# **Cookie Policy of PivotCX**

This document informs Users about the technologies that help this Application to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with this Application.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent, depending on the applicable law. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

This Application uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

# **How this Application uses Trackers**

# **Necessary**

This Application uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

# Trackers managed by third parties

New Relic (New Relic)

New Relic is a monitoring service provided by New Relic Inc.

The way New Relic is integrated means that it filters all traffic of this Application, i.e., communication between the Application and the User's browser or device, while also allowing analytical data on this Application to be collected.

Personal Data processed: Tracker, Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Trackers duration:

- NRBA SESSION: duration of the session
- NRREFL: 3 months
- NRREFP: 2 months
- \_newrelic\_ui\_session: 1 day
- login service login newrelic com tokens: 21 years
- nr\_secure: 1 day
- nr\_zd\_logged\_in: 1 day

#### Marketing

This Application uses Trackers to deliver personalized ads or marketing content, and to measure their performance.

#### Trackers managed by third parties

# Telnyx

Telnyx is a next-gen communications platform that provides carrier-grade telecommunications services, including voice, text messaging, and peer-to-peer video on a global, private IP network.

How to manage preferences and provide or withdraw consent on this Application

Whenever the use of Trackers is based on consent, users can provide or withdraw such consent by setting or updating their preferences via the relevant privacy choices panel available on this Application.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

#### How to control or delete Cookies and similar technologies via your device settings

Users may use their own browser settings to:

- See what Cookies or other similar technologies have been set on the device;
- Block Cookies or similar technologies;
- Clear Cookies or similar technologies from the browser.

The browser settings, however, do not allow granular control of consent by category.

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer
- Microsoft Edge
- Brave
- Opera

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

#### How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by <u>YourOnlineChoices</u> (EU and UK), the <u>Network Advertising Initiative</u> (US) and the <u>Digital Advertising Alliance</u> (US), <u>DAAC</u> (Canada), <u>DDAI</u> (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

# **Consequences of denying the use of Trackers**

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help this Application to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

## **Owner and Data Controller**

PivotCX Inc. 310 E 96th St Suite 200 Indianapolis, IN 46240

# Owner contact email: help@pivotcx.io

Since the use of third-party Trackers through this Application cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by this Application.

# **Definitions and legal references**

#### Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **Usage Data**

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

# **Data Subject**

The natural person to whom the Personal Data refers.

#### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

## **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

# **This Application**

The means by which the Personal Data of the User is collected and processed.

#### Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

#### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

# Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

#### **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

#### **Legal information**

This privacy policy relates solely to this Application, if not stated otherwise within this document.

Latest update: January 02, 2025