

Covoda Communications, Inc.

PRIVACY & CUSTOMER PROPRIETARY INFORMATION POLICY

We know your privacy is important to you, and we want you to know it's important to us too. This privacy Policy is meant to explain our practices when it comes to your use of our products, services, and websites.

1. INTRODUCTION:

COVODA COMMUNICATIONS, INC. (also referred to herein as "we," "us" "COVODA, and "our") understands the importance of Privacy, Security and Customer Proprietary Network Information ("CPNI") of either those who visit our website and also our Customers (also referred to herein as "users," "you") and Customer information.

This Policy applies to visitors of COVODA website, (the "Site"), any users of COVODA Products and Services (the "Services") purchased from COVODA and COVODA Customers. This Privacy Policy outlines the information COVODA may collect, how COVODA will use and disclose that information and most importantly how we protect your information. By using the Services, Customer agrees to be duly bound by all the terms and conditions of this Privacy Policy and this Privacy Policy is hereby incorporated into the COVODA Customer Agreement. COVODA reserves the right to change or modify this Privacy Policy at any time at its sole discretion and will provide Customer with notification of such change by uploading to the Customer's portal, via email, posting changes to the COVODA website and/or other means as appropriate to COVODA.

2. SECURITY - SSL. The Security of your information is very important to us. To protect your information, we have several Federally Complainant Guidelines and Standards that we adhere to in order to protect your information. We use Secure Socket Layer (SSL) technology with a minimum of 128-bit encryption. Most web browsers support SSL and therefore those protocols will automatically encrypt the information you provide to is on the secure pages of the COVODA website. When visiting a page on our web site that requires you to include your confidential information, the bottom of your browser window will display an icon (graphic) of a closed lock or an unbroken key (based upon your browser type). The representation of this like or similar graphic denotes that you have successfully connected with a secure server. To validate the security of your connection prior to the submission of your personal information you can double click on the security graphic icon which will validate our security by displaying the COVODA IT SSL certificate.

3. REGISTRATION/INFORMATION COLLECTION. Before you begin to use our Services, you will be required to provide information to COVODA which may include but is not limited to; (i) Customer name and all related personal information; (ii) your cellular phone number, alternate email address, and (iii) credit card or bank account information. We have the sole discretion to accept or reject any potential Customer based on information provided by the Customer for any reason which may include but is not limited to; (i) invalid or incomplete information; (ii) issues related to a credit check which we may perform on your Company; (iii) a Customer provided credit card or bank information: (iv) any other like or similar frailty of data provided by the Customer; and/or; (v) any combination thereof.

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4. INFORMATION COLLECTION.

COVODA may collect two different types of information: (i) Customer Proprietary Network Information (CPNI), or alternatively Customers' Proprietary Network Information which is a Customers' Personally Identifiable Information; and (ii) Non-Customer Proprietary Network Information (Non-CPNI) which does not personally identify the Customer in depth on our system.

4.1 When you use the Services of COVODA we have an obligation and a duty by law, to protect the confidentiality of certain types of information and services that relate to you and your usage of the Service. This information includes but is not limited to information about an individual Customers quantity of usage, technical configuration, type, website usage, website visits, VoIP calling destination and location, and the amount of your use of COVODA Products and Services and information associated with your Customer account concerning the Services which you receive. Such information when matched to your individual personal name, address, data usage and telephone number is known as Customer Proprietary Network Information (CPNI). Examples of this type of information include; your individual name, address, telephone number, email address, credit card information, billing address and shipping information typically available from VoIP calling Service related details on your monthly bill, technical information, type of service, type of device (and underlying device identification numbers), past of current telephone charges, billing records, directory assistance charges, usage data and calling patterns.

4.2 Non-Customer Proprietary Network Information (non-CPNI) is aggregated information, demographic information, general IP addresses, user behavior data from web interaction metrics tools and any other information that does not reveal your specific identity.

4.3 In connection with our Customer acquisition process should you become a COVODA Customer, COVODA may collect CPNI about you and your Company that may be considered sensitive. COVODA may also collect CPNI about you from, among other places: information you provide directly to us, information regarding the services that COVODA currently provides or has previously provided to you, information COVODA receives from our bona fide affiliated entities or third parties relating to the establishment of our relationship or the provision of services to you. This information can be received in any manner, including in-person discussions, telephone conversations, and electronic or other written communications and shall be protected.

