

First Orion Privacy Policy

(effective July 16, 2018)

First Orion Corporation, doing business as PrivacyStar™, is a business dedicated to using technology and data to give consumers tools to recognize and manage calls they receive and to help businesses reach the right people in a compliant manner. Your privacy is a priority for us and we are committed to safeguarding it.

This Privacy Policy covers the collection, use, and disclosure of personal information and technologies used by First Orion in the U.S. or Canada when you visit one of First Orion's Websites ('Website(s)'), when you use any of our free or subscription based applications ('Apps'), and when a business wants to call you.

Various features of our products are available on our Websites, through various PrivacyStar™ applications, through customized privately branded applications, and through customized in-network solutions with telecommunication carriers. These Websites and Apps may include features and functionality to identify unknown callers, block unwanted callers, automatically block known scammers, do reverse telephone number lookups, block all private or unknown callers, file complaints and report call violations to the proper authorities, and receive enhanced information about who is calling and why. All other First Orion's obligations governing these Websites and Apps are set forth within the Terms of Use and End User License Agreements posted for and applicable to these Websites and Apps.

First Orion's business services enable our clients who wish to call you to more effectively identify and manage their business and consumer contacts, ensuring better, compliant, and more cost-effective interactions with their customers and prospects.

What information we collect from our Websites and Apps and how we may use it

We may collect your personal information via any First Orion Website to help us deliver a better level of user experience on the site, such as your name, mailing address, phone number, email address, contact preferences, and information relating to an inquiry or support issue. This enables us to give you convenient access to our Websites and Apps and may help us keep you posted on the latest product announcements, software or service updates, special offers, and events that you might like to hear about. It also allows us to respond to any concerns you may have voiced.

First Orion may also collect personal information relevant to your interaction with us when you download a free or paid App. We collect your phone number and information about the calls you get to allow you to use all the features of this app which include the ability to block known scammers for free, customize the level of protection and blocking features in the app, provide information about who is calling and why, and file a complaint from the app against

offending callers, including abusive telemarketers and unlawful debt collectors directly with the FTC.

We use your phone number for identity validation, to know who to bill for fee based services, and to understand the number of calls you get for analytical purposes. We also use the caller ID information and the dates and times of incoming calls to develop alerts about possible scams or nuisance calls and for analytical purposes. This information will also be used to improve the functionality of our Apps.

You may need to agree to several questions to use the Apps so it functions properly. The questions may vary depending on whether you are on an Android or iOS device since these operating systems function differently.

- Allow PrivacyStar to make and manage phone calls?

- o This allows the App to launch a call from your detail screen when you touch the phone icon and to perform all the other call management activities provided in the App such as identifying unknown callers, blocking calls, filing complaints and receiving enhanced caller information about who is calling and why.

- Allow PrivacyStar to access your contacts”

- o We want to access your contacts for two reasons. First, we want to assure any incoming call that displays a number already in your contacts is displayed properly on your device. Second, the App needs to create a contact for incoming calls that display enhanced caller ID information about who is calling and why. We do NOT export outside the App any information from your contacts for any purpose.

- Allow PrivacyStar to send and view SMS messages?

- o This allows the App to streamline the verification process which sends a SMS message when you first launch the App and to block SMS messages from the same numbers that it blocks telephone calls from. The App does not do anything else with SMS messages.

If you voluntarily choose to provide complaint information, this information will be provided to government agencies such as, but not limited to, the Federal Trade Commission (FTC), the Federal Communication Commission (FCC) and the Consumer Financial Protection Bureau (CFPB) to aid in their enforcement activities. We may also use complaint information to assist calling parties understand how individuals view their calling practices, and to better understand trends and improve the functionality of our Websites and Apps.

First Orion may obtain information about you from third parties and combine it with information we already have about you to create more personalized advertising and improve our user experiences on our Websites and Apps.

First Orion may transmit personal information to or from the United States for processing, storage or other purposes related to supporting First Orion Apps. Personal information may therefore be accessed by courts, law enforcement and national security authorities in the United States.

First Orion may collect information from carriers and other sources about a phone number so businesses can determine if the number they have is active, validate the identity of the people they would like to reach, and comply with the U.S. Telecommunications Privacy Act.

All of the above information will also be used to improve the functionality of our Apps.

Publicly displayed information is public

If you use a bulletin board, chat room or blog on a First Orion website or App, you should be aware that any information you share is visible to other users. Personally identifiable information you submit to one of these forums can be read, collected, or used by other individuals for their purposes. First Orion is not responsible for the personally identifiable information you choose to submit in these forums.

