TELEPHOS LLC PRIVACY POLICY

Last Updated: July 20, 2026

Telephos LLC (together with its affiliated companies – "Telephos", "we", "our" or "us") puts great efforts in making sure that personal data processed by us is safe and used properly, and that our data practices are properly communicated to our Clients, Users and Prospects.

This Privacy Policy describes how we collect, store, use, and disclose the following types of personal data:

> **Client-Owned Data:** data relating to identified or identifiable individuals that we collect, process and manage on our Clients' behalf, as part of the Telephos.ai platform ("Platform"). Such data ("Client-Owned Data") relates to call transcripts, Slack company data, chatbot interactions, and internal training data that our Clients provide to us for processing through our Services;
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> **Telephos User Data:** contact, contractual and billing details concerning our Clients, which may also contain the details of their internal focal persons who directly engage with Telephos concerning their organizational account, and users of the Platform on behalf of such Clients, e.g., the account administrators and users, billing contacts and authorized signatories on behalf of the Client; as well as the Client's needs and preferences, as identified to us or recognized through our engagement with them ("Users" and "User Data" as relevant);
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> **Telephos Prospect Data:** data relating to our Clients, visitors of our website (**https://www.telephos.ai/**), participants at our events, and any other prospective client or partner who visits or otherwise interacts with any of our websites, online ads and content, emails or communications under our control ("Sites" and collectively with the Platform, the "Services") ("Prospect" and "Prospect Data" as relevant).

If you are our Client, User, or Prospect ("you"), please read this Privacy Policy carefully and make sure that you fully understand and agree to it. If you are a Client, please also review the Terms of Service, which governs your use of the Services.

> You are not legally required to provide us with any personal data, and may do so (or avoid doing so) at your own free will. If you do not wish to provide us with your personal data, or to have it processed by us or any of our Service Providers (defined below), please avoid any interaction with us including visiting our Sites or using our Services. If you are a User of the Services on behalf of any of our Clients, we suggest that you contact your account administrator with any questions.

1. Data Collection & Processing

(i) Client-Owned Data

Our Services provide our Clients with a single, AI-powered platform that ingests call transcripts and related business communications, applies a unified labeling and enrichment pipeline to that content, and surfaces the resulting intelligence through integrated capabilities (signal routing, research and call preparation, chat and search interfaces, reports, dashboards, notifications, and exports). Certain privacy and data protection laws require that prior to processing personal data, a legal basis for such processing be established. Accordingly, while Telephos supports these laws by providing our Clients with features and options for how they use our Services – our Client is solely responsible for determining whether and how they wish to use our Services and such features, and to ensure that the appropriate legal basis for the processing of Client-Owned Data has been established by the Client, prior to having such data processed through the Services.

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Telephos processes Client-Owned Data, and the personal data contained in it, strictly on our Client's behalf, in accordance with their reasonable instructions and as further stipulated in our Data Processing Addendum and other commercial agreements with such Client.

Accordingly, to the extent applicable by law, our Client will be deemed the 'data controller' of Client-Owned Data; and Telephos will be deemed the 'data processor' or 'service provider' when processing such data, as further described in Section 9 below.

(ii) Telephos User Data

User Data we collect and generate, includes some or all of the following types of personal data:

- User account information (e-mail address and, when applicable, hashed password);
- Profile and contact information (name, title, team, company, e-mail and phone number, and additional information submitted by a Client or a User);
- Platform usage information (connectivity, technical and aggregated usage data, such as user agent, IP addresses, device data (like type, OS, device id, browser version, locale and language settings used), activity logs, and the interactions with our Services); and
- Direct interactions and communications with us – (including recordings and transcripts of your calls and emails with us, e.g. for user enablement, support, and training purposes).

While Telephos may process some User Data on its Clients' behalf, as its 'data processor' or 'service provider' we also use it for our own purposes, (as described in Section 2 below) as an independent and separate 'data controller' or 'business' (as further described in Section 9 below).

(iii) Telephos Prospect Data

We collect and generate the following types of personal data concerning our Clients and Prospects:

- Website usage information (connectivity, technical and aggregated usage data, such as user agent, IP addresses, device data);
- Information concerning our Clients and Prospects (contact and business details, our communications with such Clients and Prospects, as well as any needs, preferences, attributes, and insights relevant to our potential engagement);
- Direct interactions and communications with us (including recordings and transcripts of your calls, emails, form submissions and interactions with us via our website, e.g. for Client support, feedback, training purposes, etc.)

