

LAST UPDATED: [1/6/2023]

TELESAIR PRIVACY POLICY

At Telesair, Inc. (“**Telesair**,” “**we**”), we value the privacy of our customers and business contacts and are devoted to the protection of their personal information. In this privacy policy, users of our website or other online services containing or linking this policy (collectively the “**Services**”) are provided with information about our collection, use, disclosure and other processing of information that can reasonably be linked with them (“**Personal Information**”). Additional information for users of our Services located in the European Economic Area (EEA), the United Kingdom (UK) and the Middle East is set forth in [Annex I](#) to this privacy policy.

CATEGORIES OF PERSONAL INFORMATION WE COLLECT

In connection with the Services, we collect the following categories of Personal Information:

- **Information you choose to provide directly to us**, such as (i) your first and last name, email address and message you may submit to us through the “Contact” section of our website, or (ii) the email address you may make available to us in order to subscribe to our newsletter or receive other updates or communications about our current or future products, services, offerings or events;
- **Information collected automatically through our Services**, such as (i) information about the device you are using to access our Services (e.g., IP address, mobile device identifiers, Media Access Control (MAC) address, cookie identifiers, screen resolution, operating system name and version, browser type, device manufacturer and model, language, etc.), or (ii) usage data (e.g., the date and time you access our Services, time spent on the Services, individual web pages visited, language preferences, clicks on individual links, and other traffic data).

HOW WE USE PERSONAL INFORMATION

We use Personal Information for the following purposes:

- To provide the Services and related support and assistance;
- To respond to user requests;
- To create and manage your user account or other user profiles (where applicable);
- To process orders or other transactions (where applicable);
- To send you our email newsletter or provide you with other updates or email communications about our current or future products, services, offerings or events;
- To measure the interest in, and interaction with, the Services;
- To improve and develop the Services and the related user experience, including testing, research, analysis and product development;
- To protect against, deter or investigate fraudulent, illegal or harmful actions and maintain the safety, security and integrity of the Services;
- To comply with our legal or contractual obligations, resolve disputes, and enforce terms and conditions applicable to the Services;

- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

DISCLOSURE OF PERSONAL INFORMATION

We disclose Personal Information:

- **To our third party service providers**, to facilitate services they provide to us. These can include providers of services such as website hosting, data analysis, fraud prevention, information technology and related infrastructure provision, email delivery, auditing, and other services.
- **To our third party advisors**. We may disclose your Personal Information to our advisors (e.g. auditors, legal counsel, tax advisers and consultants) relating to or in connection with the operation of our business, compliance with our legal, regulatory or contractual obligations and/or your investments with us.
- **To law enforcement agencies and other government authorities**. In order to comply with our legal or regulatory obligations, we may disclose your Personal Information to law enforcement agencies, regulatory or tax authorities and other governmental or public agencies or authorities.
- **To third parties in the event of reorganization**. Your Personal Information may be disclosed to third parties in the event of any reorganization, merger, sale, joint venture, partnership, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with bankruptcy or similar proceedings).

CHOICES AND INDIVIDUAL REQUESTS

Receiving marketing-related emails from us.

If you no longer want to receive our newsletter or other promotional emails from us on a going-forward basis, you may opt out by clicking on the unsubscribe link contained in every such email you receive from us. Alternatively, you may notify us of your decision to opt out in accordance with the “Contacting Us” section below.

Accessing, changing, deleting and requesting portability of your Personal Information.

If you would like to request to access, correct, update or delete your Personal Information or if you would like to request to receive a copy of your Personal Information for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), you may contact us in accordance with the “Contacting Us” section below.

RETENTION OF PERSONAL INFORMATION

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we provide the Services to you or have an ongoing relationship with you;
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or

- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. If you have any questions or concerns regarding the security of your Personal Information or your interaction with us, please notify us in accordance with the “Contacting Us” section below.

THIRD PARTY SERVICES

This privacy policy does not address, and we are not responsible for, the processing of your information by, or other practices of, any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link in the Services does not imply endorsement of the linked site or service.

USE OF SERVICES BY MINORS

The Services are not directed to individuals under the age of sixteen (16), and we do not knowingly collect Personal Information from individuals under 16.

JURISDICTION AND CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed in the United States and any other country where we have facilities or in which we engage service providers. By using the Services, you understand that your information may be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.

SENSITIVE PERSONAL INFORMATION

We ask that you not send us, and you not disclose to us, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through the Services.

DO NOT TRACK SIGNALS

Since the Services do not track users over time and across third-party web sites or online services, the Services do not respond to browser do-not-track signals.

UPDATES TO THIS PRIVACY POLICY

The “LAST UPDATED” information at the top of this privacy policy indicates when this privacy policy was last revised. Any changes will become effective when we post the revised privacy policy on the Services.

CONTACTING US

Telesair, Inc., located at 199 Technology, Suite 110, Irvine, CA 92618, United States, is the company responsible for the collection, use, and disclosure of your Personal Information under this privacy policy. If you have any questions about this privacy policy or our processing of your Personal Information, please contact us at info@telesair.com.

Annex I
Additional Information for Users Located in the EEA, the UK and the Middle East

The information set forth in this Annex I is provided to users located in the EEA, UK and the Middle East and applies in addition to the information set forth in the main body of this privacy policy. For the purposes of this Annex I, the term “Middle East” shall include the following countries: Bahrain, Israel, Kuwait, Qatar, Saudi Arabia, Turkey, and the United Arab Emirates (including, without limitation, the Dubai International Financial Centre (DIFC) and the Abu Dhabi Global Market (ADGM)).

