



Your personal information and privacy is a priority at Sawtel. Please read this Privacy Policy as it includes important information about how we gather and how we use information about you.

Who We Are

Sawtel, Inc. ("Sawtel," "we," or "us") develops and provides software that allows businesses to mobilize their enterprise communications systems. Sawtel Network's products and services are available: (1) online through www.sawtel.com/privacy (the "Site"); (2) through cloud-hosted and on-premises software (the "Software"), including Kinetic Cloud Service and Kinetic Communications Platform; and (3) through mobile applications, including Sawtel Communicator (the "Applications"). The Site, Software, and Applications are collectively called the "Services."

Sawtel is a Delaware corporation with its principal place of business at 2 Park Place, Hartford, CT 06106. If you are a resident of the EU or UK, Sawtel is the responsible party with respect to Personal Data (defined below) collected through the Services. If you have any questions regarding this Privacy Policy or your Personal Data, please contact privacy@sawtel.com.

Purpose and Application

This Privacy Policy is designed to help you understand how we collect, use, and protect your Personal Data when you interact with our Services. "Personal Data" means any information that can be associated with or that relates to a person and/or that could be used to identify a person. This Privacy Policy applies to all Personal Data collected through or in connection with the Services or any part of the Services.

By using the Services, you consent to the terms of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, do not use the Services or any part of the Services.

Information We Collect and Why

When you use our Services, we may gather and/or store your Personal Data. Sometimes, this will be on our own behalf and other times it will be on behalf of a third-party who is facilitating your access to our Services. This is an important distinction for EU/UK data protection laws and is explained in more detail below under "International Privacy Laws."

We collect Personal Data when you voluntarily provide such information to the Services, such as when you register for access to the Services, contact us with inquiries, or use certain parts of the Services. The Personal Data we may collect includes without

limitation your name, address, email address, phone number, and other information that enables you to be personally identified.

We also automatically collect certain technical data that is sent to us from the computer, mobile device and/or browser through which you access the Services (“Automatic Data”). Automatic Data, includes without limitation, a unique identifier associated with your access device and/or browser (including, for example, your Internet Protocol (IP) address) characteristics about your access device and/or browser, statistics on your activities on the Services, information about how you came to the Services and data collected through Cookies and other similar technologies. You can find out more information about how we use Cookies and other similar tracking technologies in the section of this Privacy Policy labeled “Cookies.”

In some cases, we may collect your credit card information (e.g., your credit card number and expiration date, billing address, etc.), some of which may constitute Personal Data, to secure certain payments. We may also collect or receive Personal Data from third party sources, such our customers, your bank, our payment processing partners and credit reporting agencies.

We collect your Personal Data in order to provide the Services and related support. In some instances, collection of your Personal Data is necessary for us to provide certain functionalities of the Services. In other instances, collection of your personal information helps us protect other users of the Services or helps us determine how best to improve our Services. We only collect and store your Personal Data for purposes related to the provision of the Services and related customer support.

Cookies

Like many other websites, our Site uses cookies. Cookies are small pieces of information sent to your computer and stored on your hard drive to allow a website to recognize you when you visit. They collect statistical data about your browsing actions and patterns. Using cookies helps us to improve our Site and deliver a better, more personalized service. We use traffic log cookies to identify which pages are being used. This helps us analyze data about webpage traffic and improve our Site in order to tailor it to customer needs.

Disabling cookies

Users can allow, block or delete the cookies installed on their computer at any time by means of changing the configuration settings of the browser installed on their computers:

[Chrome](#)
[Explorer](#)
[Firefox](#)
[Safari](#)

Disabling cookies neither prevents viewing the pages on this web site nor interferes with browsing. Sawtel can modify this cookies policy at any given time whenever so required by current legislation or whenever there is some change to the cookies used on this web site.

Revoking consent

The user may at any time revoke consent in relation to this Cookies Policy by deleting the cookies stored on the computer through the configuration and settings of your Internet browser, as listed above.

Changes to the Cookie Policy

This Cookies Policy may be amended at any time when requested by the applicable legislation or when there is a variation in the typology used on the website. We recommend you review this policy each time you visit our website in order to be properly informed about how and why we use cookies.

Contact Us

In case you have any doubt, comment or suggestion regarding this Cookies Policy you may contact us in this email: info@sawtel.com

How We Use Personal Data

We use the Personal Data we collect in a manner that is consistent with this Privacy Policy, as follows:

Specific Purpose. If you provide Personal Data for a certain purpose, we may use the Personal Data in connection with the purpose for which it was provided. For instance, if you contact us by e-mail, we will use the Personal Data you provide to answer your question or resolve your problem and will respond to the email address from which the contact came.

Access and Use. If you provide Personal Data in order to obtain access to or use of the Services or any functionality thereof, we will use your Personal Data to provide you with access to or use of the Services or functionality and to analyze your use of such Services or functionality.

Internal Business Purposes. We may use your Personal Data for internal business purposes, including without limitation, to help us improve the content and functionality of the Services, to better understand our users, to improve the Services, to protect against, identify or address wrongdoing, to manage your account and provide you with customer service, and to generally manage the Services and our business.