5. INFORMATION USE. We may collect CPNI about you to establish or maintain our relationship with your Company, respond to your inquiries, provide you with services you have requested, keep you informed of services we think may be of interest to you, personalize your experience with us, provision our services, and other reasons. Without CPNI, we may be unable to provide you with the services you have requested.

6. HOW TO ACCESS AND/OR CORRECT YOUR INFORMATION. You may request access to the CPNI that COVODA has about the you and users of the service at your location. You may also request the correction, amendment, or deletion of CPNI about you that is inaccurate. COVODA will treat requests for access, correction, amendment, or deletion of CPNI about you in accordance with its internal policies and applicable legal requirements.

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6.1. You can access all your CPNI and personally identifiable information that we collect about you online, by email and phone that we maintain by: (i) accessing your account using your username, password and additional information which is required to log onto our web site; (ii) by sending an inquiry to support@covoda.com; (iii) by calling 877-699-6345. When you contact us, we may also ask you additional questions to provide further information, so we are able to authenticate you on our system. We use these procedures as a way and means to safeguard your information. Federal privacy rules require COVODA to authenticate your identity prior to disclosing any of your personal information and when you contact us, we will ask you a series of question to authenticate you.

6.2 Once you have been authenticated as a valid COVODA Customer by using any of the above means you can access your account a COVODA Customer Service representative can discuss your account with you.

6.3 To protect your privacy and your security we will take all reasonable steps to verify your identity prior to our granting any access and/or prior to your making any corrections of your information.

6.4 From time-to-time COVODA may be notifying you of certain account changes. For example, whenever an online account is created or changed, or a password or other form of authentication is created or changed, COVODA may notify you. Additionally, after an account has been established, when a Customer's address including but not limited to postal or e-mail changes or; is added to an account COVODA may send a notification. These notifications may be sent to a postal or e-mail address, or by telephone, voicemail, text and or SMS message and you agree to consent to receive such delivery method including text and or SMS.

7. DISCLOSURE OF INFORMATION. COVODA does not sell or lease CPNI about you to any third-party information brokers and under no circumstances will ever use any third-party information brokers for any purpose.

7.1 COVODA maintains reasonable physical, administrative, and technical safeguards to protect your CPNI from loss, misuse, or unauthorized access, disclosure, alteration, or destruction. Our personnel and the personnel of our affiliates are provided access to CPNI about you only if they have a need to know the information in connection with a legitimate business purpose, such as; (i) the provision of services to you; (ii) to help identify other services that COVODA and its affiliates offer that may be of interest or use to you; and, (iii) to use our affiliates that aid in the provisioning of our service in order to deliver our services to you.

7.2 Notwithstanding any other provision of this Privacy and CPNI policy, our General Website Terms and Conditions of Use, our Customer Service Agreement, Acceptable Use Policy and additional program documents you may be required to sign and/or accept when you purchase our products and services and to the contrary, we reserve the right to disclose and use your CPNI if we believe that we are required to do so; (i) by law; (ii) in response to legal process, for example, in response to a court order or a subpoena; (iii) in response to a law enforcement agency's request; (iv) to enforce these policies stated herein and our other terms, conditions, or policies; (v) protect our operations; (vi) to protect the rights, privacy, safety or property of us, our employees, you or other users; and/or (vii) to permit us to pursue available remedies or limit the damages we may sustain. For example, we may to the fullest extent the law allows, disclose CPNI about you to a law enforcement or governmental agency to support them

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and/or an investigation to identify individuals who have been or may be engaged in illegal and unlawful activities.

7.3 COVODA requires third parties who perform services for COVODA to agree to treat your CPNI confidentially and securely in every circumstance in order to; (i) to protect the rights and property of COVODA or to protect you, other consumers and providers from fraudulent, abusive, or unlawful use of our services; (ii) to provide the Services to you, including our ability to assist you with troubleshooting with your services between the COVODA network and of any third parties as contacted by COVODA that may support our network; (iii) to bill you for our services. By using our web site, our products, and services and when establishing your account, you approve the use of your CPNI for our vendors, suppliers, contracted third party affiliates, joint venture partners and independent contractors in connection to deliver all products and services to you and/or for sales or marketing purposes as authorized by you.

