



PRIVACY POLICY

This Privacy Policy was last updated in March of 2020.

Graftel, LLC (“Graftel”) and its parents, subsidiaries and affiliates (hereinafter the “Company,” “we,” “us,” or “our,” as appropriate) knows the privacy of your personal information is important to you. This Privacy Policy covers the information that we collect about you both online and offline, including information that you provide to us online or that we collect when you interact with us through our website located at <https://www.graftel.com/> ([“Website”](#)) or through any other Company website, mobile app or online service that links to this policy (collectively, the “Services”); information that you provide to us or that we collect when you interact with us offline, such as email communications made in the course of business or other circumstances where we may collection information from you or about you. It also explains how we use cookies and similar technologies.

If you do not understand any aspects of our Privacy Policy, please feel free to contact us at info@graftel.com or 847-364-2600, and request to speak to Graftel’s Legal Department.

This Privacy Policy will inform you of:

- Collection and Use of Personal Information;
- Commercial Electronic Communications;
- Sharing of Personal Information;
- Access to Your Personal Information and Choices;
- Privacy Policies of Third Parties;
- Information About Minors;
- Security of Personal Information;
- California Privacy Rights;
- Changes to The Privacy Policy; and
- How to Contact Us.

1) Collection and Use of Personal Information

a) In relation to your use of the Services or your interactions with us, we collect and use certain personal information about you. Personal information is information about you through which you can be identified (including where you can be identified by combining the information with other information). Note that we may be required by law to collect certain personal information about you, or as a consequence of our contractual relationship with you. Failure to provide this personal data may prevent or delay the fulfillment of these obligations. We will inform you at the time your personal information is collected whether certain information is compulsory and the consequences of the failure to provide such information.

i) **Information You Provide.** We may collect your name, contact information, e-mail address, and any other information when you interact with us, including when you contact us or call us. We will use this information to contact you in order to answer your questions and requests and to inform you of our

products and services and those of our affiliates, including personalized marketing communications. Our basis for processing this personal information is the performance of our contract with you and our legitimate interests in communicating with you. If you have applied for employment with the Company, the personal information submitted with your job application will be used for recruitment and other customary human resources purposes. For example, we may send you information about new job opportunities within the Company as well as other career development resources. Our basis for processing this personal information is the performance of our contract with you and our legitimate interests in evaluating your application materials and staying in touch with candidates.

- ii) **Information We Gather (e.g., Cookies).** When you browse our Website, we or third parties such as online ad networks and those engaged in analytics (see “Third Party Cookies”, below) may collect information which can be used to identify your computer and its browser program or any mobile devices that you use to access the internet and their IP addresses, which we may use in order to infer your location. The information is collected by installing small text files called “Cookies” and other, similar information technology techniques (which are comprehensively referred to in this document as “**Cookies**”). In addition to other functions, when you subsequently visit the Website, the Cookies previously stored allow us to recognize your browser. Cookies may store unique identifiers, user preferences, or other information as described below. Our basis for processing this personal information is our legitimate interest in understanding how our Services are used, personalizing marketing communications (where applicable), and improving the Services.
 - iii) **Information Obtained from Third Parties.** In some cases, we may also receive certain categories of personal information from third parties. We will use this information to supplement information we may already have about you and to communicate with and inform you of our products and services and those of our affiliates. Our basis for processing this personal information is our legitimate interest in communicating with you and personalizing marketing communications (where applicable).
- b) **Company Cookies.** These are strictly related to browsing the Website and guarantee normal use of it. Among other things, they make it possible to track your choices (the choice of language or size of typeface used), to recognise the computer or mobile device when a new connection is made and to manage a browsing session. They are also used for statistical purposes to improve the service and the use of the Website by its users as well as to generally measure the effectiveness of our Website. The “Help” feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to withhold consent to the placement of cookies, or subsequently block cookies, some site features or functions may not function correctly, and you may not be able to access all or part of the content of our Website.
- c) **Third Party Cookies.** These are Cookies installed on the Website by third parties and include the following types of cookies:
- **Google Analytics.** We use Google Analytics cookies to allow us to see information on user website activities including, but not limited to, page views, source and time spent on our Website, traffic



patterns, visit counts, and visit statistics. You may opt-out of our use of Google Analytics by visiting the [Google Analytics opt-out page](#).

d) Please note that we do not currently respond to web browser “do not track” signals or other mechanisms that may allow you to opt out of the collection of information across networks of websites and online services as there is no standard for how online services should respond to such signals. As standards develop, we may develop policies for responding to do-not-track signals that we will describe in this Privacy Policy.

2) **Commercial Electronic Communications (Emails and Text Messages)**. We may use your email address to communicate with you via email. This includes sending you promotional emails as well as other emails about the Website. In addition, by providing a mobile device number, you consent to receiving autodialed text messages or calls from us for service-related messages. We may send autodialed marketing text messages and make such calls to you with your additional consent.