Marketing Communications. Where it is in accordance with your selected marketing preferences, we may use your Personal Data to contact you in the future for our marketing and advertising purposes, including without limitation, to inform you about services we believe might be of interest to you, to develop promotional or marketing materials and provide those materials to you, and to display content and advertising on or off the Services that we believe might be of interest to you. See “Opt Out from Electronic Communications” below on how to opt out of Marketing Communications.

How We Disclose, Transfer, and Store Personal Data

Sawtel takes your privacy seriously. We do not sell or rent your Personal Data to third parties, including third party advertisers. There are, however, certain circumstances in which we may disclose, transfer or share your Personal Data with certain third parties without further notice to you, as set forth below.

Consultants, Service Providers, and Partners. We may share your Personal Data with our consultants, service providers, and partners who collect or process Personal Data on our behalf to perform certain business-related functions. These companies include our marketing agencies, database service providers, backup and disaster recovery service providers, email service providers and others. When we engage another company to perform such functions, we may provide them with information, including Personal Data, in connection with their performance of such functions. These companies will be required to protect your personal information in accordance with this Privacy Policy.

Subsidiaries and Affiliates. We may share your Personal Data with our subsidiaries and/or affiliates for purposes consistent with this Privacy Policy. Our subsidiaries and affiliates will be bound to maintain that Personal Data in accordance with this Privacy Policy.

Certain Corporate Events. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets. You acknowledge and agree that any successor to or acquirer of Sawtel (or its assets) will continue to have the right to use your Personal Data and other information in accordance with the terms of this Privacy Policy.

Legal Requirements. We may be required to disclose your Personal Data pursuant to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws. We do not reveal information until we have a good faith belief that an information request by law enforcement or private litigants meets applicable legal standards. Additionally, we may share account or other information when we believe it is necessary to comply with applicable law, to protect our interests or property, to prevent fraud or other illegal activity perpetrated through the use of the Service or using our name, or to prevent imminent bodily harm. This may include sharing information with other companies, lawyers, local law enforcement agents and/or government agencies.

Data Storage. We may store Personal Data itself or such information may be stored by third parties to whom we have transferred it in accordance with this Privacy Policy. We take what we believe to be reasonable steps to protect the Personal Data collected via the Services from loss, misuse, unauthorized use, access, inadvertent disclosure, alteration and destruction. However, no network, server, database or Internet or e-mail transmission is ever fully secure or error free. Therefore, you should take special care in deciding what information you send to us electronically. Please keep this in mind when disclosing any Personal Data.

Access, Update, Correct or Delete Your Personal Data

The accuracy of your information is important to us. You can request access to some of your Personal Data being stored by us. You can also ask us to correct, update or delete any inaccurate Personal Data that we process about you. You can exercise these rights by contacting us directly by privacy@sawtel.com or at our mailing address set forth above. We will consider and respond to all requests in accordance with applicable law.

We may retain your Personal Data as long as you are registered to use the Services. You may close your account by contacting us. However, we may retain Personal Data for an additional period as is permitted or required under applicable laws. Even if we delete your Personal Data it may persist on backup or archival media for an additional period of time for legal, tax or regulatory reasons or for legitimate and lawful business purposes.

Security

Sawtel takes precautions typical in our industry, including administrative, technical, and physical measures, to safeguard your personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction.

To make sure your personal information is secure, we communicate these guidelines to our employees and strictly enforce privacy safeguards within the company. We ensure only authorized personnel have access to your data. Some Personal Data may be made available to authorized Sawtel employees for the purpose of troubleshooting support requests.

Your account information is located on a secured server behind a firewall. Sensitive Personal Data that may be stored in your account (such as your credit card number) is pseudonymized and encrypted. However, Personal Data submitted through the contact forms on our Site (such as your name and email address) is transmitted normally over the Internet and cannot be fully secured. By using the Site, you agree not to submit sensitive Personal Data such as credit card numbers and Social Security numbers through the Site's online contact forms.

Limiting Use of Your Personal Data and Opting-Out

You can browse the Services without providing any Personal Data (other than Automatic Data to the extent it is considered Personal Data under applicable laws) or with limiting the Personal Data you provide. If you choose not to provide any Personal Data or limit the Personal Data you provide, you may not be able to use certain functionality of the Services.

Electronic Marketing Communications. We will only send you electronic marketing communications if you choose to receive them. You can "opt out" of receiving these electronic communications by clicking on the "Unsubscribe" link at the bottom of any such electronic communication. In addition, you may also manage your email preferences at any time by clicking <http://info.sawtel.com/email-preferences>.

Transactional or Responsive Communications. Certain electronic communications from us are responsive to your requests. For instance, if you email our customer support department, we will return your email. Notwithstanding any unsubscribe election that you have made, you will still receive these transactional or responsive emails. You can stop receiving these types of emails only by contacting us. By electing to stop receiving all electronic communications from us or through our system you will no longer receive any updates from us. We do not recommend that you do this unless you plan to no

longer use the Services and will have no need to receive further communications from us or through our Services.

