

APPROVED CONTACT NETWORK, LLC

Texting Privacy Policy

Effective Date: March 2026

Replaces and supersedes prior version dated October 2021

IMPORTANT: BY VISITING OR USING THE SERVICE, YOU VOLUNTARILY AND WILLINGLY PROVIDE, OR AUTHORIZE US TO GATHER, CERTAIN INFORMATION. IF YOU HAVE ANY CONCERNS ABOUT HOW YOUR INFORMATION IS COLLECTED, USED, OR DISCLOSED, YOU SHOULD NOT USE THE SERVICE. IF YOU HAVE ALREADY CREATED AN ACCOUNT, YOU SHOULD CLOSE IT.

1. General

This Texting Privacy Policy ("Privacy Policy") describes the practices of Approved Contact Network, LLC, a Nevada limited liability company ("Approved Contact Network," "we," "us," or "our"), regarding the collection, use, maintenance, and disclosure of information collected through our texting platform (the "Service"). This Privacy Policy applies only to information we collect through the Service and does not apply to any other website or business activity of Approved Contact Network.

By using the Service, you consent to the collection, use, maintenance, and disclosure of your information as described in this Privacy Policy. Your use of the Service is also subject to our Texting Terms of Use, available at <https://approvedcontact.net/wp-content/uploads/approved-contact-terms-of-use.pdf>, which incorporates this Privacy Policy by reference.

We reserve the right to revise this Privacy Policy at any time. We will notify you of material changes by posting the updated policy on the Service and updating the "Effective Date" above. For significant changes, we will also endeavor to provide notice via email or an in-app notification. Your continued use of the Service following notice of any change constitutes acceptance of the updated terms. If you object to any changes, you must close your account and stop using the Service.

2. Information We Collect

We collect two broad categories of information: (1) "Personally Identifiable Information" ("PII") — information that identifies or can be used to identify you, such as your name, physical address, or email address; and (2) "Automatic Information" — information automatically collected by our servers when you use the Service, such as your IP address or browser type.

You may choose not to provide PII to us; however, certain PII (such as your email address) is required to register for and use the Service. Without it, you may be unable to access certain features.

2.1 Personally Identifiable Information

Registration and Profile

When you register for the Service or create or update your profile, we may collect: name, physical address, email address(es), phone number(s), password, and employment and payment information. You may also voluntarily provide additional information in your profile or through communications made via the Service.

Analytics

We may use in-house or third-party tools to analyze your communications and interactions with the Service in order to improve the products, content, and services we provide. We require third-party analytics providers to protect PII in a manner consistent with this Privacy Policy.

Feedback and Support

If you submit questions, comments, or report issues via the Service, we may use the PII you provide to contact you in response or to provide technical support.

2.2 Automatic Information

We may automatically collect the following when you access or use the Service:

- IP address, browser type, and operating system version
- Browsing activity, including referring and exit URLs
- Geographic location (general, not precise unless you consent to location services)
- Interactions with the Service, such as ad clicks, address book uploads, and group participation
- From mobile devices: device type, IP address, mobile carrier, and usage data

Where Automatic Information is linked or linkable to your PII, it will be treated as PII.

2.3 Sensitive Personal Information

We do not intentionally collect sensitive personal information such as financial account details (beyond payment processing), precise geolocation (without consent), racial or ethnic origin, health information, or biometric data. If you voluntarily provide such information through the Service, we will handle it with appropriate care and in accordance with applicable law.

3. Technologies We Use to Collect Information

3.1 Cookies

We use cookies — small text files placed on your device by our server — to recognize users, customize experiences, and serve relevant content. We use the following categories of cookies:

- **Strictly Necessary:** Required for the Service to function (e.g., authentication, security). These cannot be disabled.
- **Functional:** Enable personalisation and remember your preferences.
- **Analytics/Performance:** Allow us to understand how users interact with the Service and improve performance.
- **Advertising/Targeting:** Used to deliver relevant advertising, where applicable.

You may control cookie settings through your browser preferences or our cookie consent banner. Disabling non-essential cookies will not prevent you from using core features, though some functionality may be affected.

3.2 Web Beacons

We may embed small graphic images ("web beacons") in our Service pages to count users, monitor navigation, and measure the effectiveness of emails and content. Web beacons are functionally similar to cookies but are embedded invisibly in web pages rather than stored on your device.

3.3 Embedded Scripts

We may use temporary scripts downloaded to your device to collect information about your interactions with the Service, such as the links you click.

3.4 Analytics Providers

We use third-party web analytics services to understand user behaviour and improve the Service. This Privacy Policy does not govern those providers' independent use of information they collect. We encourage you to review the privacy policies of those providers.

3.5 IP Addresses

We collect IP addresses for system administration, aggregate reporting, and tracking Service usage. IP addresses are generally treated as non-personal information but may be combined with PII in certain contexts.

3.6 Mobile Device Information

When you access the Service on a mobile device, we may collect device type, IP address, mobile carrier, and device usage data. We may collect your device phone number to link to device identification information but will not use it for telemarketing.

