

# Privacy Policy

## Privacy Policy for Empire Long Distance Corporation d/b/a Empire Access and Empire Telephone Corporation.

### Introduction

Empire Access, a New York corporation, and Empire Telephone Corporation, a New York corporation (collectively, “**Empire**,” “**we**,” “**us**” or “**our**”) understands that by using our website, you are entrusting us with private information. As a result, we have crafted this Privacy Policy (“**Privacy Policy**”) with you in mind, so that we can protect your personal data and inform you of your privacy rights. In this Privacy Policy, we explain our policies and procedures for data collection, use, maintenance, protection, and disclosure when you visit <http://www.empireaccess.com> or <http://www.empiretelephone.com> (the “**Site**”). This policy is effective as of January 1, 2020.

We will update this policy as we adjust our procedures to protect your information. Before these changes go into effect, we will post the updated policies and procedures here, along with an effective date for the amended Privacy Policy. Once we alter the policy, continued use of the Site on or after the effective date is considered consent of the amended Privacy Policy.

### Automatically Collected Information

#### Automatic Information Collection

As is customary for websites, the Site will collect information, including technical and routing information about your computer, without being prompted. We use this information to optimize our Site for our users’ use. If, however, you choose to browse the internet anonymously or opt-out, we will not collect technical or routing information about your device.

#### Cookies & Web Analytics

Some information, including but not limited to IP addresses, operating systems, browsers, and browsing patterns, is either tracked or collected using “cookies” (which are small data files that a website places on your hard drive for record-keeping purposes) or “web beacons” (which are transparent pixel images that are used in collecting information about website usage). We use these to ensure our content improves and meets your, and other visitors’, needs. While most of the cookies we use will “disappear” when you finish browsing, we also use persistent cookies. Persistent cookies stay on your computer simply to ensure we recognize your device when you revisit our Site.

Please note that there are options on most browsers (including, but not limited to, Google Chrome, Mozilla Firefox, Safari, and Internet Explorer) to disable cookies, but it may impact

or limit your use of certain Site functions. To learn more about your ability to manage cookies and web beacons, please consult the privacy features in your browser.

### Google Analytics

We may use Google Analytics to collect information about your use of the Site. Google Analytics collects certain information, such as how often you visit the Site, the pages you visit, and the other websites you use prior to visiting the Site. We may use the information received from Google Analytics to improve the Site. Google Analytics collects only the IP address assigned to you on the date you visit the website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with any other information collected from you. Although Google Analytics stores a permanent cookie on your machine to identify you as a unique user the next time you visit the Site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use available at <http://www.google.com/analytics/tos.html> and the Google Privacy Policy available at <http://www.google.com/intl/en/analytics/privacyoverview.html>. You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser.

### **Other Information We Collect**

When you create an account on the Site, we may request personal information, including your name, address, email, and telephone number. This information is only collected when you present it to us, and we may use it for a variety of reasons, as explained in more detail below.

### **Use of Personally Identifiable Information**

We may use (and, where specified, share) your personal information for the following purposes:

#### Providing Services

We may use personal information to provide you with services that you have ordered or requested. We also use financial/credit card and payment information to process payments made through the Site and may need to share some of this information with delivery services, credit card clearing houses, and other third parties to complete the transaction.

#### Communication

When you contact us, we may use personal information to reply and provide you with the services or information you requested. We also may use your personal information to collect feedback on our Site and policies.

## Site Improvement

We reserve the right to use your personal information and browsing behavior to personalize our Site and improve the overall user experience. We also may use personal information to evaluate responsive rates or gauge the usability of our Site.

## Protect Content

In order to stop malicious, deceptive, fraudulent, or illegal activity from occurring on our website, we may use identifying information to monitor users' behavior on the Site. We regret that our attempts to prevent malicious, deceptive, fraudulent, or illegal internet activity may cause some users to be suspended from the Site and its features.

## **Data Processing**

We process your information so that we can deliver information, products, or services that you have either already purchased or that we believe you would be interested in. Any information we transfer to a third-party processor that is not affiliated with Empire is done so as permitted by law. We will enter into agreements with any such third-party processors to ensure that they will not further collect, sell, or use your personal information except as necessary to perform data processing. In some of these cases, we process this information automatically, but in others we will ask your permission in advance. Either way, your information helps us understand what our customers and visitors are looking for, and helps us operate as a better, more responsive business. We always strive to respect your privacy.

