



Privacy Policy

Revision Date: January 26, 2023

Introduction

Lane is a trade name of Dura Lane, LLC, a Texas limited liability company with its main offices in San Antonio, Texas and Dura Lane Ltd a United Kingdom limited company with offices in Witham, UK. Lane provides software and related services for managing facsimile transmissions. Most of our customers are health care providers in the United States, Europe, and Asia.

This Privacy Policy describes our policies for personal data that we collect and use for our own general business purposes as well as our policies for personal data that we process on our customers' behalf as part of providing our services.

How to Contact Us

Email: legalnotice@lanetelecom.com or via mail: Dura Lane, LLC, 425 Soledad, Suite 500, San Antonio, Texas 78205.

Please contact us if you have any questions about the information in this Privacy Policy or our handling of your personal data, or would like to access, correct, delete, restrict our use, or take other action with regard to your personal data. We ask, however, that if we are in possession of your data solely as a service provider for our customer you first contact our customer with your request.

Changes to Privacy Policy

We may change this Privacy Policy from time to time. We will manage your personal data in accordance with the Privacy Policy version that was published on the date that we collected the data about you. Prior versions of our Privacy Policy are available on request. Please send your request for a prior version of the policy to legalnotice@lanetelecom.com.

Definitions

The types of data we collect and our purpose for collecting it depend on how you interact with us. We have used defined terms for the different types of relationships to help us explain our privacy practices:

- **customer** means the organization that is the purchaser of our software licenses or services, such as a hospital or doctor's office; the customer might also be a technology company that resells our software licenses or services to end customers;
- **customer staff member** means an individual who interacts with us as a representative of our customer; this includes the individuals who are our customers' billing contacts and technical support contacts;
- **fax sender or recipient** means the individual who actually sends or receives a fax message using our software or services
- **fax content subject** means an individual whose personal data is part of a message that is transmitted or managed by means of our software or services; for example, a fax content subject could be an individual whose name is included on a fax cover page or whose personal data is part of the faxed message;
- **"visitor"** means an individual who visits our website, our social media pages, our offices, interacts with us at a trade show or other industry event, or communicates with us in some other way other than as a customer staff member;

These words also have certain meanings in this Privacy Policy:

- **"site"** or **"website"** refers to www.laneds.com and any other website where this Privacy Policy is posted;
- **"we"**, **"our"** and **"us"** refer to Lane Telecom;
- **"you"** and **"your"** refer to visitors, customer staff members, fax senders or recipients, and fax content subjects as indicated by the context.

Data Collection Purposes

We collect personal data for our business purposes:

- to operate our website;
- to improve our website and service offerings;
- to market our services;
- to manage our relationship with our customers, including account administration;
- to provide our online services to our customers;
- to provide customer support; and
- to manage our vendors.

We may allow third party advertisers, such as Google Ads to collect personal data on our site for their use in selling targeted advertisement services, both to *Client name and others. See **Advertising Ecosystem** below.

The Section below captioned, "How We Use Data" explains how we use different categories of data for each of these purposes.

| Category of Data Collected | Examples of Data Collected | Method of Collection | Category of Individuals |
|----------------------------|--|--|--|
| IP Address | IP address | <p>collected by our web servers when you visit our websites, customer portal, or service platform;</p> <p>collected by communications features on our site, such as chat;</p> <p>collected by our email service provider</p> | <p>customer staff member</p> <p>fax sender or recipient</p> <p>visitors</p> |
| Device | information about your device such as the operating system, time zone setting, language setting, browser settings, and browser plug ins | collected by our web servers when you visit our websites, customer portal, or service platform | <p>customer staff member</p> <p>fax sender or recipient</p> <p>visitors</p> |
| Navigation | time and duration of your visit on each page on our website, customer portal, and service platform, navigation path from page to page (i.e., what you click on); the site you visited immediately prior to and after visiting our site; geolocation data | <p>collected by our web servers when you visit our websites, customer portal, or our service platforms;</p> <p>collected by our third-party service providers, such as Google Analytics who may use cookies and other tracking technologies</p> <p>Please see How to Opt Out of Online Data Collection below for information on how to block cookies.</p> | <p>customer staff members</p> <p>fax sender or recipient</p> <p>visitors</p> |
| Search Terms | If you use a search feature on our site we will collect the search terms you use | | |
| Online Advertising Profile | <p>We capture the link that you click on in our online advertisements.</p> <p>This link enables us to associate you with the advertising parameters we provided to the advertising service. For example, we may ask an advertising service to target our ad to individuals that the ad service has identified as a staff member of a health care provider. If you arrive at our site by means of</p> | <p>Links created by advertising services and provided to us;</p> <p>See the section below captioned Advertising Ecosystem and How to Opt Out of Online Data Collection.</p> | visitors |

