



## Tello Privacy Policy

At Tello, your privacy is important to us. We will not collect any of your Personal Information unless you consent or voluntarily provide it for our provision of Services.

This Privacy Policy recognizes the importance of protecting your personal information. It explains how Tello, LLC (“Tello” “**we**,” “**our**,” “**us**”) collects, uses, protects, and discloses personal information (“**Personal Information**”) when you use the Tello website (“**Site**”), services, brands, or other service offerings we provide (“**Services**”), including our mobile application (“**Mobile Application**”). This Privacy Policy also explains your options for managing your information preferences and exercising your privacy rights under applicable privacy laws. This Privacy Policy applies when we act as a data controller concerning the personal data of our website visitors and service users, in other words, when we determine the purposes and means of processing that personal data.

As discussed in detail in this Privacy Policy, we use cookies and other tracking technologies. We may also share data with service providers.

## Scope and Effective Date

This Privacy Policy applies to the Personal Information handled or otherwise processed by us in our business, including information we collect through our Site, Mobile Application, and Services. This Privacy Policy applies to you whether you use and access the Services for personal or business purposes. This Privacy Policy does not apply to third-party websites, services, or applications, even if accessible through our Services.

## Personal Information We Collect

### A. Information you provide to us.

Depending on how you use our Site, Mobile Application, and Services, we may collect the following types of information:

- **Account and contact information.** If you create an online account, request information about us, or use our Services, we may collect certain information that can be used to identify you, including your first and last name, telephone numbers, e-mail addresses, online identifiers, Internet Protocol addresses, or device identifiers (“**Contact Data**”). We also collect any other information you add to your account profile, including information you may provide voluntarily, such as your gender. The decision to provide certain Personal Information is optional. You can delete or modify the optional personal information provided at any time via the “**My Profile**” feature.
- **CPNI.** We collect information about the calls and texts you place and receive, including the type, location, destination, and amount of voice calling or text messaging you use.
- **Data about others.** We may collect information about the names, phone numbers, profile photos, and other information you provide about your contacts.
- **How you use our Sites and Mobile Application.** We may collect information about your browsing, searching, preferences, interests, and buying activities, such as your IP address, device numbers and identifiers, web addresses of the sites you come from and go to next, screen recordings, keystrokes, cursor movements, screen interactions, and clicks, browser and operating system information, platform type, connection speed, application performance (e.g., crash logs, battery life, loading time, latency, framerate or technical diagnostics), and other attributes.
- **Inferences.** We may use inferences from any collected information to create a profile about your preferences and characteristics.
- **Job applications.** We may post job openings and opportunities on our Services. If you reply to one of these postings by submitting your application,

resume, and/or cover letter, we will collect and use the personal information you provide.

- **Messages and Contact List.** We do not retain messages, and once a message is delivered to you, we delete it from our servers. Our Mobile App imports the telephone numbers from your provided Contacts List to calculate costs for calls and texts. When you use certain features, you consent to allow the app to store and collect contact information, including names and phone numbers (e.g., Speed Dial). Otherwise, we do not collect other information from your device's address book.
- **Calling Services.** We may collect audio records using your device's microphone when you use the Mobile App to read your audio message and transfer it to the other person you are talking to, but the Mobile App is not able to record such audio records.
- **Other Data.** We may collect other data that we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.
- **Security and Fraud Protection.** We collect information to authenticate your identity when you contact us or use our mobile applications.
- **Transactions and Payment Data.** We may collect information about your payment transactions, payment card information, payment history data, order numbers, and details about services you received. In-app purchase requires the Mobile Application to read the payment data necessary to process payment, but that is not collected or stored.
- **Surveys.** We may also contact you to participate in surveys. If you decide to participate, you may be asked to provide certain information, including Personal Information.

#### **B. Information collected automatically or from third parties.**

We may collect Personal Information automatically using specific techniques when you use our Services:

- **Location Data.** We use your IP address, or similar information. We may derive the general area you are in and the internet service provider you use from your IP address.

