

## **DIALOGTECH.COM AND DIALOGTECH SERVICE PRIVACY POLICY**

THIS POLICY ("POLICY") EXPLAINS THE PRIVACY PRACTICES FOR THE WEBSITE OPERATED BY DIALOGTECH, INC., A DELAWARE CORPORATION REGISTERED TO DO BUSINESS IN ILLINOIS ("DIALOGTECH"), ACCESSIBLE AT [HTTP://WWW.DIALOGTECH.COM](http://www.dialogtech.com) (THE "DIALOGTECH WEBSITE") AND THE COMMUNICATIONS AND RELATED SERVICES OFFERED ON OR THROUGH THE DIALOGTECH WEBSITE (THE "SERVICE"), UNLESS A CONTRARY POLICY IS EXPRESSLY STATED BY DIALOGTECH TO APPLY.

**THIS POLICY APPLIES TO ALL USERS OF THE SERVICE OR THE DIALOGTECH WEBSITE, WHETHER OR NOT YOU CLICK "I AGREE" THROUGH ANY REGISTRATION OR ACCESS PROCESS AT THE DIALOGTECH WEBSITE AND WHETHER OR NOT YOU ARE THE REGISTERED HOLDER OF A DIALOGTECH ACCOUNT (A "MEMBER") OR ANOTHER USER THEREOF. IF YOU DO NOT AGREE, PLEASE DO NOT ATTEMPT TO USE OR ACCESS THE SERVICE OR THE DIALOGTECH WEBSITE.**

Questions and concerns regarding this Policy should be submitted via the Customer Support form at <http://DialogTech.com/contact.php> or by telephone at 1-877-295-5100.

DialogTech respects your privacy. Any information you give us is held with care and security, and will only be used as described in this Policy or otherwise with your consent.

### **Subscription Registration and Membership; Information Collected**

In order to access the Service, you may be required to first become a Member and complete one or several registration forms. During registration (and possibly thereafter) you may be asked to give your name, a contact telephone number used to identify you, a PIN or password, your postal address, e-mail address, and other contact or identifying information. DialogTech may also ask for other information required to provide the Service, such as your business name, information pertaining to demographic characteristics such as your age, technology or communications services purchasing preferences, or how you found DialogTech. Information may also be collected by your presence on the DialogTech Website, even if you have not registered or subscribed to any Service.

Generally, this information falls into one of four categories: (1) "Personal Information," such as your name and e-mail address, which can be used to personally identify or contact you (or to confirm your identity in the case of user IDs and passwords), (2) "Billing Information," such as your credit card information and billing address, which is a subset of Personal Information and which we may use to bill you for the Service, (3) "Usage Information" such as your IP address, Service plan choices, Service usage levels, calling history, your click patterns on the DialogTech Website and client portal, and other information indicative of your use of the Service or the DialogTech Website, and (4) "Anonymous Information" which can be aggregated across users and then used to determine the demographics, habits, preferences, or statistical characteristics of the DialogTech Website users or subscribers to the Service, but which cannot be used to identify you or your specific Service usage history.

Anonymous Information may include portions of Personal Information and Usage Information which have been decoupled from any identifying information and aggregated with that of other Service or DialogTech Website users.

### **How Information Is Used**

DialogTech will use your Personal Information as follows: (1) to regulate access to the Service and the DialogTech Website and its features (such as requiring passwords to access certain services); (2) to personalize and enhance your experience when visiting the DialogTech Website, client portal, or other third party websites; (3) to promote to you DialogTech or DialogTech endorsed products or services (including contacting you by e-mail); (4) to assist our partners and sponsors in promoting to you their products or services (including contacting you by e-mail), provided that third party promotions are provided on a "blind" basis, such that only DialogTech will have access to your Personal Information and provided also that you may opt-out of receiving promotions from us or such third parties during the registration process, and (5) for other internal or administrative purposes consistent with our mission of providing our Members with the highest quality Services in a secure manner.

