



## Privacy Policy

Your privacy is important to MediaRoutes. Therefore, MediaRoutes is committed to respecting your privacy and the confidentiality of your personal data, traffic data and communications content. This Privacy Statement is designed to assist you in understanding how MediaRoutes uses and safeguards the information You provide in using MediaRoutes service.

MediaRoutes collects and processes, or has third party service providers who collect and process on MediaRoutes's behalf, personal data relating to You, as permitted to (1) provide the Service, in particular to convey the communications You make by means of the MediaRoutes Service, (2) invoice to You Your use of the Service and (3) carry out MediaRoutes marketing activities.

In this Privacy Statement the following capitalized definitions are being used, singular as well as plural.

**Communications Content:** any information that is communicated by users of MediaRoutes Service such as calls or phone numbers.

**Feedback Information:** any information that is reported to MediaRoutes by filling in the feedback forms on the Website.

**Passive Information:** Information that is necessary in order to provide You with the desired functionality of the MediaRoutes Service, such as a CLI numbers, Called Numbers and time of the day.

**Personal Data:** any information that MediaRoutes possesses relating to an identified or identifiable user of MediaRoutes Service.

**PSTN:** Public Switched Telephone Network.

**Register Information:** any information provided when voluntarily registering at the Website, including, but not limited to, username and password.

**MediaRoutes:** means under this Privacy Statement the Media Routes Inc., a company incorporated under the laws of Canada, having its registered office at 501, 2200 Roche Crt. Fowler Drive, Mississauga, ON L5K 3Z6, Canada.

**Subscriber Information:** Information that is necessary in order to verify Your identity and to provide Service, such as your name, billing information, Phone number, CLI and e-mail address on the Website.

**Traffic Data:** any data processed for the purpose of the conveyance of communication or the billing thereof, including, but not limited to, the duration of a call and the phone numbers of the called party and the calling party.

**User Profile:** any information about the user, filled in by the user on the Website.

**MediaRoutes Service:** means the payable services provided by MediaRoutes and/or MediaRoutes's partners, and other services which may be extended or changed from time to time;

**Website:** the website located at [www.MediaRoutes.com](http://www.MediaRoutes.com).

**You:** You, the user of the MediaRoutes Service, also used in the form "Your" where applicable.

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### 1. What is MediaRoutes and what services does it offer? [top](#)

MediaRoutes is a company established under the laws of Canada. Through the Website, MediaRoutes offers you the **MediaRoutes Service**, which may be extended or changed from time to time.



### 2. What information does MediaRoutes collect? [top](#)

In order to provide the **MediaRoutes Service**, MediaRoutes gathers and processes the following information.

- Register Information
- Your calling phone number
- User Profile

- Personal Data of friends
- Feedback Information
- Passive Information
- E-mail addresses

In order to provide You with the Service, MediaRoutes shall, in addition to the above mentioned information, collect and process the following information.

- Subscriber Information
- Traffic Data



### 3. How does MediaRoutes use this information and for what purpose? [top](#)

Our primary purpose in collecting information is to provide You with a safe, smooth, efficient, and customized experience. We may use the information defined in this Privacy Statement to: provide the services and customer support You request; resolve disputes, collect fees, and troubleshoot problems; enforce our Terms of Service; customize, measure, and improve MediaRoutes Service and Website content and layout; inform You about targeted marketing, service updates, and promotional offers unless You opt out; compare information for accuracy, and verify Your identity; provide other services for You as described when we collect the information. Additionally we may use Your information as described below.

- **Register Information**

You have to register using your phone number in order to use the MediaRoutes Service.

- **User Profile**

MediaRoutes stores the User Profile centrally on a server. This profile is used to contact you in the event that it is required by MediaRoutes to render you the Service.

- **Feedback Information**

Any and all information which is voluntarily submitted in feedback forms on the Website, is used for the purposes of reviewing this feedback and improving the MediaRoutes Service and Website. MediaRoutes reserves the right to utilize anonymous information for marketing purposes, for instance by displaying selected comments on the Website or in other communications. Further, MediaRoutes may from time to time ask you to provide information on your experiences which will be used to measure and improve quality. You are at no time in any obligation to provide any of such data. MediaRoutes will never use any personally identifiable (feedback) information without Your explicit permission thereto.

- **Passive Information**

Passive Information is automatically generated and is not stored centrally. MediaRoutes will only use this Passive Information, on an aggregated level, to provide You with better service or for statistical information.

- **E-mail addresses**

MediaRoutes respects the privacy of personal e-mail accounts and stores Your e-mail addresses just as securely as other Personal Data. MediaRoutes will not send You unwanted e-mail messages or junk mail, and

Your details will not be passed to third parties for their marketing purposes without Your explicit permission. However, MediaRoutes will use e-mail to send You messages about faults and service issues. MediaRoutes may also use e-mail to keep You up to date with news about the MediaRoutes Service. If You do not want to be kept informed in this way by e-mail, please contact MediaRoutes at [support@MediaRoutes.com](mailto:support@MediaRoutes.com). Further, MediaRoutes reserves the right to use e-mail to notify You of any eventual claims related to Your use of MediaRoutes Services, including without limitation claims of violation of third party rights.

- **Subscriber Information**

MediaRoutes asks for Subscriber Information in order to verify Your identity and to provide the Service. We use third party banking organizations and other providers of payment services to bill You for the Service and we will, therefore, provide this billing provider with the necessary billing data.