- **Automatic data collection.** We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Services, our communications, and other online services, such as:
  - **Device Data and Connection Information.** When you download and use our Services and visit our Sites, we may automatically collect data specific to your device and connection such as your hardware model, internet protocol (“IP”) address, user settings, MAC address, browser information including plug-ins, device type, operating system, time zone setting, unique identifiers (including advertising identifiers), Mobile App version, language settings, mobile device carrier, and mobile network information (e.g., Wi-Fi, LTE, 5G).
  - **Service Usage, Diagnostics, and System Log information.** We gather data regarding your interactions with our Services, encompassing service-related, diagnostic, and performance details. This includes insights into how you utilize our Services, your Service preferences, your interactions with other users (including businesses), as well as the timing, frequency, and duration of your activities and engagements. We also collect log files, diagnostic reports, crash reports, website logs, and performance reports.
  - **Online Activity Data.** When you access our Site or Mobile Application, we may automatically collect the type of web browser you use, your information service provider, the pages or screens you view, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you opened our emails and clicked links within them. We record information such as your registration date for using our Services, the specific features you utilize (such as messaging, calling, Status, groups, payments, or business features).
- **Tracking Technologies.** Some of the automatic collection described in the Personal Information we collect section above is facilitated by the following technologies, which we may place, or which may be placed by our service

providers and business partners:

- **Cookies.** Cookies are small text files placed in your device's browser that store preferences and facilitate and enhance your experience. Most websites you visit use cookies to improve your user experience by allowing the website to remember you, either for the duration of your visit (using a session cookie) or for repeat visits (using a persistent cookie). We use cookies and other technologies to help us analyze trends, tailor our Sites to our users, track users' movements on the site, for authentication, and to gather demographic information about our user base as a whole. offerings, and marketing. Some features of our Sites may not work as intended if you decline to allow cookies or deactivate cookies. We use multiple types of cookies: operationally necessary, performance-related, functionality-related, and advertising or target-related. You may have software on your computer that allows you to decline or deactivate Internet cookies, but if you do so, some site features may not function correctly for you. For instructions on removing existing cookies from your hard drive and/or blocking cookies from all websites, go to your Internet service provider, operating system, or browser's website for detailed instructions. Alternatively, you can visit [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information on how to do this on a wide variety of browsers. You will find general information about cookies and details on how to delete cookies from your machine.
  - **Operationally necessary.** This includes Technologies that allow you access to our Services, applications, and tools required to identify irregular site behavior, prevent fraudulent activity, engage in network management, improve security, or use our functionality. These cookies will always be on and cannot be switched off in our systems.
  - **Performance related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how our visitors use the Services (see "Analytics" below).

- **Functionality related.** We may use Technologies that allow us to offer you enhanced functionality when you access or use our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed.
- **Advertising or targeting related.** We may use first-party or third-party Technologies to deliver content on our Services or third-party sites, including ads relevant to your interests.
- **Pixel Tags or Web Beacons.** Pixel tags (also known as web beacons or clear GIFs) are pieces of code embedded in our Services that collect information about engagement on our Services. Using pixel tags allows us to record, for example, that a user has visited a particular web page, filled out a form, placed an order, or clicked on a specific product or service. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.
- **Mobile Application Software Development Kits (“SDKs”).** SDKs are third-party computer code that may be used for various purposes, including developing or providing us with analytics regarding the use of our mobile applications, and adding features or functionality to our app.
- **Local storage technologies.** Local storage technologies, like HTML5, provide cookie-equivalent functionality but can store larger amounts of data on your device outside your browser in connection with specific applications.
- **Analytics.** We may use website analytics and other third-party tools to provide you with the best possible experience with our platforms, Site, Mobile Application, and offerings. Some of our analytics partners include, but are not limited to:
  - Facebook Connect. Facebook Connect provides a single sign-on application that allows users to interact on our websites using their Facebook account. For more information, please visit Facebook’s Data Policy.

- Google Analytics. Google Analytics provides statistics and analytical tools to assist with search engine optimization and marketing purposes. You can opt out of Google’s collection and processing of data generated by your use of the Services.
- Google Firebase. Google Firebase is a cloud-based platform that provides analytics to improve and insights into app usage, user retention, and behavior. Mobile Application usage and performance, user retention, and user behavior. You can view the Google Privacy Policy here: [Google Privacy Policy](#).
- Quora. Quora provides a tracking and analytics service that allows businesses to identify logged-in users across partner sites, personalize content based on user interests and topics, track user interactions with Quora-integrated content, and maintain authentication for Quora widgets and integrations. For more information, please visit [Quora’s Privacy Policy](#).
- X (formerly known as Twitter). X provides a personalization and analytics service that allows businesses to customize content and ads, track user engagement and interactions, maintain authentication for embedded tweets and widgets, and track user behavior for X’s advertising platform. For more information, please visit [X’s Privacy Policy](#).
- Twilio’s SendGrid. SendGrid provides an email delivery and tracking service that allows businesses to monitor email opens and clicks, capture email subscriptions through web forms, track email campaign performance, and monitor conversion actions taken after email interactions. For more information, please visit [SendGrid’s Privacy Policy](#).
- **Social Media Platforms.** Our Services may include social media buttons (such as Facebook or LinkedIn that might include widgets such as the “share this” button or other interactive mini programs that may be on our site). These features may collect your IP address, which page you are visiting on our site, may set a cookie to enable the feature to function properly, and may allow the social media provider to link information collected on our Service with information they already possess about you. These social media features are

