

PRIVACY POLICY

Last Updated: October 19, 2015

Please read this Privacy Policy (or “Policy”) carefully before using any products or services offered by Somos, Inc. (“Somos”), formerly known as SMS/800, Inc., or any current or future affiliates of Somos, Inc. (collectively, the “Somos Companies”), including any Somos Companies following any corporate name changes, including without limitation the websites somos.com, sms800.com, texting.somos.com, texting.sms800.com (and any other TSS Registry website or URL) and any other website, URL or mobile application owned or operated by or on behalf of any of the Somos Companies now or in the future (collectively, hereinafter, the “Somos Products”). By using any of the Somos Products, or any other product or service offered by or on behalf of any of the Somos Companies, you signify your agreement to be bound by this Privacy Policy.

FCC Tariff: Somos is subject to regulatory directives such as the 800 Service Management System (SMS/800) Functions Tariff FCC No. 1 (the “Tariff”) and any amendments thereto. In the event of an inconsistency between this Privacy Policy and the Tariff, or to the extent that the Tariff or any other regulatory directive binding on Somos prohibits anything contained herein with respect to data collection and use activities of Somos governed by the Tariff or such regulatory directive binding on Somos, the provisions set forth in the Tariff or such other regulatory directive, as applicable, shall apply.

IF YOU DO NOT AGREE TO BE BOUND BY THIS PRIVACY POLICY, DO NOT USE THE SOMOS PRODUCTS.

The Somos Companies are committed to protecting user privacy. This Privacy Policy is designed to inform users of the Somos Products about how the Somos Companies gather and use information provided to, or collected by or on behalf of, the Somos Companies and under what circumstances the Somos Companies will transfer, share or disclose such information. The Somos Companies take reasonable steps to protect user privacy consistent with the guidelines set forth in this Privacy Policy and with applicable laws and regulations. By using a Somos Product you agree to the data collection and use described in this Privacy Policy. Therefore, we ask that you read this Privacy Policy carefully. Any dispute that may arise over privacy or data collection, storage, transfer or use by or on behalf of a Somos Company or in connection with a Somos Product will be subject to this Privacy Policy.

Key Definitions

In this Privacy Policy, we use the following key definitions (other terms are defined in the body of the Policy):

“**Content**” means information, documentation or media presentation that are linked to or displayed on a Site or a Somos Product.

“**Personal Information**” means data that can be used to identify a single person or user that is voluntarily provided to any Somos Company or any third party acting on behalf of any Somos Company. You may be asked to provide your Personal Information in your interaction with the Sites or Somos Products. The Somos Companies, or third parties acting on behalf of the Somos Companies, may collect Personal Information which may include, but is not limited to: your name and corporate title, the name of your company and the department in which you work, telephone number, email address, as well as any additional supplemental information that the Somos Companies may request from time to time.

“**Non-Personal Information**” means data that is collected in a form that on its own cannot be used to identify a specific individual or user. The Somos Companies may collect and use Non-Personal Information which includes, but is not limited to: your industry group, zip code, area code, unique device identifier, referrer and exit websites and applications, IP address, browser type, operating system, geographic location and search queries. We may also collect information about your visits to and use of our Sites or Somos Products as well as information with respect to the interaction between you and our Sites or Somos Products, including but not limited to length of your visit and page views.

“**Sites**” or “**Websites**” means the websites, URLs and electronic or mobile device applications owned or operated by or on behalf of any of the Somos Companies or in connection with any of the Somos Products.

“**Tracking Technology**” means Cookies, Clear GIFs, Pixel tags, geolocational trackers or other technology solutions performing similar functions that are used by or on behalf of the Somos Companies.

“**User**” or “**you**” means any person viewing or otherwise accessing the Sites or the Somos Products, including without limitation, a Responsible Organization, Service Control Point Owner/ Operator, Service Registrar or Routing Database Provider.

“**User Data**” includes both Personal Information and Non-Personal information regarding a User.

Third Party Websites and Applications

The Somos Products and/or Sites may contain links to other websites or applications. The Somos Companies are not responsible for the privacy practices or the content of any third

party websites or applications. Users should be aware of this when leaving Somos Products or Sites and review the privacy statements on the third party sites or applications. This Privacy Policy applies solely to information collected by or on behalf of the Somos Companies.

What Information Do We Collect?

We collect both Personal Information and Non-Personal Information, including through the use of Tracking Technology. Our primary goal in collecting information is to provide you with the best and most useful Content and services, manage your use of the Somos Products and the Site, and communicate with you, our partners and agents, and other Users, and within the Somos Companies.

Our Somos Products or Sites may feature User generated content, such as in review sections, blogs or forum communities. Unless otherwise indicated, information provided voluntarily by Users on such forums is not private and can be viewed by all visitors to the Sites or users of the Somos Products.

How We Use The Information We Collect

Except as set forth in this Privacy Policy, we use the information we collect only for Somos Company purposes, as may be required by applicable law, regulation or court order, or with your consent.

Personal Information: The Somos Companies may share Personal Information with each other and our partners and agents and use it in a manner that is consistent with this Privacy Policy. We may use the information to help us create, develop, operate, deliver, and improve the Somos Products and services, Content, advertising and marketing materials, as well as combine it with other information to provide and improve the Somos Products and services, Content, advertising or marketing materials. The information may also be used for internal Somos Company purposes such as auditing, data analysis and research to improve the Somos Products. From time to time, we may use your information to send you important notices, such as communications related to the Sites, the Somos Products and services, the Somos Companies, and changes to our terms, conditions and policies.

