

## 7G Network Privacy Policy

**Last updated: 12/1/2024**

This is the Privacy Policy of 7G Network, Inc. ("7G") and its subsidiaries. As a business, we are committed to respecting and protecting the privacy of all individuals with whom we interact.

This Privacy Policy is divided into several sections for easier navigation. In addition to this Privacy Policy, we will also sometimes provide you with additional just-in-time privacy information where appropriate.

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### 1. **DEFINITIONS**

We use the following definitions in this notice:

The term "**7G**" or "**us**" or "**we**" or "**our**" refers to the company **7G Network, Inc,** as well as to its subsidiaries.

The term "**you**" refers to a natural person (an individual) whose Personal Information 7G Network collects and processes.

The term “**Services**” means VoIP Telecommunications and SMS/MMS messaging services (texting) focused on customized, scalable, and high-quality business communications, SIP Trunking, VoIP Inbound DID/Toll-Free and SMS/MMS messaging. The term “**Personal Information**” means any information that identifies, relates to, describes, or can be reasonably linked to a person, a household, or a person’s device. The term includes similar terms, such as “Personal Data”, “Personally Identifiable Information” and “Customer Proprietary Network Information”, as defined under Data Protection Laws.

The term “**Controller**” or “**Business**” means the organization that determines the purposes and means of data processing and is responsible for processing such data in a manner consistent with the applicable privacy law.

The term “**Processor**” or “**Service Provider**” means an organization who processes personal information on behalf of the controller.

The term “**Applicable Privacy Law**” means all applicable privacy, anti-spam, data security, and data protection laws, rules, regulations, jurisprudence, orders, ordinances, and regulatory guidance, including, where applicable, the GDPR (General Data Protection Regulation (EU) 2016/679), the UK GDPR, the California Consumer Privacy Act as amended by the California Privacy Rights Act (“CCPA”); the Virginia Consumer Data Protection Act (“VCDPA”); the Colorado Privacy Act (“CPA”); the Utah Consumer Privacy Act (“UCPA”); the Connecticut Act Concerning Personal information Privacy and Online Monitoring (“CTDPA”); the Telephone Consumer Protection Act (“TCPA”); the Controlling the Assault of Non-Solicited Pornography And Marketing Act (“CAN-SPAM”); the Electronic Communications Privacy Act; Massachusetts Gen. Law Ch. 93H, and any laws and regulations implementing the foregoing, as amended or superseded from time to time.

The term Subsidiaries means companies that are owned or controlled by 7G Network, Inc.

## 2. ABOUT 7G NETWORK SERVICES

7G Network is a VoIP Telecommunications provider focused on customized, scalable, and high-quality business communications, SIP Trunking, VoIP DID/Toll-Free and SMS/MMS messaging services (texting).

With respect to 7G Network' provision of telecommunications-related Services for our customers, 7G Network is regulated by the Federal Communications Commission and the relevant local regulators, such as State PUCs (Public Utility Commissions). In providing these telecommunications-related Services for our customers, which may include transmitting and routing voice calls and messages transmitted by third parties, 7G Network protects the privacy and confidentiality of all customers proprietary network information ("CPNI"), as required by federal law.

### WHO IS RESPONSIBLE FOR YOUR PERSONAL INFORMATION?

Type of Personal Information	Examples	Who we share it with
Identifiers	Your name, email, IP address, or account name	Advertisers, communication providers, data analysts, social networks, business customers, and others
Personal Records	Your signature, contact information, bank account number, or resume	Service providers, telecommunication providers, and others
Protected classification	Your gender, age, citizenship, marital status, or disability status	Service providers, telecommunication providers, and others
Internet activity	Your browsing history, search	Advertisers, data analysts, service providers,

	history, or interaction with websites, apps, or ads	social networks, and others
Geolocation data	Your location based on your IP address or device	Advertisers, data analysts, service providers, and others
Professional or employment-related information	Your current or past job history or performance	Service providers and others
Inferences	Your preferences, characteristics, behavior, or attitudes based on your Personal Information	Advertisers, data analysts, service providers, social networks, and others
Sensitive Personal Information	Your social security number, driver's license number, passport number, account log-in, credit card number, or the contents of your mail, email, and text messages	We only collect this information in limited situations, and we do not share it with anyone unless you allow us to or the law requires us to. You are responsible for the content of your communication, and you must make sure it is safe and legal before you send it to us or use our Services.