| Category of Data Collected | Examples of Data Collected | Method of Collection | Category of Individuals |
|--|--|--|-------------------------|
| | the link in that ad, we will be able to identify you as a staff member of a health care provider. | | |
| Name and Contact Information of Customer Staff Members | We collect your name, job title, job function, the organization you represent, email address, and phone number when you establish an online account on our customer portal as a customer representative | customer portal | customer staff members |
| Payment Card Information of Customer Staff Members | If you use a personal payment card or other financial account to make payment arrangements, then we may collect information relevant to the processing of the payment transaction. | customer portal | customer staff members |
| Name and Contact Information of Visitors | We will collect your name and other contact information that you may elect to provide as part of a communication with us, either online such as via a chat, submission of a webform, or in an email, or offline, such as on a phone call, by providing a business card or other information at a trade show | webforms, email, chat, phone call, in-person interaction | visitors |
| Customer staff member login (username and password) | Each customer staff member is required to establish a unique user name and password to use our services; If the customer wishes to integrate our services with other online services, we will require the customer to provide sufficient credentials to create an authorized connection to those services on the customer's behalf, which may include a customer representative's login information | Customer portal, service platform | customer staff member |
| Social Media Interactions | If you use the social media features on our website or visit our social media pages we will | buttons on our website that allow you to publish information about your site visit to a social media | visitors |

| Category of Data Collected | Examples of Data Collected | Method of Collection | Category of Individuals |
|----------------------------|---|---|--|
| | <p>capture the information that is generally available to users of those social media platforms.</p> <p>You should review the privacy policies of the social media providers as well since your visit to their platform by means of our social media button may allow them to collect information about your activity on our site.</p> | <p>platform or run interactive mini-programs on our site. For example, we may have a “like” or “tweet” or similar button that, when clicked on, will generate a social media posting by you on LinkedIn or other platform that highlights or points back to the content on our site that you liked, tweeted, etc.</p> | |
| Other Personal Data | <p>We may collect other information that Visitors or Customer Staff Members elect to provide in their communications with us. For example, you may volunteer personal data in a support request or email. We do not solicit more information from you than what we need to fulfill our business purpose described below, but if you volunteer this information it will be stored in our systems with the communication in which it was included</p> | <p>Customer portal; service platform; communications services such as chat and email</p> | <p>customer staff members</p> <p>fax senders or recipients</p> <p>visitors</p> |

Marketing Partners and Resellers: We have relationships with other companies that help us market, sell and deliver our services. They may collect personal data of the type described above using the methods described above and provide that data to us. For example, we have relationships with companies who refer customers to us and resellers who offer our services under the reseller’s own brand name. We will treat personal data we receive from our marketing partners and resellers the same as the personal data we collect directly.

Combinations of data collected using different methods: We may elect to associate the personal data we capture about you as part of visitor interactions with personal data we collect about you as a customer staff member.

Purpose for Collection and Use of Personal Data

This section describes more specifically how our use of personal data relates to the purposes for which we collected the data.

Visitors: We collect data about visitors:

- to operate our website – web servers, by their nature, must capture your IP address and information about your browser and device to display our site to you;

- to develop our website and help us develop of product offerings – we use the information to help us understand what part of our website and products offerings is of interest to different kinds of visitors so that we can modify and improve our site content and other marketing materials to be more appealing to prospective customers; we may also use the information about your site visits and other visitor interactions to help us measure interest in our services or various features of our services;
- to show you personalized content when you visit our site – we use information about your prior visit to our site to customize your subsequent visits; for example, we may make information about products or services that appear to be of interest to you based on your prior visit more visible to you as part of your navigation of our site;
- to measure the success of our advertising efforts – we use visitor information to verify whether the ad services we purchase from third parties are actually resulting in visits to our site or other visitor interactions;
- to register you for webinars, office visits, or other online or off-line events we may host; and
- to communicate with you as part of our marketing efforts – if you provide us with contact information we may use it to send you communications about our company, our products or services, or related topics that we think you may find of interest.