3) **Sharing of Personal Information**. The Company may share your personal information as follows:

a) **Affiliates**. The Company may share your personal information with our affiliates, including our subsidiaries, our parent company, and its subsidiaries (collectively, our “affiliates”). We may share information with our affiliates so that they can communicate with you and provide information to you about their products and services.

b) **Third party or affiliated service providers**. We may share your personal information with our service providers that perform services for us. For example, we may partner with companies to optimize services, or manage email communications and newsletters, etc.

c) **Business Partners**. Where we partner with third parties for various business purposes such as joint offerings, we may share your information with the third party consistent with the business relationship.

d) **As Permitted or Required by Law**. From time to time, we may be required to provide personal information in response to a valid court order, subpoena, government investigation, or as otherwise required by law. We also reserve the right to report to law enforcement agencies or others any activities that we, in good faith, believe to be unlawful or in violation of our Terms of Use. We may release certain personal information when we believe that such release is reasonably necessary to protect the rights, property, and safety of others and ourselves, or to detect, prevent, or otherwise address fraud, security, or technical issues.

e) **Business Transactions**. In the event that we intend to sell or transfer ownership or control of any or all of our business, operations or services to a third party, we reserve the right to disclose your personal information to a potential buyer both before and after the purchase. In the event the sale does not go through, we will require the potential purchaser to not use or disclose your personal information in any manner whatsoever and to completely erase the same.

4) **Access to Your Information and Choices**

a) Where applicable under local law, you may have the following rights regarding your personal information: the right to access personal information we hold, and in some situations, the right to have that personal

information corrected or updated, deleted, restricted, or delivered to you or a third party in a usable electronic format (i.e., the right to data portability). Where applicable, you may also object to how we use your personal information if the legal basis for processing that information is our legitimate interest.

b) Where we are using your personal information on the basis of your consent, and where applicable under local law, you may have the right to withdraw that consent at any time. Where you have granted consent to receive direct marketing communications from us, and where applicable under local law, you may withdraw that consent at any time. You also have the right to register a complaint to the appropriate data protection authority, where applicable.

- If you wish to exercise these rights, or to notify us of a change in your details, or if you have any questions about the content of this policy, please contact us at info@grafTEL.com or 847-364-2600 [and request to speak to GrafTEL's Legal Department.](#)
- [Please note that we may require additional information from you in order to honor your requests.](#)
- You can limit the communications that the Company sends to you. To opt-out of commercial emails, simply click the link labeled "unsubscribe" at the bottom of any email we send you. Please note that even if you opt-out of promotional emails, we may still need to contact you with important information about your account, in accordance with applicable data protection laws (and for Canadian residents only, such will be in accordance with the Canadian anti-spam legislation). If you have any questions about your choices or if you need any assistance with opting-out, please contact us via email to info@grafTEL.com. You can also write us at the address in the [How to Contact Us](#) section below. If you send us a letter, please provide your name, address, email address, and information about the communications that you do not want to receive.

5) **Privacy Policies of Third Parties** This Privacy Policy only addresses the use and disclosure of information by the Company. Other websites that may be accessible through this Website have their own privacy policies and data collection, use and disclosure practices. We encourage you to familiarize yourself with the Privacy Policies provided by all third parties prior to providing them with information.

6) **No Information from Minors** This Website is not directed to children under the age of 13. If you are a U.S. resident and under the age of 13 or a Canadian resident and you are a minor (persons under the age of majority in their province or territory of residence) ("Minor"), please do not attempt to register with us at this Website, or provide any personal information about yourself to us. If we learn that we have collected personal information from a Minor, we will promptly delete that information. If you believe we have collected personal information from a Minor, please contact us at info@grafTEL.com or 847-364-2600, and request to speak to GrafTEL's Legal Department.

7) **Security of Personal Information** We will use physical, technical, and administrative security measures designed to protect your personal information against unauthorized access and provide for the ongoing integrity and confidentiality of your personal information. However, since the internet is not a 100% secure environment, we cannot warrant, guarantee, or ensure the security of any information you transmit to us. There is no guarantee that the information may not be accessed, disclosed, altered, or destroyed by a breach of our physical, technical, or administrative safeguards. We retain your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Comply with record retention requirements under applicable law;

- Defend or bring any existing or potential legal claims; and
- Resolve or otherwise address any complaints or queries relating to our Services or our business.

- 8) **California Privacy Rights** Under California’s “Shine the Light” law, California residents who provide personal information in obtaining products or services for personal, family, or household use are entitled to request and obtain from us once a calendar year information about the consumer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year (e.g. requests made in 2016 will receive information regarding 2015 sharing activities). To obtain this information, please send an email request to info@grafTEL.com with “Request for California Privacy Information” on the subject line and in the body of your message. We will provide the requested information to you at your e-mail address in response. Please be aware that not all information sharing is covered by the “Shine the Light” requirements and we may only include information on covered sharing in our response.
- 9) **Changes to the Privacy Policy** Our Privacy Policy may change from time to time. We will post any privacy policy changes on our Website and, if the changes are significant, we will provide a more prominent notice. The date the privacy policy was last revised is identified at the top of the page.
- 10) **How to Contact Us** If you have questions or concerns regarding this Privacy Policy, or to exercise any rights you may have under applicable law with regard to your personal information, please contact: info@grafTEL.com or 847-364-2600, and request to speak to Graftel’s Legal Department. You may also write us at 95 Chancellor Dr., Roselle, IL 60172, Attention: Legal Department. If you send us a letter, please provide your name, address, email address, and detailed information about the change you would like to make.