

## **Privacy Policy**

This Privacy Policy covers Teal's collection and treatment of information and data collected when you visit Teal's Websites or use Teal's Services.

### **SECTION 1. DEFINITIONS**

1.1 "Teal" means Teal Communications, Inc.

1.2 "Services" means the any and all services and hosted software applications provided by Teal, including but not limited to, the Teal API, cellular connectivity via Teal's eSIM, Teal's Platform Application, Teal's website and any other software services offered by Teal.

1.3 "You" means yourself and any entities you represent.

1.4 "Personal Data" means information relating to You which either identifies You or from which You can be identified, either directly or indirectly.

1.5 "Products" means both the physical products produced and sold by Teal, including, for example, the Teal eSIM and accessories or kits; and the firmware, provided by Teal, that is programmed onto certain of these physical products.

1.6 "Third Party Products" – includes but is not limited to applications, websites, APIs, software, or hardware that interacts with, uses or connects to any Teal Products or Services.

1.7 "Website(s)" means any web domains owned, operated, branded or co-branded by Teal Websites include Teal's Platform Web Based Application.

### **SECTION 2: WHAT DOES THIS PRIVACY POLICY COVER?**

2.1 Teal respects Your privacy and is committed to protecting Your Personal Data. We want to be transparent with You about how we collect and use Your Personal Data in making available Teal's Websites and Teal's Services and tell You about your privacy rights and how the law protects You.

2.2 With that in mind, this Privacy Policy is designed to describe:

2.2.1 Who we are and how to contact us.

2.2.2 Your rights relating to your Personal Data.

2.2.3 Marketing communications preferences.

2.2.4 What Personal Data Teal collects.

2.2.5 How Teal collects Personal Data.

2.2.6 How Teal uses Your Personal Data and why.

2.2.7 Who Teal shares Your Personal Data with.

2.2.8 How Teal keeps Your Personal Data secure.

2.2.9 How Teal uses cookies and other tracking or profiling technologies.

2.2.10 How long Teal stores Your Personal Data.

2.2.11 Teal's policy on children.

2.2.12 Third party links

2.3 The Privacy Policy is intended to meet Teal's duties of transparency under the European Union's General Data Protection Regulation (2016/679) or "GDPR".

### SECTION 3: WHO WE ARE AND HOW TO CONTACT US

3.1 Teal Communications, Inc. is the Controller (for the purposes of the GDPR) of Your Personal Data (referred to as "Teal" in this Privacy Policy). Our address is: 1700 Westlake Ave N Suite 702, Seattle, WA 98109. You can contact us by emailing: [privacy@tealcommunications.com](mailto:privacy@tealcommunications.com)

### SECTION 4: YOUR RIGHTS RELATING TO YOUR PERSONAL DATA

4.1 Under certain circumstances, by law You have the right to:

4.1.1 Request access to Your Personal Data. This enables You to receive a copy of the Personal Data we hold about You and to check that we are lawfully processing it.

4.1.2 Request correction of the Personal Data that we hold about You. This enables You to have any incomplete or inaccurate information we hold about You corrected.

4.1.3 Request erasure of Your Personal Data. This enables You to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove Your Personal Data where you have exercised Your right to object to processing (see below).

4.1.4 Object to processing of Your Personal Data. This right exists where we are relying on a Legitimate Interest as the legal basis for our processing and there is something about Your particular situation, which makes You want to object to processing on this ground. You also have the right to object where we are processing Your Personal Data for direct marketing purposes.

4.1.5 Request the restriction of processing of Your Personal Data. This enables You to ask us to suspend the processing of Personal Data about You, for example if You want us to establish its accuracy or the reason for processing it.

4.1.6 Request the transfer of Your Personal Data. We will provide to You, or a third party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which You initially provided consent for us to use or where we used the information to perform a contract with You.