Retention. It may take up to forty-eight (48) hours for us to process an unsubscribe request. Even after you opt out of all electronic communications, we will retain your Personal Data in accordance with this Privacy Policy; however, we will no longer use it to contact you.

Do Not Track. We currently do not participate in any “Do Not Track” frameworks that would allow us to respond to signals or other mechanisms from you regarding the collection of your Personal Data.

Exclusions

This Privacy Policy does not apply to any Personal Data that you provide to another organization, regardless of whether such organization is a partner or customer of ours.

This Privacy Policy applies only to the Services. The Services may contain links to other websites not operated or controlled by us (the “Third Party Sites”). The policies and procedures we described here do not apply to the Third Party Sites. The links from the Services do not imply that we endorse or have reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

We do not knowingly collect Personal Data from children under the age of thirteen (13). If you are under the age of thirteen (13), do not submit any Personal Data through the Services. If you have reason to believe that a child under the age of 13 has provided Personal Data to us through the Services, please contact us and we will endeavor to delete that information from our databases.

International Privacy Laws

If you are visiting the Services from outside the United States, please be aware that you are sending information (including Personal Data) to the United States where our servers are located. That information may then be transferred within the United States or back out of the United States to other countries outside of your country of residence, depending on the type of information and how it is stored by us. These countries (including the United States) may not necessarily have data protection laws as comprehensive or protective as those in your country of residence; however, our collection, storage and use of your Personal Data will at all times continue to be governed by this Privacy Policy.

The EU General Data Protection Regulation (GDPR)

In May 2018, a new data privacy law known as the EU General Data Protection Regulation (or the “GDPR”) becomes effective. The GDPR requires us to provide users residing in the EU/UK with more information about the processing of their Personal Data. If you reside in the EU or UK, here is what you need to know:

Legal Grounds for Processing your Personal Data. The legal grounds for us processing your Personal Data for the purposes set out above will typically be because: (1) you provided your consent (such as in subscribing for email updates); (2) it is necessary for

our contractual relationship (such as when you use Sawtel Communicator); (3) the processing is necessary for us to comply with our legal or regulatory obligations; and/or (4) the processing is in our legitimate business interest (for example, to protect the security and integrity of our systems and to provide you with customer service, etc.).

Transfers of Personal Data. As Sawtel is an international company, we may need to transfer your Personal Data outside of the country from which it was originally provided. This may be intra-group or to third parties that we work with who may be located in jurisdictions outside the EU and the UK which have no data protection laws or laws that are less strict compared with those in Europe.

Whenever we transfer Personal Data outside of the EU or the UK, we take legally required steps to make sure that appropriate safeguards are in place to protect your Personal Data. Feel free to contact us at privacy@sawtel.com for more information about the safeguards we have put in place to protect your Personal Data and privacy rights in these circumstances.

Personal Data Retention. We retain your Personal Data for as long as necessary to provide you with our Services, or for other important purposes such as complying with legal obligations, resolving disputes, and enforcing our agreements. If you have an account with us, we will typically retain your Personal Data for a period of 90 days after you have requested that your account be closed or if it's been inactive for 7 years.

Your Rights. The GDPR provides you with rights in respect of Personal Data that we hold about you, including the right to request a copy of the Personal Data, request that we rectify, restrict or delete your Personal Data, object to profiling and unsubscribe from marketing communications. To unsubscribe from or change your marketing email communication preferences, please click <http://info.sawtel.com/email-preferences>. To change information collected about you by our website, please visit the "cookie settings" in your browser. For all other requests related to your personal data, please contact us at privacy@sawtel.com.

Please note that requests to exercise data protection rights will be assessed by us on a case-by-case basis. There may be circumstances where we are not legally required to comply with your request because of the laws in your jurisdiction or because of exemptions provided for in data protection legislation. If you have a complaint about how we handle your Personal Data, please contact us at privacy@sawtel.com to explain. If you are not happy with how we have attempted to resolve your complaint, you may contact the relevant data protection authority.

Data Controller and Data Processor. The GDPR makes a distinction between organizations that process Personal Data for their own purposes (known as "data controllers") and organizations that process personal data on behalf of other organizations (known as "data processors"). Sawtel may act as either a data controller or a data processor in respect of your Personal Data, depending on the circumstances. For example, if you submit Personal Data to us through our website then we are the "data controller" with respect to such Personal Data. However, if you use our Software through a third-party provider who sends your Personal Data to us for storage, then the third-party provider is the "data controller" with respect to such Personal Data.

Questions or complaints about how your Personal Data is handled should always be directed to the relevant data controller since they are the ones with primary responsibility for your Personal Data.

Notices and Revisions

Sawtel may update this Privacy Policy from time to time. When we change the policy in a material way a notice will be posted on our website along with the updated privacy policy. We encourage you to refer to this policy on an ongoing basis so that you understand our current privacy policy. Unless stated otherwise, our current privacy policy applies to all information that we have about you and your account.

Contact Us

If you have questions or concerns regarding this Privacy Policy you should contact our support staff at privacy@sawtel.com.