

# **Tele-Town Hall® Privacy Policy**

***EFFECTIVE DATE: 8/8/2023***

## **Introduction**

Tele-Town Hall™ utilizes a patented mass automated variable speed dialing system with a voice over IP (Internet Protocol) connection to dial out to thousands of phone numbers from a pre-selected list of participants, submitted to us by our customers.

## **Scope of This Policy**

This Privacy Policy describes how your personal information is collected, used, and disclosed by Tele-Town Hall, LLC, and its subsidiary and affiliated companies (“TTH”, “we”, “us”, or “our”) when you visit our websites (the “Site”) or use any of our online properties, mobile applications, or services controlled by TTH (the “Services”), and wherever this policy is posted or linked.

“Personal information” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Information that is publicly available, a matter of public concern (such as newsworthy information), aggregated (e.g., compiled to create statistics that cannot identify a particular individual) or de-identified (stripped of all unique identifiers such that it cannot be linked to a particular individual) is not considered “personal information” for the purposes of this Privacy Policy.

This Policy applies to all personal information including on-line, off-line, and manually processed data. This Policy does not apply to third-party websites, mobile applications, or services that may link to the Site or Services or be linked to from the Site or Services.

## **Privacy Statement Changes**

TTH reserves the right to change this Privacy Policy at any time, at which time we will also change the “Effective Date.” Please review this policy each time you visit our Site or use our Services to stay current, as continued patronage and use of this website denotes your consent to any modifications. You should not use the Site or Services if you have any objections to our Privacy Policy, which is binding upon all users of the Site and Services.

## **Notice at Collection**

We may collect or process various categories of personal information. The sections titled “**Info**mation We Collect” and “**Region**/Country Specific Disclosures” contain information on the categories of personal information collected and our disclosure practices. As an overview, we collect: identifiers; financial information; commercial information; internet or other electronic network activity information; audio, electronic, visual, or similar information; and sensitive personal information. We collect this information to provide, maintain, and improve our Services, including your in-store and online ordering experience, and for other reasons listed in the “**How** We Use Your Information” section below. We will retain your information for as long as needed to fulfill the purpose for which it was collected and to comply with our legal obligations, resolve disputes, and enforce our agreements. While we do not sell your personal information for monetary compensation, we partner with third party advertising and analytics partners, which may be considered a “sale” of personal information under applicable laws. If you are a resident of California, Virginia, Colorado, or Connecticut and would like to exercise your rights, please visit the “**Region**/Country Specific Disclosures” section of this Policy. We only collect sensitive personal information, such as identifiers, internet or other electronic network activity, and login credentials to access your account, to provide our Site or Services and we delete this information as soon as our Services are complete.

## **Information We Collect**

We may collect information from you directly, from the devices you use to interact with us, from business partners that provide us with your personal information, and from third parties. We may also combine information from the Site and Services together with other information we obtain from our business records. You may have choices about the information we collect, as outlined in the section of this Policy titled “**Your** Privacy Choices.”

### **Information you provide to us**

You may provide the following information to us directly:

- Identifiers, such as name, address, phone number, email address, or social media handles.
- Commercial information, such as purchase history.
- Financial information, including payment card information, and credit information.
- Demographic information, such as your date of birth or gender.
- Audiovisual information, such as call recordings when you contact customer support or when you provide videos or photos through our social media platforms.

- Education information when you apply for a job with us, such as education history and level of education.
- Contents of communications, such as content of phone calls, emails, or text messages when you communicate with us or during the provision of our Services.
- Content of communications, such as photos, GIFs, videos, or audio files when TTH sends an MMS message on your behalf to your audience.
- Contacts, where you provide us with a list of contacts or where you give us permission to collect these contacts from your device.
- Sensitive personal information, such as account login information along with your password or credentials to allow access to your account.

### **Information we collect automatically**

We and partners working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following information from the device or application you use to interact with our Sites and Services:

- Device information, including IP address, device identifiers, and details about your web browser.
- Analytical information, including details about your interaction with our website, app, and electronic newsletters.
- Diagnostic information, including web traffic logs.
- Advertising information, including special advertising and other unique identifiers that enable us or third parties working on our behalf to target advertisements to you. Please be aware that our advertising partners may collect information about you when you visit third-party websites or use third-party apps. They may use that information to better target advertisements to you on our behalf.
- Business record information, including records of your purchases of products and Services.
- Geolocation information, such as coarse geolocation information that describes location with less precision than a zip code.