We will use your Billing and Usage Information to bill you for the Service and to provide you with technical and billing support. To the extent that Usage Information includes stored telephone number lists you generate or compile by using the Service, we do not provide such lists to third parties except as necessary to complete telephone calls you initiate by switching calls to our carriers (which typically includes providing both caller ID information and the target phone number). We will, however, validate the accuracy and format of individual telephone numbers and may also store and provide, for the benefit of all DialogTech clients, information pertaining to the success, failure, or other results of calling certain numbers (or similar information): for example, if a call generates a response that a line is no longer active, or if we detect that the line is used by a fax machine, we may store and utilize such information to advise clients when they attempt to initiate a call to the same number, but access to such information is on an anonymous basis from the standpoint of identifying users who have initiated calls to such numbers.

We will use Anonymous Information to optimize our marketing and product development efforts (such as keyword advertising purchases and search engine optimization), to determine the success of our marketing campaigns, to provide demographic information to sponsors, advertisers and partners, improve the user interface, and other relevant commercial purposes. We may also provide Anonymous Information to our sponsors, advertisers and partners so that they may track the success of their advertising and promotional efforts, for example, to determine the demographic attributes and use preferences of visitors to pages in the DialogTech website that feature their products or services.

DialogTech may use third party providers and subcontractors for the Services or any feature offered on the DialogTech Website. Service through these providers may necessarily include providing them with some or all of your Personal Information,

Billing Information (for credit card processing, collections, and related matters), and your Usage Information (for subcontracted Service, but typically on an anonymous basis), but we will use diligent efforts to restrict use of this Information by these third parties to the purpose of providing the specific DialogTech feature, function or service for which the third party has been engaged. Additionally, DialogTech may share your Information with parents and affiliates under its control or common control, subject to the same restrictions described in this Policy.

In addition, DialogTech specifically reserves the right, to the maximum extent permitted by law, to use or disclose any Information (a) for the purposes of enforcing our user agreements, use policies and the like or (b) when requested by law enforcement agencies (whether or not under subpoena), if we reasonably suspect a violation of our user agreements or use policies or any applicable law.

### **How Information is Stored; Security**

DialogTech has appropriate technical and organizational security measures in place to reasonably protect against the loss, misuse and alteration of user data under our control. For example, we use appropriate encryption for payment card transactions when we bill you for the Service, and we impose strict rules on DialogTech employees who have access either to the databases that store member information or to the servers that host our services. While we cannot guarantee that loss, misuse or alteration of data will not occur, we make diligent efforts to prevent such unfortunate occurrences.

Please note that information or data (including Usage Information and data you collect through the Service), other than Billing Information, cannot practicably be stored in a manner that is PCI (payment card industry) or HIPAA (healthcare patient confidentiality and security) compliant. Accordingly, other than the Billing Information which we specifically request, we do not recommend that you use the service to collect or store any sensitive financial, payment, or personal information, and we cannot be responsible in any manner if you do so.

Additionally, we strongly recommend that you keep all of your user information, such as account IDs, passwords, and other sensitive information secret and not disclose such information to anyone else. We cannot be responsible for any use of this information should you disclose it to anyone else, or for the use or distribution of any of your information or data stored on the DialogTech Website or with the Service if it is obtained via use of your account ID or password. Please note that DialogTech will never email you to "phish" for (attempt to convince you to disclose) your username or password.

### **Use of "Cookies," "Flash Cookies," Web Beacons, and Log Files**

DialogTech uses a feature of your Web browser called a "cookie" -- a file that your browser places on your computer's hard drive to uniquely identify your computer. DialogTech creates and then uses cookies to make log-in more convenient on the DialogTech Website, to tell us whether you have previously visited the DialogTech Website, to track your clicks through the website, and to help us determine whether

you came to DialogTech from a particular Internet link or advertisement. Cookies can also be used to save and retrieve passwords and to save information on past usage of features and other preferences. DialogTech does not and cannot use cookies to retrieve personal information about you from your computer unless such information was knowingly and willingly provided by you.

Some of our business partners, sponsors, and advertisers use cookies through the DialogTech Website (for example, advertisers) to track the success of their advertising and marketing efforts, which is standard practice for many of the websites you may visit. If you wish to restrict how cookies are placed on your computer, please check your browser settings, or check your browser's "Help" information for instructions on how to enhance the security of your browser or limit use of and access to cookies.

