

Privacy Policy

1. INTRODUCTION

Sangoma Technologies Corporation and its subsidiaries including the FreePBX.org project (collectively, the "Sangoma Group") take your privacy very seriously and acts in accordance with the applicable data protection legislation. This Privacy Statement applies to the processing of your personal data by the Sangoma Group.

When you visit our websites (or subdomains), contact us, register with an account on any of our websites such as but not limited to freepbx.org or portal.sangoma.com (individually, a "Website" or collectively, the "Websites") or purchase products from us, we collect information from and about you. Some of the information we collect may be classified as personal data under data protection legislation, that is, "any information relating to an identified or identifiable natural person". It may be collected any time you submit it to us, whatever the reason may be.

This Privacy Statement describes which personal data is collected and for which purposes this personal data is processed by the Sangoma Group. It also states which rights you have under applicable data protection legislation.

PARTICULARLY IMPORTANT INFORMATION

WHO WE ARE: For the purpose of applicable data protection legislation, the data controller of your personal data is Sangoma Technologies Inc., the operating subsidiary of Sangoma Technologies Corporation, with its main address at 100 Renfrew Drive, Suite 100, Markham, Ontario, L3R 9R6.

MUST READ SECTIONS: We draw your attention in particular to the sections entitled "*International Data Transfers*" and "*Your Rights.*"

2. COLLECTING YOUR PERSONAL DATA

Information you give to us. This includes personal data collected:

Through our Website or online purchasing process when you register, login, commence or complete an online transaction to use our products and services, you have provided your consent, in order to:

- subscribe to any of our marketing communications;
- complete customer surveys;
- conduct business as it relates to but not limited to support and purchases;
- receive communications about product releases and updates;
- enter competitions; or
- provide feedback.

When we do business with you, which will usually include:

Full or partial contact details including names and addresses (including business details), telephone and email details based on the information you have provided to us with our account sign up and

management process. We collect payment card and/or bank information from you should you choose to use this form of payment for purchasing or guaranteeing use of our products and services.

Information Automatically Collected. This includes information and personal data collected:

Through our Websites, we automatically log information about you and your computer or mobile device upon access. The information about your use of our Websites comprises http header information which your browser transmits to our web server, information collected through the use of cookies and log information. For example, when visiting our Websites, we may log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Websites, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Websites. server, information collected through the use of cookies and log information. For example, when visiting our Websites, we may log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Websites, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Websites.

3. WHY DO WE PROCESS YOUR PERSONAL DATA?

Your personal data will be stored in centralized systems which are under the control of the Sangoma Group and accessible by authorized staff of the Sangoma Group or it's reseller/channel partners, as applicable.

We use the information we collect about you to process your purchase orders, answer your queries, provide services to you and enable you to manage your accounts with us. With your consent, we will contact you via our marketing and sales channels (email/ phone/ post) about other related products and services we, or our group business, provide which we think may be of interest to you. Our marketing communications are generally sent by email, but we may sometimes use other methods of delivery such as by mail or SMS.

We mainly collect, store and process personal data at two different stages: (i) before you decide to register an account on our Websites and (ii) when you have registered an account on our Websites.

i. Before you register an account on our Websites

When you visit our Websites, we collect information about your use of our Websites. This includes both information we collect directly from you, and information we collect about your behaviour. This information may constitute 'personal data' under applicable law. We use this information to provide you with (personal) offers, both on our Websites and via advertisements on other websites you visit.

Advertising

Generally. We may use other companies to serve third-party advertisements when you visit and use our Websites. These companies may collect and use click stream information, browser type, time and date, subject of advertisements clicked or scrolled over during your visits to our Websites and other websites in order to provide advertisements about goods and services likely to be of interest to you. These companies typically use tracking technologies to collect this information. Other companies' use of their tracking technologies is subject to their own privacy policies.

Targeted Advertising. We use Website information to provide you with (personal) offers, both on our Websites and via advertisements on other websites you visit. In order to serve offers and advertisements that may interest you, we may display targeted advertisements on our Websites, or other digital properties or applications in conjunction with our content based on information provided to us by our users and information provided to us by third parties that they have independently collected. We do not provide personal data to advertisers when you interact with an advertisement.

ii. After you have registered an account on our Websites

When you register on our Websites, you may be required to provide us with your name, email address, phone number, mailing address, credit card or other payment information as applicable. We use this personal data to process your purchase orders, for billing purposes, and to allow us to communicate with you about your purchase orders.

Overview of activities under stage (i) and (ii):

We may at each of the stages outlined above use your personal data but only when and to the extent the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have provided your consent.

4. SHARING YOUR DATA

We may share your personal data as follows:

Third Parties Designated by You. We may share your personal data with third parties where you have provided your consent to do so.