### **Information we collect from other sources**

We may collect the following information about you from business partners, service providers, and third-party sources:

- Identifiers, demographic information, and inferences about your interests and purchases, from consumer data providers or third party advertising partners.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.

- Information about your interaction with advertisements on our Services, or ads that we place on third party websites, from online advertising companies.
- Health information where your healthcare provider is using our Services to send you information or notifications.
- Student education records as defined under the Family Educational Rights and Privacy Act (“FERPA”) when we provide Services on behalf of a school or local education agency.
- Sensitive personal information, which may include (i) union affiliation or membership information, (ii) information about your political affiliations from political campaigns or voter registration lists, (iii) your religious or philosophical beliefs, (iv) racial or ethnic origin, and (v) citizenship status.
- If you invite others to the Services on behalf of your business or organization, we will collect your and the other person’s identifiers to send an email or text message and follow up with the other person. You agree that you will obtain the other person’s consent before giving us their contact information. You also agree that you will not send us the contact information of a minor. We will inform any individuals you invite that you gave us their information in the invitation.

### **Special Information for Job Applicants**

When you apply for a job with us, we may collect information from you, including:

- Information you provide in connection with your application.
- Information that you make available in your social media accounts.
- Information about you that is available publicly.
- Health information, such as COVID-19 status and/or disability information.
- Information that you authorize us to collect via third parties, including former employers or references.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

### **How We Use Your Information**

TTH will process personal information only in ways compatible with the purpose for which it was collected or subsequently authorized by you. To the extent necessary for

such purposes, TTH will take reasonable steps to make sure that personal information is accurate, complete, current, and otherwise reliable with regard to its intended use.

We may use any of the information we collect for the following purposes:

- Service functionality, such as to provide you with our Site and Services, including to take steps to enter a contract for sale or for services, process payments, fulfill orders, send service communications (including renewal reminders), and conduct general business operations, such as accounting, recordkeeping, and audits.
- To improve and grow our Site and Services, including to develop new products and services and understand how our Site and Services are being used, our customer base and purchasing trends, and the effectiveness of our marketing.
- To offer you personalized recommendations and tailor the Site and Services to your preferences.
- To send you advertising and marketing communications, personalize the advertisements you see on our Sites and Services and third-party online properties, and measure the effectiveness of our advertising.
- For security purposes, such as to protect and secure our Sites and Services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- For legal compliance, such as to comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements.

## Disclosure of Your Personal Information

We may disclose any of the information we collect to the following recipients:

- *Affiliates:* We share information with other members of our group of companies.
- *Service providers:* We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract to use information that we share only for the purpose of providing these business functions, which include: supporting service functionality; auditing and accounting; professional services consultants; analytics and marketing services; and information technology services.
- *Business partners:* From time to time, we may share your contact information with other organizations for marketing purposes.
- *Online advertising partners:* We partner with companies that assist us in advertising our Services, including partners that use cookies and online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising.

- *Social media platforms:* If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Site or via our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- *Government entities/Law enforcement:* We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our customers, or other individuals.
- *Other businesses in the context of a commercial transaction:* We may change our ownership or corporate organization while providing the Site or Services. We may transfer to another entity, its affiliates, or its service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, a change in ownership control, or a financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this policy.

## **Data Security**

TTH will take reasonable precautions to protect personal information. To prevent unauthorized access or disclosure, maintain data accuracy, and ensure the appropriate use and confidentiality of personal information, either for its own purposes or on behalf of our customers, TTH has put in place appropriate physical, electronic, and administrative procedures to safeguard and secure the personal information we process. However, we cannot guarantee the security of personal information transmitted to TTH via the Internet.

There has never been a security breach and we take every effort to ensure there never will be. If we learn of a security system breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Site or Services and providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Site or Services. We may post a notice via our Site if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

If you register with our Services, you are responsible for maintaining the security of your password at all times. You may gain access to and review your personal information by accessing your account. You are responsible for activity occurring while logged into your account. You are responsible for the security of the user names and personal identification numbers (PIN codes) that are issued to you to access the phone broadcasting and service interface. If security has been breached, you are advised to contact our customer service department at **(202) 237-8313** or toll-free at **(877) 536-0565** to request the PIN numbers be changed immediately. Alternatively, you may also contact us [here](#).

