

itel Privacy Policy

Last Updated: April 8, 2021

Overview

This Privacy Policy describes itel, Inc. (“itel”) policies regarding the collection, use, and disclosure of information about you in connection with your use of our website (itelinternational.com) (the “Site”) and the services provided directly to our contracted Clients (the “Services”). The terms “we”, “us”, and “itel” refers to itel, Inc., with its headquarters in Montego Bay, Jamaica.

When you use our Services, you consent to our collection, use, and disclosure of information about you as described in this Privacy Policy.

Information We Collect

itel collects personal information to facilitate your use of the itel Site or Services. “Personal Information” means information that identifies or is reasonably capable of identifying an individual, directly or indirectly, and information that is being associated with an identified or reasonably identifiable individual.

Personal Information That We Collect Directly From You

itel collects the following categories of information directly from individuals:

Through Its Website

Category of Personal Information
Business contact information (such as your contact name, phone number, and email address).
Professional information (such as your institution or company).
Nature of your communication, such as the reason for your inquiry and how you have heard about itel.
Any information you choose to provide to us when completing any ‘free text’ boxes in our forms.
Any information you enter into Indeed.com (Privacy Policy found at https://hrtechprivacy.com/) in searching for potential employment with itel.

Through Its Services with Contracted Clients

Category of Personal Information
itel only collects Personal Information through contractual arrangements with itel Clients.

How We Use the Information We Collect

For the general Internet user and potential Client, the Personal Information we collect and the practices described above are undertaken in an effort to provide you with the best experience possible, protect you from risks related to improper use and fraud, and help us maintain and improve itel's offerings. We may use your Personal Information to:

- **Provide you with itel Services.** itel uses your Personal Information to provide you with its Site pursuant to its **Terms of Use** for the Site and this Privacy Policy.
- **Comply with legal and regulatory requirements.** itel processes your Personal Information as required by applicable laws and regulations.
- **Protect the security and integrity of our Site.** itel uses your Personal Information to further our security practices related to Personal Information.
- **Provide you with Client support.** itel processes your Personal Information anytime that you reach out with issues arising from your use of the Site.
- **Optimize and enhance our Services.** itel uses your Personal Information to understand how our Site is being used to help us improve our Site.
- **Market our Services to you.** itel may contact you with information about our Services. We will only do so with your permission, which can be revoked at any time.
- **Other business purposes.** itel may use your information for additional purposes if that purpose is disclosed to you before we collect the information or if we obtain your consent.

For our Clients, we may use the Personal Information we collect or receive through the Service (alone or in combination with other data we source) for the purposes and on the legal bases identified below:

- To perform our contract with you for the use of the Services or where we have not entered into a contract with you, in accordance with our legitimate interests to operate and administer our Services.
- To enforce compliance with our contractual obligations and applicable law, and to protect the rights and safety of our Clients in reliance on our legitimate interest to protect against misuse or abuse of our Services and to pursue remedies available.

- To meet legal requirements, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
- To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements in reliance on our legitimate interests.
- To prosecute and defend a court, arbitration, or similar legal proceeding.
- To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- To provide, support, and improve the Services to perform our contract with you for the use of the Services or where we have not entered into a contract with you, in reliance on our legitimate interests in administering and improving the Services and providing certain features. When we share your Personal Information with third parties, we take steps to protect your information in a manner that is consistent with our obligations under applicable privacy laws.
- To combine and anonymize data about our Clients and our Clients' use of the Services in order to create aggregate, anonymized statistics, which we may use to provide certain features within the Services and for promoting and improving the Services in reliance on our legitimate interests.

How We Share the Information We Collect

itel will not share your Personal Information with third parties, except as described below.

- **Third-Party Service Providers and Vendors.** itel may share your Personal Information with third-party service providers for business or commercial purposes. Your Personal Information may be shared so that they can provide us with services, including identity verification, fraud detection and prevention, security threat detection, payment processing, Client support, data analytics, Information Technology, advertising, marketing, data processing, network infrastructure, storage, transaction monitoring, and tax reporting. itel share your Personal Information with these service providers only so that they can provide us with services, and we prohibit our service providers from using or disclosing your Personal Information for any other purpose. Our third-party service providers are subject to strict confidentiality obligations.
- **Law Enforcement.** itel may be compelled to share your Personal Information with law enforcement, government officials, and regulators.
- **Corporate Transactions.** itel may disclose Personal Information in the event of a proposed or consummated merger, acquisition, reorganization, asset sale, or similar corporate transaction, or in the event of a bankruptcy or dissolution.