If we introduce location-tracking ("pinpointing") services, we will obtain your explicit opt-in consent before using such data. You may disable location services at any time through your device settings or by contacting your mobile carrier.

3.7 SMS and Text Messaging Services

Approved Contact Network operates as a technology intermediary, providing messaging infrastructure that enables businesses ("Senders") to deliver text messages to their end recipients ("Message Recipients"). Approved Contact Network is not the originating Sender of any messages delivered through the platform.

Sender Responsibility and Consent

The obligation to obtain, record, and manage lawful consent from Message Recipients rests solely with the Sender, in accordance with the **Telephone Consumer Protection Act (TCPA)** and CTIA Messaging Principles. As a condition of using the Service, all Senders must warrant that valid consent has been obtained prior to initiating any messaging through our platform.

Opt-Out

If you are a Message Recipient wishing to opt out, reply STOP to any message received or contact the Sender directly. If you cannot identify the Sender, contact us at security@approvedcontact.com and we will use reasonable efforts to assist.

Carrier Liability

We partner with third-party carriers to facilitate delivery but are not responsible for delays or failures attributable to carrier networks. Standard message and data rates may apply.

Platform Enforcement

We reserve the right to suspend any Sender found to be using the platform in violation of the TCPA, CTIA guidelines, or applicable carrier requirements.

4. How We Use Your Information

We use the information we collect for the following purposes:

- To create and manage your account and provide the Service
- To process transactions and send related information (e.g., confirmations, receipts)
- To respond to your enquiries and provide customer support
- To send administrative communications, such as updates to our terms or policies
- To send promotional communications, subject to your communication preferences and applicable law
- To analyse usage and improve the Service, our products, and user experience
- To detect, prevent, and respond to fraud, abuse, security incidents, or technical issues
- To comply with applicable legal obligations
- To enforce our Terms of Use and other agreements

5. How We Share Your Information

We do not sell your personal information to third parties for their own marketing purposes. We may share your information in the following circumstances:

5.1 Service Providers

We share information with third-party vendors and service providers that perform services on our behalf, including payment processing, analytics, cloud hosting, customer support, and marketing. These providers are contractually required to use your information only as directed by us and in a manner consistent with this Privacy Policy.

5.2 Enterprise Accounts

If your account is associated with an Enterprise Account, we may share your information, including contact data, with the holder of that Enterprise Account. This sharing is part of the enterprise service relationship. Please review your enterprise agreement for further details.

5.3 Business Transfers

In the event of a merger, acquisition, reorganisation, bankruptcy, or sale of all or a portion of our assets, your information may be transferred to the acquiring entity. We will notify you via email or prominent notice on the Service before your information is transferred and becomes subject to a different privacy policy.

5.4 Legal Compliance and Protection

We may disclose your information if required to do so by law or if we believe in good faith that such disclosure is necessary to: (a) comply with a legal obligation; (b) protect our rights, property, or safety or that of our users or the public; (c) detect, prevent, or address fraud or security issues; or (d) respond to a government request.

5.5 With Your Consent

We may share your information with third parties when you have given us your explicit consent to do so.

6. Data Retention

We retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including to provide the Service, comply with legal obligations, resolve disputes, and enforce our agreements. When determining retention periods, we consider the nature and sensitivity of the data, the purposes for which it is processed, and applicable legal requirements.

When you close your account, we will delete or anonymize your personal information within a reasonable timeframe, subject to any legal obligations to retain it. Note that information you have shared with others, or that other users hold in their accounts, may remain accessible even after your account is closed. We may also retain certain transaction records for legal, tax, and audit purposes.

7. Your Rights and Choices

7.1 Access, Correction, and Deletion

You have the right to access, correct, update, or request deletion of your personal information. If you have an account, you can review and update many details by logging in. For other requests, please contact us using the details in Section 13.

7.2 California Residents (CCPA/CPRA)

If you are a California resident, you have the following additional rights under the California Consumer Privacy Act (as amended by the California Privacy Rights Act):

- Right to Know: The categories and specific pieces of personal information we have collected, used, disclosed, or sold.
- Right to Delete: Deletion of personal information we hold about you, subject to certain exceptions.
- Right to Correct: Correction of inaccurate personal information we hold about you.
- Right to Opt-Out: We do not sell personal information. If this practice changes, we will provide a prominent "Do Not Sell or Share My Personal Information" link.
- Right to Limit Use of Sensitive Personal Information: Where applicable, you may request that we limit use of sensitive personal information to necessary purposes.
- Right to Non-Discrimination: We will not discriminate against you for exercising your privacy rights.

To exercise these rights, please contact us as set out in Section 13. We will verify your identity before responding. You may designate an authorised agent to submit requests on your behalf.

In addition, California Civil Code Section 1798.83 ("Shine the Light") permits California residents to request information about our disclosure of PII to third parties for direct marketing purposes during the preceding calendar year. To make such a request, please contact us.