4.1.7 Withdraw consent. This right only exists where we are relying on consent to process Your Personal Data ("Consent Withdrawal"). If you withdraw Your consent, we may not be able to provide You with access to the certain specific functionalities of our Site. We will advise You if this is the case at the time you withdraw Your consent.

4.2 If You want to exercise any of the rights described above, please contact via email at [privacy@tealcommunications.com](mailto:privacy@tealcommunications.com). Typically, You will not have to pay a fee to access Your Personal Data (or to exercise any of the other rights). However, except in relation to Consent Withdrawal, we may charge a reasonable fee if Your request is clearly unfounded, repetitive or excessive, or, we may refuse to comply with your request in these circumstances.

4.3 We may need to request specific information from You to help us confirm your identity and ensure Your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We

may also contact You to ask You for further information in relation to Your request to speed up our response.

4.4 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or You have made several requests. In this case, we will notify you and keep You updated.

4.5 If You would like to make a complaint regarding this Privacy Policy or our practices in relation to Your Personal Data, please contact us at: [privacy@tealcommunications.com](mailto:privacy@tealcommunications.com) We will reply to Your complaint as soon as we can. If You feel that Your complaint has not been adequately resolved, please note that the GDPR gives You the right to contact Your local data protection supervisory authority, which for Ireland is the Data Protection Commissioner, Canal House, Station Road, Portarlington, Co. Laois, Lo-Call: 1890 25 22 31, Tel. +353 57 868 4800, e-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie), website: <http://www.dataprotection.ie/>.

## SECTION 5: MARKETING COMMUNICATIONS PREFERENCES

5.1 You can ask us to stop sending You marketing messages at any time by following the opt- out links on any marketing message sent to you AND/OR by contacting us at any time using the contact details shown here [privacy@tealcommunications.com](mailto:privacy@tealcommunications.com)

5.2 Where You opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of [describe all strictly necessary “service correspondence/emails” – e.g., emails relating to purchases or subscription renewals].

## SECTION 6: ADDITIONAL INFORMATION

6.1 All the Personal Data we collect, both from You and from third parties about You, is outlined below.

Identity Data – First name, last name, email address

Contact Data – Billing address, shipping address, email address and telephone numbers.

Financial Data – Your bank account and payment card details.

Transaction Data – Any details about payments to and from you and other details of subscriptions and services you have purchased from us.

Marketing and Communications Data – Your preferences in receiving marketing from us

Technical Data – Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform. Technical information as it relates to you or your businesses devices in order to assist with troubleshooting.

6.2 We also collect, use and share “Aggregated Data” such as statistical or demographic data for any purpose. Aggregated Data may be derived from Your Personal Data, but once in aggregated form it will not constitute considered Personal Data for the purposes of the GDPR as this data does not directly or indirectly reveal Your identity. However, if we combine or connect Aggregated Data with Your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

6.3 We do not collect any “Special Categories of Personal Data” about You (this includes details about Your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

## SECTION 7: HOW TEAL COLLECTS PERSONAL DATA

7.1 Teal collects certain personal data from visitors to Teal Websites in order to continuously improve and enhance our customer’s experiences. This data is collected via the following methods:

7.1.1 Teal, like many other websites, will store session information (often called “Cookies”) in Your browser that will help Teal to identify information such as browsing activity, IP addresses and page view order. You do have the option to not use these Cookies; the majority of browsers will have a “help” tool that will help You to prevent Cookies if You want to, but Teal recommends You keep Cookies active as it will provide a better user experience on Teal’s Websites. For further information in Section 11.

7.2 Information You provide:

7.2.1 When You create an account with Teal, You provide us with data that includes an email address and password. Teal may also give you the option to voluntarily share other data with us that is connected to your account. If any of these details change, You may update your account at any time and modify, correct or delete your account details.

7.2.2 If you are using Teal to connect a Product to the Teal Platform, You will be required to identify a network and corresponding network password. This information exists only locally, and Teal does not have access to it. When You connect a Product, a specific Product ID will be sent to the Teal Platform, after which Teal will be able to match a specific device ID to Your account details.