either hosted by a third party or hosted directly on our site. Your interactions with these features, apart from your visit to our Site, are governed by the privacy policy of the company providing them, and we encourage you to read their policies.

### **C. Information from other sources**

We may obtain Personal Information about you from other sources, including through third-party services and organizations, to supplement your information. For example:

- **Business development and strategic partnerships.** We may collect Personal Information from individuals, third-party services, and organizations to assess and pursue potential business opportunities.
- **Fraud and security.** We may collect information from other third-party providers for identity verification, security monitoring, and other services that help us protect our Services.
- **Service Providers.** We may collect information from marketing partners, third-party integrations, publishers, and others participating in our marketing programs.
- **Users of the Service.** We may collect information from users of the Services who share information with us when you text or chat with them or when you save your contact details to their mobile devices.
- **Third-party Social Networks.** If you create an account using your login credentials from one of your social network accounts ("SNS Accounts"), we may be able to access and collect your name, email address, and other personal information that your privacy settings on the SNS Account permit us to access. If you create an account through the Site or one of your SNS Accounts, we may also collect your gender, date of birth, and other personal information, as well as non-personal information relating to you.
- **Referral Services.** If you choose to use our referral service to refer a friend to our Site, we will ask you for your friend's name and email address. We will automatically send your friend a one-time email with an invitation to visit the Site. Tello stores this information for the sole purpose of sending this one-time email and tracking the success of our referral program. Please direct referrals

to the “Contact Us” section below if they would like us to request that we remove this information from our databases.

#### **D. Collection and Use of Sensitive Personal Information**

We have collected the following categories of sensitive Personal Information (as defined under specific US state privacy laws) from consumers within the last twelve months:

- Complete account credentials;
- Contents of mail, email, and text;
- Biometric information processed to identify an individual;
- Credit card numbers; and
- Precise location information.

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

We use your Personal Information for various business purposes, including providing our Services, administrative purposes, and marketing products and services that may interest you, whether from Tello or nonaffiliated third parties, as described below. When we process your Personal Information, we do so when (i) needed to perform our responsibilities in connection with our obligations to you, (ii) we have a legitimate interest in processing your personal information, (iii) we have a valid legal basis for doing so, and (iv) we have your consent to do so. We retain Personal Information about you for as long as necessary to provide you with the Services. Sometimes, we keep your Personal Information for an extended period of time if required to comply with our legal obligations or as permitted by applicable law. Afterward, we retain some information in a de-identified and/or aggregated form, but not in a way that would identify you personally. We may use automation, including artificial intelligence, to assist us with these uses.

#### **A. To Provide our Services**

We use your information to fulfill our contract with you and provide you with our Services, such as:

- Accessing the Services, including account registration and keeping you logged into our Mobile Application (although you can log out of the Mobile Application at any time);

- Managing your subscription and accounts;
- Designating specific cell sites;
- Answering requests for customer or technical support;
- Fulfilling orders;
- Communicating with you about your account, activities on our Services, and policy changes;
- Using the telephone numbers provided in your Contacts List to calculate the costs of calls and texts;
- Billing and processing your payment methods for the Services;
- Processing applications if you apply for a job we post on our Services; Providing, developing, customizing, and personalizing the Services (e.g., customer service, improving our Services, detecting spam, etc.); and
- Using the information for internal business purposes, such as data analysis, benchmarking, audits, research, analysis, studies, or surveys, and identifying usage trends.

## **B. Administrative Purposes**

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests, direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Researching and developing products, services, marketing, or security procedures to improve their performance, resilience, reliability, or efficiency;
- Improving, upgrading, or enhancing our Services;

- Monitoring internal sales and other metrics;
- Ensuring internal quality control and safety;
- Authenticating and verifying your identities, including requests to exercise your rights under this Privacy Policy;
- Auditing relating to interactions, transactions, and other compliance activities;
- Enforcing our Terms of Service and other policies; and
- Complying with our legal obligations, protecting your vital interests, or as may be required for the public good.