Our Third-Party Service Providers. We may share your personal data with our third-party service providers who provide services such as payment processing, information technology and related infrastructure provision, business support (operational and administrative), customer service, the processing and delivery of marketing communications to you, email delivery, auditing and other similar services. These third parties are only permitted to use your personal data to the extent necessary to enable them to provide their services to us. They are required to follow our express instructions and to comply with appropriate security measures to protect your personal data. Third parties are subject to confidentiality obligations and may only use your personal data to perform the necessary functions and not for other purposes.

Affiliates. We may share some or all of your personal data with our affiliates, in which case we will require our affiliates to comply with this Privacy Statement. In particular, you may let us share personal data with our affiliates where you wish to receive marketing communications from them.

Corporate Restructuring. We may share personal data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.

Other Disclosures. We may share personal data as we believe necessary or appropriate: (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (c) to enforce our Privacy Statement; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

We do not share your data with any third parties outside of the above processing arrangements and we do not share your data with any business external to our group for their own marketing purposes. From the data we collect, you should only ever receive marketing communications from our own brands.

5. INTERNATIONAL DATA TRANSFERS

It is necessary to transfer your personal data overseas as most of our centralized data processing is in the United States of America. Any transfers will be made in full compliance with all aspects of the applicable regulations.

When we transfer the data to a country outside of the EEA that does not offer an adequate level of data protection, we will ensure compliance with applicable law by way of EU Model Clauses, EU-US Privacy Shield-certification, or other legally accepted safeguards, as applicable.

6. YOUR RIGHTS

We provide the following rights to all individuals:

Right to revoke consent

If we process personal data on the basis of your consent, you have the legal right to revoke such consent at any time. We will then cease the relevant processing activity going forward (which may include discontinuation of services and/or processing future orders).

Right of access to your information

If you want to know what personal data we have collected or process about you, you may request us to provide a copy of your personal data by contacting us as defined in Section 10. We will ask you to identify yourself. We will not provide you with a copy of your personal data to the extent that the rights and freedoms of others are or may be adversely affected.

Right to rectification and erasure of data, and restriction of processing

If you believe that our processing of your personal data is incorrect, inaccurate, unlawful, excessive, incomplete, no longer relevant, or if you think that your data is stored longer than necessary, you may ask us to change or remove such personal data or restrict such processing activity, by contacting us as defined in Section 10.

Right to data portability

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format, in accordance with Article 20 of the General Data Protection Regulation, by contacting us as defined in Section 10.

Right to object

You have the legal right to object, on grounds relating to your particular personal situation, at any time to processing of your personal data. Furthermore, you have the right to object at any time to our processing of your personal data for direct marketing purposes or to profiling. You can do this by either updating your preferences for your account on our Websites.

For the sake of clarity: without prejudice to the foregoing we are at all times entitled to send you messages that do not constitute direct marketing, i.e. service messages as it relates to your business relationship with the Sangoma Group.

General information relevant for all requests and queries

Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under applicable mandatory data protection law.

We will use reasonable endeavours to respond to your request or query within one month. We are entitled to extend this term by another two months if the complexity of the situation so requires. If your request is manifestly unfounded or excessive we may either (i) charge you a fee, or (ii) refuse to process your request. With respect to access requests we may also charge you for extra copies. If we decide not to honour your request or answer your query, we will explain our reasons for doing so in our reply.

7. PROTECTION AND STORAGE OF YOUR DATA

We have used and will continue to use reasonable endeavours to protect your personal data against loss, alteration or any form of unlawful use. Where possible, your personal data will be encrypted and stored by means of state of the art protection measures. A strictly limited amount of people has access to your personal data.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. COOKIES

Our Websites use various cookies. We may track and record your use of our online services, either through cookies or via other means. Cookies enable us and others to monitor your browsing behaviour. Information generated by the use of cookies may constitute personal data. We may use the personal data collected in this manner for the purposes as stipulated in this Privacy Statement.

9. RETENTION OF INFORMATION

We will only retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Statement and your continued business relationship with Sangoma Group or to the extent permitted by law.

Should you choose to unsubscribe from our mailing list, please note that your personal data may still be retained on our database to the extent permitted by law.

10. GENERAL

We are committed to resolve any complaints about our collection or use of your personal data. In case you have any questions in relation to this Privacy Statement or our practices in relation to your personal data you may open a Customer Service request at <https://support.sangoma.com>. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority.

We have done our best to make sure that this Privacy Statement explains the way in which we process your personal data, and rights you have in relation thereto. We may change this Privacy Statement from time to time to make sure it is still up to date and we will notify you if we make any material updates. We may also notify you in other ways from time to time about the processing of your personal information.

For any other requests, you may contact the Sangoma Group by opening a Customer Service request at <https://support.sangoma.com>.