The main entity responsible for processing Personal Information as described in this Privacy Policy – the Controller or Business – is 7G Network, Inc., 4906 Via Cupertino, Camarillo, CA 93012.

If you have any questions regarding this Privacy Policy or our privacy practices, you may contact us via the email address [regulatory@7gnetwork.net](mailto:regulatory@7gnetwork.net).

#### 4. HOW DO WE OBTAIN YOUR PERSONAL INFORMATION?

Most of the Personal Information we process is provided to us directly by you when you for example use our Services, when you visit our website, register for an event, participate in our research initiatives, submit an application form, or otherwise communicate with us. In general, we may collect the following categories of Personal Information:

**5. HOW 7G NETWORK USE THE PERSONAL INFORMATION COLLECTED**

We use your Personal Information to:

Processing Purpose(s)	Examples(s) of Processing Purpose	Categories of Personal Information
Performing Services	<p><b>Provide Services:</b> to provide you with our Services and enable the delivery of communication.</p> <p><b>Process orders:</b> to process or fulfill an order or transaction.</p> <p><b>Billing:</b> to invoice our customers for the Services provided</p> <p><b>Contact You:</b> to contact you about your use of our Services and, at our discretion, changes to our Services or our Service’s policies.</p> <p><b>Customer support:</b> to respond to any questions, comments, or requests you have for us.</p> <p><b>Payment and other purchase-related purposes:</b> to facilitate a purchase made using our Services, including payment.</p>	<p>Identifiers, Personal Records, Commercial Information, Geolocation Data, Professional or Professional or employment-related information, Inferences, Sensitive Personal Information</p>
Security	<p><b>Security/fraud prevention:</b> to protect the security of 7G Network, our Services, or its</p>	<p>Identifiers, Personal Records, Commercial Information,</p>

	users and to prevent and address fraud	Geolocation Data, Sensitive Personal Information
Debugging	<b>Repairs:</b> scan, identify and repair errors that impair the existing intended functionality of our Services.	Identifiers, Personal Records, Commercial Information, Geolocation Data, Sensory Data
Providing Advertising & Marketing Services	<b>Content and offers customization:</b> to customize your experience on our websites, apps, or other Services or to serve you specific content and offers that are relevant to/customized for you (e.g., pricing and discounts based on your profile)	Identifiers, Personal Records, Commercial Information, Geolocation Data, Sensitive Personal Information

## 6. HOW AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may engage suppliers (also known as vendors or service providers) to assist us in processing your Personal Information, including Subsidiaries. As a global company, we may share your personal data to facilitate internal procedures across our offices, conduct specific processing activities on a global scale, or support you in using our products and Services. Notwithstanding the previous, as a rule, we do not share Personal Information with third parties except when strictly necessary and on a need-to-know basis, such as with:

Telecom operators and other communications service providers when necessary for the set-up of proper routing and connectivity.

Service and technology providers to the extent strictly necessary for them to perform specific actions on our behalf. These might be related both to our Services (e.g., as part of the functionality of our Services) and to our other processes (e.g. utilizing a software provider to manage our job application process).

Third parties when required to comply with our legal obligations. We may share your Personal Information with authorized legal authorities due to relevant legislation, such as a judicial proceeding, court order, or legal process served on us (e.g. for criminal procedures) or because of emergency cases (911 calls) or threats to public security, regulatory requirement, or in the context of investigations or bankruptcy. As a communications provider, we are required to retain certain communications-related data for law enforcement purposes and will be required to share that data with authorized law enforcement authorities upon their request. Also, if we are obligated to demonstrate compliance with relevant accounting, financial and tax legislation, your data can be shared with auditors and tax authorities for those purposes.

Advertising partners that we might use as part of our marketing activities.