### **C. Marketing and Advertising Products and Services from Tello or Nonaffiliated Third Parties**

We work with third-party marketing and advertising companies (“Ad Networks”). These companies may collect and use information about your use of the Site, Mobile Application, or Services to provide targeted advertisements about goods and services that may interest you. Advertisements may be shown via the Site, the Services, the Mobile Application, or third-party websites. These ads may appear on our platforms or third-party websites. These companies use cookies, web beacons, and other technologies to track your browsing behavior. Our Privacy Policy does not cover any use of information that an Ad Network may collect from you. It also does not cover any information you may provide to an Ad Network or an advertiser whose goods or services are advertised through the Site or the Services. If you wish not to use this information to serve targeted ads, visit TrustArc, DoubleClick’s opt-out page, or the Network Advertising Initiative opt-out page. If you are in the European Union, you can visit Your Online Choices. Please note that this does not opt you out of being served advertising. You will continue to receive generic ads.

### **D. Other Purposes**

- **Consent.** We may use Personal Information for other purposes disclosed to you when you provide Personal Information or with your consent.
- **Using de-identified and aggregated information.** We might also share information collected from you from the Site with a third party if that information has been de-identified or aggregated in a way that does not directly identify you.

## **E. Disclosing Your Personal Information to Third Parties**

We may disclose your Personal Information to third parties for various business purposes, including to provide our Service, fulfill orders, deliver packages, process payments, handle chargeback requests, or for customer support. We may also disclose your Personal Information to protect us or others, or in the event of a significant business transaction such as a merger, sale, or asset transfer, as described below. We do not share your information with third parties who are not business partners (as discussed below) for their direct marketing purposes unless you consent. Tello may use certain services to prevent fraud.

We may also use and share with third parties, including advertisers, non-personal information you provide when using the Services, such as general demographic and location information that does not identify you personally. Advertisers may use this information to make predictions about your interests or preferences and display advertisements on our Services and other sites across the Internet tailored to your interests. The use and disclosure of such non-personal information are not subject to any restrictions under this Privacy Policy.

## **F. Disclosures to Provide Services**

The categories of third parties we may share your information with are described below.

- **Advertising Partners.** We may share information collected from you on the Tello Site or the Mobile Application with third-party service providers or consultants who need access to the data to perform their work on Tello's behalf, such as a website analytics company or our third-party advertising partners. These third-party service providers are limited to accessing or using this data only to provide services to us. They must provide reasonable assurances that they will appropriately safeguard the information.
- **Affiliates.** We may share Personal Information and Message Data with businesses controlled by or under common control.
- **Business Partners.** We may share your Personal Information with business partners to provide you with a product or service that may interest you. We may also share your personal information with business partners with whom we offer products or services jointly. These partners may also use our information to customize offers and services for you or their marketing purposes.
- **Service Providers and other partners.** We may share your Personal Information with our vendors, third-party service providers, and partners who

use that information to help us provide our Services. This includes service providers that provide us with hosting and maintenance, customer relationship management, data storage and management, fraud prevention, security, and compliance. We only provide our Service Providers with the information necessary for them to perform these services on our behalf. Each Service Provider and its subcontractors must agree to use reasonable security procedures, comply with the law, and adopt other practices appropriate to the nature of the information involved to protect your Personal Information, Message Data, and Contact Data from unauthorized access, use, or disclosure. Service Providers are prohibited from using Personal Information, Message Data, or Contact Data other than as specified by us.

- **Standard Analytics Information.** We may use and disclose certain aggregate or anonymous data regarding the Site and Services to third parties.

#### **G. Disclosures to Protect Others**

We may disclose your Personal Information to a third party if (i) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process, or government request (including to meet national security or law enforcement requirements), (ii) to obtain legal advice, (iii) to enforce our agreements and policies, (iv) to protect the security or integrity of the Tello Site, Mobile Application, or our services and products, (v) to protect ourselves, our other customers, or the public from harm or illegal activities, (vi) to respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing a death or serious bodily injury; or (vii) permitted by law. If Tello is required by law to disclose any of the Personal Information that directly identifies you, then we will use reasonable efforts to provide you with notice of that disclosure requirement unless we are prohibited from doing so by statute, subpoena, or court or administrative order. Further, we object to requests that we do not believe were issued properly.