We collect such data either automatically, through the data subject's interaction with us or with our Sites or Services; or through third-party services, analytics tools, events we organize or participate in, and other business initiatives.

2. Data Uses

We use personal data for the following purposes:

User Data

- To facilitate, operate, and provide our Service
- To authenticate the identity of our Users, and to allow them to access our Service
- To provide our Users with assistance and support
- To evaluate and develop new features, technologies, and improvements to the Service

User & Prospect Data

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• To gain a better understanding on how individuals use and interact with our Sites and Services, and how we could improve their and others' user experience, and continue improving our products, offerings and the overall performance of our Services

• To facilitate and optimize our marketing campaigns, ad management and sales operations, and to manage and deliver advertisements for our products and services more effectively

• To provide our Prospects with assistance and support

• To explore and pursue growth opportunities by facilitating a stronger local presence and tailored experiences

• To contact our Prospects (whether existing or prospective) with general or personalized service-related messages, as well as promotional messages that may be of specific interest to them

• To facilitate, sponsor and offer certain events, contests and promotions

• To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity

• To create aggregated data, inferred non-personal data or anonymized or pseudonymized data (de-identified data), which we or our business partners may use to provide and improve our respective services, conduct research, or for any other purpose. We do not attempt to re-identify de-identified data, and we do not disclose one Client's identifiable data to another Client

• To comply with applicable laws and regulations

3. Data Location

We and our authorized Service Providers (defined below) maintain, store and process personal data in the United States of America; provided that Client-Owned Data may only be processed in such locations as permitted in our Data Processing Addendum and other commercial agreements with such Client.

Telephos LLC is headquartered in the United States. We transfer personal data in accordance with applicable U.S. privacy laws.

4. Data Retention

We retain Client-Owned Data strictly on our Client's behalf, in accordance with their reasonable instructions and as further stipulated in our Data Processing Addendum and other commercial agreements with such Client. In general, we will retain data until our Client requests its deletion.

We retain User Data and Prospect Data for as long as it is reasonably necessary to maintain and expand our relationship and provide you with our Services and offerings; to comply with our legal and contractual obligations; or to protect ourselves from any potential disputes, all in accordance with our data retention policy.

If you have any questions about our data retention policy, please contact us by e-mail at **dpo@telephos.ai**.

5. Data Disclosure

Legal Compliance

In exceptional circumstances, and except as stipulated otherwise in our Data Processing Addendum and other commercial agreements with you, we may disclose or allow government and law enforcement officials access to your personal data, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such

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disclosure is required to protect our legitimate business interests, including the security or integrity of our products and services.

Service Providers

We may engage selected third-party companies and individuals to perform services complementary to our own. Such service providers include hosting and server co-location services, communications and content delivery networks (CDNs), data and cyber security services, billing and payment processing services, fraud detection and prevention services, web and mobile analytics, AI services (including OpenAI, Claude.ai, and Perplexity.ai), e-mail distribution and monitoring services, call, session or activity recording and analysis services, remote access services, performance measurement, data optimization and marketing services, social and advertising networks, content providers, e-mail, voicemails, support and customer relation management systems, and our legal, financial and compliance advisors (collectively, "Service Providers").

These Service Providers may have access to your personal data, depending on each of their specific roles and purposes in facilitating and enhancing our Services, and may only use it for such limited purposes as determined in our agreements with them.

Partnerships

We engage selected business and channel partners, resellers, distributors and providers (collectively, "Partners") of professional services related to our Services, which allow us to explore and pursue growth opportunities by facilitating a stronger local presence and tailored experiences for our prospective and existing Clients and Users. In such instances, we may disclose relevant contact, business and usage details with the respective Partner, to allow them to engage with those Clients and Users for such purposes.

Clients and other Users

Client-Owned Data is typically disclosed and is available to the Users belonging to such Client's account. Telephos User Data is disclosed to the administrator of the Client's account to which such User belongs (including data and communications concerning such user's account). In such cases, disclosure of such data means that the administrator(s) or other users of the same account may access it on behalf of the Client, and will be able to monitor, process and analyze the personal data contained therein.

Please note that Telephos is not responsible for and does not control any further disclosure, use or monitoring by or on behalf of the Client, that itself acts as the 'data controller' of such data (as further described in Section 9 below).

Protecting Rights and Safety

We may disclose personal data with others if we believe in good faith that this will help protect the rights, property, or personal safety of Telephos, any of our Users or Clients, or any members of the general public.