Please note that your browser's security settings may disable some features or services on certain websites.

In addition to conventional cookies, we may also use a cross-domain tracking feature that employs Adobe Local Shared Objects, which are also known as "LSOs" or "Flash Cookies," to collect data pertaining to your use of the DialogTech Website. Anonymous data obtained via Flash Cookies may be shared with various vendors, including Google and DoubleClick, and service providers for optimization of our inbound marketing and related efforts. We believe the use of Flash Cookies is mutually beneficial because they can assist us in optimizing your user experience, however, you should be aware that web browsers may not provide you with the ability to block Flash Cookies and that browser settings which block conventional cookies may not affect Flash Cookies. You may also find that deleted Flash Cookies may be reinstated.

Similarly, DialogTech, its advertisers and partners may also use "web beacons" (small image files which are used to track presence on web pages and surfing patterns) in a similar fashion to cookies, except that web beacons do not store any personal information on your computer. We may also use web beacons or similar technology to track clicks from our newsletters and the like.

Finally, servers owned or controlled by DialogTech will log each website visitors' IP address, browser type, referring and exiting URLs, and other statistical and technical information. Except for policy, agreement, and law enforcement purposes, DialogTech will treat this as Anonymous Information

### **Remarketing with Google Analytics**

DialogTech utilizes Remarketing with Google Analytics to advertise online, on the DialogTech Website and third party websites. Third party vendors, including Google, may show DialogTech advertisements across the Internet.

## **Surveys and Contests**

From time-to-time DialogTech may request information via surveys or contests. Participation in these surveys or contests is completely voluntary and you have a choice whether or not to disclose this information. In addition to any use of information described in this Policy, information collected during surveys and contests will be used for the purposes specified on the forms on which it is collected.

## **Posted Information and Content; Use of Community Features**

To the extent you post any content on the DialogTech Website or participate in any forum, chat, message board, or any other interactive or community service or feature on the website, all of the information contained in your submission or communications will become published public information and DialogTech will not have any control over the use of such information by users and third parties with access to that information. DialogTech reserves the right to use all of such information at its discretion without restriction.

## **Other Events**

Please note that all information collected or provided may be transferred or assigned by DialogTech in conjunction with a merger or the sale of all or a portion of the DialogTech business (or similar event).

## **Links**

The DialogTech Website contains links to third party websites and advertisements leading to promotions of third party products and services. DialogTech is not responsible for the privacy practices of such other websites. We encourage our users to be aware when they leave our website and to read the privacy statements of each website that collects personally identifiable information. This Policy applies solely to information collected by the DialogTech Website and other websites operated or controlled by DialogTech, and not any third party website.

## **Children**

The DialogTech Website and the Service are not intended for use by children or minors. We ask that children and minors not use the website or the Service without their parents' guidance and only after their parents have fully reviewed the terms applicable to such use, including the contents of this Policy.

## **Modifications; Cancellation**

DialogTech reserves the right to reasonably modify this Policy at any time by publication on the DialogTech Website, by notice through email, or by transmission through the Service. All such modifications will be binding on all registrants and users. If you are concerned, please check back periodically to review the current DialogTech Privacy Policy.

If you do not agree with any such changes, or if you no longer wish to be subject to this Policy, you may contact DialogTech (see above and also the [Terms of Service](#)) to cancel your account, and upon complete payment of any amounts due and owing under your account (or the account you use) for DialogTech service, DialogTech will

use diligent efforts to delete your Personal and Billing Information.

### **Priority**

The terms contained in this Policy are subordinate to any contrary terms contained in any express user or membership agreement between a user and DialogTech or to any express written agreement containing the signatures of authorized representatives of both parties.

### **Liability**

DialogTech's liability from or arising out of this Policy or any breach thereof is subject to the general limits of liability stated in the DialogTech [Terms of Service](#).

### **General Contact Information**

Business name: DialogTech, Inc.  
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City: Chicago  
State/Province: IL  
ZIP: 60606  
Country: USA  
Website URL: DialogTech.com  
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