7.2.3 You may choose to contribute and interact on Teal Websites. You will have the opportunity to choose what information (other than Your user name which is not optional) you would like to make public. You may choose whether to display or give out Your contact details and other personally identifiable information on the Websites.

7.2.4 When You actively provide information on Teal Websites, Teal may retain that data for You for later use. This data is stored on secure third party servers.

7.2.5 You may actively provide payment details when purchasing Products from Teal. Teal uses a third-party secure e-commerce site with a Level 1 PCI compliant payment system, for direct online sales. No employees of Teal have access to the credit card details associated with these purchases.

### 7.3 Information provided by third parties

7.3.1 At times Teal may collect information from Third Parties that use our Services or Products. They may provide us with Personal or Anonymous Data that we will use to continue to improve our Services and Products.

## SECTION 8: HOW TEAL USES YOUR PERSONAL DATA AND WHY

8.1 The data referenced in this Privacy Policy is primarily used by Teal to improve, troubleshoot and enhance Products, Websites and Services.

8.2 Email addresses and any other information supplied by You may also be used by Teal to respond to emails, phone calls and requests. In addition, Teal may use the data that identifies the Product IDs associated with Your account to provide information and technical assistance to You. For example, Your email address and device details may be used to respond to a technical support question that You send to Teal.

8.3 Teal may collect and create anonymous data by excluding personally identifiable information. Teal reserves the right to use Anonymous Data for any purpose and disclose Anonymous Data to third parties at its sole discretion.

8.4 Teal will only use Your Personal Data for the purposes for which we collected it as listed below, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use Your Personal Data for an unrelated purpose, we will update this Privacy Policy and we will explain the legal basis which allows us to do so.

8.5 What is our “legal basis” for processing Your Personal Data?

8.5.1 In respect of each of the purposes for which we use Your Personal Data, the GDPR requires us to ensure that we have a “legal basis” for that use. Most commonly, we will rely on one of the following legal bases:

(a) where we need to perform a contract we are about to enter into or have entered into with You (“Contractual Necessity”);

(b) where it is necessary for our legitimate interests and Your interests and fundamental rights do not override those interests (“Legitimate Interests”). More detail about the specific legitimate interests pursued in respect of each Purpose we use Your Personal Data for is set out in the table below;

(c) where we need to comply with a legal or regulatory obligation (“Compliance with Law”); or

(d) where we have Your specific consent to carry out the processing for the purpose in question (“Consent”). Generally we do not rely on your Consent as a legal basis for using Your Personal Data other

than in the context of direct marketing communications.

8.6 We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use Your Personal Data. functionalities of the Websites). In this case, we may have to stop You using our Site have with us but we will notify You if this is the case at the time.

8.7 Where we need to process Your Personal Data either to comply with law, or to perform the terms of a contract we have with You and You fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with You (for example, to provide You with the functionalities of the Websites). In this case, we may have to stop You using our Site have with us but we will notify You if this is the case at the time.

## SECTION 9: WHO TEAL SHARES YOUR PERSONAL DATA WITH

9.1 Teal may at some point have a third-party process or analyze some of the Personal Data we have collected.

9.2 When appropriate, Teal may share Personal Data with entities and persons who are actively doing business with Teal and have entered into a contract with Teal Inc (such as companies that have created “Powered by Teal” products). A company of this sort will have access to the data generated by individuals who are users of the product created and sold by said company.

9.3 Teal may share Aggregated or Anonymous Data publicly or as described above in section 8.3

9.4 Teal will share Personal Data with companies, organizations or individuals outside of Teal if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

9.4.1 meet any applicable law, regulation, legal process or enforceable governmental

9.4.2 enforce applicable Terms of Service, including investigation of potential violations.

9.4.3 detect, prevent, or otherwise address fraud, security or technical issues.

9.4.4 protect against harm to the rights, property or safety of Teal, our users or the public as required or permitted by law.