## **Forums, Chat Rooms, and Public Posting Areas**

Please note that any information you include in a message you post to any public posting area, such as the comment section of our social media pages or accounts, is available to anyone with Internet access. If you don't want people to know your email address, for example, don't include it in any message you post publicly. PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY INFORMATION IN PUBLIC POSTING AREAS. WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF THE INFORMATION THAT YOU DISCLOSE IN PUBLIC POSTING AREAS.

## **Chatbox and Session Replay Technology Disclosure**

We may use technology to monitor how you interact with our Services. This may include, without limitation, which links you click on, information that you type into our online forms, and about your device or browser. Further, we utilize session replay software to monitor and record mouse clicks and movements, keystrokes, and pages and content viewed by you. Please discontinue use of the Site or Services if you do not consent to our collection of such information.

## **International Data Transfers**

If you are using our Services or visiting our Site from a location outside of the U.S., your connection may be through and to servers located in the United States. Any information you provide during your visit will be processed and maintained on our server and other internal systems located within the U.S. or otherwise as described above. You acknowledge you understand that by providing your personal information to us, your personal information: (i) will be used for the uses identified above in accordance with this Privacy Policy; and (ii) may be transferred to the U.S. as indicated above, in accordance with applicable law.

For example, where personal information is transferred from the European Economic Area to areas which have not been determined to have an adequate level of protection, we take measures designed to transfer the information in accordance with lawful requirements, such as Standard Contractual Clauses. Please [contact](#) us for more information and to receive a copy of the Standard Contractual Clauses we may utilize. By using the Site, participating in any of the Services, and/or providing us with this information, you acknowledge this transfer, which may not offer the same level of data protection as the country where you reside, in accordance with the terms of this Policy and you do not require separate notification of each such transfer that occurs.

## **Data Retention**

We determine the retention period for each of the categories of personal information listed above based on: (1) the length of time we need to retain the information to achieve the business or commercial purpose for which it was obtained; (2) any legal or regulatory requirements applicable to such information; (3) internal operational needs; and (4) any need for the information based on any actual or anticipated investigation or litigation.

## **Children's Information**

The Site and Services are intended for users aged 16 and older. We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 16, we will delete that information. Please [contact](#) us with any concerns.

## **Enforcement and Dispute Resolution**

TTH utilizes the self-assessment approach to assure its compliance with our privacy statement. TTH periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented, and in conformity with applicable laws. We encourage interested persons to raise any concerns with us using the [contact](#) information below. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Policy.

With respect to any complaints relating to this Policy that cannot be resolved through our internal processes, if a legal authority determines that we did not comply with this Policy, we will take appropriate steps to address any adverse effects and to promote



future compliance. Any person who we determine is in violation of our privacy policies will be subject to disciplinary process.

## Information Subject to Other Policies


We are committed to the principles outlined in this document. Information obtained from or relating to customers or former customers is further subject to the terms of any privacy notice to the customer, any contract or other agreement with the customer, and applicable and enforceable laws.


## Disclaimer Regarding Video Content

The TTH Sites may contain pixels which provide us with analytics regarding how website visitors interact with video content, audiovisual content, or content of a like nature (collectively, "Video Content"). Video Content is provided for the purpose of enhancing the user experience on the TTH Sites and by continuing to use the Mars Sites and interacting with Video Content, you understand that your personal data, including your video viewing history, may be processed according to this Privacy Policy. You may also visit the "Your Privacy Choices" section below for more information about how to update your settings.

## Your Privacy Choices

You have choices regarding the collection, use, and disclosure of your personal information as outlined below.

**Your Account:** If your contact information changes, or if you no longer desire to use our Services, you may visit your Tele-Town Hall [account page](#) to update your personal information, or  contact us.

**Email Unsubscribe:** If you do not wish to receive marketing information from us or wish to opt out of future email promotions from us, please  contact us. Please note that all promotional email messages you receive from us will include an option to opt out of future email communications.

**Cookies and Ad Choices:** You have options to limit the information that we and our partners collect for online advertising purposes. You may disable cookies in your browser or mobile device using their settings menus. Your mobile device may give you the option to disable advertising functionality. Because we use cookies to support Site


and Service functionality, disabling cookies may also disable some elements of our online properties.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized. Nor will exercising these options prevent other companies from displaying personalized ads to you. If you delete your cookies, you may also delete your opt-out preferences.

**SMS Messages:** We will only send you SMS text messages regarding promotional offers or other news if you specifically grant us permission. You have the right to choose not to receive our mobile direct marketing communications by simply notifying us of your preference to unsubscribe. At any time, you can unsubscribe from our mobile list by replying “STOP” through SMS text message. Upon such choice, we: (a) will not contact you directly with our promotional messages; and (b) will not use personal information obtained from your registration to contact you with our product or service messages.

