

Privacy Policy

Last updated: [DATE]

We value your privacy, and encourage you to read this Privacy Policy carefully to learn how we collect, use, share, and otherwise process your information (“Personal Data”), and to learn about any rights and choices that may be available to you regarding your Personal Data.

This Privacy Policy applies to LMA Telecommunications, Inc. Dba Convergent Networks, (“us,” “we,” “our”), and it explains how we collect, use, and share the Personal Data we gather on the subdomains and websites on <https://www.convergent-networks.com/> (the “Website”).

This Privacy Policy does not apply to the extent we process Personal Data in the role of a processor or service provider on behalf of our customers, including where we offer to our customers various products and services through which our customers (or their affiliates) collect, use, share, or process Personal Data via our software products and services.

Our Website may also contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any data to these websites.

By continuing to use our Website or otherwise indicating your affirmative assent to this Privacy Policy, you agree to the terms of this Privacy Policy.

1. What Personal Data we collect and store

Information You Give Us. You may give us information by entering information through our online forms or surveys or contacting us by phone or email for information or customer service.

The categories of information include:

- Identifiers, such as name, IP address, email address, phone number, or other similar identifiers.
- Commercial information, such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information, such as browsing history, search history, and information regarding a consumer’s interaction with an Internet website, application, or advertisement.

- Professional or employment-related information.

Information We Automatically Collect. Like many website operators, we collect information that your browser sends whenever you visit our Website. This includes log data, such as your computer's IP address, browser type, browser version, the pages of our Website that you visit, the time and date of your visit, the time spent on those pages and other statistics, and whether you reached our page via a social media or email campaign. This information may be collected via several technologies, including cookies, web beacons, clear GIFs, canvas fingerprinting and other means, such as Google Remarketing and Facebook Pixel. You can control cookies in your browser to enable or disable them.

Information We Collect From Third Parties. If you access our Website through third parties (e.g., Facebook or Google), or if you share content from our Website to a third-party social media service, the third-party service will send us certain information about you if the third-party service and your account settings allow such sharing. The information we receive will depend on the policies and your account settings with the third-party service.

2. With whom we share your Personal Data

Affiliates and Service Providers. We share your information with our third-party service providers and any subcontractors as required to provide you with our Website and its related services. The service providers we use help us to:

- Run, operate, and maintain our Website through third-party platforms and software tools;
- Perform content moderation and crash analytics;
- Run email messaging campaigns;
- Perform marketing analytics;
- Provide measurement services and targeted ads (you can opt out of these services at websites such as <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>);
- Provide payment attribution; and,
- Provide technical and customer support.

Some external service providers may also collect information directly from you (for example, a payment processor may request your billing and financial information) in accordance with their own privacy policy. These external service providers do not share your financial information, like credit card number, with us, but may share limited information with us related to your purchase, like your zip code.

Aggregated and/or Anonymized Data. We may also aggregate or otherwise strip information of all personally identifying characteristics and may share that aggregated and/or anonymized data with third parties or publish it. We reserve the right to make use of any such aggregated and/or anonymized data as we see fit.

Third Party Marketing and Advertising Organizations. With respect to website cookies, we share your information with third-party marketing and advertising partners to market our services on our Sites and other websites that you may visit.

Disclosures Required by Law. We may be required to disclose your data in response to lawful requests by public authorities, including to meet law enforcement requirements. We may be under a duty to disclose or share your Personal Data to comply with any legal obligation, to enforce or apply our terms and conditions and other agreements, to protect our rights, property, or safety, or to protect the rights, property, or safety of others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

3. How we use your Personal Data

We use your Personal Data for the following purposes:

- To provide you with the services on our Website, which includes:
 - providing customer service,
 - processing and fulfilling orders and transactions,
 - verifying customer information,
 - processing payments, and,
 - providing advertising or marketing services to you.
- To provide analytic services, such as analyzing customer usage and improving services offered.
- To conduct market research.
- To detect security incidents, protect against fraudulent or other criminal activity, debug and repair errors, and maintain the overall quality and safety of our Website.
- To share your website visitor activity, through website cookies, with third-party marketing partners to market our services on our Website and other websites that you may visit.
- To fulfill our legal and financial obligations.

Marketing. We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may

opt out of receiving any, or all, of these communications from us by following the unsubscribe instructions provided in any email we send, or you can contact us using the contact details provided in the “Questions” section below. You will still continue to receive service-related messages concerning products and services you have purchased (unless we have indicated otherwise).

