

MITEL® MOBILE APPLICATION PRIVACY POLICY- **Mitel Office**

CAREFULLY READ THE FOLLOWING POLICY. USE OF ANY OF THE MOBILE PRODUCTS LISTED CONSTITUTES YOUR ACCEPTANCE OF THIS POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS POLICY, PROMPTLY REMOVE THE PRODUCT FROM YOUR MOBILE DEVICE. LAWFUL USE OF ANY LISTED PRODUCT IS CONDITIONAL UPON YOUR AGREEMENT WITH THE TERMS OF THIS POLICY AND ANY APPLICABLE TERMS OF SERVICE AND END USER SERVICE OR LICENSE AGREEMENT.

Introduction

When reading this Privacy Policy, please use the following definitions:

- The terms “Mitel”, “we”, “us”, or “our” refer to Mitel Networks Corporation, including itself, subsidiaries, divisions, and affiliates.
- The term “Customer” refers to the business that has established a Master Account with us and is responsible for billing and payment of the Master Account and administration of its User Accounts.
- The term “User” refer to the persons that have established a User Account to use one of our mobile products.
- The term “product” refers to the following Mitel mobile applications and services available for use with a mobile device: **Mitel MiVoice Office**

When we discuss information “we collect”, we mean information we collect and store. Our policy regarding stored information is discussed later in this Privacy Policy.

Protecting your privacy and information is important to us. Accordingly, we are providing this Privacy Policy to assist you in understanding what information we collect, how we collect this information, how we use the information we collect, and what options you have.

What We Collect

We Collect Required Customer and User Information

We require certain information to create Customer and User accounts and activate your use of our mobile products. We keep required information requests to a minimum while balancing our goal of providing each Customer and User with a superior product experience. Required information is used to expedite communication and foster our relationship with you. Required information includes such things as your name, business address, business phone number, business email addresses, contact preferences, and your account log-in and password (encrypted). If you are the Customer, we also require bank or credit card information and corresponding billing address for the Master Account except when participating in a product trial period. We encrypt all required information we collect.

We Collect Information as You Use Our Products.

For the best experience with our mobile products, it is important that you follow our recommended settings for your mobile device and for your User Account profile for the product you are using. If you do not follow our recommended settings, you may not have access to all the available features of the mobile product or may not be able to use the mobile product at all. Access to phone calls, call history, chats, and contacts are especially important to our mobile products.

When using our mobile products we will collect information from you and other parties with whom you interact including, incoming calls, chats and text messages, contact information such as names, email addresses, mobile phone, and land line phone numbers and extensions, content you or others create, share, or post through our products in audio, video, text, or image formats and other software or media formats, the location of photos, file date/time stamps, and call history information. To improve our products, we also collect log data, crash data, information about the features that you use and the frequency of usage, the sequence of features you click and screens you view within the product, information sent to us by our product, and the mobile device you use when using our products, the type of mobile device you are using, the operating systems you use, the date and time you use our services, application or device identifiers, IP addresses.

Keep in mind this information is only collected when using our product, for example, we would not collect call, text, or chat information if you are not accessing those features through our product.

We will also collect your communications with our customer service or support teams including any feedback, suggestions and ideas you may send to us.

Tokens

To enable a secure connection to our back-end systems, when you use our products we place small encrypted text files known as “tokens” on your mobile device. We use both “persistent” and temporary “session” tokens.

We Store Your Information and Data

We store your information only as long as necessary to achieve the intended use of the information, or for as long as the retention serves a reasonable purpose.

Third Parties

Third Party Service Providers

Whenever you use Mitel's mobile products from other service providers, and Mitel connects to those service providers, any data accessed or collected by the other service providers will be subject to the other service provider's policies.

Mitel may receive information from the applications and websites of our affiliated companies, our partners and third-party providers. We use this information to enhance our Customer and User information and for analytic purposes, such as measuring the success of marketing initiatives or promotional offers.