CONTROLLER

Telesair, Inc. is the controller responsible for the processing of your Personal Information. You may contact us in accordance with the “Contacting Us” section above.

PURPOSES AND LEGAL BASES

We process the Personal Information collected from or about you when you use the Services for the purposes and based on the legal bases described in the chart below.

To Provide the Services

Purpose	Examples of Processing Activities	Personal Information	Legal Basis
Functionality of the Services	Provide the Services to you, such as facilitating your access to, and maintaining the functionality, safety, security and integrity of, the Services (including, without limitation, troubleshooting and diagnostic testing, conducting performance analyses of our systems, testing new system features to evaluate their impact, system and log maintenance, technical support, system debugging, and data hosting)	Information about the device you are using to access the Services; usage data; user account and login information (where applicable)	Necessity of the processing to pursue legitimate interests, such as ensuring the Services you have requested are functional and safe to use
User Support	Respond to your inquiries and fulfill your requests, for example, when you send us	Information you submit to us through the “Contact” section of our website or the	Necessity of the processing to pursue legitimate interests, such as responding to

	questions, suggestions, compliments or complaints	email address provided in the "Contacting Us" section of this privacy policy	your inquiries regarding our products, services, offerings or events
Order Processing and Similar Transactions	Accept and process orders or complete similar contractual transaction through the Services (where applicable)	Information regarding the individual placing the order or seeking to enter into a similar contractual transaction (including, where applicable, name, contact details, products or services purchased, order history, payment information)	<p>Necessity of the processing to enter into and/or perform a contract (where the individual placing the order or seeking to complete a similar contractual transaction is a party to the contract)</p> <p>Necessity of the processing to pursue legitimate interests, such as to enable the individual placing the order or seeking to enter into a similar transaction to do so on behalf of a third party such as their employer or business (where the third party is the party to the contract)</p>

For Our Business Purposes

Purpose	Examples of Processing Activities	Personal Information	Legal Basis
Promotional Communications	Upon your request, send you our email newsletter or provide you with other updates or email communications about our current or future products, services, offerings or events	Your email address	<p>Your consent (where necessary under applicable law)</p> <p>Necessity of the processing to pursue legitimate interests, such as to promote our products, services, offerings and events to current or prospective customers</p>

Analytics	Measure the interest in, and interaction with, our Services	Information about the device you are using to access the Services; usage data	Your consent (where necessary under applicable law) Necessity of the processing to pursue legitimate interests, such as to analyze, improve and further develop our Services
Fraud Prevention, Audits and Security	Conduct audits; verify that our internal processes function as intended and are compliant with legal, regulatory, or contractual requirements; monitor for, prevent and investigate fraud; and security purposes, including system security	Products and services purchased (where applicable); information about the device you are using to access the Services; usage data	Necessity of the processing for compliance with legal obligations, such as to detect and prevent cyberattacks Necessity of the processing to pursue legitimate interests, such as identifying, preventing or identifying fraudulent transactions or use
Legal and Compliance	Fulfill our legal and compliance-related obligations, including complying with applicable laws; comply with legal process; respond to requests from public and government authorities; meet national security or law enforcement requirements; enforce applicable terms and conditions; facilitate corporate transactions; protect our operations; protect our rights, privacy, safety, or property and/or that of you, or others; allow us to pursue available legal remedies, defend claims, and limit the	Personal Information as relevant for the specific legal action, regulatory investigation, or legal processes in question, which may include payment-related information, products or services purchased, information about the device you are using to access the Services or usage data	Necessity of the processing for compliance with legal obligations, such as complying with legal processes Necessity of the processing to pursue legitimate interests, such as enforcing applicable terms and conditions and bringing or defending legal claims

	damages that we may sustain		
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OUR USE OF COOKIES

Cookies are pieces of information stored directly on the device that you are using to access the Services. Cookies allow us to collect information such as the date and time you access our Services, time spent on the Services, individual web pages visited, language preferences, clicks on individual links, and other traffic data. We use this information for to operate the Services, for security purposes, to facilitate navigation, and to display information more effectively. We also gather statistical information about the use of the Services in order to understand how they are being utilized and to continually improve their design and functionality.

Cookies fall into the following categories:

- **Necessary Cookies:** These cookies either have the sole purpose of allowing or facilitating electronic communication (e.g., transmit communications over the Internet) or are strictly necessary to provide a service you have explicitly requested (e.g., securely authenticating users when they log into their user account or other user profiles (where applicable));
- **Functionality Cookies:** These cookies help us create a better user experience by enabling personalization and engagement, such as displaying certain popup notifications one-time only;
- **Analytics/Performance Cookies:** These cookies allow us to monitor the performance of our Services. We use them to understand how people use our website so that we can continue to improve and develop the Services;
- **Third-Party Cookies:** These cookies are set by third-party vendors and service providers (as opposed to Telesair).

The Services use the following cookies:

Currently, no cookies will be collected nor used by any Services.

INDIVIDUAL RIGHTS REQUESTS

Subject to applicable law, you may have the right to request to access, rectify or erase Personal Information, to object to, opt out, of or request to restrict the processing of Personal Information, or to request to receive a copy of your Personal Information for the purposes of transmitting it to another company. Where you have provided your consent to our processing of your Personal Information, you may withdraw your consent at any time without affecting the lawfulness of the processing based on consent before its withdrawal. To exercise these rights, you may contact us in accordance with the “Contacting Us” section above. We will respond to your request consistent with applicable law. You may lodge a complaint with a data protection authority for your country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs.