

MEZMOCORP (DBA INNOCAPTION) PRIVACY POLICY

Last Updated January 2020

MEZMO Corporation ("InnoCaption," "we," "us," or "our") is committed to the privacy of our users (also referred to as "you" and "your"). This Privacy Policy is a binding agreement between us and you and is published and maintained to disclose our information gathering and dissemination practices in a transparent manner. This Privacy Policy applies to both the InnoCaption website (www.innocaption.com, the "Website") and InnoCaption applications ("InnoCaption App") (collectively, the "Services"), as may change or be updated from time to time. The Services are offered only to users located in the United States.

By entering the InnoCaption Website, registering for the Services, or otherwise providing InnoCaption information in relation to the Services, you accept all terms and conditions in this Privacy Policy and our [Terms of Service](#), which may also be updated and revised from time to time. Please also refer to our Customer Proprietary Network Information disclosures, available [here](#). InnoCaption reserves the right to change this Privacy Policy at any time by notifying our registered users of the existence and location of the new or revised Privacy Policy or by posting the new or revised Privacy Policy on our Website.

This Privacy Policy provides information about the following:

- I. What information of yours InnoCaption may collect;
- II. How InnoCaption uses your information;
- III. How you can modify or correct inaccuracies in your information;
- IV. How we protect your information; and
- V. Your use of the Services.

I. WHAT INFORMATION WE MAY COLLECT

InnoCaption may collect either PII or Non-PII when you provide that information, you use the Services, or you register for the Services.

Personal Information is any information regarding an identified individual, while Personally Identifiable Information ("PII"), is a subset of Personal Information that can be used to identify or contact a specific individual. Examples of PII include your name, address, and telephone number. InnoCaption generally collects Personal Information and/or PII in two ways:

1. When you choose to register for and/or use the InnoCaption App; and
2. When you choose to send an e-mail to InnoCaption, fill out a form on the Website, participate in a survey, or engage in other transactions or interactions with InnoCaption.

We also may collect certain non-personally identifying information ("Non-PII") when you visit the Website, respond to e-mails or other communications with the InnoCaption Team, or otherwise use the Services.

Some examples of the types of information we may collect are:

1. Your name
2. Your address(es), including the location from which you will access the Services
3. Your phone number(s)
4. Your email address(es)
5. Your IP address(es)
6. Your operating system/machine type
7. Analytics regarding your use of the Services (including minutes of use, telephone numbers or IP addresses called, date and time of call, among others)
8. Correspondence you send to us

Collection of User Personal Information During Registration

In order to use the InnoCaption App and access our Internet Protocol Captioned Telephone Service (IP CTS) service, you are legally required to complete our online registration process. InnoCaption collects the following PII during our registration process:

INFORMATION REQUIRED	WHY	DISCLOSURE
1. Full Name 2. Date of Birth 3. Last Four Digits of Your Social Security Number 4. Residential Address 5. Mobile Telephone Number	The Federal Communications Commission (FCC) legally requires us to obtain this information from you during the registration process. <i>47 CFR § 64.611(j)(1)</i>	Your information is only shared with the FCC's contracted Telecommunications Relay Services (TRS) Fund Administrator for compliance purposes. InnoCaption will never sell, distribute, share, or reveal your registration PII in any way unless compelled to do so by lawful order.

Set-Up Process and App Permissions

The InnoCaption App will ask for several permissions as pop-ups during the setup process. These permissions are to enable you to have a fully functional phone within your InnoCaption App. These permissions do NOT grant InnoCaption the ability to remotely access your device.

APP PERMISSION REQUEST	REQUIRED?	WHY	DISCLOSURE & ACCESS NOTES
Permission to Send Notifications	YES	This is how we let you know calls are coming through, that you have a voicemail, or that a new version of the InnoCaption App should be downloaded.	We do not use this permission setting to send you other types of notifications.
Access to Microphone	YES	This enables people to hear you during phone calls.	Your calls are not recorded and stored on the InnoCaption server.
Access to Contacts	YES	This enables our users to seamlessly place calls from their contacts using the InnoCaption App.	Your contacts are not transmitted to the InnoCaption server and are only visible to you.
Access to Location	YES	This allows our App to access your location in the event you call 911 from the InnoCaption App and do not know where you are.	InnoCaption does not track your location in the background.
Access to Media (Android Only)	YES	This enables you to save and email transcripts to yourself.	InnoCaption does not have access to your transcripts. None of your device's personal media is transmitted to the InnoCaption server when you save your InnoCaption transcript and email it to yourself.

Children's Privacy

The Website is a general audience website and is not directed to children generally, including children under the age of thirteen (13). In addition, we do not knowingly collect PII over the Internet from anyone under the age of thirteen (13).

II. HOW WE MAY USE YOUR PERSONAL INFORMATION

InnoCaption may use your information as required by any laws or regulations, to troubleshoot the Services, for internal analytics, or to market products to you.