Telephos Subsidiaries and Affiliated Companies

We may disclose personal data internally within our group, for the purposes described in this Privacy Policy. In addition, should Telephos or any of its subsidiaries or affiliates undergo any change in control or ownership, including by means of merger, acquisition or purchase of substantially all or part of its assets, personal data may be disclosed or transferred to the parties involved in such an event. If we believe that such a change in control might materially affect your personal data then stored with us, we will notify you of this event and the choices you may have via e-mail or a prominent notice on our Services.

For the avoidance of doubt, Telephos may disclose User Data and Prospect Data in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so, or if we have successfully rendered such data

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non-personal, non-identifiable and anonymous. We may transfer, disclose or otherwise use non-personal and non-identifiable data at our sole discretion and without the need for further approval.

6. Communications

We engage in service and promotional communications, through e-mail, phone, SMS and notifications.

Service Communications

We may contact you with information regarding our Services. For example, we may send you notifications (through any means available to us) of changes or updates to our Services or legal terms, billing issues, log-in attempts or password reset notices, etc. Our Clients, and other Users on the same Client account, may also send you notifications, messages and other updates regarding their or your use of the Services.

Promotional Communications

We may also notify you about new features, additional offerings, events, special opportunities or any other information of a promotional nature we think you will find valuable, as our Client, User or Prospect. We may provide such notices through any of the contact means available to us (e.g. phone, mobile or e-mail), through the Services, or through our marketing campaigns on any other sites or platforms.

You can typically control your communications and notifications settings from your Telephos user profile settings, or otherwise in accordance with the instructions included in the communications sent to you. Please note that you will not be able to opt-out of receiving certain service communications which are integral to your use (like password resets or billing notices). If you do not wish to receive promotional communications, you may notify us at any time by sending an e-mail to: **marketing@telephos.ai**, changing your communications preferences in your user profile settings, or by following the "unsubscribe", "stop", "opt-out" or "change e-mail preferences" instructions contained in the promotional communications you receive.

7. Data Security

To protect your personal data held with us, we use industry-standard physical, procedural and technical security measures, including encryption as appropriate. However, please be aware that regardless of any security measures used, we cannot and do not guarantee the absolute protection and security of any personal data stored with us or with any third parties as described in Section 5 above.

8. Data Subject Rights

Individuals have rights concerning their personal data under applicable law, including the California Consumer Privacy Act (CCPA), the California Privacy Rights Act (CPRA), or other applicable U.S. privacy laws.

Such rights may include: (i) to know/request access to personal data (specific pieces of personal data collected; categories of personal data collected; categories of sources from whom the personal data was collected; purpose of collecting personal data; categories of third-parties to whom we have disclosed personal data), (ii) to request rectification or erasure of personal data held with Telephos, (iii) to restrict or object to such personal data's processing (including the right to direct us not to sell your personal data to third parties now or in the future), (iv) to port such personal data, or (v) to equal services and prices. To exercise any of these rights you may have, please contact us by e-mail at: **dpo@telephos.ai**.

Please note that when you ask us to exercise any of your rights under this policy or applicable law, we may need to ask you to provide certain credentials to make sure that you are who you claim you are (to avoid disclosure to you of personal data related to others) and to provide further information to better understand the nature and

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scope of data for which you request access. Such additional data will be then retained by us for legal purposes (e.g. as proof of the identity of the person submitting the request, or proof of request fulfillment).

We may redact from the data that we will make available to you, any personal data or confidential information related to others.

If your request relates to personal data that we process on our Client's behalf (i.e. Client-Owned Data), you should contact such Client directly, as they are the "data controller" of such data (see Section 9 below).

9. Data Controller/Processor

Certain data protection laws and regulations typically distinguish between two main roles for parties processing personal data: the "data controller" who determines the purposes and means of processing; and the "data processor" who processes the data on behalf of the data controller. Below we explain how these roles apply to our Services, to the extent such laws and regulations apply.

Telephos is the "data controller" of Telephos Prospect Data. With respect to such data, we assume the responsibilities of data controller (solely to the extent applicable under law) as set forth in this Privacy Policy. In such instances, our Service Providers processing such data will assume the role of "data processor".

Telephos is the "data processor" of Client-Owned Data, which we process on behalf of our Client (who is the "data controller" of such data); and our Service Providers, who process such Client-Owned Data on our behalf, are the "sub-processors" of such data.

Telephos is both a "data controller" and "data processor" of Telephos User Data. Such data is processed by Telephos for its own purposes (as described in Section 2 above) as an independent 'controller'; while certain portions of it which are included in Client-Owned Data are processed by us on our Client's behalf, as a 'processor'.