#### **H. Disclosure in the event of merger, sale, or other asset transfers**

If we go through a corporate sale, merger, reorganization, receivership, dissolution, purchase or sale of assets, financing, or similar event, your Personal Information, Usage Data, and Message Data may be part of the assets sold, transferred, or shared in connection with due diligence for any such transaction as permitted by law and/or contract. Any acquirer or successor of Tello may continue to use the information we collect from you through our website as described in this policy.

#### **I. Information from Children**

We do not knowingly collect Personal Information from children under 16. If we become aware that we have inadvertently received Personal Information from a child under 16, we will delete such information from our records. In addition, we recommend that minors aged 16 years or older obtain parental permission before sending any information about themselves to anyone over the Internet. If you believe we have information from or about anyone under 16, please get in touch with us as described in the “**Contact Us**” section below.

## **J. Other Provisions**

### **1. International Data Transfers**

You acknowledge that all information we process may be transferred, processed, and stored anywhere in the world, including but not limited to the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws. If we transfer Personal Information to countries outside the European Economic Area, the United Kingdom, or Switzerland, we will put in place appropriate safeguards as required by applicable law to ensure that this transfer complies with the relevant laws and regulations and require our third-party service providers and partners to have proper safeguards as well. Further details can be provided upon request; please get in touch with us as outlined in “**Contact Us**” below.

### **2. Security of Your Information; Links to Other Websites**

We are very concerned about safeguarding the confidentiality of your information. We employ measures designed to protect your information from unauthorized access. However, no data transmission over the Internet or other networks can be guaranteed 100% secure. As a result, while we strive to protect information transmitted on or through the Site or Services, we cannot guarantee the security of any information you transmit on or through the Site or Services, and you do so at your own risk. We also cannot guarantee that unauthorized access, hacking, data loss, or a data breach will never occur. Our Site and Services may contain links to other websites or allow others to send you such links. A link to a third party’s website does not mean we endorse or are affiliated with it. We do not exercise control over third-party websites. You access such third-party websites or content at your own risk. You should always read the privacy policy of a third-party website before providing any information to the website. If you have any questions about the security of our Sites or Mobile Application, please get in touch with us as outlined in “Contact Us” below.

### **3. Your Sharing of Your Information**

Please be aware that whenever you share information on a publicly available profile page, community page, or any other public forum, the public may access it. In addition, when

you share information in SMS, WAP, instant messages, images, photos, or any other communications with third parties, that information may be passed along or made public by others. That means anyone accessing such information can use it for any purpose, including sending unsolicited communications.

#### **4. Global Privacy Control**

Tello participates in a service called the Global Privacy Control (“**GPC**”) that lets you set a “**Do Not Sell or Share**” preference at the browser level. You’ll need to have a GPC-enabled browser or browser extension that you’ll activate or turn on in the browser. When you visit a website, your browser automatically sends the site a “**Do Not Sell or Share**” signal, and participating websites like ours will honor your preferences. **Note:** Not all browsers and extensions offer a GPC setting. To download a GPC-enabled browser, go to the **Global Privacy Control website**. To check if our website received your GPC signal, click the “**Do Not Sell or Share My Personal Information**” link in our footer. If we receive your GPC signal, we’ll automatically opt you out of selling your Personal Information and tell you that a GPC signal was used. When detecting your active GPC signal, we won’t allow you to opt back into selling or sharing your Personal Information.

#### **5. Data Retention**

As explained in this Privacy Policy, we will store your Personal Information for as long as it is reasonably necessary for the purposes for which it was collected. In some circumstances, we may store your personal information for extended periods, for instance, where we are required to do so by legal, regulatory, tax, or accounting requirements. In specific circumstances, we may store your personal information for extended periods to record your dealings with us in case of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

#### **6. Your Privacy Rights and Choices**

##### **A. Your Privacy Rights**

To the extent required by applicable law, you may have the right to:

- **Access, know, or port information about you**, including (i) confirming whether we are processing your personal information; (ii) the specific pieces and categories of your personal information collected; (iii) the categories of sources from where your data is collected; (iv) the purpose for collecting your personal information; (v) the categories of third parties with whom we have shared your personal information; (vi) obtaining access to or a copy of your

personal information in a structured, commonly used, and machine-readable format; and (vii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine-readable format (the “**right of data portability**”).