7.3 EU/UK Residents (GDPR / UK GDPR)

If you are located in the European Economic Area (EEA) or the United Kingdom, the processing of your personal data is subject to the General Data Protection Regulation ("GDPR") and, in the UK, the UK GDPR. The data controller is Approved Contact Network, LLC.

Our lawful bases for processing your personal data include:

- Performance of a contract: Processing necessary to provide the Service to you.
- Legitimate interests: Processing for our legitimate business interests (e.g., fraud prevention, improving services), balanced against your rights.
- Consent: Where we rely on your consent (e.g., marketing emails, optional cookies), you may withdraw it at any time.
- Legal obligation: Processing required to comply with applicable law.

As an EEA or UK resident, you have the following rights:

- Right of access to your personal data
- Right to rectification of inaccurate data
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to data portability
- Right to object to processing based on legitimate interests
- Right not to be subject to solely automated decision-making with significant effects

To exercise these rights, please contact us at security@approvedcontact.com. You also have the right to lodge a complaint with your local supervisory authority (e.g., the ICO in the UK, or your national DPA in the EEA).

Please note that our Service is hosted in the United States. If you access the Service from the EEA or UK, your data will be transferred to and processed in the United States. We rely on appropriate transfer mechanisms (such as Standard Contractual Clauses) to ensure adequate protection of your data.

7.4 Other US State Privacy Rights

Residents of certain US states (including Virginia, Colorado, Connecticut, Texas, and others) may have additional privacy rights under applicable state law, including rights to access, correct, delete, and opt out of certain processing activities. Please contact us to exercise these rights.

7.5 Communication Preferences

You may update your communication preferences (including opting out of promotional messages) by logging into your account or contacting us. You are responsible for any carrier fees associated with text messages sent to your mobile device.

8. Privacy of Children

The Service is a general audience platform and is not directed at children. We do not knowingly collect personally identifiable information from users under the age of 13. By using the Service, you represent and warrant that you are at least 13 years of age.

In compliance with the Children's Online Privacy Protection Act (COPPA), if we become aware that we have collected personal information from a child under 13, we will promptly delete that information from our records.

We also recognise that various US state laws (including the California Age-Appropriate Design Code) and certain international regulations afford additional protections to minors up to age 16 or 18. We encourage parents and guardians to monitor and guide their children's online activities. If you believe we have collected information from a minor, please contact us immediately.

9. Security

We implement commercially reasonable technical and organisational measures to protect your personal information from unauthorised access, use, disclosure, alteration, or destruction. These measures include Secure Sockets Layer (SSL) encryption for data in transit.

However, no method of transmission over the internet or electronic storage is 100% secure. While we strive to protect your personal information, we cannot guarantee its absolute security.

You play an important role in maintaining the security of your information. Please keep your username and password confidential and do not share them with third parties. Sign off when using a shared computer. Please note that emails and in-app messaging are not encrypted; do not transmit confidential information through these channels.

9.1 Data Breach Notification

In the event of a data breach that is likely to result in a risk to your rights and freedoms or as otherwise required by applicable law, we will notify affected individuals and relevant authorities in accordance with our legal obligations. Notification timelines vary by jurisdiction (e.g., 72 hours under GDPR; varying timelines under applicable US state breach notification laws).

10. Updating Your Information

If you would like to review, change, or request updates to your PII, you may do so by logging into your account or contacting our customer service team.

If you close your account, we may remove your PII from the Service. We have no obligation to retain information you provided (including contact information), and we may delete it without liability. However, where your account is part of an Enterprise Account, we may provide your contact information to the holder of that Enterprise Account. Please see Section 5.2 for details.

You may request deletion of your information by contacting Approved Contact customer service at security@approvedcontact.com. Information you have shared with others, or that other users hold in their accounts, may remain visible after deletion.

11. Links to Other Websites

The Service may contain links to third-party websites. These links are provided for your convenience only. We have no control over the content, privacy practices, or policies of third-party sites, and we are not responsible for them. We encourage you to review the privacy policy of any third-party site you visit.

12. International Users

Our Service is hosted in the United States and governed by US law. If you access the Service from outside the United States, your information may be transferred to, stored, and processed in the United States. US data protection laws may differ from those in your country.

For EEA and UK users, please see Section 7.3 for information about the legal mechanisms we use to facilitate cross-border data transfers.

By using the Service, you acknowledge that your information will be processed in the United States and in any other country where we or our service providers operate.

13. Contact Information

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

Approved Contact Network, LLC Privacy Officer

Address: 561 Keystone Avenue, Suite 490, Reno, NV 89503

Email: security@approvedcontact.com

EU/UK residents may also contact our appointed representative in the EEA/UK if applicable. Please contact us at the email above for those details.

We will endeavour to respond to all legitimate requests within 30 days. Occasionally, it may take longer if your request is complex or you have made multiple requests. In that case, we will notify you and keep you updated.

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