**Do Not Track and Opt-Out Preference Signals:** The “Do Not Track” (DNT) privacy preference is an option that may be made in some web browsers allowing you to opt out of tracking by websites and online services. At this time, global standard DNT technology is not yet finalized and not all browsers support DNT. We therefore do not recognize DNT signals and do not respond to them.

We currently do not recognize opt-out preference signals, such as the Global Privacy Control (available [here](#)).

**Jurisdiction-specific rights:** You may have certain rights with respect to your personal information depending on your location or residency. Please see “Region/Country Specific Disclosures” below. Please  contact us to exercise your rights.

## Region/Country Specific Disclosures

**The California “Shine the Light” Law:** If a company shares “personal information” (as defined in California’s “Shine the Light” law, Civil Code § 1798.83) with third parties for their direct marketing purposes (e.g., to send offers and information that may be of interest to you), California law requires either providing a mechanism by which consumers can obtain more information about such sharing over the prior calendar year, or providing a mechanism by which consumers can opt out of such sharing. We do not share your personal information with third parties for their direct marketing purposes.

## Your Privacy Rights for California, Colorado, Connecticut, and Virginia

Depending on your state of residence, the rights available to you may differ in some respects. TTH responds to any rights requests in accordance with legal obligations. The rights provided by California, Colorado, Connecticut, and Virginia law are listed in the chart below. Additionally, all users may exercise their rights to opt-out of marketing communications by following the directions provided below. TTH will respond to any rights request in accordance with applicable legal regulations.

Description of Rights	Applicable to Residents of:
<p><b>Right to Know or Access:</b> You may have the right to obtain confirmation about whether or not your personal information is being processed by us. If so, you may have the right to access the personal information we hold about you and/or request other related information, such as the purposes for which use that information, the categories of personal information we process about you, the recipients (or categories of recipients) to whom your personal information has been or will be disclosed, the retention period for such personal information, or, if not possible, the criteria used to determine that period, your legal rights with respect to your personal information, etc.</p>	<ul style="list-style-type: none"> <li>• California</li> <li>• Colorado</li> <li>• Connecticut</li> <li>• Utah</li> <li>• Virginia</li> </ul>
<p><b>Right to Delete:</b> You may have the right to request the deletion or erasure of your personal information in certain circumstances.</p>	<ul style="list-style-type: none"> <li>• California</li> <li>• Colorado</li> <li>• Connecticut</li> <li>• Utah</li> <li>• Virginia</li> </ul>
<p><b>Right to Correct:</b> You may have the right to correct or update your personal information if inaccurate.</p>	<ul style="list-style-type: none"> <li>• California</li> <li>• Colorado</li> <li>• Connecticut</li> <li>• Virginia</li> </ul>
<p><b>Right to Opt-out of Sale, Sharing, and Targeted Advertising of your Personal Information:</b> You may have the right to opt-out of the sale or sharing of your personal information to third parties. To exercise this right, you may submit a request by</p>	<ul style="list-style-type: none"> <li>• California</li> <li>• Colorado</li> <li>• Connecticut</li> <li>• Utah</li> </ul>

<p>contacting us. Note that we do not sell the personal information of individuals under 16 years old. Please also note that in some jurisdictions, this is an opt-in right to which we comply by obtaining express consent at our points of collection.</p>	<ul style="list-style-type: none"> <li>• <b>Virginia</b></li> </ul>
<p><b>Right to Withdraw Consent:</b> You may have the right to withdraw consent to the continued use or disclosure of your personal information, subject to legal or contractual restrictions and reasonable notice.</p>	<ul style="list-style-type: none"> <li>• <b>California</b></li> <li>• <b>Colorado</b></li> <li>• <b>Connecticut</b></li> </ul>
<p><b>Right to Nondiscrimination:</b> You may have the right to non-discrimination, such as to receive equal service and pricing from a business, even after exercising your rights.</p>	<ul style="list-style-type: none"> <li>• <b>California</b></li> <li>• <b>Colorado</b></li> <li>• <b>Connecticut</b></li> <li>• <b>Utah</b></li> <li>• <b>Virginia</b></li> </ul>
<p><b>Right to Data Portability:</b> You may have the right to receive the personal information that you have given us, in a structured, commonly used and machine-readable format. You may also have the right to send that personal information to another controller if the processing is based on consent pursuant or on a contract and is carried out by automated means.</p>	<ul style="list-style-type: none"> <li>• <b>California</b></li> <li>• <b>Colorado</b></li> <li>• <b>Connecticut</b></li> <li>• <b>Utah</b></li> <li>• <b>Virginia</b></li> </ul>
<p><b>Right to Opt-out of Profiling:</b> You may have the right not to be subject to a decision based solely on profiling or automated decision-making, except under certain exceptions under local law.</p>	<ul style="list-style-type: none"> <li>• <b>California</b></li> <li>• <b>Colorado</b></li> <li>• <b>Connecticut</b></li> <li>• <b>Virginia</b></li> </ul>
<p><b>Right to Limit the Use and Disclosure of Sensitive Personal Information:</b> You may have the right to limit the use and disclosure of your sensitive personal information if we use such information to infer characteristics about you; however, TTH does not use your sensitive personal information for these purposes, so it does not offer the right limit.</p>	<ul style="list-style-type: none"> <li>• <b>California</b></li> </ul>