- **Request correction of your personal information where it is inaccurate or incomplete.** In some cases, we may provide self-service tools that enable you to update your personal information or refer you to the controller who can correct your personal information.
- **Request deletion** of your personal information, subject to certain exceptions prescribed by law.
- **Request restriction** of or object to processing your personal information, including sensitive personal information.
- **Withdraw** your consent to our processing of your personal information.
- **Restrict** the use of sensitive personal information.
- **Access** information on Automated Decision-Making related to your personal information.

To exercise the rights listed above, please get in touch with us as described in the “Contact Us” section below. We may ask you for additional information to confirm your identity and for security purposes before taking any action regarding your information.

Please note that even if you request that we delete the information we’ve collected from you, we may still retain your information in an aggregated or anonymized form that does not identify you. We also will not delete your information if we are legally required to maintain it.

## **B. Your Privacy Choices**

The online advertising industry provides websites from which you may opt out of receiving targeted ads from data and other advertising partners participating in self-regulatory programs. You can access these and learn more about targeted advertising, consumer choice, and privacy by visiting the **Network Advertising**

**Initiative, the Digital Advertising Alliance, the European Digital Advertising Alliance, and the Digital Advertising Alliance of Canada.** To make separate choices for mobile apps on a mobile device, you can download DAA's AppChoices application from your device's app store. Alternatively, for some devices, you may use your device's platform controls in your settings to exercise your choice. Please see <https://www.networkadvertising.org/mobile-choice/> for more information on how to opt out on mobile devices. Please note that you must separately opt out in each browser and on each device.

## Supplemental Notice

This supplemental notice ("**Supplemental Notice**") for California, Colorado, Connecticut, Delaware, Iowa, Maryland, Montana, Nebraska, New Jersey, New Hampshire, Oregon, Tennessee, Texas, Utah, Virginia residents ("**Supplemental Notice States**") only applies to our processing of Personal Information that is subject to the California Consumer Privacy Act ("**CCPA**"), the California Privacy Rights Act ("**CPRA**"), the Colorado Privacy Act ("**CPA**"), the Connecticut Data Privacy Act ("**CDPA**"), the Delaware Personal Data Privacy Act ("**DPDPA**"), the Iowa Consumer Data Protection Act ("**ICDPA**"), the Maryland Online Data Privacy Act ("**MODPA**"), the Montana Consumer Data Privacy Act ("**MCDPA**"), the Nebraska Data Privacy Act ("**NDPA**"), the New Jersey Data Protection Act ("**NJDPA**"), New Hampshire Privacy Act ("**NHPA**"), the Oregon Consumer Privacy Act ("**OCPA**"), the Tennessee Information Protection Act ("**TIPA**"), the Texas Data Privacy and Security Act ("**TDPSA**"), the Utah Consumer Privacy Act ("**UTCPA**"), and the Virginia Consumer Data Protection Act ("**VCDPA**") (collectively the "State Privacy Law(s)") and applies solely to individuals ("**consumer**" or "**you**"), who are residents of the states of California, Colorado, Connecticut, Delaware, Iowa, Maryland, Montana, Nebraska, New Jersey, New Hampshire, Oregon, Tennessee, Texas, Utah, and Virginia in our role as a business.

### A. Information We Collect

In providing our Services, we may collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("**Personal Information**"). Personal Information does not include:

- Personal Information collected in the business-to-business context (defined as personal information reflecting a communication or transaction with a consumer, where that consumer is acting as an employee, owner, director, officer, or contractor of another business, non-profit or government entity, and where the communication or transaction occurs solely within the context of us

conducting due diligence regarding or providing or receiving a product or service to or from the other business). Deidentified or aggregated consumer information.

- Publicly available information from government records.
- Personal Information excluded from the Supplemental Notice States scope, like health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (“**HIPAA**”) or clinical trial data; Personal Information covered by specific sector-specific privacy laws, including the Fair Credit Reporting Act (“**FCRA**”), the Gramm-Leach-Bliley Act (“**GLBA**”) or California Financial Information Privacy Act (“**FIPA**”), and the Driver’s Privacy Protection Act of 1994.

This Supplemental Notice does not address our handling of Personal Information about consumers, which we undertake on behalf of our customers to provide those customers with our products and services. In those contexts, we act as a service provider.