- **Professional Advisors.** itel may share your Personal Information with our professional advisors, including legal, accounting, or other consulting services for purposes of audits or to comply with our legal obligations.
- **Consent.** itel may share or disclose your information with your consent.

If itel decides to modify the purpose for which your Personal Information is collected and used, we will amend this Privacy Policy.

Cookies

When you access itel’s Site, we may make use of the standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (“Cookies”) on your computer or other devices used to visit the itel Site. We use Cookies to help us recognize you as a Client, collect information about your use of the itel Site to better customize our services and content for you, and collect information about your computer or other access devices to assess and improve our Site.

The purposes for which itel uses Cookies in its Site include:

Purpose	Explanation
Advertising	We use cookies to personalize online advertising based on the behaviour of our website users.
Analytics:	We use cookies to track non personally identifiable information about our website usage including page views or time on site.

Please note that if you reject cookies, you will not be able to use some or all of itel’s Site. If you do not consent to the placing of Cookies on your device, please do not visit, access, or use the itel Site.

Your Privacy Rights – General Information

itel is required under certain domestic and international data laws to provide certain information to individuals about how itel collects, uses, and shares your Personal Information, and about the rights and choices that you may have concerning your Personal Information. The following sections provide an overview of the Personal Information that itel collects, uses, and shares,

outlines the rights that you have concerning your data, and the actions that you can take to make certain requests concerning your Personal Information.

Personal Information That itel Collects, Uses, and Shares

For ease of reference, we have compiled the list below to demonstrate how we use the categories of Personal Information we have collected, used, and disclosed.

The purposes for the collection, use, and sharing of information include:

Category of Personal Information	How It Is Collected	How It Is Used	How It Is Shared
Business contact information (such as your contact name, phone number, and email address, as well as whether or not you are currently an itel Client)	You have actively provided this information to itel through the itel Site.	itel will use this information to directly respond to your requests through its Site.	itel does not sell information to third parties. itel may share information it is provided with third parties or vendors to respond to request or provide further services.
Professional information (such as your institution or company)	You have actively provided this information to itel through the itel Site.	itel will use this information to directly respond to your requests through its Site.	itel does not sell information to third parties. itel may share information it is provided with third parties or vendors to respond to request or provide further services.
Nature of your communication, such as the reason for your inquiry, how you have heard about itel	You have actively provided this information to itel through the itel Site.	itel will use this information to directly respond to your requests through its Site.	itel does not sell information to third itel. itel may share information it is provided with third

			parties or vendors to respond to request or provide further services.
Marketing Information	You have actively provided this information to itel through the itel Site.	itel will use this information to directly respond to your requests through its Site.	itel does not sell information to third parties. itel may share information it is provided with third parties or vendors to respond to request or provide further services.
Any information you choose to provide to us when completing any 'free text' boxes in our forms	You have actively provided this information to itel through the itel Site.	itel will use this information to directly respond to your requests through its Site or Services.	itel does not sell information to third parties. itel may share information it is provided with third parties or vendors to respond to request or provide further services.

How to Make Data Requests - Information for California Residents

itel is required under the California Consumer Privacy Act of 2018 (“CCPA”) to provide certain information to California residents about how we collect, use, and share their Personal Information, and about the rights and choices California residents may have concerning their Personal Information. For purposes of this section, “Personal Information” has the meaning provided in the CCPA.

Rights Afforded to California Residents

California consumers have the following rights under the CCPA with respect to their Personal Information. Please understand, however, that these rights are not absolute, and itel may decline requests as permitted under applicable law.