Please contact us for more information about how to submit a request to exercise these rights.

## Your Nevada Privacy Rights

Operators of commercial websites that collect or maintain the personal information of Nevada residents must provide the ability for Nevada residents to opt-out of the sale of their personal information. We currently do not sell your personal information as defined by Nevada law.

### European Economic Area (“EEA”), United Kingdom, and Switzerland

We process “personal data,” as that term is defined in the European Union’s General Data Protection Regulation (“GDPR”). If you are located in the EEA, U.K., or Switzerland, you have the following rights:


- You have the **right to access information** about the categories of personal data we have collected about you. You may also request a copy of the personal data we have collected, and upon request, we will provide this information to you in electronic form or transfer it to a third party.
- You have the **right to correct** your personal data if inaccurate.
- You have the **right to request erasure** of your personal data when such data is no longer necessary for the purpose for which it was collected, when you withdraw consent and no other legal basis for processing exists, or when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- You have the **right to restrict our processing of personal data** if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise or defense of legal claims; or if your request to object to processing is pending evaluation.
- You have the **right to object to processing of your personal data** based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.
- You have the **right to obtain information** about, and a copy of, the safeguards we use to transfer personal data across borders.

In processing personal information, we may rely upon the following lawful bases:

- **Consent:** We may process personal data with the consent of the individual whose data is being processed and/or in reliance upon the consent of the administrator

of the account, who must affirm that s/he has obtained appropriate consent from all participants.

- **Contract:** When we enter a contract with you and/or an administrator for your account, we process personal data on the basis of our contract in order to prepare and enter into the contract, as well as to perform and manage our contract. This is necessary for us to provide the Site and Services to you.
- **Vital interests:** In a case where the personal data is required to protect your vital interests or the vital interests of another natural person, then this may be used as the lawful basis of the processing. For example, we may need to process personal data in the event of a pandemic.
- **As required by law:** We may process personal data as required to comply with legal obligations to which we are subject for the for the purpose of compliance with EEA, UK, or Swiss public, governmental, judicial, or other regulatory authorities.
- **For legitimate business purposes:** This includes but is not limited to legal compliance and the purposes described above. We use legitimate interests as the legal basis to process your personal data for fraud prevention, ensuring network and information security, processing employee or client data, for direct marketing, or to complete administrative transfers within our company.

Users who are located in the European Economic Area (“EEA”), U.K., or Switzerland have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned. Please  contact us if you would like to exercise your rights.

## **Contact Information and Submitting Rights Requests**

Questions or comments regarding this Policy should be submitted to the TTH Privacy Policy Department by mail or e-mail as follows:

Tele-Town Hall, LLC  
Attn: Privacy Policy Dept.  
1001 N 19<sup>th</sup> St., Suite 1200  
Arlington, VA 22209  
Email: [privacy@teletownhall.com](mailto:privacy@teletownhall.com)  
Telephone: (877) 536-0565

**Submitting Requests:** You may request to exercise your rights by making a request using the contact information above. If you are a resident of California, Colorado, or Connecticut, you may, under certain circumstances, authorize another individual or a

business, called an authorized agent, to make requests on your behalf. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

*Verification:* We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against information we may have collected from you previously. We may need to follow up with you to request more information to verify identity. We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

*Appeals:* Residents of Colorado, Connecticut, and Virginia have the right to appeal a denial of their request by contacting us as described in the notice of denial.