## IsMyConnect Privacy Policy for Microsoft Teams

IsMyConnecty (part of CallMyWay NY S.A.): Telephone interconnection from Microsoft TEAMS

## Effective: January 1st, 2020

This privacy policy explains how information about you is collected, used and disclosed by IsMyConnect (part of CallMyWay NY S.A.), ("IsMyConnecty", "we" or "us") when you use our web site, services or applications (such as the Microsoft Teams app), other online products and services (collectively, the "Services"), or when you otherwise interact with us. If you do not agree with the terms, do not access or use the Services, website or any other aspect of IsMyConnect or its business.

We will not use or share your information with anyone except as described in this Privacy Policy.

IsMyConnect is based in Costa Rica and we process and store the information in the U.S.A.. Therefore, we and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection both in the jurisdictions in which we process it and the jurisdiction you use the service.

We use your Personal Information for providing and improving IsMyConnect. By using IsMyConnect, you agree to the collection and use of information in accordance with this policy.

## We collect the following information from the Services:

- We collect information you provide directly to us.

- Profile information: when registering / signing-up we collect your first name, last name, profile picture, username, identifier and email address. And other related information needed to provide the service.

- From support: We store any communication between you and us.

- Payment Information: we collect certain payment and billing information when you register for our paid Services. For example, we ask you to designate a billing representative, including name and contact information, upon choosing a paid offering. You might also provide payment information, such as payment card details, which we collect via secure payment processing services.

# **Use of Information**

We use the information we collect as follows:

- Provide, deliver, maintain and improve the Services;
- Respond to your comments, questions and requests, and to provide customer service;
- Send you technical notices, updates, security alerts and support and administrative messages;

• Communicate with you about products, services, offers, promotions, rewards and events we offer, and provide news and information we think will be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or email support@callmyway.com

• Personalize and improve the Services and provide content or features that match user profiles or interests;

• Monitor and analyze trends, usage and activities in connection with the Services; and

- For invoicing and payment options.
- Carry out any other purpose as disclosed in this Privacy Policy.

#### Log Data

We may also collect information that your browser sends whenever you visit our site IsMyConnect.comy ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages and other statistics. In addition, we may use third-party services, such as Google Analytics, that collect, monitor and analyze this type of information in order to increase our Service's functionality.

These third-parties may use cookies to help us analyze how our users are using IsMyConnect and they have their own Privacy Policies addressing how they use such information.

#### **Google Analytics**

Google Analytics service is provided by Google Inc.

You can opt-out from Google Analytics service from using your information by installing the Google Analytics Opt-out Browser tool: https://tools.google.com/dlpage/gaoptout For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: http://www.google.com/policies/privacy/

#### Sharing of information

We may share or transfer information we collect or receive about you as follows or as otherwise described in this privacy policy:

• With vendors, consultants and other service providers who need access to such information to carry out work on our behalf;

• In response to a request for information if we believe disclosure is in accordance with applicable law, regulation or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements

• If we believe your actions are inconsistent with the spirit or language of our terms of service or other user agreements or policies, or to protect the rights, property and safety of us or others;

• In connection with, or during negotiations of, any merger, sale of company assets, financing, reorganization, or acquisition of all or a portion of our business to another company;

• Between and among us and our current and future parents, affiliates, subsidiaries and other companies under common control and ownership; and

• With your consent or at your direction, including if we notify you through the Services that the information you provide will be shared in a particular manner and you then provide such information.

We may also share aggregated or de-identified information that cannot reasonably be used to identify you.

### Transfer / Sale of Personal Data

We do not sell, transfer or lease out your personal data to third parties.

### **Cookies / local storage**

Cookies / local storage are files with small amount of data, which may include an anonymous unique identifier. Cookies / local storage are sent to your browser from a web site and stored on your computer's hard drive.

We use "cookies / local storage" to collect information. You can instruct your browser to refuse all cookies / local storage or to indicate when a cookie is being sent. However, if you do not accept cookies / local storage, you may not be able to use some portions of IsMyConnect.

### Security

We take all necessary precautions, as well as the appropriate organizational and technical measures, to maintain the security, integrity and confidentiality of your personal data, and in particular to prevent it from being deformed or damaged and to prevent any unauthorized third party from accessing it. We also use secured payment systems consistent with the state of the art and the applicable regulation.

Nevertheless, the security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure

# Your choices

You can delete your account at any time. You can also request that we update, correct or delete your account information at any time by contacting us at support@callmyway.com. Note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

# **Push Notifications**

With your consent, we may send push notifications or alerts through the Teams system to your device.

You can deactivate these messages at any time by updating your profile settings in Teams.

## **Microsoft Bot Framework**

Our Q App service is enabled by Microsoft Bot Framework. The Microsoft Bot Framework is a set of web-services that enable intelligent services and connections using conversation channels you authorize. As a service provider, Microsoft will transmit content you provide to our Q App bot to enable the service. For more information about Microsoft privacy policies please see their privacy statement here: http://go.microsoft.com/fwlink/?LinkId=521839 . In addition, your interactions with the Q App bot are also subject to the conversational channel's applicable terms of use, privacy and data collection policies. To report abuse when using a bot that uses the Microsoft Bot Framework to Microsoft, please visit the Microsoft Bot Framework website at https://www.botframework.com and use the "Report Abuse" link in the menu to contact Microsoft.

# **Changes to this Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

# Contact us

If you have any questions about our Privacy Policy, please contact us at support@callmyway.com.