



Privacy Statement



@COM Personal Call Manager App

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Index

1.	GENERAL INFORMATION	4
1.1	Preface.....	4
1.2	Changes to our privacy policy	4
1.3	Privacy policy third parties	4
1.4	How to contact us	4
2.	DATA COLLECTION	5
2.1	Personal Data.....	5
2.2	Financial Data	6
2.3	Data from Social Networks	6
2.4	Geo-Location Information	6
2.5	Mobile Device Access.....	6
2.6	Mobile Device Data	6
2.7	Push Notifications	6
2.8	Third-Party software.....	7
3.	USE OF YOUR INFORMATION.....	7
4.	SECURITY OF YOUR INFORMATION	7
5.	POLICY FOR CHILDREN.....	7
6.	DATA PROTECTION RIGHTS.....	8



1. GENERAL INFORMATION

1.1 Preface

TECHNETWORKS B.V. ("we" or "us" or "our") is the distributor/manufacturer of the @COM Business Manager telephony solution and this application (the "atCOM Personal Call Manager") which provides "communications services" to users of this application. We respect the privacy of users ("user" or "you") that utilize our communication services, and this Privacy Policy explains to you how we collect, use, disclose, and safeguard your information when you use the application.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE APPLICATION.

1.2 Changes to our privacy policy

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the "Last revised" date of this Privacy Policy and by providing updated information via each update of this application. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Application after the date such revised Privacy Policy is posted.

1.3 Privacy policy third parties

This Privacy Policy does not apply to the third-party online/mobile store from which you install the Application or make payments, which may also collect and use data about you. We are not responsible for any of the data collected by any such third party.

1.4 How to contact us

If you have any questions about our privacy policy, the data we hold on you, or you would like to exercise one of your data protections rights, please to not hesitate to contact us.

Email us at : support@technetworks.eu
Call us at : +31 10 742 0 260
Or write to us at : TechNetworks BV
Hoofdweg 20
3067 GH Rotterdam
The Netherlands.

2. DATA COLLECTION

We made this application available for use with our @COM Business Manager telephony solution either as a cloud-based, or as an on-premises, communication solution. We provide this communication solution to service providers ("your service provider") which install our communication solution at the company or organization you work for (or are otherwise engaged with) ("your organization"). The application augments our web-based @COM Personal Call Manager (which is a service integrated into our communication solution) by adding integration into your mobile devices to allow for easier operation and integration with your mobile device features.

2.1 Personal Data

Your organization gives your service provider data needed to provision the application and associated communications services for you. When you use these communications services, your provider may process data about you and people you communicate with ("personal data") as required to provide the communication services (associated training and maintenance services, if any), which may include your personal data in the company directory.

2.1.1 Personal Data transmitted of your device

The application transmits the following information from your device to our communication services:

- a) Your username and password required to logon to the communication services.
- b) The phone number you selected to dial using our communication platform.
- c) The status of your mobile phone, if you selected to allow for this to happen.
- d) Audio to record your voicemail greetings if you choose to do so.

2.1.2 Personal data present in our communication solution

We do not require your personal data, but for the application to work your service provider and organization may process the following types of information about you and those individuals you communicate with into our communication solution:

- a) User ID, first name, last name, language preference, phone numbers, email addresses, photo, username, and password.
- b) Inbound and outbound call logs (Caller ID), phone calls, video calls, recorded calls, inbound and outbound faxes, voicemails, meeting information, personal contacts, login/logoff actions.
- c) IP addresses, service set-up information, service configurations and settings.

Where personal data is processed, it is only done on behalf of your organization and under the terms of our contract with your organization.

2.1.3 Disclosure of your personal data

Personal data can be disclosed by your company or your service provider to us for the following purposes:

- As required to contact you and/or your organization.
- As required provide technical support to you and your organization.
- As required to bill your organization.
- As required by a lawful access request or court order.