7.4 You agree to assume any and/or all risks associated with providing CPNI and personally identifiable information to third parties via the use of our products and services. COVODA is committed to maintaining your privacy therefore we are obliged to provide you with protections to certain information about how you effectuate the use of our Services.

7.5 Because Non-CPNI does not personally identify you, we reserve the right to use non-CPNI, and to disclose Non-CPNI to third parties, for any purpose. This statement and nothing contained herein does not address the privacy and security practices or policies of third parties. However, we make all best efforts for our Third-Party affiliates to comply with all applicable privacy laws and regulations.

7.6 Unless restricted by law, regulation, contract, or professional standards, COVODA may transfer CPNI about you outside of the United States to other countries for the purposes described in this privacy notice. COVODA will not share CPNI about you with an unaffiliated third party who is not performing services for us without first obtaining your permission, unless provided however if such sharing is otherwise permitted by this privacy notice.

7.7 COVODA will provide CPNI about you to the following types of third parties including but not limited to the associated reasons:

7.7.1 Phone Service Delivery Providers: COVODA will provide your name and address to companies which provide a delivery service between COVODA, you and other parties that you may call using the service and as a means of delivering our products to you as quickly as possible.

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7.7.2 Financial Institutions, Banks Credit Bureaus: COVODA may provide financial institutions with your payment information, name, address, and phone number to process orders for products and services placed by you and complete the transaction of your payment to COVODA. We may also provide this information to other like and similar agencies and organizations to check your credit or validate your financial history.

7.7.3 You: From time to time, we may choose to use your CPNI information to provide you with information about our related communications and non-communications products and services or special promotions. Our use of CPNI may also enhance our capability to offer products and services which may be direct and customized to your specific needs. Therefore, you provide your approval by continuing to use our web site and/or our products and services to inform you of any such products and services other than those to which you may currently subscribe. Unless provided however you determine that you wish not to be contacted by us. If you determine that you do not want to be contacted by us about any new or different product or service offerings other than those to which you subscribe unless you opt out from such notifications as defined in Article 8 below.

7.7.4 Customer location/address installation, Shipping, Delivery, and Logistics: COVODA will provide your name, address and phone number to those entities or people within our network of on-site installation(s), service-related support calls and also distribution channels in order to process and ship your orders with speed and accuracy.

8. COOKIES. A cookie is a small file placed on your computer by a website server that uses the cookie to store information about your use of the website and to prepare customized pages. The Help menu on the menu bar 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, and how to disable cookies altogether. However, our web site may use cookies to recognize you when you return to the COVODA website to provide you with a better user experience. We use cookies to keep track of login/password information as well as your CPNI to personalize the website as well as for resolving fraud issues pending discrepancies.

8.1 Our cookies do not contain any CPNI, such as your name, or sensitive information, such as your credit card number. We also allow our affiliates and third-party vendors to use cookies on our website; some of these parties may use cookies in ways that we do not. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of the COVODA website. Unless you have adjusted your browser setting so that it will refuse cookies, our system may issue cookies when you log on to our site.

9. INTERNET PROTOCOL (IP) ADDRESSES.

9.1 We use your IP address if to help diagnose problems with our server, to administrate our website, diagnose hacking events and to better serve you. If your IP address is only used to identify you and form broad demographic information. This practice is common and even essential for most websites since all companies find it necessary to assess their business online and we at COVODA do the same. This is done by us in better order to serve your needs and better process your requests.

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9.2 We collect log files pertaining to the amount of amount unique users, the length of a visit, pages visited, time and day of visit, file downloads and if applicable advertising links and banners which we may have on our site; along with click thoughts to other web sites.

9.3 All of this information is collected in aggregate and is used in aggregate and not specific to a user. We do monitor usage of our system through IP addresses to assist with the investigation and prevention of potentially unlawful activities that may threaten the integrity of service or otherwise violate our Privacy Policy, our General Website Terms and Conditions of Use.

