

Privacy Policy

Effective Date: February 1, 2017

At Spoke, we care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy.

By using or accessing our products, applications and other services provided to you by Spoke and its distribution partners through this website and other delivery methods (collectively “Services” or “Service”) in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

Your use of our Services is at all times subject to the Terms of Use, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

WHAT DOES THIS PRIVACY POLICY COVER?

This Privacy Policy covers our treatment of personally identifiable information (“Personal Information”) that we gather when you are accessing or using our Services, but not to the practices of companies we don’t own or control, or people that we don’t manage. We gather various types of Personal Information from our users, and we use this Personal Information to deliver our Services, including to personalize, provide, and improve our Services, to allow you to set up a user account and profile, to contact you and allow other users to contact you, to fulfill your requests for certain Services, and to analyze how you use the Services. In certain cases, we may also share some Personal Information with third parties, but only as described below.

We do not knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at support@spokephone.com.

WILL THIS PRIVACY POLICY EVER CHANGE?

Spoke is constantly trying to improve our Services, and as such, we may need to change this Privacy Policy from time to time. If we do need to change this Privacy Policy, we will alert you to any changes by placing a notice on the SpokePhone.com website, by sending you an email, and/or by some other means. Please note that if you’ve opted not to communications from us, those notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have

been posted, that means you agree to all of the changes. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used.

WHAT INFORMATION DO WE COLLECT?

Information You Provide to Us: We receive and store any information you knowingly provide to us. For example, through the registration process and/or through your account settings, we may collect Personal Information such as your name, email address, phone number, and third-party account credentials (for example, your log-in credentials for Google or other third party sites). If you provide your third-party account credentials to us or otherwise sign in to the Services through a third party site or service, you understand some content and/or information in those accounts (“Third Party Account Information”) may be transmitted into your account with us if you authorize such transmissions, and that Third Party Account Information transmitted to our Services is covered by this Privacy Policy. Certain information may be mandatory for you to provide in order to register with us and/or to take advantage of some of our features.

We may communicate with you if you’ve provided us the means to do so. For example, if you’ve given us your email address, we may send you promotional email offers on behalf of other businesses, or email you about your use of the Services. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make our communications with you more interesting and improve our Services. If you do not want to receive communications from us, please indicate your preference by unsubscribing through the link at the bottom of our emails.

Information Collected Automatically: Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device, which may include your IP address, device identification, “cookie” information, the type of browser and/or device you’re using to access our Services, and the page or feature you requested. “Cookies” are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features. Our advertising partners may also transmit cookies to your browser or device, when you click on ads that appear on the Services. Also, if you click on a link to a third party website or service, such third party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of cookies by any third parties, and we aren’t responsible for their privacy policies and practices.

We may use this data to customize content for you that we think you might like. We may also use it to improve the Services – for example, this data can tell us how often users use a particular feature of the Services, and we can use that knowledge to make the Services better, or remove Services that are not being used.

Information Collected From Other Websites and Do Not Track Policy: Through cookies we place on your browser or device, we may collect information about your online activity after you leave our Services. Just like any other usage information we collect, this information allows us to improve the Services and customize your online experience, and otherwise as described in this Privacy Policy. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and/or across different websites. Our Services do not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Services and after you leave our Services.

HOW DO WE USE YOUR INFORMATION?

We use your Personal Information to facilitate our ongoing and proposed business dealings with you, including to process transactions that you initiate with or through us, establish and maintain your account and to communicate updates, policy changes and other technical matters concerning these Services.

With your permission, we may use your Personal Information to market our Services, or those of our business partners, including sending announcements and other similar communications regarding the Services, sending trial or limited access opportunities to our Services, soliciting input from you regarding improvements we can make, and informing you of third-party offerings that we think you or your company may be interested in which relate to our Services;

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DO WE SHARE YOUR PERSONAL INFORMATION?