Merger and acquisition stakeholders as part of disclosure in the event of a merger, sale, or other asset transfer. Your information may be transferred as part of such a transaction, as permitted by law or contract.

## **6.1. DISCLOSURE TO PROTECT US OR OTHERS**

In addition to what is disclosed in the table in section 4, we may access, preserve, and disclose each of the categories listed in the table above to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal processes, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

For purposes of the applicable privacy law, 7G Network does not "sell" or "share" Personal Information or sensitive personal information, including that of minors under 16 years of age.

## **6.2. SENSITIVE PERSONAL INFORMATION**

Notwithstanding the purposes described above, we do not use or disclose sensitive Personal Information beyond the purposes authorized by the Applicable Privacy Law. Accordingly, we only use and disclose sensitive Personal Information as reasonably necessary (i) to perform our Services requested by you, (ii) to help ensure security and integrity, including to prevent, detect, and investigate security incidents, (iii) to detect, prevent and respond to malicious,

fraudulent, deceptive, or illegal conduct, (iv) to verify or maintain the quality and safety of our Services, (v) for compliance with our legal obligations, (vi) to our Service providers who perform Services on our behalf.

## 7. HOW DO WE SECURE YOUR PERSONAL INFORMATION?

7G Network care about your information privacy. We know that sending information online is not always safe, but we do our best to protect your information from anyone who should not see it. We follow the Applicable Privacy laws that tell us how to do that. 7G Network stores your information on our or our Service providers' very secure servers. We only use your information according to our security rules or the ones we agree with our service providers. We also need your help to keep your information safe. Sometimes, we give you or you choose a password to use some parts of our websites or online services. You have to keep this password to yourself and follow any other security steps we tell you. Please do not share your password with anyone.

## 8. WHAT ARE YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION?

Depending on the Applicable Privacy Law, you may have certain rights concerning your Personal Information.

We are a company that collects and uses some Personal Information about you when you use our Services. We follow the Applicable Privacy Laws of the states where you live. Some states have different privacy rights than others. We will try to respect your privacy rights, but we may not be able to do everything you ask.

If you want to use your privacy rights, you can fill out and send us your request via [regulatory@7gnetwork.net](mailto:regulatory@7gnetwork.net), and we will answer it. Please do not use other ways to contact us (like fax, chat, social media, etc.). We will not accept or answer your requests that way These are the privacy rights you can use:

### **Right to Limit Sensitive PI Processing**

Some of your Personal Information is more sensitive than others. We call it Sensitive Personal Information. It is the kind of Personal Information that the Applicable Privacy Laws protect more. If you choose to give us your Sensitive Personal Information, you agree that we can use it. But you can also tell us to limit how we use your Sensitive Applicable Privacy Laws. If you do that, we will tell you what we can and cannot do according to the Applicable Privacy Laws.

### **Right to Know/Access**

If you live in California, Virginia, or Colorado, you can ask us to show you your Personal Information twice a year. If you live in Connecticut or Utah, you can ask us once a year and pay a fee if you ask for more. If you live in other states, we will limit your requests the same way as Connecticut and Utah.

### **Categories (only for California Residents)**

If you live in California, you can ask us for any of the following things for the last year:

- The types of PI we have collected about you.

- The sources where we got your PI from.

- The reasons why we collected your PI.

- The third parties whom we shared your PI with.

- A list of the types of PI we shared for a business reason and who we shared it with, or that we did not share anything.

- A list of the types of PI we sold about you, who we sold it to, or that we did not sell anything.

Specific pieces of PI, you can ask us to confirm if we are using your Personal Information and, if we are, to give you a copy of your Personal Information that we have and can move. We may limit how many times you can ask for this. For your specific pieces of Personal Information, we will check your identity more carefully, as the Applicable Privacy Laws require.

### **Do Not Sell / Share / Target**

The Applicable Privacy Laws have different ways of defining what it means to sell your Personal Information. They also have different ways of letting you opt out of selling your Personal Information. California also enables you to opt out of sharing your Personal Information for online ads that follow you across different websites or apps. Other states let you opt out of targeted ads that use your Personal Information to track, profile, and show you ads. We may share your Personal Information and/or use your Personal Information for

targeted ads, depending on the state laws. But we also give you a way to opt out of all of these things, no matter where you live.