We may have collected the following categories of Personal Information from our consumers in our role as a business within the last twelve (12) months:

- **Identifiers like your name, email, address, phone number, phone call records, account information, payment information, device information, data about others**
  - **Sources of Personal Information:** You provided it to us directly, from third-party sources, and through automatic collection
  - **How and Why We Use This Information:** We use it for service delivery, analytics, marketing and advertising, compliance, fraud protection, security, to enforce our policies, terms, and conditions, or other agreements, and for the creation of anonymous or de-identified data
  - **Categories of Third Parties to Whom We May Have Disclosed This Information and Why:**
    - Service providers
    - Payment processors

- Advertising partners
  - Business and marketing partners
  - Entities that provide fraud prevention services
  - Government Authorities
- **Categories of Third Parties to Whom We May Have Sold or Shared This Information:** Third-party analytics, marketing, and advertising providers
- **Internet activity information, like browsing history, interactions with our website, and online advertisements; unique identifiers, including device identifiers; cookies or similar tracking technologies**
  - **Sources of Personal Information:** Automatic collection
  - **How and Why We Use This Information:** We use it for service delivery, analytics, marketing and advertising, compliance, fraud protection, security, to enforce our policies, terms, and conditions, or other agreements, and for the creation of anonymous or de-identified data
  - **Categories of Third Parties to Whom We May Have Disclosed This Information and Why:**
    - Service providers
    - Payment processors
    - Advertising partners
    - Business and marketing partners
    - Entities that provide fraud prevention services
    - Government Authorities
  - **Categories of Third Parties to Whom We May Have Sold or Shared This Information:** Third-party analytics, marketing, and advertising

providers

- **Commercial information like transaction data, marketing data, payment information, and online activity data**

- **Sources of Personal Information:** You provided it to us directly, from third-party sources, and through automatic collection
- **How and Why We Use This Information:** We use it for service delivery, analytics, marketing and advertising, compliance, fraud protection, security, to enforce our policies, terms, and conditions, or other agreements, and for the creation of anonymous or de-identified data
- **Categories of Third Parties to Whom We May Have Disclosed This Information and Why:**
  - Service providers
  - Payment processors
  - Advertising partners
  - Business and marketing partners
  - Entities that provide fraud prevention services
  - Government Authorities
- **Categories of Third Parties to Whom We May Have Sold or Shared This Information:** Third-party analytics, marketing, and advertising providers

- **Geolocation data**

- **Sources of Personal Information:** Automatic collection
- **How and Why We Use This Information:** We use it for service delivery, analytics, marketing and advertising, compliance, fraud protection, security, to enforce our policies, terms, and conditions, or

other agreements, and for the creation of anonymous or de-identified data

- **Categories of Third Parties to Whom We May Have Disclosed This Information and Why:**

- Service providers
- Payment processors
- Advertising partners
- Business and marketing partners
- Entities that provide fraud prevention services
- Government Authorities

- **Categories of Third Parties to Whom We May Have Sold or Shared This Information:** Third-party analytics, marketing, and advertising providers

- **Sensitive Personal Information, such as login credentials**

- **Sources of Personal Information:** You provided it to us directly, third-party sources, your contacts, or other individuals you may be communicating with using the Service

- **How and Why We Use This Information:** We use it for service delivery, compliance, and protection

- **Categories of Third Parties to Whom We May Have Disclosed This Information and Why:**

- Service providers
- Government Authorities

- **Categories of Third Parties to Whom We May Have Sold or Shared This Information:** No

- **Inferences drawn from account data, marketing data, device data, online activity data, CPNI, and Message Data**
  - **Sources of Personal Information:** N/A
  - **How and Why We Use This Information:** We use it for service delivery, analytics, marketing and advertising, compliance, fraud protection, security, to enforce our policies, terms, and conditions, or other agreements, and for the creation of anonymous or de-identified data
  - **Categories of Third Parties to Whom We May Have Disclosed This Information and Why:**
    - Service providers
    - Payment processors
    - Advertising partners
    - Business and marketing partners
    - Entities that provide fraud prevention services
    - Government Authorities
  - **Categories of Third Parties to Whom We May Have Sold or Shared This Information:** Third-party analytics, marketing, and advertising providers
- **Communications like audio and video recordings and images.**
  - **Sources of Personal Information:** You provided it to us directly; it came from users of the Service, your contacts, or other individuals you may be communicating with while using our Services
  - **How and Why We Use This Information:** We use it for service delivery, compliance, and protection
  - **Categories of Third Parties to Whom We May Have Disclosed This Information and Why:**