9.5 If another company acquires Teal or our assets via a merger, acquisition or sale, that company will possess the Personal Data collected by Teal and will assume the rights and obligations regarding Your Personal Data as described in this Privacy Policy. In this event Teal will give You prior notification via email or by putting a prominent notice on our site before Your Personal Data is transferred.

9.6 We share Your Personal Data within Teal. This will involve transferring Your Personal Data outside the European Economic Area (“Europe”). Many of our external third parties are also based outside Europe so their processing of Your Personal Data will involve a transfer of data to countries based outside of Europe.

9.7 We endeavor to ensure that people to whom we provide Personal Data hold it subject to appropriate safeguards and controls. Whenever we transfer Your Personal Data out of the Europe, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

9.8 We may transfer Your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission. For further details, see [European Commission: Adequacy of the protection of Personal Data in non-EU countries](#).

9.9 Where we use service providers outside Europe, we may use specific contracts approved by the European Commission, which give Personal Data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of Personal Data to third countries](#).

9.10 Where we use service providers based in the U.S., we may transfer Personal Data to them if they are part of the Privacy Shield which requires them to provide similar protection to Personal Data shared between [Europe and the U.S. For further details, see European Commission: EU-U.S. Privacy Shield](#).

## SECTION 10: WHO TEAL SHARES YOUR PERSONAL DATA WITH

10.1 Teal uses Secure Socket Layer (SSL) encryption on the APIs (Application Programming Interface)



and Websites operated by Teal.

10.2 Personal Data collected by Teal via its Websites and Services is stored on secure third-party servers.

10.3 Teal has put in place appropriate security measures to prevent Your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.

10.4 We limit access to Your Personal Data to those employees and other staff who have a business need to have such access. All such people are subject to a contractual duty of confidentiality.

10.5 We have put in place procedures to deal with any actual or suspected Personal Data breach. In the event of any such breach, we have systems in place to work with applicable regulators. In addition, in certain circumstances (e.g., where we are legally required to do so) we may notify You of breaches affecting your Personal Data.

## **SECTION 11: HOW TEAL USES COOKIES AND OTHER TRACKING OR PROFILING TECHNOLOGIES**

11.1 We may collect information using “cookies”. Cookies are small data files stored on the hard drive of Your computer or mobile device by a website. We may use both session cookies (which expire once You close Your web browser) and persistent cookies (which stay on Your computer or mobile device until You delete them) to provide You with a more personal and interactive experience on our Websites.

11.2 We use two broad categories of cookies:

11.3 first party cookies, served directly by us to Your computer or mobile device; and

11.4 third party cookies, which are served by our partners or service providers on our Websites.

11.5 Cookies we use

11.5.1 Our Websites uses the following types of cookies for the purposes set out below:

**Essential Cookies** – These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. For example, they allow you to log in to secure areas of our Site and help the content of the pages you request to load quickly. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.

**Functionality Cookies** – These cookies allow our Site to remember choices you make when you use our Site, [such as remembering your language preferences, remembering your login details and remembering the changes you make to other parts of our Site which you can customize]. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Site.

**Analytics and Performance Cookies** – These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered via these cookies does not “directly” identify any individual visitor. However, it may render such visitors “indirectly identifiable”. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access our Site. The information collected is aggregated and anonymous. It includes the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information and to monitor the level of activity on our Site. We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Site works. You can find out more information about Google Analytics cookies

here: <https://developers.google.com/analytics/resources/concepts/gaConceptsCookies> ,You can find out more about how Google protects your data here: [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html).

11.6 You can typically remove or reject cookies via Your browser settings. In order to do this, follow the instructions provided by Your browser (usually located within the “settings”, “help” “tools” or “edit” facility). Many browsers are set to accept cookies until You change your settings.

11.7 If You do not accept our cookies, You may experience some inconvenience in Your use of our Websites. For example, we may not be able to recognize Your computer or mobile device and You may need to log in every time You visit our Websites.

