

PRIVACY POLICY

Protel Technologies Inc.

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1. INTRODUCTION

In this Privacy Policy, “Protel”, “Company”, “we”, “us”, or “our” refers to Protel Technologies Inc., 2531 Cornwall Drive, Penticton, BC, V2A 6R9. Protel’s licensors, vendors, and service providers may act in Protel’s place with respect to any portion of this Privacy Policy.

2. PURPOSE OF THIS PRIVACY POLICY

Protel created this Privacy Policy (“Policy”) to demonstrate our commitment to the privacy of our customers, resellers, advisors, affiliates, and visitors to our websites, chat boxes, live chats, chatbots, and mobile applications. This Policy applies to Personal Data collected by Protel in connection with providing our Services, primarily to businesses located in British Columbia and Alberta.

3. HOW PROTEL DEFINES PERSONAL DATA

“Personal Data” means any information about an identified or identifiable individual, in accordance with the meaning of the Personal Information Protection and Electronic Documents Act (PIPEDA), British Columbia’s Personal Information Protection Act (PIPA), or any other applicable Canadian data protection law. Personal Data is collected by Protel when:

- You access or use Protel’s websites or Services;
- A prospective customer or reseller submits information to receive information about our Services;
- A new customer creates a Protel account or purchases Services; or

- A current customer contacts our customer service or technical support team.

By visiting our websites, creating a Protel account, purchasing Services, or using our platform, you accept the practices set out in this Privacy Policy.

4. SCOPE OF THIS PRIVACY POLICY

This Privacy Policy covers Personal Data collected by Protel. Our websites may contain links to third-party websites. Protel does not accept responsibility or liability for the privacy policies of third-party websites. Please check applicable third-party privacy policies before submitting any data to those sites.

5. GUIDELINES REGARDING CHILDREN

Protel requires all account holders to be 18 years of age or older. Our websites and Services are not designed for or directed to children under the age of 18, and Protel does not knowingly collect or maintain Personal Data about any person under 18. If you believe Protel has collected Personal Data from a person under 18, please contact us at sales@proteltech.ca.

6. USE OF COMPANY FORUMS

Protel may make chat rooms, forums, message boards, and similar media available. Any information disclosed in these areas may become public. Please exercise caution when deciding to disclose Personal Data in any of these areas.

7. WHAT INFORMATION PROTEL COLLECTS

Protel may collect the following categories of information, which may include Personal Data:

Type of Information	Examples	How Protel May Use It
Contact and Account Information	Email address, name, username, telephone number, business address, IP address, account numbers, billing name and address	Provide Services; create accounts; communicate with customers; respond to support requests; market Services to potential customers
Payment Information	Billing name, address, credit card and other payment information	Bill account holders who subscribe to Services
Service Usage Data	IP address, device type, OS, call records, duration, routing information, session logs, fraud data	Connect and optimize user experience; provide dashboards; detect fraud and spam; monitor network performance; comply with applicable law
Application Data	Mobile device model, OS version, device identifiers, mobile carrier, app feature usage	Provide Services; communicate with customers; send account notifications; market Services to existing and prospective customers
Geolocation Information	Location information when using Services	Provide Services; personalize user experience; support emergency 911 routing

End User Personal Data (collected on behalf of Protel customers)	Email address, name, telephone number, business address, IP address, chat identifiers	Provide Services to the Protel customer; detect and prevent fraud, spam, and AUP violations
User Content	Files, images, chat content, or other information uploaded or transmitted through the Services	Provide Services; optimize user experience

8. HOW PROTEL COLLECTS YOUR PERSONAL INFORMATION

- Protel collects Personal Data when you provide it through interactions with us.
- Protel may automatically collect Personal Data as you use our applications and/or Services or visit our websites.
- Protel may receive Personal Data about you from a business or commercial partner or another user of our Services.

9. HOW PROTEL USES, STORES AND RETAINS YOUR INFORMATION

In addition to the uses described in Section 7, Protel may use, store, and retain information (including Personal Data) to:

- Gather broad demographic and statistical information in de-identified or aggregated form;
- Comply with applicable legal requirements and industry standards;
- Enforce our Agreements and defend our legal rights; and
- For other purposes to which you may provide your consent.

Protel has designed its AI-related services with the intent of not using your audio, video, chat, screen sharing, attachments, or other communications to train artificial intelligence models. AI-related services may generate inaccurate responses and there may be a risk of copyright infringement issues in AI analysis output.

Your Personal Data will be stored in accordance with applicable Canadian data protection laws. All Personal Data will be anonymized or irrevocably deleted within fourteen (14) calendar days following termination of your applicable Service, except for account-level business records such as billing information, access logs, and other business operation information, which are retained in accordance with Protel's business information retention policies. It is solely Your responsibility to secure all necessary Personal Data from Your account prior to termination.

10. HOW PROTEL DISCLOSES YOUR INFORMATION

Protel does not sell your Personal Data. Protel may disclose your Personal Data to third parties only as follows:

- To entities within Protel's group and third-party business partners, consistent with the purposes described above;
- To organizations that process billing information on Protel's behalf;
- In de-identified or aggregated form to service and licence providers for licence compliance and billing purposes;

- To vendors and contractors retained in connection with the provision of Services or support of Protel's business, who are required to maintain strict security and confidentiality and are prohibited from using the information for any other purpose.

