the last 12 months:

<b>Personal Data We Process</b>	<b>How We Obtain It</b>
<i>Identifiers:</i> Your name, work-related title and position, city, state, customer product key, username, password, and other registration information.	We collect this information when you create your account, use the Services, communicate with us, or write a review of testimonial.

<p><i>Contact and communication information:</i> email address, phone number, chat history, time and date of the chat.</p>	<p>We collect this information from you when you communicate with us.</p>
<p><i>Commercial information:</i> Records of the products or Services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies; transaction-related information such as when the transaction was initiated, the cardholder’s name and email address and other identifiers evident on a receipt.</p>	<p>We receive this information directly from you, or from third-party service providers that process card payments on our behalf.</p>
<p><i>Internet or other similar network activity:</i> Depending on your permissions, we may collect your browsing history, search history, advertising ID, cookie identifiers, information on your interaction with the website, or advertisement, type of device you use, the device’s unique ID, mobile operating system, type of mobile internet browsers used by you.</p>	<p>We collect this information from you when you use or browse our website.</p> <p>Please review the section below “Cookies and Other Online Tracking Technologies” for more information.</p>
<p><i>Preferences:</i> Your review and experience about Bridge Communications, its products, and Services.</p>	<p>We collect this when you submit a review or customer experience testimonial.</p>
<p><i>Professional or employment-related information:</i> Current or past job history, job title, and any information submitted to us.</p>	<p>We collect this from you when you submit your CV or resume to us.</p>
<p><i>Other:</i> Any other Personal Data which you submit or disclose to us such as in a message, email, via the telephone, or when you complete an online form.</p>	<p>We collect this information directly from you.</p>

We will not collect additional categories of Personal Data without informing you.

**Cookies and Other Online Tracking Technologies**

Our website may collect certain information automatically when you browse or use our website and have given your prior consent for the collection of this Personal Data, or when it is strictly necessary to collect the data for you to use our website. Our website does this by using cookies and other online tracking technologies. A “cookie” is a small file stored on your device that

contains information about your device. Where applicable, Bridge use localStorage rather than cookies to function the website. For example, when you pass between webpages or submit a support service ticket, localStorage rather than cookies are used.

If you would prefer not to accept cookies and other trackers, change your preference in the consent manager tool on the website or you can change the setup of your browser to reject all or some cookies. Note, if you reject certain cookies, you may not be able to use all features of our Services. For more information, please visit <https://www.aboutcookies.org/>. You may also set your browser to send a Do Not Track (DNT) signal. For more information, please visit <https://allaboutdnt.com/>. Please note that our website does not have the capability to response to “Do Not Track” received from web browsers.

### **For What Purposes Do We Use Your Personal Data?**

We may process your Personal Data for the following purposes:

- to render the Services to you, and to respond to your requests or questions;
- to prepare and respond to pre-sale questions;
- to receive your feedback on your use of the Operator Console and our Services;
- to showcase your feedback publicly on our website for marketing purposes;
- to send you marketing communication about the Operator Console and our Services;
- to verify that you are a human customer and not a robot;
- to evaluate whether the company you represent will be a suitable reseller of the Operator Console;
- to contact and correspond with you to establish a commercial relationship with the company you represent and engage in pre-contractual negotiations;
- to enter into and perform in terms of the agreement we have with the company you represent and to manage the commercial relationship;
- to defend or institute legal claims, where applicable;
- to assess the suitability of your application for employment;
- to record financial transactions in our financial management software and maintain records of these transactions; and
- to enable the use of our website and to improve our website to better serve you.

We use Intuit Inc.’s QuickBooks platform for some processing activities. Intuit considers itself an independent controller with regard to any information placed in its products or services. For more information about Intuit and how it processes your personal data for its own purposes, please see Intuit’s Global Privacy Statement ([here](#)).

### **Do Third Parties See and/or Have Access to Personal Data?**

The table below describes, in the last twelve months, the categories of information we have disclosed to third parties for business purposes and categories of those third parties.