11.8 For further information about cookies, including how to see what cookies have been set on Your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.com.uk](http://www.youronlinechoices.com.uk). In particular, You can disable cookies which remember Your browsing habits and target advertising at You by visiting <http://www.youronlinechoices.com/uk/your-ad-choices>. If You choose to remove targeted or advertising cookies, You will still see adverts but they may not be relevant to You. Even if You do choose to remove cookies by the companies listed at the above link, not all companies that serve online behavioral advertising are included in this list, and so You may still receive some cookies and tailored adverts from companies that are not listed. You can also prevent the use of Google Analytics relating to Your use of our Websites by downloading and installing the browser plugin available via this link: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>.

## **SECTION 12: HOW LONG TEAL STORES YOUR PERSONAL DATA**

12.1 We will only retain Your Personal Data for so long as we reasonably need to use it for the purposes set out in Section 2.2.6 unless a longer retention period is required by law (for example for regulatory purposes).

12.2 The below shows our standard retention practices:

Behavioral Data – Google Analytics is configured to retain data for no more than 26 months after a user's last recorded activity on any of our websites. Full Story, similar to Google Analytics is configured to retain sessions for 90 days and then permanently purged.

Marketing and Communications Data – For so long as you remain a customer of ours.

Contact Data – For so long as retention is necessary to fulfill the Purposes/Use for which it is used (see Section 2.2.6)

## **SECTION 13: OUR POLICY ON CHILDREN**

13.1 The Websites and Services are not intended for children below 13 and we do not knowingly collect data relating to children

## **SECTION 14: THIRD PARTY LINKS**

14.1 The Websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share Your Personal Data. We do not control these third-party websites and are not responsible for their privacy statements. When You leave our Websites, we encourage you to read the privacy policy of every website You visit.

14.2 Third Parties may on occasion offer products or services that interact with Teal. Teal will encourage these Third Parties to follow a similar privacy policy as this one, but You acknowledge and agree that Teal is not responsible for the privacy policies of others.

## **SECTION 15: NETWORK TRANSPARENCY STATEMENT**

15.1 The Federal Communications Commission's transparency rule, 47 CFR § 8.1(a), requires internet service providers that offer mass-market retail broadband service disclose information about the service. Teal does not provide service to retail end users. Teal provides broadband connectivity to the internet to companies that further resell access to retail end users. To enable broadband access, Teal uses the facilities-based networks of Commercial Mobile Radio Service providers. Teal's network partners in the United States are FCC licensed and provide Network Transparency Statements that pertain to their networks. T-Mobile's can be found at <https://www.t-mobile.com/responsibility/consumer-info/policies/internet-service> and AT&T's can be found

at <https://about.att.com/csr/home/governance/transparency.html>.

Verizon's can be found at

If you have any questions you can contact us through our Privacy Center –

<https://privacypcenter.cytrio.com/tealcom>

## **Acceptable Use Policy**

Prohibited Uses. You agree not to:

- use the Site or its contents for any purpose that is unlawful or prohibited by these Terms of Use;
- resell any aspect of the Site or services available on it;
- bypass or circumvent measures we may use to prevent, interfere, or limit access to the Site or any T Mobile network;
- use the Site to send altered, deceptive or false source-identifying information;
- use the Site to intercept, collect or store personal information about other users;
- spam other users or take other actions that may affect the operation or enjoyment of the Site by other users;
- access, monitor or copy any content or information on the Site using any robot, spider, scraper or other automated means or any manual process;
- decompile, disassemble or reverse engineer any of the software or content used in any part of the Site or any T Mobile network;
- send a virus or use any malicious programs or techniques in connection with the Site;
- overload or crash the Site or any T Mobile server or network; or
- engage in excessively high volume data transfers or bandwidth use, including without limitation by hosting a web server, internet relay chat server or any other server via any use of the Site; or
- infringe the copyrights or intellectual property rights of others.