



## Tello Privacy and Cookie Policy

This privacy policy describes how tello.com collects and uses the personal information you provide on the website and app.

The scope of this Privacy Policy encompasses all services, sites, brands, and applications owned by Tello, LLC ("Tello"), except where explicitly stated otherwise.

At Tello we care about the privacy of our visitors and we are committed to protecting your private data at all times. This privacy policy describes how Tello collects and uses the personal information, why we collect it and how we use it for our web site: Tello.com. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users, in other words, where we determine the purposes and means of the processing of that personal data.

We will not collect any of your personal information that you do not volunteer to make available or consent to for further action. We do not sell, share, or rent this personal information to others in any way that we have not mentioned in this statement.

If you have questions or complaints regarding our privacy policy or practices, please contact us at [customerservice@tello.com](mailto:customerservice@tello.com).

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## **Personal information we collect**

The data collected by tello.com is initially managed and processed by the owning company, Tello, LLC ("Tello").

Personal information means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### **Personal information we collect from you when you use our Services**

#### **Account information**

We collect personally identifiable information, like names, postal addresses, phone numbers, email addresses, credit card numbers, when voluntarily submitted by our visitors. This information is used only to fulfill your specific request or process your order, unless you give us permission to use it in another manner, for example to add you to one of our contact lists.

#### **User Messages**

We do not retain your messages in the ordinary course of providing our Services to you. Instead, your messages are stored on your device and not typically stored on our servers. Once your messages are delivered, they are deleted from our servers.

#### **Contact Lists**

The app imports the phone numbers from your provided Contacts List to calculate the costs of calls and texts. Specifically, the cost calculation is based on the destination country prefix, with consideration for certain phone numbers that have special costs. We verify and provide the user with the accurate cost of service based on these specific numbers. It's important to note that we only access and use the phone numbers for this purpose; we do not collect any other information from your device's address book, such as names or email addresses.

There are certain features like Speed Dial that allow the app to collect and store contact information, including names and phone numbers, only when the user grants permission. This information is securely stored in our database and linked to the user's account. Consequently, whenever the user logs in to another device, the saved phone numbers are accessible on that device as well. We do not share the contact details with any other third party. The user's data remains confidential and protected within our system.

### **Calling service**

To deliver the calling service, the app uses your phone's microphone to read your audio message and transfer it to the other party you are talking to. The app has NO audio Record function.

### **Personal information we collect automatically when you use our Services**

#### **Log information and Usage**

We gather data regarding your interactions with our Services, encompassing service-related, diagnostic, and performance details. This includes insights into how you utilize our Services, your Service preferences, your interactions with other users (including businesses), as well as the timing, frequency, and duration of your activities and engagements. We also collect log files, diagnostic reports, crash reports, website logs, and performance reports. Additionally, we record information such as your registration date for using our Services, the specific features you utilize (such as messaging, calling, Status, groups, payments, or business features).

#### **Device and Connection Information**

When you install, access, or utilize our Services, we gather data specific to your device and connection. This includes details like your hardware model, operating system information, app version, browser information, mobile network, connection details (including phone number, mobile operator or ISP), language and time zone settings, IP address, device operations information, and identifiers (including unique identifiers associated with KeepCalling products and linked to the same device or account).

### **Personal information we collect using cookies and similar technologies**

Tello and its partners use technologies such as cookies, or similar technologies to analyze trends, administer the site, track users' movements around the site and to gather demographic information about our user base as a whole, and remember our users' settings (e.g. language preference, location etc), or for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

### **What is a cookie?**

A cookie is a simple text file that is stored on your computer or mobile device by a website's server. Each cookie is unique to your web browser. It will contain some anonymous information such as a unique identifier and the site name and some digits and numbers.

Most websites you visit use cookies to improve your user experience by allowing the website to 'remember' you, either for the duration of your visit (using a 'session cookie') or for repeat visits (using a 'persistent cookie').

Cookies may be set by the website you are visiting ('first party cookies') or they may be set by other websites who run content on the page you are viewing ('third party cookies').

### **What do cookies do?**

Cookies have lots of different jobs, like letting you navigate between pages efficiently, storing your preferences, and improving your experience of a website. Cookies make the interaction between you and the website faster and easier. If a website doesn't use cookies, it will think you are a new visitor every time you move to a new page on the site, for example, even after you "log in," if you move to another page it won't recognise you and it won't be able to keep you logged in.