Category	Personal Data Disclosed for Business Purposes?	
	Yes or No	Categories of Third Parties Receiving Personal Data
Identifiers	Yes	<ul style="list-style-type: none"> <li>• Infrastructure service provider</li> <li>• Office tool and email provider</li> </ul>
Contact and communication information	Yes	<ul style="list-style-type: none"> <li>• Infrastructure service provider</li> <li>• Office tool and email provider</li> </ul>
Commercial information	Yes	<ul style="list-style-type: none"> <li>• Infrastructure service provider</li> <li>• Office tool and email provider</li> <li>• Financial management software provider</li> </ul>
Internet or similar network activity	Yes	<ul style="list-style-type: none"> <li>• Infrastructure service provider</li> <li>• Office tool and email provider</li> <li>• Web analytics provider</li> </ul>
Preferences	Yes	<ul style="list-style-type: none"> <li>• Infrastructure service provider</li> <li>• Office tool and email provider</li> </ul>
Professional or employment-related information	Yes	<ul style="list-style-type: none"> <li>• Infrastructure service provider</li> <li>• Office tool and email provider</li> </ul>
Other Personal Data	Yes	<ul style="list-style-type: none"> <li>• Infrastructure service provider</li> <li>• Office tool and email provider</li> </ul>

Bridge Communications and some of our third-party service providers are located outside of the European Union, the European Economic Area, or the United Kingdom. Therefore, your Personal Data may be processed outside your jurisdiction. In some cases, the European Commission may have determined that in some countries, their data protection laws provide a level of protection equivalent to European Union law. You can see [here](#) the list of countries that the European Commission has recognized as providing an adequate level of protection to personal data. We will only transfer your Personal Data to third parties in countries not recognized as providing an adequate level of protection to personal data when there are appropriate safeguards in place. These safeguards may include, but are not limited to, the [Standard Contractual Clauses](#) as approved by the European Commission under Article 46.2 of the GDPR, and the [UK International Data Transfer Agreement](#) or the [International Data Transfer Addendum to the EU Commission Standard Contractual Clauses](#) issued pursuant to Section 119A(1) of the Data Protection Act 2018 and approved by the UK Parliament.

**Other Disclosures of Your Personal Data**

We may disclose your Personal Data to the extent required by law, or if we have a good-faith belief that we need to disclose it in order to comply with official investigations or legal proceedings (whether initiated by governmental/law enforcement officials, or private parties). If we have to disclose your Personal Data to governmental/law enforcement officials, we may not be able to ensure that those officials will maintain the privacy and security of your Personal Data.

We may also disclose your Personal Data if we sell or transfer all or some of our company's business interests, assets, or both, or in connection with a corporate restructuring.

We reserve the right to use, transfer, sell, and share aggregated, anonymous data for any legal purpose. Such data does not include any Personal Data. The purposes may include analyzing usage trends or seeking compatible advertisers, sponsors, and customers.

### **How Long Do We Keep Your Personal Data?**

We will retain your Personal Data for as long as is necessary to fulfil the purposes for which we collected your Personal Data and any other linked purpose. For example, we will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Generally, we retain usage data for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our services, or we are legally obligated to retain this data for longer time periods.

If your Personal Data is used for more than one purpose, we will retain it until the purpose with the longest retention period expires; but we will stop using it for the purpose with a shorter retention period once that period expires. Our retention periods are also based on our business needs and good practice.

Your Personal Data may need to be retained in our backup systems and will only be deleted or overwritten 35 days after it was placed into the backup system. This may be the case even when you or a Supervisory Authority has validly asked us to delete your Personal Data or when we do not no longer have a legal basis for processing such Personal Data.

### **Privacy of Children**

The Operator Console and our Services are not directed at, or intended for us by, children under the age of 13 years. We do not knowingly solicit data from or market to children under

the age of 13. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us using our details in this Notice.

### **Data Integrity and Security**

We are concerned about safeguarding the confidentiality of your Personal Data. We have implemented, provide, and will maintain technical, administrative, and physical safeguards to protect information we process and maintain, including your Personal Data, from unauthorized processing.

### **What Privacy Rights Do You Have?**

You have specific rights regarding your Personal Data that we collect and process. Please note that you can only exercise these rights with respect to Personal Data that we process about you when we act as a data controller. To exercise your rights with respect to information processed by us on behalf of one of our customers, please read the privacy notice of that customer.

In this section, we first describe those rights and then we explain how you can exercise those rights.

### **Right to Know What Happens to Your Personal Data**

This is called the right to be informed. It means that you have the right to obtain from us all information regarding our data processing activities that concern you, such as how we collect and use your Personal Data, how long we will keep it, and who it will be shared with, among other things.