We neither rent nor sell your Personal Information in personally identifiable form to anyone. However, we may share your Personal Information with third parties as described in this section:

Information that's no longer personally identifiable. We may anonymize your Personal Information so that you are not individually identified, and provide that information to certain of our partners to help us understand our users' online behavior. We may also provide aggregate usage information to our partners, who may use such information to understand how often and in what ways people use our Services, so that we can provide you with an optimal online experience. However, we never disclose aggregate usage information to a partner in a manner that would identify you personally, as an individual. Additional information regarding our partners' privacy policies and the option to opt-out of sharing your usage information is available at <https://mixpanel.com/terms/>. If you choose to opt-out, please note that your actions, such as getting a new computer, installing a new browser, erasing or otherwise altering your browser's cookie file, may clear any opt-out cookies that you have enabled.

Advertisers: We allow advertisers and/or merchant partners ("Advertisers") to choose the demographic information of users who will see their advertisements and/or promotional offers and you agree that we may provide any of the information we have collected from you in non-personally identifiable form to an Advertiser, in order for that Advertiser to select the appropriate audience for those advertisements and/or offers. For example, we might use the fact you are located in San Francisco to show you ads or offers for San Francisco businesses, but we will not tell such businesses who you are. Or, we might allow Advertisers to display their ads to users with similar usage patterns to yours, but we will not disclose usage information to Advertisers except in aggregate form, and not in a manner that would identify you personally. Note that if an advertiser asks us to show an ad to a certain audience or audience segment and you respond to that ad, the advertiser may conclude that you fit the description of the audience they were trying to reach.

We may deliver a file to you through the Services (known as a "web beacon") from an ad network. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Because your web browser must request these advertisements and web beacons from the ad network's servers, these companies can view, edit, or set their own cookies, just as if you had requested a web page from their site. You may be able to opt-out of web beacon tracking conducted by third parties through our Services by adjusting the Do Not Track settings on your browser; please note that we don't control whether or how these third parties comply with Do Not Track requests.

Agents: We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide Services to you; for example, we may use a payment processing service like Stripe to receive and process your credit card transactions for us; we may use a customer engagement service like Intercom to send you tips and training on how to use our Services or we may use a customer support service like Zendesk to help answer your questions. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

User Profiles and Submissions: Certain user profile information, including your name, email, phone number, and any video or image that you upload to the Services, may be displayed to other users to facilitate user interaction within the Services or address your request for our Services. Your account privacy settings may allow you to limit the other users who can see the Personal Information in your user profile and/or what information in your user profile is visible to others.

Business Transfers: We may choose to buy or sell assets. In these types of transactions, customer information is typically one of the business assets that would be transferred. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party.

Other Access to your Personal Information: We reserve the right to access, read, preserve, and disclose any information that we believe is necessary to comply with the law, or in response to a court order or subpoena; enforce or apply our Terms of Use and other agreements; or protect the rights, property, or safety of Spoke, our employees, our users, or others.

IS MY PERSONAL INFORMATION SECURE?

Spoke has implemented stringent security measures to protect information. These include encrypting data while at rest in our databases, encrypting data in transit to and from employee phones, rotating encryption keys and certificates on a regular basis, and, enforcing two factor authentication for all Spoke engineers and support staff who require access to any data or system. In addition, your account is protected by either a password or a 2 factor authentication login for your privacy and security. If you access your account via a third party site or service, you may have additional or different sign-on protections via that third party site or service.

You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

WHAT PERSONAL INFORMATION CAN I ACCESS?

Through your account settings, you may access, and, in some cases, edit or delete the following information you've provided to us:

- name and password
- email address
- phone number(s)
- user profile information, which may include job title, department, office location, manager's name, images, videos and chats you may have uploaded to the site or created as you use the Services
- billing information
- Other information we may add from time to time

The information you can view, update, and delete may change as the Services change. If you have any questions about viewing or updating information we have on file about you, please contact us at support@spokephone.com.

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of Personal Information, which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to: support@spokephone.com.

WHAT CHOICES DO I HAVE?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

You may be able to add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your Spoke account by emailing support@spokephone.com. After deletion of such information from your account, some information may remain in our records for a period of time that is consistent with the purpose for the which the data was collected. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

Following the cancellation of your Services, we may retain information covered by this Policy for a period of eighteen months from the date of termination of your relationship with Spoke.

WHAT IF I HAVE QUESTIONS ABOUT THIS POLICY?

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to support@spokephone.com and we will try to resolve your concerns.