



## **KLAS TELECOM ONLINE PRIVACY STATEMENT**

**Effective 23 January 2020**

### **1. General**

This is the Klas (Klas Limited, Klas Telecom Government, Inc. and Klas Telecom, Inc.) corporate website ("the website"). Klas respects your privacy and this Privacy Statement is intended to demonstrate that commitment.

This website is best viewed using the latest version of Chrome, Firefox, Safari, Opera, or Internet Explorer.

This Privacy Statement discloses Klas's information collection and dissemination practices relating to this website.

### **2. Your Acceptance of this Privacy Policy**

By using the website you accept this Privacy Statement.

If you disagree with or are uncomfortable with any aspect of the Privacy Statement your only remedy is to discontinue use of the website.

Klas reserves the right to modify this Privacy Statement at any time. If you continue to use the website or any portion thereof following notification or posting of any such changes your continued use will constitute acceptance of those changes. We therefore advise that you read the Privacy Statement each time you visit this website.

### **3. What Information do we collect and for what use?**

#### **General Web Browsing**

No Personal Data is revealed to us while you browse our website generally. Certain statistical information, however, is made available to us via our internet service provider and such information may include the IP and logical address of the server you are using, the top level domain name from which you access the internet (e.g. ie.com, etc), the type of browser and operating system you are using, the date and time you access our website the language you access our site in, the type of device you are using to access our site and the internet address linking to our website. We may use this information to help us in improving, administering, and diagnosing problems in, our website. This information may be used to monitor traffic to the website, helping us manage the website's capacity and efficiency. The information lets us know how many



people are on our site at a given time, the number of people that return to the website, the geographic location of visitors to our website and how long you spend on each page, what pages from our website visitors actually view, and how visitors interact with the content of our website. By collecting and analysing this data we can better understand what parts of the website are most popular; we can access user behaviour and characteristics, generally so that we can measure interest in, and better tailor, the content of our website.

This statistical and analytical information provides general information, not information which is specific to each individual visiting the website. We do not link this information to your Personal Data unless you have logged in to the website.

#### Personal Data

Personal Data is any information that can identify you as an individual, such as your name, postal or e-mail address, phone number, or personal interests.

If you provide Klas with Personal Data about somebody else (such as a friend, work colleague, family member) you must have that person's permission and consent to do so.

Access to certain Klas web pages, services, products or online activities may require that you create, or are provided with, a 'log-on'. It is your responsibility to maintain the confidentiality of your login username and password information.

During your use of the Klas website you may choose to provide us with Personal Data. Such circumstances may include:

If you register for an account on a Klas website;

If you register to attend a Klas event;

If you participate in a survey or other marketing event;

If you ask to be included in an e-mail or other mailing list;

If you use certain Klas products or services (such as helpdesk services);

If you contact us through the website, or by e-mail or any other means; or

If you choose to submit Personal Data to Klas for any other reason.



If you choose to provide us with your Personal Data through your participation in such activities, your Personal Data may be used by us for the following purposes:

the purpose(s) for which you provide it;

verification purposes and statistical analysis;

marketing and administration purposes;

to complete a transaction or in order to deliver products, services, or materials requested by you;

to carry out our obligations or enforce our rights arising from any contracts entered into between you and us;

to notify you about changes to our websites or applications, or any products or services we offer or provide through them;

to improve our websites, applications, services, and products, including by developing data analytics and reports about your and others' use of them;

to combat fraud or any other criminal activity; and

as otherwise required or permitted by law.

#### **4. What Rights do you have in relation to your Personal Data held by Klas?**

You have the right to request a copy of any Personal Data held by us about you. We may charge a fee for this which shall not exceed €6.35. If you wish to make such a request please send your request in writing to [legal@klastelecom.com](mailto:legal@klastelecom.com). We will respond advising you of the fee to be charged and such fee together with evidence of your identity should then be sent by mail to Legal Counsel, Klas Limited, One Kilmainham Square, Inchicore Road, Kilmainham, Dublin 8, Ireland.

You also have the right to have any inaccuracies in the Personal Data which we hold about you corrected, and to have your Personal Data erased if you consider we no longer have a legitimate reason to retain such data. You may also object to the use of your Personal Data or to block its use for specific purposes. If you wish to make any such requests they should be made in writing to Legal Counsel, Klas Limited, One Kilmainham Square, Inchicore Road, Kilmainham, Dublin 8, Ireland or to [legal@klastelecom.com](mailto:legal@klastelecom.com).