- **Right to Request Access.** You may submit a request that itel disclose the categories and specific pieces of Personal Information that we have collected, used, or disclosed about you in the past twelve (12) months.
 - Without having to submit a request to access your Personal Information, you have the right to know what categories of Personal Information we have collected from consumers generally within the past twelve (12) months, where we got it, why we collected it, and with whom we shared it.
 - Please note that simply because itel has provided the categories of Personal Information it may collect pursuant to California law does not mean itel necessarily collected all of the specific pieces of Personal Information listed for any given person. Also, please note where Personal Information was disclosed within the past twelve (12) months as indicated in the last column of the table, it may have been disclosed only to service providers and/or third parties for business or commercial purposes so we can provide our Site or Services to you.
 - We have not “sold” Personal Information within the past twelve (12) months, as that term is defined by the CCPA.
- **Right to Request Deletion.** You may submit a request that itel delete the Personal Information that we have about you.
- **Right to Opt out of Sale of Personal Information.** You have the right to opt out of the sale of your Personal Information. itel does not sell your Personal Information.
- **Right Not to Receive Discriminatory Treatment.** You have the right to exercise the privacy rights conferred by the CCPA without discriminatory treatment.

You may submit a request to access or delete your Personal Information by following Privacy Request Form link or by emailing us at privacy@itelinternational.com.

itel is legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your Personal Information, you will also be required to confirm the deletion request by email.

You may designate an authorized agent to make a request under the CCPA on your behalf. Your authorized agent must submit proof that you have provided them with power of attorney pursuant to California Probate Code Sections 4000 to 4465. itel may deny a request from a purported authorized agent who does not provide proof of authorization to act on your behalf.

Please understand that we are not obligated to provide you with a copy of your Personal Information more than twice in a twelve (12) month period pursuant to the CCPA.

How to Make Data Requests – Information for California Residents

To make a data request, you can elect to contact itel through one of the following methods:

- Email the itel Privacy Team at privacy@itelinternational.com; or
- Complete the form located at <https://itelinternational.com/data-privacy-request>

What happens after I submit a request?

Once we receive your request, we must first verify your identity. We will take commercially reasonable steps to verify your identity, including asking you to provide us with information to confirm your identity using the information we have on file. If you wish to designate an authorized agent to make a request on your behalf, please indicate that when submitting your request.

We will make good faith efforts to respond to your request. There may be circumstances under the CCPA in which we cannot, or need not, respond to your request. For example, we are not required to delete Personal Information needed to complete the transaction for which the Personal Information was collected, to detect fraudulent or illegal activity, or for legal compliance purposes. We are also not required to provide access or deletion where your identity could not be verified, where you have exceeded the number of requests you can make within a twelve-month period, or where the information contains legally privileged material or would violate the rights of others. If we determine that your request should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries.

Any requests that can be processed by us will be done so in no more than forty-five (45) days from the date we receive your request, unless we notify you that an extension is required. In case of an extended completion period, we will process your request in no more than ninety (90) days from the date of your original request. Consumers are limited to two requests to know/access their Personal Information within a twelve (12) month period.

How to Make Data Requests - Information for Subjects of the EU General Data Protection Regulation

itel is required under the European Union General Data Protection Regulation (“GDPR”) to provide certain information to EU data subjects about how we collect, use, and share their Personal Information, and about the rights and choices EU data subjects may have concerning their Personal Information. For purposes of this section, “Personal Information” has the meaning provided in the GDPR.

Rights Afforded to EU Data Subjects

EU data subjects have the following rights under the GDPR with respect to their Personal Information. Please understand, however, that these rights are not absolute, and itel may decline requests as permitted under applicable law.

- **Right to Request Access / Right to Be Informed.** You may submit a request that itel disclose the categories and specific pieces of Personal Information that we have collected, used, or disclosed about you.
 - Without having to submit a request to access your Personal Information, you have the right to be informed (right to know) what categories of Personal Information itel has

collected from consumers generally, where we got it, why we collected it, and with whom we shared it.