9.4 We maintain two types of web files using IP addresses and other information; (i) a web log file that monitors the usage of the site itself originating at individual IP addresses; and (ii) a log of calling information, such as phone number. COVODA will not read, listen to, or disclose to any third parties private e-mail, conversations, or other communications that are transmitted using COVODA services and actual phone conversations are not recorded and/or listened to by our staff or any of our third-party affiliates. Unless provided however when and as required to ensure proper operation of our services or as otherwise required by law.

10. LINKS AND SPECIAL RELATIONSHIPS.

10.1 Our site may include links to other websites on the Internet. However, we are not responsible for the privacy practice of such sites.

10.2 We encourage you to read the privacy statements of these linked sites as their privacy and security practices may differ from ours.

10.3. It's also important to know that COVODA has several strategic partners that help provide one or more of the services available through COVODA. Occasionally, we will share your account information with our partners if that is necessary in the development and/or improvement of our services, if you choose to opt-in to the sharing. On a case-by-case basis, if our partners have product information that may be of interest to you, we may allow them to use your information for the dissemination of product information, unless you instruct us otherwise by opting-out. COVODA may use pixels, transparent GIF files and/or like file types to help manage online advertising.

These files may be provided by our various partners, vendors, and providers. These files enable us to learn which advertisements bring users to our website. The information that we collect, and share is anonymous and not personally identifiable. It does not contain your name, address, telephone number, or email address.

11. SOFTWARE AND NETWORK.

11.1 COVODA uses multiple methods and modes to protect your CPNI. This includes but is not limited to software and software enhancements that identify whether you have approved use of your CPNI. Further, all COVODA employees are trained on COVODA's privacy and security policies and the use of your CPNI; this includes when it is to be protected or when it may or may not be disclosed. All marketing campaigns are approved by our management team and as needed by our regulatory team in order to ensure that all such campaigns comply with applicable local, state and Federal rules and regulations surrounding CPNI. Further we will not release any of your CPNI during a telephone call which you may

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initiate without first authenticating your identity in the manner set-forth herein this document. If any of our employees or affiliated entities violate this privacy, CPNI and security policy it will result in immediate disciplinary action against that employee and or affiliated entity as set-forth in our internal employee policies and procedures documents, independent contractors Agreement and/or any affiliated entities that have executed agreements by and between us and the contracting party.

12. CHILDREN'S ONLINE PRIVACY PROTECTION ACT. COVODA does not knowingly solicit or collect Customer identifiable information from children or teenagers under the age of eighteen. However, you should be aware that services purchased by you may be used by minors at your premise location without your knowledge or the knowledge of COVODA. If this occurs, any information collected from the usage will appear as your usage as the actual adult Customer and treated as such under this Privacy Policy.

13. NOTIFICATIONS AND POLICY CHANGES. If we are going to use your CPNI in a manner different from that stated at the time of collection we will notify you. You will have a choice as to whether we use your information in this different manner by opting out once you receive this notification.

14. LINKS TO OTHER WEBSITES, APPLICATIONS.

On our website, we may provide links to third party websites. We are not responsible for the content or information collection procedures and policies of those third-party sites, including their individual privacy policies. Please review the privacy policies of any and/or all third-party websites. By using devices to access the COVODA you are also able to access third-party websites or applications. Any third-party application or website you access from a calling device or other form of device is subject to content or information collection practices of those third-party sites and COVODA is not responsible for their individual operations, policies, or practices. Please review their privacy policies before using third party applications or visiting their sites.

17. GOVERNING LAW AND JURISDICTION. This Privacy and Customer Proprietary Information Policy, in all respects shall be governed by, construed, and enforced in accordance with the laws of the State of Florida, including all matters of construction, validity and performance. Any action to enforce or interpret the terms of this Agreement shall be instituted and maintained in the Superior Court of the County of Palm Beach, Florida. Either party hereby consents to the jurisdiction of such court and waives any objections to such jurisdiction.

18. CHANGES TO THIS POLICY. COVODA reserves the right to make changes to this Policy, so please check back periodically for changes. You will be able to see that changes have been made by checking to see the effective date posted at the bottom of the Policy. If we make any significant changes to our privacy policies and procedures, we may post a prominent notice on our website notifying you of the change and/or we may choose to email you directly (if you have opted to receive emails from us).

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