Customer Staff Members: we use data collected about our customer’s staff members (alone or as combined with data collected as part of an customer staff member’s visits to our website prior to logging in):

- to provide our online services – we use login credentials to authenticate individuals as authorized users of our services; we use data collected by our servers as necessary to provide the services
- we use contact information to send invoices and other account communications, authenticate individuals who request information or support on the customer’s behalf, and administer the customer’s account, such as processing billing information to complete purchases; we may also use customer staff member’s contact information to communicate with them about service issues and provide support
- to review compliance with usage terms in our services agreements; for example if the customer’s use of our services is limited to a certain number of individuals we may use personal data to help us monitor compliance with the usage restrictions;
- to help us develop our service offerings – we may use information about customer staff member’s use of our services to measure interest in various features and plan enhancements or new features, and to improve user experience;
- to communicate with you as part of our marketing efforts – we use contact information and information about your use of our services to send you communications about our products or services, or related topics that we think you may find of interest; and
- to market our services - if you provide a customer testimonial or other content for marketing purposes we will publish the content with your name or other identifying information that you

authorize us to use; if you agree that we may use you as a reference, we may provide your name and contact information to prospective customers for our services so that they may contact you to discuss your experience with our services.

Please note that if you participate in a Webinar or other open forum on our site your communications in that forum will be available to all other participants.

Fax Senders or Recipients: we use data collected about fax senders and recipients to transmit fax communications as part of our online services; we do not use this information for any other purpose.

Fax Content Subjects: our customers' fax messages may include data about individuals; we do not have access to the content of a fax message unless the customer uses our online service offering, in which case we have access to the content of our customers' fax messages only for a brief time (seconds) as necessary to transmit the message; we do not use the information that is part of the fax message for any purpose.

Data Integrity

We process personal data only for the purposes for which it was collected and in accordance with this Privacy Policy. We regularly review our data collection, storage, and processing practices to ensure that we only collect, store, and process the minimum personal data needed for the purpose collected. We take reasonable steps to ensure that the personal data that we process is accurate, complete, and current, but we depend on our customer users to update their personal data as necessary.

Choices and Means to Limit Use and Disclosure of Your Data

We will honor your requests to:

- disclose to you the personal data that we have about you;
- restrict the use or disclosure of your data or delete your data from our records, except to the extent the law permits us to retain or use your data for reasonable record keeping purposes;
- correct your data if the data is inaccurate or incomplete for the purpose for which we process your data;
- revoke any consent you may have previously given for the use or disclosure of your data.

For example, if you no longer consent to our use of your data for marketing purposes, we will stop using the data for that purpose and notify any third party with whom we have shared that data that they must also stop using it for that purpose.

However, if we have your data as a service provider to our customer and your request would prevent us from fulfilling a legal obligation to our customer, we will notify you that this is the case and ask you to communicate directly with our customer to resolve the issue.

You may submit a request to us at legalnotice@lanetelecom.com. If you ask a third party to make a request to us in connection with your personal data, we will require the third party to provide reasonable evidence that they are authorized to make the request on your behalf or may contact you to confirm their authority.

California Privacy Law

In addition to our commitments stated above, if our collection of personal data about you for our own general business purposes is covered by the California Consumer Privacy Act you have certain rights under that law.

You may request disclosure of the following specific information:

- the categories of personal data as well as the specific pieces of personal data that we have collected about you for our business purposes over the prior 12 months,
- the categories of sources from which we have collected that personal data,
- our purpose(s) for collecting that personal data,
- the categories of third parties with whom we have shared the personal data, such as our service providers, and
- whether we have sold the personal data to third parties or disclosed the information to third parties for a business purpose, and if so the categories of personal data and third parties.

