

# FINTEL COMMUNICATIONS

## PRIVACY POLICY

FinTel Communications, LLC is committed to maintaining robust privacy protections for its users. Our Privacy Policy (“Privacy Policy”) is designed to help you understand how we collect, use and safeguard the information you provide to us and to assist you in making informed decisions when using our website (“Site”).

We collect “Non-Personal Information” and “Personal Information”. Non-Personal Information includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. Personal Information includes your email and other contact information that you voluntarily submit to us through our Site.

We track Non-Personal Information using cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a user’s browser from our servers and are stored on the user’s computer hard drive. Sending a cookie to a user’s browser enables us to collect Non-Personal Information about that user and keep a record of the user’s preferences when utilizing our services, both on an individual and aggregate basis. It also helps us improve and customize the user experience on our Site.

We only use the Personal Information that you provide us to provide support services for current customers, for sales efforts for products of business, and to communicate with you in responding to your contact requests. We do not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties. We will keep your Personal Information while we are providing services to you. Thereafter, we will keep your Personal Information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf.
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your Personal Information for longer than necessary for the purposes set out in this Privacy Policy. Please note that different retention periods apply for different types of Personal Information. Once it is no longer necessary to retain your personal information, we will delete or anonymize it.

We implement commercially reasonable security measures designed to protect your information from unauthorized access. We further protect your information from potential security breaches by implementing certain technological security measures including encryption, firewalls and secure socket layer technology. However, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by unauthorized persons who breach such firewalls and secure server software. By providing your Personal Information to us, you acknowledge that you understand and agree to assume these risks.

Our services are restricted to users who are 18 years of age or older. We do not permit users under the age of 18 (a “Child”) on our Site and we do not knowingly collect Personal Information from a Child. If we discover that we have received Personal Information from a Child, then we immediately delete such information. Nonetheless, if you are a parent or guardian of a Child and you become aware that your Child has provided us with Personal Information without your consent, you should contact us through our Site’s Contact page. Parents and guardians always have the right to inspect any information that we may have inadvertently collected from their Child and have the right to have us edit or delete it.

FinTel Communications, LLC reserves the right to change this policy at any time. We will notify you of significant changes to our Privacy Policy by placing a prominent notice on our site. Significant changes will go into effect 7 days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check the Site for updates.

## U.S. STATE PRIVACY LAWS

### California Privacy Rights Disclosure

If you are a California resident, the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), the California Online Privacy Protection Act (CalOPPA), provide you additional rights with the respect to your Personal Information. California law permits our customers who are California residents to request certain information about our disclosure of their personal information to third parties for direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. To make such a request, please write to us at the following address:

FinTel Communications  
ATTN: Privacy Protection Officer  
P.O. Box 815  
Silver Spring, Maryland 20918-0815  
[info@FinTelCom.com](mailto:info@FinTelCom.com)  
Phone: 301-593-1111

If you are a California resident, California law provides you with the following additional rights with respect to your Personal Information:

- The right to know what personal information we have collected, used, disclosed and sold about you. You may submit a request to know by using the contact information detailed in this Section. You also may designate an authorized agent to make a request for access on your behalf.
- The right to request that we delete any personal information we have collected about you. You may submit a request for deletion by using the contact information detailed in this Section. You also may designate an authorized agent to make a request for deletion on your behalf.

California residents may also have the right not to be subject to automated decision-making, including profiling, where it would have a legal or similarly significant effect on them; and the right to data portability with regard to the data they provided to us. If you exercise any of these rights and submit a request to us, we may verify your identity. We also may use a third party verification provider to

verify your identity. Your exercise of these rights will have no adverse effect on the price and quality of our goods or services.

### **Connecticut Data Privacy Rights.**

If you are a Connecticut resident, (Public Act No. 22-15) An Act Concerning Personal Data Privacy and Online Monitoring provides you additional rights with the respect to your personal information. The Act grants Connecticut consumers the right to (A) access, correct, delete and obtain a copy of personal data that we collect, and (B) opt out of the processing of personal data for the purposes of (i) targeted advertising, (ii) certain sales of personal data, or (iii) profiling.

### **Utah Consumer Privacy Rights.**

If you are a Utah resident, the Utah Consumer Privacy Act (UCPA) (S.B. 227) gives consumers a number of rights related to their personal data, including the right to: (A) access and delete personal data, (B) opt out of the collection and use of personal data for certain purposes, and (C) obtain a copy of their personal data.

### **Virginia Consumer Data Privacy Protection Act.**

If you are a Virginia resident, the Virginia Consumer Data Protection Act (“VCDPA”) (Va. Code § 59.1-575) allows for consumers to request that the company collecting their personal data: (A) confirm if the company is actually processing their personal data, (B) correct inaccuracies in the consumer’s personal data that is collected by the company, (C) delete personal data provided by or obtained about the consumer, (D) obtain copies of the personal data collected by the company, and (E) opt out of the processing of personal data for purposes of targeted advertising, the sale of personal data, or further profiling.

### **Colorado Protect Personal Data Privacy Act.**

If you are a Colorado resident, the Protect Personal Data Privacy Act (SB21-190) gives consumers a number of rights related to their personal data, including the right to: (A) access and delete personal data, (B) opt out of the collection and use of personal data for certain purposes, and opt out of secondary use of such data.

### **Delaware Personal Data Privacy Act.**

If you are a Delaware resident, the Delaware Personal Data Privacy Act (HB-154) gives consumers a number of rights related to their personal data, including the right to: (A) to know what information is being collected about them, (B) see the information, (C) correct any inaccuracies, or (D) request deletion of their personal data that is being maintained by entities or people.

### **Iowa Consumer Data Protection Act.**

If you are an Iowa resident, the Iowa Consumer Data Protection Act (ICDPA) gives consumers a number of rights related to their personal data, including the right to: (A) to know what information is being collected about them, (B) see the information, (C) correct any inaccuracies, or (D) request deletion of their personal data that is being maintained by entities or people.



### **Montana Consumer Data Privacy Act.**

If you are an Montana resident, the Montana Consumer Data Privacy Act (MCDPA) companies who collect personal information from Montana residents may receive clear consent before processing such personal information. The Act also grants Montana residents the right to (A) access, correct, delete and obtain a copy of personal data that we collect, and (B) opt out of the processing of personal data for the purposes of targeted advertising.

### **Oregon Consumer Privacy Act.**

If you are an Oregon resident the Oregon Consumer Privacy Act (SB-619) gives consumers a number of rights related to their personal data, including the right to: (A) access and delete personal data, (B) opt out of the collection and use of personal data for certain purposes, and (C) obtain a copy of their personal data.

### **Texas Data Privacy and Security Act.**

If you are a Texas resident the Texas Data Privacy and Security Act (HB-04F) allows for Texas residents to request that the company collecting their personal data: (A) confirm if the company is actually processing their personal data, (B) correct inaccuracies in the consumer's personal data that is collected by the company, (C) delete personal data provided by or obtained about the consumer, (D) obtain copies of the personal data collected by the company, and (E) opt out of the processing of personal data for purposes of targeted advertising, the sale of personal data, or further profiling.