



## Personal Information Privacy Policy

### Introduction

AnswerNet and its U.S.-based subsidiary Cerida Investment Corporation d/b/a Call Center Services and Appointment Setting Pros ("ANSWERNET", "we", "our") believe in protecting your privacy. We recognize the importance of safeguarding the privacy of our users while providing the highest possible quality of service. Our Privacy Policy is designed to assist you in understanding how we collect and use the information you provide to us. In adopting this policy, it is our intent to balance our legitimate business interests in collecting and using information, with your reasonable expectations of privacy.

Please read this agreement carefully. By using this site, you signify your consent to our Privacy Policy. If you do not agree to this policy, please do not use our site.

### Capturing and Using Information

When you visit our site, we may collect two types of information. Personal information (which you provide when you fill out forms or register on our website) includes things such as, for example, name, address, telephone number and email address. This is collected on an individual basis. Site use information is "Aggregated Data." This means that the information from many users is grouped together in a way that does not disclose the personal information of any particular user.

The Information collected when you visit the site may be used in the following ways: to contact you directly to process your specific request; to enhance and improve our website by performing statistical analyses of user behavior and characteristics in order to measure interest in and use of the various areas of the site; to help us improve our customer services; to periodically send emails to provide you with information and updates regarding our company and services.

### Opt-Out Instructions

Please note that if at any time you wish stop receiving emails, unsubscribe instructions will be available on the email. You can also ask us to stop contacting you by emailing at [answer@answernet.com](mailto:answer@answernet.com), or calling us at 800-411-5777.

### Cookies

You should also be aware that information may be collected through "Cookies." Cookies are small data files that web sites transfer to your computer's hard drive for record-keeping purposes. Cookies can be used to tell when your computer has contacted a web site but cookies do not contain personally identifiable information.

### Disclosure to Third Parties

We do not trade, sell or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business or servicing you. However, non-personally identifiable information may be provided to third parties for marketing, advertising, analytical or other uses. However, we do not control the privacy policies of our business partners, advertisers, sponsors or other sites to which we provide hyperlinks. You should be aware that, if you voluntarily disclose personal information in public areas, such as chats or bulletin boards, that information may be collected by others, resulting in unsolicited messages.

### Children

No information should be submitted to or posted at our site by guests under 13 years of age without the prior consent of their parent or guardian. No information collected from guests under 13 years of age is used for any marketing purpose whatsoever.

## **EU-US and Swiss-US Privacy Shield**

ANSWERNET complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries [and Switzerland] transferred to the United States pursuant to Privacy Shield. ANSWERNET has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

These are our promises to you:

1. Notice. When we seek to collect your personal information, we will give you timely and appropriate notice by describing what personal information we seek to confirm or collect (which consists of: the individual's name and title; business name, address, email and phone number), advising that we are calling on behalf of a client and will be providing that client with the information received. This information is collected and used exclusively for purposes of conducting business with our customers. We will collect only as much personal information as we need for specific, identified purposes as per our client, and we will neither disclose the information to any third party nor use it for any other purpose, without first obtaining your consent. If you would like to opt out, simply contact us as indicated in Paragraph 6. You may also contact us if you would like access to your information and/or have questions related to our use of your information.
2. Choice. We will provide an individual opt-out or opt-in choice before we share their data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To limit the use and disclosure of your personal information, please submit a written request to the contact information listed below.
3. Onward Transfer/Sharing. We are a business to business (B2B) call center. Companies hire us to make calls to other companies to tell them about their products or services. The only third party we share our data with is the client that hired us and gave us the original data. After we have completed the campaign they have hired us for, we then return the updated data back to them. It does not get shared with anyone else. Except as described in this Privacy Policy, we will not share your personal information with other third parties without your consent, except to the extent required in response to a lawful request by public authorities, including those related to national security or law enforcement. ANSWERNET's accountability for personal data that it receives under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, ANSWERNET remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless ANSWERNET proves that it is not responsible for the event giving rise to the damage.
4. Security. We will take appropriate physical, technical, and organizational measures to protect your personal information from loss, misuse, unauthorized access or disclosure, alteration, and destruction.
5. Data Integrity & Purpose Limitation. We will take reasonable steps to ensure that the data collected is reliable for its intended use and is accurate, complete and current. We will process and use your personal information in a way that is compatible with the purposes for which it is being collected, or as permitted by law, in compliance with this Privacy Policy.
6. Access. We acknowledge that EU and Swiss individuals have the right to access the personal information that we maintain about them. An EU or Swiss individual who seeks access, or who seeks to correct, amend, or delete inaccurate data, should direct their query to the contact information listed below. If requested to remove data, we will respond within a reasonable timeframe.
7. Recourse, Enforcement and Liability. We will regularly review how we are meeting these privacy promises and will provide an independent way to resolve complaints about our privacy practices. You are encouraged to contact ANSWERNET with questions or issues regarding this Privacy Policy. We will investigate the inquiry, respond to it and attempt to resolve any concerns regarding privacy. Please see below for additional options for resolution of your inquiries, to the extent they are not resolved by ANSWERNET. ANSWERNET is subject to the investigatory and enforcement powers of the Federal Trade Commission.

To access your information, ask questions about our privacy practices, or issue a complaint, contact us at:

Ms. Cassandra Rheault, General Manager  
Cerida Investment Corporation d/b/a ANSWERNET

175 Cabot Street, Suite 440  
Lowell, MA 01854  
978-649-3682 ext. 212  
978-513-1229 (direct)  
[cassandra.rheault@answernet.com](mailto:cassandra.rheault@answernet.com)

In compliance with the Privacy Shield Principles, ANSWERNET commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact ANSWERNET at:

Ms. Cassandra Rheault, General Manager  
Cerida Investment Corporation d/b/a ANSWERNET  
175 Cabot Street, Suite 440  
Lowell, MA 01854  
978-649-3682 ext. 212  
978-513-1229 (direct)  
[cassandra.rheault@answernet.com](mailto:cassandra.rheault@answernet.com)

ANSWERNET has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/EU-privacy-shield/for-eu-consumers](http://www.bbb.org/EU-privacy-shield/for-eu-consumers) for more information and to file a complaint. This service is provided free of charge to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

## Contact Us

If you have any questions or concerns about this policy or our information handling practices, you may contact us at [answer@AnswerNet.com](mailto:answer@AnswerNet.com) or by telephone at 800-411-5777.

## Policy Changes

We review this policy periodically and reserve the right, at our discretion, to modify or remove any portions of such policy at any time. This policy was last modified on 5/1/2018. If we decide to change our Privacy Policy, we will post those changes on this page. Your continued use of our site following the posting of changes to these terms will mean you accept those changes.