## **5. With whom does Klas share your Personal Data?**

In order to respond to your requests Klas may need to share your Personal Data with third parties and if that is the case Klas will only share information necessary to handle your request and will require such third parties to limit their use of your Personal Data to the extent required to fulfil your request. We will use your Personal Data to provide products and services you have asked for, to respond to call-back requests, and to provide specific marketing materials you have requested. If we do need to share your information with third parties in order to fulfil your request, such third parties may include our subsidiaries and affiliates, business partners (for example in the case of joint sales promotions, or distributors); service vendors; complementary product or service vendors; shipping companies; and postal and government authorities (such as customs authorities).

Third-party service providers and suppliers receiving your Personal Data are expected to maintain privacy and security protections that are consistent with Klas's privacy and information security policies. These companies are authorized to use your Personal Data only for the purposes for which it was originally collected or as required or permitted by law. However, unless otherwise dictated by law or agreement, Klas is not responsible for any improper use by such parties.

Klas may also disclose your Personal Data and other information, including across country borders, as follows:

- to comply with the law or in response to a subpoena, court order, law enforcement or government request, or other legal process,

- to produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigations, or other legal or administrative proceedings,

- if Klas determines in its good faith judgment that such disclosure is necessary to provide its services or to protect the rights, interests, safety, or property of its business, employees, suppliers, customers, or others,

- in connection with any proposed or actual sale or other transfer of some or all assets of Klas, and/or any proposed or actual sale or merger of Klas or any division of Klas,

- to enforce the terms of any agreement with Klas,



to combat fraud or other criminal activity,  
for any other purpose disclosed by us when you provide the information,  
as otherwise required or permitted by law, and/or  
with your consent.

## **6. Transfer of your Personal Data to Other Countries**

In accordance with applicable law, Personal Data covered by this Privacy Statement may be transferred to, and processed and stored in, the United States or any other country in which Klas or its affiliates, subsidiaries, service providers, business partners, or customers maintain facilities, even if the level of data protection required in that country differs from that required within the European Union. By submitting your Personal Data to Klas, you consent to such transfers and to the worldwide processing of your Personal Data.

## **7. Security**

The Klas website has industry standard security measures in place to protect the loss, misuse and alteration of information under the control of Klas. However, as no system can be guaranteed as 100% secure, we cannot ensure or warrant the security of any information you transmit to us and you transfer the data at your own risk. We endeavour to use appropriate security measures.

Some ways to protect your Personal Data include changing passwords often, using a combination of letters and numbers in passwords, and making sure you use a secure browser. In addition, be aware of phishing attacks, which attempt to steal consumers' personal identity data and financial account credentials. Phishers use 'spoofed' e-mails to lead consumers to counterfeit websites designed to trick recipients into divulging sensitive Personal Data such as credit card numbers, account usernames, passwords and personal tax numbers. Klas will never send you an e-mail asking you to provide or confirm sensitive Personal Data. If you receive a communication such as this, please immediately forward it to [legal@klastelecom.com](mailto:legal@klastelecom.com) and immediately delete it from your computer.

## **8. Links to Third Party Websites**

The Klas website may from time to time contain links to and from third party websites, some of which may be co-branded with the Klas logos. These websites are not operated or maintained by Klas and Klas does not share your Personal Data with such sites. If



you follow a link to any of these sites please note that Klas does not accept any responsibility or liability for the privacy statements or privacy practices of such third parties. Although we choose our business partners carefully, your use of their websites is entirely at your own risk. Once you have left our website you should make a practice of checking the relevant privacy statement of the third party website in order to determine how they will use the information they collect from you.

#### **9. Children and Privacy**

Our website does not target and is not intended to attract children, Klas does not knowingly solicit Personal Data from children, or request Personal Data from them.

#### **10. Governing Law and Jurisdiction**

This legal notice and all issues regarding this website are governed by Irish Law and are subject to the Irish courts.

#### **11. Severability & Waiver**

Delay or failure on our part in enforcing any of our rights shall not constitute a waiver by us of our rights and remedies. If any part of this Privacy Statement is held to be invalid or unenforceable, the validity or enforceability of the remainder will not be affected.

#### **12. Contacting Klas**

If you have any questions about this Privacy Statement, our policies or practices relating to the website, or to your use of the website you may contact: Legal Counsel, Klas Limited, One Kilmainham Square, Inchicore Road, Kilmainham, Dublin 8, Ireland. Email: [legal@klastelecom.com](mailto:legal@klastelecom.com).

#### **13. Changes to this Privacy Statement**

Klas will review and update this Privacy Statement periodically, and will note the date of its most recent revision above. We encourage you to review this Privacy Statement frequently to be informed of how Klas is collecting, using, retaining, protecting, disclosing, and transferring your information.