We are informing you of how we process your Personal Data with this Notice.

We will always try to inform you about how we process your Personal Data. However, if we do not collect the Personal Data directly from you, the GDPR and UK GDPR exempts us from the obligation to inform you (i) when providing the information is either impossible or unreasonably expensive; (ii) the gathering and/or transmission is required by law, or if (iii) the Personal Data must remain confidential due to professional secrecy or other statutory secrecy obligations.

### **Right to Know What Personal Data Bridge Communications Has About You**

This is called the right of access. This right allows you to ask for full details of the Personal Data we hold on you.

You have the right to obtain from us, including confirmation of whether or not we process Personal Data concerning you and, where that is the case, a copy or access to the Personal Data and certain related information.

Once we receive and confirm that the request came from you or your authorized agent, we will disclose to you:

- the categories of your Personal Data that we process;
- the categories of sources for your Personal Data;
- our purposes for processing your Personal Data;
- where possible, the retention period for your Personal Data, or, if not possible, the criteria used to determine the retention period;
- the categories of third parties with whom we share your Personal Data;
- if we carry out automated decision-making, including profiling, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you;
- the specific pieces of Personal Data we process about you in an easily-sharable format;
- if we disclosed your Personal Data for a business purpose, the categories of Personal Data and categories of recipients of that Personal Data for and disclosure;
- if we rely on legitimate interests as a lawful basis to process your Personal Data, the specific legitimate interests; and
- the appropriate safeguards used to transfer Personal Data from the European Union, European Economic Area or the United Kingdom to the third country, if applicable.

Under some circumstances, we may deny your access request. In that event, we will respond to you with the reason for the denial.

### Right to Change Your Personal Data

This is called the right to rectification. It gives you the right to ask us to correct without undue delay anything that you think is wrong with the Personal Data we have on file about you and to complete any incomplete Personal Data.

### Right to Delete Your Personal Data

This is called the right to erasure, right to deletion, or the right to be forgotten. This right means you can ask for your Personal Data to be deleted.

Sometimes we can delete your information, but other times it is not possible for either technical or legal reasons. If that is the case, we will consider if we can limit how we use it. We will also inform you of our reason for denying your deletion request.

### Right to Ask Us to Limit How We Process Your Personal Data

This is called the right to restrict processing. It is the right to ask us to only use or store your Personal Data for certain purposes. You have this right in certain instances, such as where you believe the data is inaccurate or the processing activity is unlawful.

### Right to Ask Us to Stop Using Your Personal Data

This is called the right to object. This is your right to tell us to stop using your Personal Data. You have this right where we rely on a legitimate interest of ours (or of a third party). **You may also object at any time to the processing of your Personal Data for direct marketing purposes.**



We will stop processing the relevant Personal Data unless: (i) we have compelling legitimate grounds for the processing that override your interests, rights, or freedoms; or (ii) we need to continue processing your Personal Data to establish, exercise, or defend a legal claim.

### **Right to Port or Move Your Personal Data**

This is called the right to data portability. It is the right to ask for and receive a portable copy of your Personal Data that you have given us or that you have generated by using our services, so that you can:

- move it;
- copy it;
- keep it for yourself; or
- transfer it to another organization.

We will provide your Personal Data in a structured, commonly used, and machine-readable format. When you request this information electronically, we will provide you a copy in electronic format.

### **Right Related to Automated Decision Making**

We sometimes use computers to study your Personal Data. We might use this Personal Data so we know how you use our Services. For decisions that may seriously impact you, you have the right not to be subject to automatic decision-making, including profiling. But in those cases, we will always explain to you when we might do this, why it is happening and the effect.

To turn off personalized advertising, please change your cookie settings.

### **Right to Withdraw Your Consent**

Where we rely on your consent as the legal basis for processing your Personal Data, you may withdraw your consent at any time. If you withdraw your consent, our use of your Personal Data before you withdraw is still lawful.

If you have given consent for your details to be shared with a third party and wish to withdraw this consent, please also contact the relevant third party in order to change your preferences.