In such events your organization and service provider are responsible for your privacy and must therefore inform you when and which personal data they share with us. Examples of personal data and derivative

data we may process as a result, are:

- Log files that hold your login and logoff actions.
- Log files that hold any communications between our communication services which may include Caller ID information, Signalling between with your device and the recording of specific call(s).
- Call Detail Records recorded in the databases of our communication solutions.

2.1.4 Disclosure of personal data to third parties

We will NOT disclose personal data to any third parties unless you have explicitly agreed to this. Any personal data will be retained for the minimal required time required by law or to resolve the matter, once this time has passed it will be deleted immediately. We will not review the content of messages, calls, voice mails or recorded conferences unless required to do so by your organization, by applicable law or other extenuating circumstances. We treat personal and non-personal (derivative) data found in communications content in the same manner.

2.2 Financial Data

We store no financial information of you as this application is totally free of charge.

2.3 Data from Social Networks

We DO NOT GATHER data from social networking sites.

2.4 Geo-Location Information

We DO NOT GATHER data to track location-based information from your mobile device, either continuously or while you are using the Application, or to provide location-based services.

2.5 Mobile Device Access

We may request access or permission to certain features from your mobile device, including your mobile device's microphone, phone app status or contacts. If you wish to change our access or permissions, you may do so in your device's settings. Not allowing us access or permissions will reduce the functionality of the application but will not render it useless.

2.6 Mobile Device Data

Device information such as your mobile device ID number, model, and manufacturer, version of your operating system, phone number, country, location, and any other data you choose to provide is only communicated to the Apple App Store or Google Play store and not to us.

2.7 Push Notifications

We may request to send you push notifications regarding your account or the Application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

2.8 Third-Party software

Our product uses third-party software from the following providers:

- Apache Cordova (Open-Source Software)
- Capacitor JS (Open-Source Software)

We are responsible for the proper operations of these third-party products regarding your privacy. We have checked that these applications do not communicate any sensitive information to any other third-parties. Our application uses a third-party integrated web-browser which has been configured to only communicate with our communication services. The application blocks access to all other websites ensuring your privacy is secured.

3. USE OF YOUR INFORMATION

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the application to:

1. Notify you of updates to the Application.
2. Allow us to read you and analyze your reviews of the application.
3. Request feedback and contact you about your use of the application.
4. Increase the efficiency and operation of the application.
5. Resolve disputes and troubleshoot problems.
6. Respond to product and customer service requests.
7. Assist law enforcement and respond to subpoena.

4. SECURITY OF YOUR INFORMATION

Our systems and software used to host personal data are protected by appropriate security controls including, but not limited to, firewalls, access controls and unique user ids and passwords. User account creation and deletion procedures for granting and revoking access to systems and networks are based on a "need-to-know" basis and use the least privilege approach. Ongoing security testing is performed on all our systems which contain personal data. We monitor and track ongoing reported security vulnerabilities.

While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

5. POLICY FOR CHILDREN

We do not knowingly solicit information from or market to children under the age of 13. If you become aware of any data, we have collected from children under age 13, please contact us using the contact information provided below. And even-though our application uses in integrated web-browser, we have ensured it cannot be reconfigured to access any other websites other that our communication services. Providing no way for children to access other websites via this application.

6. DATA PROTECTION RIGHTS

We would like to make sure you are fully aware of all of your data protection rights in regard to the GDPR data protection laws set by the European Union.

Every user is entitled to the following:

- **The right to access**
You have the right to request us for copies of your personal data.
We may charge you a small fee for this service.
- **The right to rectification**
You have the right to request that we correct any information you believe is inaccurate.
You also have the right to request us to complete the information you believe is incomplete.
- **The right to erasure**
You have the right to request that we erase your personal data, under certain conditions.
- **The right to restrict processing**
You have the right to request that we restrict the processing of your personal data, under certain conditions.
- **The right to object to processing**
You have the right to object to us processing of your personal data, under certain conditions.
- **The right to data portability**
You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make any request, we have one month to respond to you.
If you would like to exercise any of these rights, please contact us.



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