InnoCaption reserves the right to contact site visitors and/or users regarding account status and changes to the subscriber agreement, Privacy Policy, or any other relevant policies or agreements.

Disclosure of Your Personal Information to Third Parties

We will disclose information required for troubleshooting purposes to individuals calling on your behalf who are able to provide proper verification of permission to access the account.

We may disclose your Non-PII in our internal statistical analysis and in research and development of products. We may disclose your Personal Information to the FCC, TRS Administrator and/or auditors, or other regulatory or law enforcement agencies as required pursuant to rules, regulations, requirements, laws, or lawful requests. In order to provide the Services, we may occasionally provide information to other companies or independent contractors that work on our behalf. In addition, InnoCaption may use or share your email address to enable us to market InnoCaption products or services to you or to provide you with quality customer service and troubleshooting assistance.

Online Data Collection

InnoCaption contractors and vendors may collect your information using the following tools, although InnoCaption does not collect or analyze your PII through these tools and applications:

TOOL/APPLICATION USED	PURPOSE
Google Ads	Keyword Tracking
Google Tag Manager	Conversion Tracking
Google Analytics	Website Behavior

III. YOUR ACCESS TO AND ABILITY TO CONTROL YOUR PERSONAL DATA

If you would like to obtain a summary of or correct the information InnoCaption has about you, please contact us.

Collection of Personal Information of subscribers is mandatory under FCC regulations. Upon request via postal mail, e-mail, or telephone, InnoCaption will provide to subscribers a summary of any Personal Information retained by InnoCaption regarding the subscriber. Subscribers may modify, correct, change, or update their Personal Information. InnoCaption will only send Personal Information to the e-mail address on file for the subscriber name associated with it, and any correspondence requesting to modify, correct, change, or update Personal Information must contain in the subject line: "Request to Modify Personal Information" for spam filtering purposes.

Phone: (571) 210-7687
Email: regulatory@innocaption.com
Address: MEZMO Corporation
14111 Robert Paris Court
Chantilly, VA 20151

Your California Privacy Rights

InnoCaption does not share your information with affiliates, sponsors, partners, advertisers, or other third parties for their direct marketing purposes.

IV. PROTECTING YOUR PERSONAL INFORMATION

We do our best to protect your information when you use the Services but cannot guarantee the confidentiality of all material transmitted to or from InnoCaption and/or the Services.

When you register on the InnoCaption Website or use our Website to access your account information, we endeavor to provide you a secure server. The secure server is designed to encrypt information a visitor inputs before it is sent to InnoCaption. Please be advised, however, that although InnoCaption has endeavored to create a secure and reliable Website for visitors, the confidentiality of any communication or material transmitted to/from InnoCaption via the Website, e-mail, or internet cannot be guaranteed. Accordingly, InnoCaption is not responsible for the security of information transmitted via the Internet. By using the Services, you agree and understand that InnoCaption is not

responsible or liable, directly or indirectly, for any damages or losses caused in connection with your use of or reliance on InnoCaption to transmit information.

V. YOUR USE OF THE SERVICES

You agree that InnoCaption is not liable for any third-party website content or functionality or for protection of any intellectual property you send. InnoCaption does not honor “Do Not Track” requests.

Links to Outside Content

InnoCaption may provide links to third-party websites or resources or third-party information referencing or linking to third-party websites or resources. InnoCaption has no control over such third-party websites and resources, and you acknowledge and agree that InnoCaption is not responsible for the content or information contained therein. When you follow such a link, you are no longer protected by our Privacy Policy, and we encourage you to read the privacy statements or other disclaimers of other such parties. InnoCaption is not responsible for the privacy or security practices or the content of non-InnoCaption websites, services or products. InnoCaption cannot and does not guarantee, represent, or warrant that the content or information contained in such third-party websites and resources is accurate, legal, non-infringing, or inoffensive. InnoCaption does not endorse the content or information of any third-party website or resource and, further, InnoCaption does not warrant that such websites or resources will not contain viruses or other malicious code or will not otherwise affect your computer. You agree and understand that InnoCaption shall not be responsible or liable, directly or indirectly, for any damages or losses caused or alleged to be caused by a third-party website.

Emails and Other Communications

This Privacy Policy does not protect you when you send business information, ideas, concepts, inventions, or other intellectual property by e-mail or other means to InnoCaption or via the Services. If you want to keep confidential any business information, ideas, concepts, inventions, or other intellectual property, do not send them to InnoCaption or via the Services.

Do Not Track

Some Internet browsers include the ability to transmit “Do Not Track” signals as part of the browser’s privacy settings, allowing users opt out of tracking by websites and online services. InnoCaption does not process or respond to “Do Not Track” signals.

If you have questions regarding this policy, please contact our Director of Regulatory Affairs by email at: regulatory@innocaption.com