### **Right to Non-Discrimination**

We will not discriminate against you for exercising any of your privacy rights. Unless the applicable data protection laws permit it, we will not:

- deny you goods or services;
- charge you different prices or rates for goods or services, including through granting discounts or other benefits or imposing penalties;
- provide you a different level or quality of goods or services; or
- suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Right to Lodge a Complaint with a Supervisory Authority**

If the GDPR or UK GDPR applies to our processing of your Personal Data, you have the right to lodge a complaint with a supervisory authority if you are not satisfied with how we process your Personal Data. Specifically, you can lodge a complaint in the Member State of the European Union of your habitual residence, place of work, for the alleged violation of the GDPR and the UK Information Commissioner's Office for the alleged violations of the UK GDPR.

### **How Can You Exercise Your Privacy Rights?**

To exercise any of your privacy rights above, please submit a request by either:

- Contacting us via email at [privacy@bridgeoc.com](mailto:privacy@bridgeoc.com) (preferred method); or
- Calling us at +17012121015

### **Verification of Your Identity**

In order to correctly respond to your privacy rights requests, we need to confirm that YOU made the request. Consequently, we may require additional information to confirm that you are who you say you are.

For requests submitted via password-protected accounts, your identity is already verified.

For requests sent by other means, we will verify your identity via the following method, you will need to provide us with sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Data. Generally, we will request only information that we may have about you to confirm your identity, but under some circumstances we may require additional information or documentation to complete your request. We cannot respond to your request or provide you with Personal Data if we cannot verify your identity or authority to make the request. Making a request does not require you to create an account with us.

We will only use the Personal Data you provide us in a request to verify your identity or authority to make the request.

### **Verification of Authority**

If you are submitting a request on behalf of somebody else, we will need to verify your authority to act on behalf of that individual. When contacting us, please provide us with proof that the individual gave you signed permission to submit this request, a valid power of attorney on behalf of the individual, or proof of parental responsibility or legal guardianship.

Alternatively, you may ask the individual to directly contact us by using the contact details above to verify their identity and confirm with us that they gave you permission to submit this request.

### **Response Timing and Format of Our Responses**

We will confirm the receipt of your request within ten (10) business days and, in that communication, we will also describe our identity verification process (if needed) and when you should expect a response, unless we have already granted or denied the request.

Please allow us up to a month to reply to your requests (except requests to stop selling your Personal Data) from the day we received your request. If we need more time (up to 90 days in total), we will inform you of the reason why and the extension period in writing.

If we cannot satisfy a request, we will explain why in our response. For data portability requests, we will choose a format to provide your Personal Data that is readily useable and should allow you to transmit the information from one entity to another entity without difficulty.

We will not charge a fee for processing or responding to your requests. However, we may charge a fee if we determine that your request is excessive, repetitive, or manifestly unfounded. In those cases, we will tell you why we made that determination and provide you with a cost estimate before completing your request.

### Changes

If we make any material change to this Notice, we will post the revised Notice to this web page. We will also update the “last updated on” date at the top of this Notice.

### Contact Us

If you have any questions regarding this Notice, or have questions about our processing of your Personal Data, or want to exercise any of your privacy rights, please contact us by:

- Email: [privacy@bridgeoc.com](mailto:privacy@bridgeoc.com)
- Telephone: +17012121015
- Webform: Complete the [Contact Form](#)
- Postal mail at: Bridge Communications LLC, 1830 52nd Street, S, Fargo, North Dakota, 58103, United States of America

Please allow up to four weeks for us to reply.

### United Kingdom Representative

VeraSafe has been appointed as Bridge Communications’ representative in the United Kingdom for data protection matters, pursuant to Article 27 of the UK GDPR. If you are located within the United Kingdom, VeraSafe can be contacted in addition to or instead of Bridge Communications only on matters related to the processing of Personal Data.

To make such an inquiry, please contact VeraSafe using this contact form:

<https://verasafe.com/public-resources/contact-data-protection-representative> or via telephone at: +44 (20) 4532 2003. Alternatively, VeraSafe can be contacted at:

VeraSafe United Kingdom Limited  
37 Albert Embankment London  
SE1 7TL  
United Kingdom

European Union Representative

VeraSafe has been appointed as Bridge Communications' representative in the European Union for data protection matters, pursuant to Article 27 of the GDPR. If you are in the European Economic Area, VeraSafe can be contacted in addition to Bridge Communications, only on matters related to the processing of Personal Data.

To make such an inquiry, please contact VeraSafe using this contact form:  
<https://verasafe.com/public-resources/contactdata-protection-representative> or via telephone at: +420 228 881 031. Alternatively, VeraSafe can be contacted at:

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