- itel has provided a chart that sets this out for you in the Section of this Policy titled “Your Privacy Rights – General Information.” Please note that these are categories of personal information as they are set forth under European Union law. We did not necessarily collect all of the specific pieces of Personal Information listed for any given person. Please note that simply because itel has provided the categories of Personal Information it may collect does not mean itel necessarily collected all of the specific pieces of Personal Information listed for any given person.
- **Right to Request Erasure.** You may submit a request that itel delete the Personal Information that we have about you.
- **Right to Rectification (Correct or Update Your Personal Information).** You may submit a request that itel correct or update Personal Information that itel may have about you.
- **Right to Data Portability.** You may submit a request that itel provide you with a readily accessible, portable format of the Personal Information itel may have collected, processed, or stored about you.
- **Right to Object to the Processing.** You may submit a request to itel to revoke your consent to the processing of the Personal Information itel may have collected, processed, or stored about you.
- **Right to Restrict Processing.** You may submit a request to itel to restrict the processing of the Personal Information itel may have collected, processed, or stored about you.

You may submit a request to access or delete your Personal Information by following Data Privacy Request link or by emailing us at privacy@itelinternational.com.

itel is legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your Personal Information, you will also be required to confirm the deletion request by email.

You may designate an authorized agent to make a request under the GDPR on your behalf. itel may deny a request from a purported authorized agent who does not provide proof of authorization to act on your behalf.

The right to complain to a data protection authority about the collection and use of Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA and UK are available [here](#) and Switzerland are available [here](#).

If Personal Information is collected or processed on the basis of consent, the data subject can withdraw their consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

How to Make Data Requests (for EU Data Subjects)

To make a data request, you can elect to contact itel through one of the following methods:

- Email the itel Privacy Team at privacy@itelinternational.com; or
- Complete the form located at <https://itelinternational.com/data-privacy-request>

What happens after I submit a request?

Once we receive your request, we must first verify your identity. We will take commercially reasonable steps to verify your identity, including asking you to provide us with information to confirm your identity using the information we have on file. If you wish to designate an authorized agent to make a request on your behalf, please indicate that when submitting your request.

We will make good faith efforts to respond to your request. There may be circumstances under the GDPR in which we cannot, or need not, respond to your request. For example, we are not required to delete Personal Information needed to complete the transaction for which the Personal Information was collected, to detect fraudulent or illegal activity, or for legal compliance purposes. We are also not required to provide completion of a rights request where your identity could not be verified, or where the information contains legally privileged material or would violate the rights of others. If we determine that your request should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries.

Any requests that can be processed by us will be done so in no more than thirty (30) days from the date we receive your request, unless we notify you that an extension is required. In case of an extended completion period, we will process your request in no more than ninety (90) days from the date of your original request.

How to Make Data Requests – Information for Brazil Data Subjects

itel is required under the Lei Geral de Proteção de Dados, the General Data Protection Regulation (“LGPD”) to provide certain information to Brazilian nationals about how we collect, use, and share their personal information, and about the rights and choices Brazilian nationals may have concerning their personal information. For purposes of this section, “Personal Information” has the meaning provided in the LGPD.

Rights Afforded to Brazilian Nationals

Brazilian residents have the following rights under the LGPD with respect to their Personal Information. Please understand, however, that these rights are not absolute, and itel may decline requests as permitted under applicable law.

- **Right to Request Access / Right to Be Informed.** You may submit a request that itel disclose the categories and specific pieces of Personal Information that we have collected, used, or disclosed about you.
 - Without having to submit a request to access your personal information, you have the right to be informed (right to know) what categories of Personal Information itel has collected from consumers generally, where we got it, why we collected it, and with whom we shared it.
 - Under the LGPD, you also have the right to the following information: type of data processing; duration of the processing; contact details of the privacy team; and responsibilities of the agents that will carry out the processing.
- **Right to Request Erasure.** You may submit a request that itel delete the Personal Information that we have about you.
- **Right to Rectification (Correct or Update Your Personal Information).** You may submit a request that itel correct or update Personal Information that itel may have about you.
- **Right to Data Portability.** You may submit a request that itel provide you with a readily accessible, portable format of the Personal Information itel may have collected, processed, or stored about you, subject to commercial and industrial secrecy, pursuant to the regulation of itel.
- **Right to Object to the Processing.** You may submit a request to itel to revoke your consent to the processing of the Personal Information itel may have collected, processed, or stored about you, if there is non-compliance with the LGPD.
- **Right to Restrict Processing.** You may submit a request to itel to restrict the processing of the Personal Information itel may have collected, processed, or stored about you.