Safety and Security

We appreciate the trust you place in us whenever you decide to use our products and we take the security of your information seriously. We strive to ensure your information is protected from misuse and

unauthorized disclosure or theft. All communication between your mobile device and our back-end systems is encrypted. We use reasonable safeguards to protect the information we collect and store from misuse and unauthorized access and disclosure.

Should we determine that there has been a security breach or unauthorized access to personally identifiable information, we will notify all impacted Customers and Users.

How We Use the Information We Collect

We will never sell the personally identifiable information we collect about you. We will use aggregated and anonymized data whenever possible. Examples of how we use your information and data include:

Personally, Identifiable Information

Your personally identifiable information is used only when necessary. Such use includes, but is not limited to, communicating with Customers or Users by email or phone for support or security reasons, Customer billing and payment tracking and requirements of law enforcement agencies, court order, or as may be required by law.

Other Information and Data

Other information we collect is used for communicating with our Customers and Users regarding their use of our products, enhancing the security and safety of our products, personalizing your experience when using our products, developing new tools, products and services, notifying you of new features of our products, associating activity on our products across different devices operated by the same User to enhance your experience and to conduct data and system analytics. We will also use the log and crash files we collect from you to fix bugs, and to maintain and improve the systems and infrastructure that support our products.

It is not the intention of this policy to limit or restrict how we use aggregated or anonymized information.

Your Choices

You have control over the information you choose to allow us to collect, as well as the information we have collected about you. We attempt to balance the information collected from you against our objective of providing products that provide value to you. Your choices regarding information and data you share will impact the quality of your experience with our products.

Your Account

You may edit your account information and change your account settings in our products whenever you choose. We highly recommend keeping your account information current. You may also choose to opt-out of certain information sharing and marketing options.

Our Products

You may choose to stop using our products at any time. Refer to the Terms of Service agreement for the product you are cancelling for information about possible refunds.

Your Information

You may instruct your site administrator to purge any personally identifiable information collected about you.

PLEASE NOTE: This policy is not intended to alter the terms and conditions of subscriptions or agreements you may have with our partner's or other third-party vendors for their products or services. If you cancel subscriptions or services with our partner's or other third-parties, you must refer to such partner or third-party's agreements for cancellation and refund conditions and policies.

Your Device Settings

Your mobile device may have settings for managing services and features such as information sharing, service or product integration and restricting geolocation information. Please refer to the manual for your specific devices for further information and options.

Keep in mind that your choices regarding information you share or allow us to access will impact the quality of your experience with our products.

How We Share or Disclose Your Information

We may share your information with our affiliated companies to enhance your experience with our products.

We also use third-parties to handle certain processes related to support our products such as customer service or support, data processing and analytic services and hosting services. We make every effort to ensure we use third-party providers that adhere to the security and best practices of their respective industries and who will give your information the care it deserves, however, we are not responsible for how such providers collect, use and share information. Question about the third-party providers can be sent to CloudLink-Support@mitel.com

We may also disclose your information for law enforcement requirements, court orders, to enforce our rights or for other legal reasons and requirements.

Children's Information

Our products are not designed for and not directed to children, and it is not our intention to collect personally identifiable information from children. Should we discover, or be notified that we have inadvertently collected personally identifiable information from someone under the age of 13, we are required under federal rules to permanently remove all such information. Notification regarding collection of personally identifiable information of anyone under 13 years of age can be sent to CloudLink-Support@mitel.com.

Contacting Us

For Terms of Service for our products, please use the following link and locate the Terms of Service for your mobile product: <http://www.mitel.com/content/end-user-license-agreements>

For questions about this policy, complaints, or the identities of third-parties with whom we share your information, please contact our customer service and support at: CloudLink-Support@mitel.com

Mitel reserves the right to make changes to this Privacy Policy at any time without notice. Your use the product constitutes your acceptance of the currently posted Privacy Policy. For prior versions of this Privacy Policy, use the following link: <https://www.mitel.com/legal/cloudlink>