In addition, Protel may access and release your Personal Data:

- As required by law enforcement, court order, or other mandatory legal process;
- Where Protel believes in good faith that disclosure is necessary to exercise, establish, or defend legal rights;
- With your consent or permission; or
- If Protel or any of its websites, Services, or related assets are acquired by, transferred to, or merged with another company.

11. IS YOUR PERSONAL DATA SECURE?

Protel takes reasonable steps to ensure your Personal Data is treated securely and in accordance with this Privacy Policy. Protel maintains administrative, technical, and physical safeguards intended to protect Personal Data against accidental or unlawful destruction, loss, unauthorized alteration or access, misuse, and other unlawful processing. Your contact and financial information is submitted via a secure (HTTPS) connection and stored in a database protected by a firewall. Payment transactions are encrypted using SSL technology.

Although Protel uses reasonable efforts to protect your Personal Data, transmission via the Internet is not completely secure. Protel cannot guarantee the security of Personal Data transmitted using our websites or Services, and any transmission is at your own risk.

12. YOUR RIGHTS AND CHOICES

You have the right to request that Protel not use your Personal Data for marketing communications. You may exercise this opt-out right by accessing opt-out features in the administrative control panel for your Account, following the "unsubscribe" instructions in any communication you receive, or by contacting Protel at sales@proteltech.ca.

Please note that you cannot unsubscribe from certain correspondence relating to your Account or the provision of Services, unless you stop using the Services. You may revise your contact and financial information or terminate your account through the administrative control panel.

13. CANADIAN PRIVACY RIGHTS

Applicable Law

Protel's collection, use, and disclosure of Personal Data is governed by the Personal Information Protection and Electronic Documents Act (PIPEDA) at the federal level, and British Columbia's Personal Information Protection Act (PIPA) for customers located in BC. Protel complies with applicable Canadian privacy legislation and is committed to protecting your privacy rights.

Your Rights Under Canadian Privacy Law

Subject to applicable law, you have the right to:

- Access the Personal Data Protel holds about you;
- Request correction of inaccurate or incomplete Personal Data;
- Withdraw consent to the collection, use, or disclosure of your Personal Data (subject to legal or contractual restrictions);
- Lodge a complaint with the Office of the Privacy Commissioner of Canada at www.priv.gc.ca, or with the BC Information and Privacy Commissioner at www.oipc.bc.ca.

Transfer of Personal Data Outside Canada

Protel stores and processes Personal Data primarily in Canada. In some cases, Personal Data may be transferred to, and processed in, countries outside Canada (including the United States) by Protel's service providers. These countries may not have equivalent data protection laws. Where such transfers occur, Protel takes adequate measures to ensure your Personal Data is protected in accordance with this Privacy Policy and applicable Canadian law.

International Customers

Protel's Services are primarily intended for business customers located in Canada. If you are located outside Canada, please be aware that your Personal Data will be transferred to and processed in Canada. By using the Services, you consent to such transfer. If you have questions about how your Personal Data is handled, please contact us at sales@proteltech.ca.

14. COOKIES

What Are Cookies?

Cookies are small text files placed on your device when you use Protel's websites, services, applications, or administrative control panel. They allow Protel's services to function more efficiently by storing preferences, combating fraud, and analyzing performance. Session cookies expire when you close your browser. Persistent cookies remain on your device and can track settings or activities across multiple visits.

How Protel Uses Cookies

Protel uses both session and persistent cookies to retain session states, personalize your experience, assess website performance, and deliver relevant content. The following types of cookies are used:

- **Necessary Cookies:** Required for Protel's websites and Services to operate, including the administrative control panel and web chat.
- **Performance Cookies:** Used to assess and improve the performance of Protel's website and Services.
- **Functional Cookies:** Help with functionality such as saving your preferences or location settings.
- **Advertising or Targeting Cookies:** Used to deliver relevant content and measure marketing campaign effectiveness.

How to Control Your Cookies

You can manage and control cookies using Protel's cookie preference tool on our websites (where available), or by changing the browser settings on your device. Most browsers allow you to reject and/or

remove cookies. Learn more at <https://www.aboutcookies.org>. Note that disabling certain cookies may affect the functionality of the administrative control panel and other aspects of our Services.

15. QUESTIONS REGARDING THIS PRIVACY POLICY

If you have any questions about this Privacy Policy or Protel's privacy practices, please contact us:

Protel Technologies Inc.

2531 Cornwall Drive, Penticton, BC, V2A 6R9

Email: sales@proteltech.ca

Web: www.proteltech.ca

Protel reserves the right to update this Privacy Policy at any time. Changes will be posted to www.proteltech.ca. Where changes materially alter your rights or obligations, Protel will make reasonable efforts to notify you (for example, by email or a notification when you next access the Services). Your continued use of the Services constitutes acceptance of the updated Policy.