In addition, you have the right to ask us to delete your personal data. We will comply with your deletion request and require our service providers to do the same, unless we plan to retain the personal data on a legally permitted basis, and we give you notice of this fact and the legal basis on which we rely.

You may make a request by calling our toll-free number 800-295-0494 or submitting the request to [web form](#) or by sending an email or physical mail request to the addresses above.

Before responding to your request, we may ask you to provide information needed to verify that you are the consumer (or have authorization from the consumer) whose personal data is covered by the request.

We may not discriminate against you because you make a request described in this Section by denying you our services or providing a different quality or price for our services, unless the different service or price is reasonably related to the value provided to you by your data.

Additional Rights for European Economic Area (EEA) and Certain Other Territories: Your Rights under the General Data Protection Regulation

If you are from certain territories (such as the EEA), you may have the right to exercise additional rights available to you under applicable laws, including:

- Right of erasure: In certain circumstances, you may have a broader right to erasure of personal information that we hold about you. For example, if it is no longer necessary in relation to the purposes for which it was originally collected. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.
- Right to object to processing: You may have the right to request that Lane stop processing your personal information and/or to stop sending you marketing communications.

- Right to restrict processing: You may have the right to request that we restrict processing of your personal information in certain circumstances (for example, where you believe that the personal information, we hold about you is inaccurate or unlawfully held).
- Right to data portability: In certain circumstances, you may have the right to be provided with your personal information in a structured, machine readable and commonly used format and to request that we transfer the personal information to another data controller without hindrance.

If you would like to exercise such rights, please contact us at the contact details section below. We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

You also have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. A list of contact details for the EU data protection authorities is available here.

https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

Lawful Basis for Processing under GDPR

The European Union's General Data Privacy Regulation or "GDPR" and the equivalent law in the United Kingdom require that processors of personal data meet one of the "lawful basis" or "legal basis" grounds defined in those laws. Our lawful basis for processing under these laws is either consent (for visitors) or the necessity of fulfilling our contractual obligations to our customer (for customer's staff members, fax senders and recipients, and fax content subjects). In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person. Where we rely on your consent to process the personal information, you have the right to withdraw or decline your consent at any time. Please note that this does not affect the lawfulness of the processing based on consent before its withdrawal.

Data We Have in Our Role as a Service Provider to Our Customers

As stated above, we have personal data provided to us by our customers for our use as a service provider to the customer. We have described the limited ways we process that data above. Some of our customers are subject to special data privacy laws, such as the General Data Protection Regulation adopted by the European Union in May 2018 (the "GDPR") and the California Consumer Privacy Act. (the "CCPA"). We make appropriate contractual commitments to our customers in support of their obligations under the GDPR, CCPA or other data privacy and protection laws applicable to them.

Please contact us at the address above if you have questions or concerns regarding our processing of the data that we have in our role as a service provider to our customer. We ask, however, that your first contact our customer if you have a request to access, block, erase or take other action with respect to data that we have solely as a data processor for our customer.

Disclosure

We have not sold or leased personal data and will not sell or lease your personal data unless you give us your consent to do so. The California Consumer Privacy Act includes a definition of "sale" that may include permitting third party advertisers to collect data about our Site visitor for use as part of their

advertising services generally. During the prior 12 months we have permitted LinkedIn to collect data on our site by means of advertising cookies. See the section below captioned Advertising Ecosystem for information on how you block these cookies.

Unless we ask for and you provide you additional consent in writing, we will not disclose your personal data to third parties except as follows:

Legal Reasons

When we believe release is appropriate to comply with the law, to enforce our terms of use and other rights, or to protect the rights and safety of others.

This may include exchanging information with government regulatory or law enforcement agencies, or with other companies and organizations for fraud protection and legal compliance.

Sale of Business

As part of a sale of a sales of business assets where the purchaser needs the personal data to use the assets.

We may in the future sell all or part of our assets or be involved in a merger. We may provide the company that is seeking to acquire our business with access to personal data as part of their evaluation of our business, but will require them to maintain the personal data in confidence and use it only to evaluate our business. If we complete a transaction, it is customary to transfer personal data that is related to the purchased business assets to the purchaser.