- Service providers
  - Payment processors
  - Advertising partners
  - Business and marketing partners
  - Entities that provide fraud prevention services
  - Government Authorities
- **Categories of Third Parties to Whom We May Have Sold or Shared This Information:** No
- **Protected Classification Characteristics — We do not require you to provide this information, but you may offer it as part of your account profile or reveal it in a message or other user-generated content or other information we collect.**
  - **Sources of Personal Information:** N/A
  - **How and Why We Use This Information:** N/A
  - **Categories of Third Parties to Whom We May Have Disclosed This Information and Why:** N/A
  - **Categories of Third Parties to Whom We May Have Sold or Shared This Information:** No

The categories of sources from which we collect Personal Information and our business and commercial purposes for using Personal Information are outlined in “**Personal Information We Collect**” and “**How We Use Your Personal Information**” above, respectively.

## **B. Your Rights and Choices**

The State Privacy Laws provide state residents with specific rights regarding their Personal Information. If you are a resident of one of the states with State Privacy Laws, you can opt out of automated profiling that produces legal or similarly significant effects. Only you, or

someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request for your minor child. To designate an authorized agent, please contact us as outlined in “**Contact Us**” below and provide written authorization signed by you and your designated agent. To protect your privacy, we will take the following steps to verify your identity before fulfilling your request. When you make a request, we will ask you to provide sufficient information to confirm that you are the person from whom we collected personal information or an authorized representative. This may include asking you to answer questions regarding your account and use of our Services.

### **C. Exercising Your Rights**

If you want to exercise your rights, you can contact us as outlined in the “**Contact Us**” section below; we will respond to verifiable requests received as required by law. We may also ask you for additional information to verify or process your request. We may also check with third-party identity verification services to verify your identity before taking any action regarding your personal information. We will respond substantively to your verifiable requests within the periods required by law, which is most likely within 45 days unless additional time (up to 45 extra days) is needed, in which case we will let you know.

Certain states permit businesses to charge a fee to a consumer if the consumer’s requests are excessive; we may charge a fee for excessive requests.

### **D. Verifiable Requests for Copy, Deletion, and Right to Know**

Subject to certain exceptions, California consumers can make the following requests twice every twelve (12) months. If we determine that the consumer’s request is excessive, we may charge a fee or notify the consumer of the reason for the denial of the request.

### **E. Sales of Personal Information and Targeted Advertising**

While we do not sell Personal Information for monetary consideration, we work with nonaffiliated third parties for marketing purposes that help deliver targeted advertising to you. Our use of these services may be considered a “sale” or “sharing” of your Personal Information under certain State Privacy Laws. You may opt out of such selling by completing the “**Do Not Sell My Personal Info**” link on our webpage or contacting us through one of the methods described in the “**Contact Us**” section below. We do not collect or have actual knowledge of any “sale” of Personal Information of minors under 16 years of age.

### **F. Incentives and Discrimination**

We will not discriminate against you for exercising your State Privacy Law rights. We may offer specific financial incentives permitted by State Privacy Laws with different prices, rates, or

quality levels. Any permitted financial incentive we provide in the Supplemental Notice States will reasonably relate to your Personal Information's value and contain written terms describing the program's material aspects. Participation in an economic incentive program requires prior opt-in consent, which you may revoke at any time.

#### **G. How to Resolve Disputes Relating to Our Privacy Practices**

If you have a dispute about our privacy practices, please contact us as described in the "Contact Us" section below. If we decline to act in response to any of your privacy requests, you have the right to appeal that decision within a reasonable amount of time, but no later than 90 days from the date of our decision. To submit an appeal request, you can exercise this right by contacting us as described in the "Contact Us" section below. If you believe your rights have been violated and cannot resolve the issue directly with us, you may file a complaint with your state attorney general's office.

#### **H. California's "Shine the Light" Law**

Civil Code Section § 1798.83 permits users of our Sites and Services who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please contact us as outlined in "**Contact Us**" below.

### **Supplemental Notice For Nevada Residents**

If you are a resident of Nevada, you have the right to opt out of the sale of certain Personal Information to third parties. You can exercise this right by contacting us as outlined in "Contact Us" below with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please get in touch with us as outlined in "Contact Us" below.

### **Contact Us**

If you have questions about this policy or our privacy practices, you may request more information by contacting us by email at [privacy@tello.com](mailto:privacy@tello.com) or by mail to:

Tello, 107 Technology PKWY STE 401

Peachtree Corners

GA 30092-2909