Please note that Your billing data is sensitive information, which can be used to find out information about Your use of Service. Please be sure to keep this information safe and do not share it with others.

- **Traffic Data**

In order to transmit the calls through the PSTN and to bill the calls, MediaRoutes collects Traffic Data. MediaRoutes will erase Traffic Data, or make Traffic Data anonymous, as soon as it is no longer needed for the purpose of the transmission of the communication or for billing purposes, unless applicable law permit otherwise.



#### **4. To whom does MediaRoutes transfer Your personal information? [top](#)**

Except as provided below, MediaRoutes shall not sell, rent, trade or otherwise transfer any Personal and/or Traffic Data or Communications Content to any third party without Your explicit permission, unless it is obliged to do so under applicable laws or by order of the competent authorities.

In order to provide You with the MediaRoutes Services or other services You have requested, MediaRoutes may sometimes, if necessary, share Your Personal and Traffic Data with carriers, partner service providers and/or agents, for example the PSTN-VoIP gateway provider and/or the third party banking organization or other providers of payment services. MediaRoutes will always require these third parties to take appropriate organizational and technical measures to protect Your Personal Data and Traffic Data and to observe the relevant legislation. Please be informed that, notwithstanding the abovementioned, in the event of a designated competent authority requesting MediaRoutes or MediaRoutes's local partner responsible towards such authority, to retain and provide Personal and/or Traffic Data, or to install wiretapping equipment in order to intercept communications, MediaRoutes and/or its local partner will provide all necessary assistance and information to fulfill this request.

Information collected on the Website may be stored and processed in any country in which MediaRoutes and its affiliates maintain facilities, including outside of the Canada. In this regard, or for purposes of sharing or disclosing data in accordance with this article 4, MediaRoutes reserves the right to transfer information outside of Your country. By using MediaRoutes Service You consent to any such transfer of information outside of Your country. As MediaRoutes continues to develop its business, MediaRoutes might sell or buy subsidiaries or business units. In such transactions as well as in the event MediaRoutes or substantially all of

its assets are acquired by a third party, personal information of MediaRoutes users will generally be one of the transferred business assets. We reserve the right to include Your personal information, collected as an asset, in any such transfer to a third party.



#### **5. What are cookies and how does MediaRoutes use them?** [top](#)

Cookies are pieces of information that MediaRoutes will transfer to Your computer's hard drive through Your browser to enable MediaRoutes's systems to recognize Your browser. Cookies also enable MediaRoutes to gain information about the use of its Website and to enhance the Website accordingly to the preferences of the users.

The Help option on the toolbar of most browsers will tell You how to prevent Your browser from accepting new cookies, how to have the browser notify You when You receive a new cookie, or how to disable cookies altogether. MediaRoutes's cookies do not contain any identifying information. Please bear in mind that some personalized services may not be available if You choose to disable cookies.



#### **6. How far does MediaRoutes's responsibility extend?** [top](#)

The Website may contain links that will let You leave the Website and access another website. Linked websites are not under the control of MediaRoutes and it is possible that these websites have a different privacy policy. The Privacy Statement applies solely to personal information that is acquired on the Website, so MediaRoutes urges You to be careful when You enter any personal information online. MediaRoutes accepts no responsibility or liability for these other websites.



#### **7. How does MediaRoutes protect Your personal information?** [top](#)

MediaRoutes shall take appropriate organizational and technical measures to protect the Personal Data and Traffic Data provided to it or collected by it, and shall not retain it any longer than permitted in order to perform its services or as required under relevant legislation. Your Personal and Traffic Data can only be accessed by authorized employees of MediaRoutes who need to have access to these data in order to be able to fulfill their given duties.

MediaRoutes shall take appropriate technical measures to protect the confidentiality of the Communications Content via its MediaRoutes Services, with due observance of the applicable obligations and exceptions under the relevant legislation.



#### **8. Can this Privacy Statement be modified?** [top](#)

MediaRoutes reserves the right to modify the provisions of this Privacy Statement if deemed necessary. We will inform You of these changes by publishing the revised Privacy Statement at [www.MediaRoutes.com/privacy](http://www.MediaRoutes.com/privacy). The revised Privacy Statement shall become effective within thirty (30) days of such publishing, unless You expressly accept the revised statement earlier by clicking on the accept button. You agree that the express acceptance by You, or Your continued use of the MediaRoutes Service after the notice period of

thirty (30) days, shall constitute Your acceptance of the Privacy Statement.



#### **9. What rights do You have and how can You contact MediaRoutes?** [top](#)

If You would like to exercise your right to view, correct, complete or remove Your Personal Data, please contact MediaRoutes at [support@MediaRoutes.com](mailto:support@MediaRoutes.com). Within a reasonable period of time and upon verification of Your identity, MediaRoutes will fulfill Your request, provided MediaRoutes will not act contrary to applicable legislation by fulfilling Your request.



#### **10. How long is Your Personal Data kept by MediaRoutes?** [top](#)

MediaRoutes will retain Your information for as long as is necessary to: (1) perform the MediaRoutes Service; (2) invoice to You Your use of the Service and to maintain records until invoicing for the Service cannot be lawfully challenged and legal proceedings may no longer be pursued; (3) carry out MediaRoutes marketing activities; (4) comply with applicable legislation, regulatory requests and relevant orders from competent courts; (5) enforce our Terms of Service; or (6) fulfill any of the other purposes detailed in this Privacy Statement.