Non-Personal Information: The Somos Companies may share Non-Personal Information with each other and our partners and agents and use it in a manner that is consistent with this Privacy Policy. We may use the information to help us create, develop, operate, deliver and improve the Somos Products and services, Content, advertising or marketing materials, as well as combine it with other information to provide and improve the Somos Products, Content, advertising or marketing materials. The information may also be used for internal Somos Company purposes such as auditing, data analysis and research to

improve the Somos Products and services. This information may be aggregated and used to help us improve the Somos Products and services and to better understand which Somos Products or services are of most interest to our users. Anonymized, aggregated data is considered Non-Personal Information for purposes of this Privacy Policy.

Disclosure: We may use third parties to collect User information on our behalf. Except as otherwise provided in this Privacy Policy or in agreements with Users, we may share, sell, license or transfer User Data to Somos Company service providers, agents, partners, or other third parties. We reserve the right to store User Data as long as may be permitted by applicable laws and regulations. We will delete your Personal Information if you ask us to do so via the contact information we have provided in this Policy, unless we are required to retain it under any application laws or regulations.

Improper Conduct: We may use and share User Data to investigate and help prevent unlawful activity or activity that threatens our network or otherwise jeopardizes the provision or operation of any of the Somos Products. We may disclose User Data to third parties (such as law enforcement) to the extent required by applicable laws or regulations or if we believe, in our sole discretion, that such disclosure is needed to help prevent unlawful activity or any activity that threatens any Sites, Somos Companies or Somos Products.

Tracking Technology

The Somos Products, email communications, advertisements, marketing materials, or any other interactive applications or services may use Tracking Technology, including but not limited to Cookies, Clear GIFs, Pixel tags or geolocational tracking. Tracking Technology helps us to better understand which parts of our Sites and Somos Products users use and visit, and to facilitate and measure the effectiveness of any Somos Company advertisements, surveys, functions, promotions, or other Content. Except as otherwise stated in this Privacy Policy or pursuant to applicable laws and regulations, information collected by Tracking Technology is considered Non-Personal Information.

The Somos Companies may use Cookies and other Tracking Technologies to remember Personal Information when you use the Somos Products. You should be able to control how and whether Cookies will be accepted by your web browser. If you reject our Cookies, some functions and conveniences of the Somos Products may not work properly.

The Somos Companies may send email messages, text messages, “push” notifications or other similar advertising and marketing materials from time to time which may include a “click-through URL” linked to a Site, Somos Product or Content. We, or third parties on our behalf, may track this click-through data to help us determine interest in particular topics and measure the effectiveness of our communications to you. We may also include Pixel tags or other similar technologies in the email messages, text messages or

notifications that tell us whether our message has been opened or notification received. We may use this information to reduce or eliminate messages sent to you and other Users. If you prefer not to be tracked in this way, you should not click the text or graphic links in the messages or notifications.

How Can You Opt Out of Use and Disclosure of Your Information?

We will only use your information for the purposes described in this Privacy Policy. If you have elected to receive information about the Somos Products or other Somos Company information, and you wish to opt out of receiving such information, we allow Users the option to opt-out of receiving emails from the Somos Companies at any time by contacting the Somos Help Desk at 888-SMS-3300 or as indicated in your User account settings.

Security

We have implemented reasonable security measures to protect information from loss, misuse and unauthorized access, disclosure, alteration or destruction. Nevertheless, our services depend in substantial part on public networks and third-party products and services. We cannot guarantee against security breaches, including without limitation any that are associated with such public networks, or third-party products and services.

Consent to Communications

You hereby consent to our use of your contact information for purposes of communications with you by or on behalf of the Somos Companies regarding the Somos Products and Sites.

Access and Updating of Information

The instructions to review, amend or delete your information by updating your User account settings may be provided in the applicable Somos Product or related documentation or materials provided by or on behalf of the Somos Companies. Users may change information at any time and as often as necessary. Users who are experiencing problems with our services or who have questions about how our services work can contact the Somos Help Desk at 888-SMS-3300.

General

Registration Password: Your account(s) with any Somos Company or Somos Product may be password-protected to control access to your account by third parties. Do not divulge your password to anyone. We never ask for passwords in unsolicited phone calls or unsolicited emails. You may not transfer or share your registration password or other credentials without our prior written consent.

Business Transfers: We are always seeking to improve the Somos Products, our Sites and our business. If all or part of a Somos Company is sold, merged or otherwise transferred to another entity, the User Data may be transferred as part of that transaction.

Amendments: We may modify or amend this Privacy Policy from time to time. Therefore, we ask you to check this Privacy Policy occasionally to ensure that you are aware of the most recent version which will apply from the time you access the Site. If we make any material changes in the way in which User Data is collected, used or transferred, we will notify you of these changes on the Site for the applicable Somos Product. If you object to any of the changes, you can have us delete your information from our database by contacting the Somos Help Desk at 888-SMS-3300.

Enforcement

If you believe that we have not complied with this Privacy Policy, or if you have any other complaint with regard to collection, use or disclosure of User Data by a Somos Company, you may send a written notice of complaint to the applicable Somos Company at the address indicated on the applicable Site or to the address below:

The Somos Companies
c/o Somos, Inc.
2411 Dulles Corner Park, Suite 250
Herndon, VA 20171 U.S.A.
Attention: WEBSITE USER COMMUNICATIONS

OR

Toll-free Data Services, Inc. (“TDSI”)
2411 Dulles Corner Park, Suite 250
Herndon, VA 20171 U.S.A.
Attention: WEBSITE USER COMMUNICATIONS

The Somos Companies reserve the right to modify and update this Privacy Policy from time to time in their sole discretion.

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