When we disclose your information

To help us provide a better experience, your personal information may be shared with legal entities within the First Orion group globally who will take steps to safeguard it in accordance with the Terms of Use and End User License Agreement posted for or applicable to First Orion Websites and Apps.

There are also times when it may be appropriate for First Orion to make certain personal information about you available to companies that First Orion has a relationship with or that perform work for First Orion to provide Website and App function on our behalf. These companies may help us process information, fulfill orders, deliver Website and App functionality to you, manage and enhance data, provide customer service, assess your interest in our Websites and Apps, or conduct customer research or satisfaction surveys.

At times we may be required by law or litigation to disclose your personal information. We may also disclose information about you if we determine that for national security, law enforcement, or other issues of public importance, disclosure is necessary. If First Orion is involved in a business transaction, such as a merger, acquisition or sale of all or a portion of its assets, your personal information will likely be among the business assets transferred. You will be notified via email or prominent notice on our website of such change in ownership as well as any choices you may have regarding your personal information.

First Orion's business services provide the name of the calling party, verification of address, and information regarding whether the number is active or not. These services also provide information about changes from one carrier to another, and calculate a score indicating the likelihood the number is being used for fraudulent purposes.

The information we collect will only be used to provide an easy way to help you and others block unwanted calls without compromising your privacy. Your phone number and details about the calls you get will never be shared with a third party without your knowledge and consent. Your contacts are YOUR contacts! Unlike other apps, we never share or sell your personal contact list. Your contact list is only used by the app to aid and enhance your experience with incoming calls on your device.

How we protect your personal information

First Orion takes precautions — including administrative, technical, and physical measures — to safeguard your personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction.

Children

We do not knowingly collect personal information from children under 13 for marketing purposes. If a child under 13 submits personal information to First Orion via our website and

we learn that that personal information is about a child under 13, we will delete the information as soon as possible.

Cookies and other technologies

As is standard practice on many corporate websites, First Orion's websites use "cookies" and other technologies to improve the user experience. These include the use of Google Analytics, to study traffic patterns, to make the website user experience more rewarding as well as to study the effectiveness of our website user communications. How Google uses the data may be found at www.google.com/policies/privacy/partners/. Information gathered using Google Analytics consists of counts of unique daily or monthly visitors, visitors by device type, location data, unique registrants, time on site, browser types, onboarding abandonment, channel, and existing user abandonment.

If you prefer not to enable cookies, certain features of the First Orion websites may not be available once cookies are disabled.

First Orion may gather certain information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data.

We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole.

In some of our email messages we may use a "click-through URL" linked to content on the First Orion websites. When website users click one of these URLs, they pass through our web server before arriving at the destination web page. We may track this click-through data to help us determine interest in particular topics and measure the effectiveness of our communications. If you prefer not to be tracked simply avoid clicking text or graphic links in the email.

In addition, we may use pixel tags — tiny graphic images — to tell us what parts of our website users have visited or to measure the effectiveness of searches website users perform on our site.

Pixel tags also enable us to send email messages in a format that website users can read. And they tell us whether emails have been opened to ensure that we're sending only messages that are of interest to our website users.

First Orion's website has links to the sites of other companies. First Orion is not responsible for their privacy practices. We encourage you to learn about the privacy policies of those companies.

Your California Privacy Rights

California Civil Code Section 1798.83 permits our customers who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a

California resident and would like to make such a request, please submit your request to First Orion in writing to the address below.

Your EU and UK Privacy Rights

First Orion's certification for the EU-U.S. Privacy Shield with the Department of Commerce is pending. First Orion's Privacy Shield Policy can be found at [www.firstorion.com/privacy-shield-policy] and our Privacy Shield Policy for Human Resource Data can be found at [www.firstorion.com/privacy-shield-policy-for-human-resource-data].

Updates

First Orion reserves the right, at its sole discretion, to change, add or remove portions of its privacy policy from time to time by posting the updated privacy policy and effective date. It is your responsibility to check this privacy policy periodically for changes.

Privacy questions

If you have questions or concerns about First Orion's privacy policy for www.firstorion.com or www.privacystar.com or its information practices please contact us by sending paper mail to:

First Orion Corp.
Attention: Legal Team
500 President Clinton Avenue, Suite 215
Little Rock AR 72201 USA
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First Orion Corp., 500 President Clinton Avenue, Suite 215, Little Rock, Arkansas 72001, USA.

Start getting protected.

Providing transparency in the call process.





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