## **Data Rights**

If you have concerns about your personal information, we will work with you to review, revise and correct the personal information we have on file. Contact us via phone at 800-338-3300 or via email at [info@empireaccess.com](mailto:info@empireaccess.com) to request that we correct any of your personal information.

Subject to applicable law, you may have the right to request and obtain information about, or copies of, the personal information we process regarding you, where said information comes from, the business or commercial purpose for collecting this information, the third parties with whom this information is shared with, and whether our source of information is publicly accessible. Lastly, you may have the right to request information about when we typically delete stored information, or request that information be anonymized or destroyed. Depending on the situation and applicable laws, we may comply with your request to delete your personal information and direct any third parties to delete your personal information as well.

All of our processing is in furtherance of a legitimate business interest under applicable law. We recognize that a user may withdraw consent if such consumer wishes to do so, and that such consumer maintains a right to his or her own data.

## **Information Disclosure**

We may need to disclose your personal information, as described herein. Most of our disclosures are necessary to complete a transaction provide the services you have requested. Nonetheless, we may disclose your information if needed to comply with a court order, law, legal proceeding, or request from the government. We also reserve the right to disclose your information if we have the reasonable belief that said disclosure is fundamental to the safety of individuals associated with Empire or others unaffiliated with the company.

## **Tracking Disclosure**

We do not respond to web browser “do not track” signals or other similar mechanisms.

## **Children Under the Age of 13**

This Site is not designed for children under the age of thirteen, and we do not collect information about children specifically. If you believe that we have inadvertently collected information from a child in that age demographic, please contact us. Our policy is to delete any information collected from a child under the age of 13 as quickly as possible.

## **External Links**

The Site may contain links to third-party material, including other websites. This material is not affiliated with, or owned by, Empire and all other websites have their own separate terms and conditions and privacy policies. After you choose to follow the link and leave our Site, we are not responsible for the content of those websites, or their privacy policies. We cannot be held liable for what information they collect, or how they choose to use that information, as their respective privacy policies control your use of their website.

## **Third Party Advertisers**

Please note that at times, third parties may set cookies or use related technologies or web beacons when you view and/or click their advertising banners, links or other ads. Information from tracking technologies received with third party ads and links may be collected directly by those advertisers and ad service providers and used to cause relevant ads to be displayed to you. For example, these companies may collect and use information about you and your visits to the Site and other websites in order to provide advertisements about goods and services of interest to you. These advertisements may appear on the Site and on other websites. The advertiser’s privacy policy and/or that of its service provider will govern the use of this information and we are not responsible for the privacy practices of such companies. We encourage you to read these businesses’ privacy policies to learn about how they treat your information. Additionally, some of these companies (like the ad networks) are members of the industry groups, the Network Advertising Initiative and the

Digital Advertising Alliance, each of which offers a single location to opt out of their cookies. For more information about third party advertisers and how to prevent them from using your information, we encourage you to visit the Network Advertising Initiative's consumer web site, at <http://www.networkadvertising.org/choices>, and the Digital Advertising Alliance's consumer choice page at <http://www.aboutads.info>.

## **Security**

We utilize standard and reasonable security methods, including technical and physical protections, to prevent the theft, access, alteration, destruction, or disclosure of your information. Our methods are frequently and repeatedly tested and improved. Nonetheless, no communication using the internet is perfectly secure. We will attempt to protect your information, but we cannot guarantee the safety of any information you send to us, and you do so at your own risk. In the unlikely case of a breach of private information, we will disclose the breach to you in the most expedient time possible and without unreasonable delay.

## **Data Transfer from EU to US**

This company is located in the United States, and the information gathered from you will be processed there. The United States has not been given an "adequacy" finding by the European Union. Nonetheless, we will only transmit your private information to the United States if you agree to us doing so, to perform a contract with you, or to fulfill a compelling legitimate interest of Empire in a manner that does not outweigh your rights and freedoms.

## **Contact Us**

If you have any questions or concerns about these policies, or how Empire protects your personal data, please feel free to contact: [info@empireaccess.com](mailto:info@empireaccess.com).