For California residents, the term “Consumer” is not limited to data subjects acting as individuals regarding household goods and services and includes data subjects in a business-to-business context. This is not the case in the other states.

**Non-Applicability, Human Resources:** This Notice does not apply to our job applicants, current employees, former employees, or independent contractors; however, our California Personnel may obtain a separate privacy policy that applies to them by contacting our human resources department.

### **8.1.1 SUBMITTING REQUESTS.**

California, Colorado, Connecticut, Nevada or Virginia residents or residents of other states, if prescribed by privacy law applicable to them, may exercise their privacy rights as set forth by submitting a request, by emailing us at [regulator@7G Networknetwork.com](mailto:regulator@7GNetwork.com)

### **8.1.2 AUTHORIZED AGENT**

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 on behalf of your minor child. Authorized agents may initiate a request on behalf of another individual by emailing us at [regulatory@7gnetwork.net](mailto:regulatory@7gnetwork.net). Authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

### **8.1.3 VERIFICATION**

To protect your privacy, we will take the following steps to verify your identity before fulfilling your request by matching the information you provided with the information we have in our records. Your request must:

Provide sufficient information that allows us to reasonably verify whether you are the individual about whom we collected Personal Information or an authorized representative.

Describe your request with sufficient details that allow us to properly understand, evaluate, and respond to it.

If we are unable to adequately verify a request, we will notify the requestor.

We will process such requests in accordance with applicable laws.

We will not discriminate or retaliate against you in a manner prohibited by Applicable Privacy Laws for your exercise of your privacy rights. We may charge a different price or rate or offer a different level or quality of good or service, to the extent that doing so is reasonably related to the value of the applicable data.

## **9. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**

We will retain your Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required by law, for legal, tax or regulatory reasons, or other lawful, legitimate purposes. We will also delete your Personal Information upon a verifiable request to delete the Personal Information unless we have a legitimate purpose (e.g., a legal obligation) for the retention.

We also keep a record of any request you make asking us not to send you direct marketing solicitations or not to process your Personal Information for marketing purposes.

## **10. INFORMATION FROM CHILDREN**

Children under 16 cannot use our products and services as our customers. If we learn or are notified that this is the case, we will immediately take reasonable steps to delete that information from our records as quickly as possible. If you think a child under 16 is using our products or services as a customer, please contact us at [regulatory@7gnetwork.net](mailto:regulatory@7gnetwork.net).

## **11. 7G NETWORK USES CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) IN ACCORDANCE WITH THE LAW**

7G Network is a company that provides phone and internet services. We follow the rules of the Federal Communications Commission (FCC) to protect your privacy.

One of the things we protect is your CPNI. CPNI stands for customer proprietary network information. We have this information solely because of your relationship with us. It either relates to data—such as the type, destination, and amount of voice-calling you use—or it may be certain information contained in your bills. Your CPNI doesn't include your name, address, phone number, or the content of your phone calls. Phone call content has stricter protections under wiretapping laws.

We do not share your CPNI with anyone without your permission unless the law allows us to. Sometimes, we may use your CPNI to improve our Services, offer you new Services, fix any problems, prevent fraud, or help you when you call us.

We may also share your CPNI with other companies that work with us to provide you with the Services you want, collect your payments, or follow the law. For example, we may share your CPNI with credit bureaus, collection agencies, directory publishers, or law enforcement agencies.

If you do not want to receive communications from us in the future or do not want us to share your personal information with these companies, please let us know by sending us an e-mail at the address below, and we will note your information accordingly.

We take your CPNI security seriously. If someone tries to access your CPNI without your permission, we will let you know as soon as possible. We will also report it to the authorities within seven (7) days after reasonable determination of the breach unless they tell us not to.

## **12. HOW OFTEN DO WE UPDATE THIS PRIVACY POLICY?**

The most current version of this Privacy Policy will govern our practices for collecting, processing and disclosing Personal Information. We will provide notice of any modifications on this page. You can always check the date of the last update at the beginning of this Privacy Policy.