4. How we protect your Personal Data

We implement a variety of security measures to maintain the safety of your Personal Data when you enter, submit, or access your Personal Data. However, no website, application, or transmission can guarantee security. Thus, while we have established and maintain what we believe to be appropriate technical and organizational measures to protect the confidentiality, security, and integrity of Personal Data obtained through the Website, we cannot ensure or warrant the security of any information you transmit to us.

5. Cookies

To make our Website and services work properly, we sometimes place small data files called cookies on your device. A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, shopping cart, or other preferences) over a period of time, so you do not have to keep re-entering them whenever you come back to the site or browse from one page to another.

Google Analytics. We may use Google Analytics. We use the information we get from Google Analytics only to improve the Website. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Please refer to Google’s [Privacy Policy](#) for more information. You may also choose to download the [Google Analytics opt-out browser add-on](#).

You may wish to restrict the use of cookies. Please be aware that some of the features of our Website may not function correctly if you disable cookies. Most modern browsers allow you to change your cookie settings. You can usually find these settings in the options or preferences menu of your browser. To understand these settings, the following links for commonly used browsers may be helpful:

- [Cookie settings in Chrome](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Microsoft Edge](#)
- [Cookie settings in Safari web](#) and [iOS](#)

Personalized Advertising. We may also use targeted advertising cookies, such as Google Ads, to deliver tailored advertising on our Website and other websites that you may visit. You can learn more about how to control advertising cookies by visiting the Network Advertising Initiative's Consumer Opt-Out [link](#), the DAA's Consumer Opt-Out [link](#) for browsers, or the DAA's opt-out [link](#) for mobile devices. Please note that electing to opt-out will not stop advertising from appearing in your browser or applications and may make the ads you see less relevant to your interests.

6. Children's privacy

The Website is not directed at individuals under the age of 16. We do not knowingly collect Personal Data from children under 16. If you become aware that a child has provided us with Personal Data, please contact us using the contact details provided at the end of this Privacy Policy. If we become aware that a child under 16 has provided us with Personal Data, we will take steps to delete such information.

7. Information retention

We retain information from or about you for so long as necessary to fulfill the purposes outlined in this Privacy Policy. When the information is no longer necessary for these purposes, we delete it or keep it in a form that does not identify you, unless we are required by law to keep this information for a longer period. When determining the retention period, we take into account various criteria, such as the type of products and services requested by or provided to you, the nature and length of our relationship with you, possible re-enrollment with our products or services, the impact on the services we provide to you if we delete some information from or about you, mandatory retention periods provided by law and the statute of limitations

8. Privacy rights and additional disclosures for California residents

California grants state residents certain rights and disclosures. We provide the following information to further help you understand your potential privacy rights. If you would like to exercise any rights or inquire as to whether such rights are available to you, please email us at administration@convergent-networks.com.

Request for Information or Deletion. Residents of California have the right to know whether we are processing your Personal Data, and in some instances, you have the right to request that we disclose to you the categories listed below for the preceding 12 months. We have the right to request verification of your identity for all requests for information. In responding to this right, we shall provide to you:

- The categories of Personal Data we collect about you.
- The categories of sources from which your Personal Data is collected.
- The business or commercial purpose(s) for collecting, selling, sharing, or disclosing your Personal Data, and the categories of Personal Data disclosed for such purpose(s).
- The categories of third parties with whom we share your Personal Data.
- The categories of Personal Data we have sold, if any, about you and the categories of third parties to whom your Personal Data was sold, by category or categories of Personal Data for each third party to whom the Personal Data was sold.
- The specific pieces of Personal Data we have collected about you.

In addition, you may have the right to request we delete your Personal Data.

Request for Correction. Residents of California have the right to request the correction or rectification of inaccurate information in the resident's Personal Data.

Request for Portable Data. Residents of California have the right to receive, in certain circumstances, a portable format of their Personal Data that allows the data to be transmitted to another entity.

Opting Out of Cookies and Sale/Sharing Using Online Tracking Technologies. Our use of online tracking technologies may be considered a "sale" / "sharing" under applicable law. Residents of certain U.S. states may have the right to opt out of being tracked by these third parties by clicking the Your Privacy Choices link at the bottom of our website and selecting your preferences.

Residents of certain U.S. states may opt out by broadcasting an opt-out preference signal, such as the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). To download and use the browser supporting the GPC browser signal, click here: <https://globalprivacycontrol.org/orgs>. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use.