You may submit a request to access or delete your Personal Information by emailing us at privacy@itelinternational.com

itel is legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your Personal Information, you will also be required to confirm the deletion request by email.

You may designate an authorized agent to make a request under the LGPD on your behalf. Your authorized agent must submit proof that you have provided them with power of attorney. itel may deny a request from a purported authorized agent who does not provide proof of authorization to act on your behalf. Your right of access will be exercised only upon an express request from you or your legal representative.

If Personal Information is collected or processed on the basis of consent, the data subject can withdraw their consent at any time. Withdrawing your consent will not affect the lawfulness of any

processing we conducted prior to your withdrawal, nor will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

How to Make Data Requests (for Brazilian Nationals)

To make a data request, you can elect to contact itel through the following method:

- Email the itel Privacy Team at privacy@itelinternational.com or
- Complete the form located at <https://itelinternational.com/data-privacy-request>.

What happens after I submit a request?

Once we receive your request, we must first verify your identity. We will take commercially reasonable steps to verify your identity, including asking you to provide us with information to confirm your identity using the information we have on file. If you wish to designate an authorized agent to make a request on your behalf, please indicate that when submitting your request.

We will make good faith efforts to respond immediately to your request. There may be circumstances under the LGPD in which we cannot, or need not, respond to your request. For example, we are not required to delete personal information needed to complete the transaction for which the personal information was collected, to detect fraudulent or illegal activity, or for legal compliance purposes. Additionally, we are not required to delete personal information where processing of personal information is done by a natural person exclusively for private and non-economic purposes.

Any requests that can be processed by us will be done so in no more than fifteen (15) days from the date we receive your request.

Information for Nevada Residents

Nevada law (SB 220) requires website operators to provide a way for Nevada consumers to opt out of the sale of certain information that the website operator may collect about them. itel does not sell your personal information to third parties as defined in Nevada law, and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law. If you have any questions regarding our data privacy practices or our compliance with Nevada data privacy law, please contact us at privacy@itelinternational.com.

Retention of Data

Retention of Data

itel retains Personal Information where we have an ongoing legitimate business or legal need to do so. Our retention periods will vary depending on the type of data involved, but, generally, itel refer to these criteria in order to determine retention period:

- Whether we have a legal or contractual need to retain the data;
- Whether the data is necessary to provide our Site or Services; and
- Whether our Clients would reasonably expect that we would retain the data until they remove it or until their accounts are closed or terminated.

When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

Children's Privacy

itel's Site is not intended for general audiences and is not directed to children under 17. We do not knowingly collect Personal Information from children under 17 through the Site. If you become aware that a child has provided us with Personal Information without parental consent, please contact us at privacy@itelinternational.com. If we become aware that a child under 17 has provided us with Personal Information without parental consent, itel takes steps to remove such information.

Security

No security is foolproof, and the Internet is an insecure medium. We cannot guarantee absolute security, but we work hard to protect itel and you from unauthorized access to or unauthorized alteration, disclosure, or destruction of Personal Information that we collect and store.

itel addresses its guarantees as to privacy and security in the various agreements and data processing addendum that it enters into contractually with its Clients.

Third Party Websites

The itel Site contains links to the social networks Facebook, Instagram, LinkedIn, and Twitter. itel disclaims any and all liability and responsibility for your use of these sites, but encourages you to review their individual privacy policies before your use of these sites.

Updates to This Privacy Policy

itel may revise this Privacy Policy from time to time. If itel makes material changes to this Privacy Policy, we will notify you by email or by posting a notice on our Site prior to or on the effective date of the changes. By continuing to access or use the services after those changes become effective, you acknowledge the revised Privacy Policy.

Contact Information

If you have questions or concerns regarding this policy or our processing of your Personal Information, please feel free to contact itel through the following:

Email: privacy@itelinternational.com

Address:

Corporate Head Office
Freeport House
38 Coconut Drive
Montego Bay, Jamaica