Our Service Providers

We use the services of other companies to collect data on our behalf or to help us analyze, store, manage and otherwise process your personal data. Each of these companies commits in its contract with us to use the personal data only according to our contract with them or our other instructions as necessary to support our business. They are not authorized to use your personal data for any other purpose. They are not authorized to disclose your personal data to others except with our permission, and only if they require the others to comply with the same restrictions that apply to them.

Our subprocessors include:

- Stripe, bill.com - payment processing
- Microsoft O365- organization email and documents management provider
- Google Analytics - analytics
- Google Ads - advertising
- Salesforce – customer relationship management
- Pardot – automated marketing communications
- Amazon AWS – Infrastructure provider, applications
- Azure - Infrastructure provider, applications
- Slack
- WordPress
- etherFAX

Protecting Network and Information Security

We may disclose your personal data as necessary to protect our information and systems from unauthorized actions that compromise their security or availability, such as disclosures as part of industry initiatives to identify and block malicious actors.

Advertising Ecosystem

We use online advertising services that enable a practice referred to as “online behavioral advertising.” These services aggregate data about an individual’s behavior on many different sites and online services and use that data to sell targeted advertising services. For example, we permit Google’s advertising services to collect data about your behavior on our Sites, as do many other website operators who use Google’s ad services. Google combines the data about an individual that it collects from different sources and uses this aggregate data to sell advertising services that target the display of ads to web users who meet certain behavioral criteria. Google does not disclose this aggregate data to us, but we are able to infer that users who interact with our ad meet the advertising criteria we provided. Google collects this data using cookies, web server logs (its own and its advertising customers), clear gifs and other online data collection techniques. See Online Data Collection Techniques and How to Opt Out of Online Data Collection.

Online Data Collection Techniques

A cookie is a unique alphanumeric identifier that is placed by a web server on the web visitor’s browser. Cookies are used to analyze visitors’ use of the website. For example, a website operator can use the cookie to identify the number of unique visitors to the site, whether or not those visitors are repeat visitors, and information about the visitor’s activity on the site, device and device settings. A tracking pixel, also known as a web bug or web beacon, is a small graphic (usually 1 pixel x 1 pixel) invisible to the eye, that is embedded in web content or email. When content that has an embedded web beacon is viewed, the browser will request content from a web server, which in turn will set a cookie. We use these tracking pixels to determine whether an email has been opened and acted upon.

How To Opt Out of Online Data Collection

You can manage your cookie preferences at any time.

You can also manage browser cookies through your browser settings. The 'Help' feature on 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, how to disable cookies, and when cookies will expire. If you disable all cookies on your browser, neither we nor third parties will transfer cookies to your browser. If you do this, however, you may have to manually adjust some preferences every time you visit a site, and some features and services may not work.

Our servers do not recognize or respond to any “do not track” setting you may have in your browser.

The third parties who we permit to collect data on our site have features that allow you to block their data collection via cookies. See their privacy policies and cookie policies.

Communications Policy

If you do not wish to receive our email or other communications, please send your request to legalnotice@lanetelecom.com. Please note that it may take up to ten days to remove your contact information from our marketing communications lists, so you may receive correspondence from us for a short time after you make your request.

Children

Children are not permitted to use our site or services. We do not knowingly collect personal information from anyone under 16. If you are under 16, do not use or provide any information on our Sites unless you have involved your parent or guardian. If we discover that we have information about a child, we will delete that information. If you are the parent or guardian of a child and you believe we have personal data about the child without your consent, please contact us at the address appearing at the top of this page and we will delete that information.

Security

We protect personal data from unauthorized use, disclosure, corruption, and destruction using appropriate technical and organizational measures.

Data Retention

We will retain your personal data only for as long as reasonably necessary to fulfill the purpose for which it was collected, and to comply with our legal obligations, and will use secure means to destroy the data after that time. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

International Transfers

We will comply with laws applicable to the transfer of personal data across international borders. We provide appropriate contractual commitments to our customers in the European Union and countries in the European Economic Area that are not part of the European Union, as well as the United Kingdom and other jurisdictions that require protections around transfer of personal data to the United States.

Other

Links to Other Site: we may include links on our site to other websites. This Privacy Policy does not cover information collected by operators of those other websites and you should review the posted notices on those sites to understand their privacy practices.