Accordingly, Telephos processes Client-Owned Data strictly in accordance with such Client's reasonable instructions and as further stipulated in our Data Processing Addendum and other commercial agreements with such Client. The Client, as controller of such data, will be responsible for meeting any legal requirements applicable to data controllers (such as establishing a legal basis for processing and responding to Data Subject Rights requests concerning the data they control).

For the avoidance of doubt, each Client is solely responsible for establishing a legal basis for proceeding and providing adequate notice to their account users and clients whose data may be contained in Client-Owned Data (including sufficient reference to the processing of their personal data via the Services), and any other information necessary to comply with all applicable privacy and data protection laws; as well as for obtaining all approvals and consents from such individuals as required under such laws.

10. Website Analytics & Visitor Identification

When you visit our public websites (including **telephos.ai** and our application at **app.telephos.ai**), we operate our own first-party analytics to understand how our sites are used and which organizations are interested in Telephos. This section describes that processing. It applies to visitor data we collect about our own website visitors as an independent data controller, and is separate from Client-Owned Data we process on our Clients' behalf.

What we collect

- **A first-party analytics identifier.** We set a first-party cookie (**tph_vid**) and derive a browser/device characteristic (a “fingerprint” computed from properties your browser exposes, such as screen, timezone, language, and rendering characteristics). We use these to recognize returning visits to our own sites. We do not use them for third-party advertising and we do not sell them.

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- **Your IP address and coarse location.** Our servers observe the IP address of your request and derive an approximate location (such as country/region) and network information from it.
- **Usage and referral data.** The pages you view, the referring URL, and marketing-campaign parameters in the link you arrived through (for example UTM parameters).

Reverse-IP company identification

We may use your IP address, either directly or through a third-party lookup service, to infer the **organization or company** associated with your network (for example, "a visitor from Company X"). This is company-level business intelligence about which organizations engage with us; where an IP corresponds to a shared, hosting, VPN, or relay network, we exclude it from this inference rather than attribute it to an individual.

Linking a visit to your account

If you create an account or sign in to our application, we may associate your prior and subsequent visits to our sites (identified by the first-party identifier above) with your account, so we can understand your journey and improve our Services.

Retention

We retain the raw IP address for a limited period and then remove it, while retaining the derived, non-identifying information (such as coarse location and any inferred company). Other analytics records are retained in accordance with our data retention practices described in Section 4.

Your choices and consent

- **European Union, United Kingdom, EEA and Switzerland.** We request your consent before setting non-essential analytics identifiers or performing fingerprinting, and you may decline.
- **California and other U.S. states with opt-out rights.** We provide a "Do Not Sell or Share My Personal Information" choice and honor the Global Privacy Control (GPC) browser signal as a valid opt-out.
- **Everywhere else.** We provide notice of this processing and, where your browser sends a recognized privacy-preference signal, we honor it.

To exercise these choices or ask any question about this processing, contact us at **dpo@telephos.ai**.

11. Additional Notices

Updates and Amendments

We may update and amend this Privacy Policy from time to time by posting an amended version on our Services. The amended version will be effective as of the date it is published. We will provide prior notice if we believe any substantial changes are involved via any of the communication means available to us or via the Services. After such notice period, all amendments shall be deemed accepted by you.

External Links

While our Services may contain links to other websites or services, we are not responsible for their privacy practices. We encourage you to pay attention when you leave our Services for the website or application of such third parties, and to read the privacy policies of each and every website and service you visit. This Privacy Policy applies only to our Services.

Children Under 16

Our Services are not designed to attract children under the age of 16: We do not knowingly collect personal data from children and do not wish to do so. If we learn that a person under the age of 16 is using the Services, we will

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attempt to prohibit and block such use and will make our best efforts to promptly delete any personal data stored with us with regard to such child. If you believe that we might have any such data, please contact us by e-mail at **dpo@telephos.ai**.

Data Protection Officer

Telephos has appointed Adam Kane as our Data Protection Officer, for monitoring and advising on Telephos's ongoing privacy compliance and serving as a point of contact on privacy matters for data subjects and supervisory authorities. If you have any comments or questions regarding our Privacy Policy, if you have any concerns regarding your Privacy or if you wish to make a complaint about how your personal data is being processed by Telephos, you can contact **Legal@telephos.ai** or our DPO at **dpo@telephos.ai**.

Questions, concerns or complaints

If you have any comments or questions regarding our Privacy Policy, or if you have any concerns regarding your personal data held with us, please contact us at: **dpo@telephos.ai**.

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