Limiting the Use of Sensitive Personal Data. Residents of California have the right to direct us to use or disclose sensitive Personal Data only for providing goods or services,

or as otherwise minimally permitted under applicable law. However, we do not use or disclose sensitive Personal Data for any purpose other than providing our goods and services to you, or as otherwise minimally permitted under applicable law.

Third Party Marketing. If you are one of our customers, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your Personal Data to third parties for the third parties' direct marketing purposes.

Right to Equal Service & Price. You have the right to receive equal service and price, even if you exercise a privacy right.

Verification Process for Exercising Rights. To protect our consumers' privacy, we verify privacy rights requests to ensure that only you (or your authorized agent) can exercise rights pertaining to your Personal Data. As part of our verification process, we may request you to submit additional information.

If you are an authorized agent wishing to exercise rights on behalf of a state resident, please contact us using the information at the bottom of this Privacy Policy and provide us with a copy of the consumer's written authorization designating you as their agent. We may need to verify your identity and place of residence before completing your rights request.

Appeal Process. If we do not decide to act in response to your request to exercise a right, we may provide a timely response detailing the reasons for not taking the action and, depending on the situation, any rights that you may have to appeal our decision.

9. Privacy rights and additional disclosures for EEA, UK, and Swiss individuals

Lawful Bases for Processing (EEA, UK, and Swiss individuals). If you are from the European Economic Area (EEA), United Kingdom (UK), or Switzerland, our legal bases for collecting and using your Personal Data is as follows:

- The performance of your contract or to enter into the contract and to take action on your requests. For example, the processing of your account registration.
- Our legitimate business interests. For example, fraud prevention, maintaining the security of our network and services, direct marketing to you, and improvement of our services.
- Compliance with a mandatory legal obligation. For example, accounting and tax requirements, which are subject to mandatory retention periods. We may also

collect your Personal Data to record your requests to exercise your rights and to verify your identity for such requests.

- Consent you provide where we do not rely on another legal basis. Consent may be withdrawn at any time.
- In some limited cases, we may also have a legal obligation to collect Personal Data from you in response to lawful requests by public authorities, including to meet law enforcement requirements, as described above in the “With whom we share your Personal Data” section.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Data, please contact us using the contact details provided at the end of this Privacy Policy.

EEA, UK, and Swiss Individuals’ Rights. If you are from the EEA, UK, or Switzerland, you have the right, under certain circumstances, to:

- Access your Personal Data;
- Correct inaccurate information in your Personal Data;
- Request erasure of your Personal Data without undue delay;
- Request restriction of, in certain circumstances, the processing of your Personal Data;
- Request receiving a portable copy of your Personal Data held by us, and to have that portable copy transmitted to another controller; and
- To object to the processing of your Personal Data.

To exercise any of these rights, contact us using the contact details provided at the end of this Privacy Policy, and please specify which privacy right(s) you wish to exercise. We may need to verify your identity to honor your request.

International Transfers of Data. Any data that you provide to us may be accessed, shared, or processed by our offices, located in the United States, and service providers located in the United States, if such data transfer is necessary for the specific purpose for which you submitted your data (such as the provision of goods or services under a written contract). This may entail a transfer of your Personal Data across international borders. The data protection standards may differ and be lower than the standards enforced in your jurisdiction.

Right to Lodge a Complaint. If you have any issues with our compliance, you have the right to lodge a complaint with an EEA supervisory authority. We would, however, appreciate the opportunity to first address your concerns and would welcome you directing an inquiry to us via the contact information at the bottom of this Privacy Policy.

10. Do Not Track and other opt-out signals

Some browsers provide you with a way to signal that you do not want your browsing activity to be tracked. The Website may not currently respond to all Do Not Track (“DNT”) or similar signals, as we are awaiting consensus from the Internet policy and legal community on the meaning of DNT and the best way to respond to these signals.

Residents of certain U.S. states may opt out by broadcasting an opt-out preference signal, such as the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). To download and use the browser supporting the GPC browser signal, click here: <https://globalprivacycontrol.org/orgs>. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use.

11. Change of control

Personal Data may be transferred to a third party because of a sale, acquisition, merger, reorganization, or other change in control. If we sell, merge, or transfer any part of the business, part of the sale may include your Personal Data.

12. Changes to Privacy Policy

This Privacy Policy may be periodically updated, and we encourage you to periodically review this Privacy Policy to ensure you are familiar with the most current version. The date this Privacy Policy was last updated is indicated at the top of this page.

13. Questions

If you have any questions about this Privacy Policy, please contact us at administration@convergent-networks.com.