### **How does Tello use cookies?**

Tello and its partners use technologies such as cookies, or similar technologies to analyze trends, administer the site, track users' movements around the site and to gather demographic information about our user base as a whole, and remember our users' settings (e.g. language preference, location etc), or for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

### **What third-party cookies does Tello use?**

Trusted partners like Firebase, Facebook, Twitter, SendGrid, Quora etc and analytics companies like Google Analytics may also place cookies on your device. Please read our partners' privacy policies to ensure that you're comfortable with how they use cookies.

### **What should you do if you don't want cookies to be set?**

If you prefer, you may choose to block some or all cookies, or even to delete cookies that have already been set; but you should be aware that you might lose some functions of the website.

If you want to restrict or block the cookies that are set by our Site, or any other site, you can do so through your browser setting. The 'Help' function in your browser should explain how. Alternatively, you can visit [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information on how to do this on a wide variety of browsers. You will find general information about cookies and details on how to delete cookies from your machine.

To opt-out of third-parties collecting any data regarding your interaction on our Site, please refer to their websites for further information.

### **Personal information we collect from third parties**

We partner with third party ad networks to either display advertising on our web site or to manage our advertising on other sites. Our ad network partners use cookies and web beacons to collect other information about your activities on this and other web sites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by clicking [here](#), or if located in the European Union click [here](#). Please note this does not opt you out of being served advertising. You will continue to receive generic ads.

If you choose to sign up or log in to Tello using a social media account (Facebook, Google, etc), Tello will have access to the name and email address you registered in your social media account. Even if you remove the social media account you connected with from your Tello account, your name and email address will not be removed from your Tello account.

If you choose to use our referral service to refer a friend to our site we will ask you for your friend's name and email address. We will automatically send your friend a one-time email inviting him or her to visit the site. Tello stores this information for the sole purpose of sending this one-time email and tracking the success of our referral program. Your friend may contact us at [customerservice@tello.com](mailto:customerservice@tello.com) to request that we remove this information from our database.

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## **Offers and Promotions**

With your consent, we will use the data you provide us to notify you of offers or products that may be of interest to you, but at no time will we provide your data to third parties for their own direct marketing activities.

If you wish to subscribe to our newsletter(s), we will use your name and email address to send the newsletter to you. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, accessing the email preferences in your account settings page or you can contact us at [customerservice@tello.com](mailto:customerservice@tello.com).

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## **Personal information we collect automatically when you use our Services**

As is true of most web sites, we 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 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. We link this automatically-collected data to personally identifiable information, for example IP addresses are tied to personally identifiable information in the remote situations of fraud investigation.

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## **Personal information collected from third parties**

We partner with third party ad networks to either display advertising on our web site or to manage our advertising on other sites. Our ad network partners use cookies and web beacons to collect other information about your activities on this and other web sites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by clicking [here](#). Please note this does not opt you out of being served advertising. You will continue to receive generic ads.

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## **How long do we keep your personal information**

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Upon request Tello will provide you with information about whether we hold any of your personal information. You may access, correct, or request deletion of your personal information by making the change on our member information page or by emailing our Customer Support at [customerservice@tello.com](mailto:customerservice@tello.com). We will respond to your request to access within a reasonable timeframe.

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## **How do we protect your personal information**

We use reasonable precautions to keep the personal information you disclose both in your browsing and your purchases and to never release this information to third parties. Your personally identifiable information is kept secure. Only authorized employees have access to this information. When you enter sensitive information (such as a credit card number) on our order forms, we encrypt the transmission of that information using secure socket layer technology (SSL). We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any

questions about security on our Web site, you can contact us at [customerservice@tello.com](mailto:customerservice@tello.com).

We may use some data collected to investigate, prevent or take action regarding illegal activities and violations of our Terms and Conditions.

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## **Personal information we collect using cookies and similar technologies**

Like many other websites, Tello and its partners use technologies such as cookies, or similar technologies, to identify members and gather information related to the number of visitors and understanding how visitors use the website, to analyze trends, administer the site, track users' movements around the site and to gather demographic information about our user base as a whole. Cookies can also help customize the website for our visitors and improve your experience by displaying goods and services that might interest you. You can choose to disable or selectively turn off our cookies or third-party cookies in your browser settings, Ads Preferences Manager or Consumer Opt-Out tool. However, this can affect your interaction with our website, as well as other websites.

Our partners, affiliates and service providers use cookies in order to make it easier for you to navigate our site.

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## **How we share your personal information**

We may disclose your personal information to other members of our group of companies who may use it to:

- provide you access to our services (account registration, customer support)
- help detect, investigate, mitigate and prevent potentially fraudulent and illegal acts and data security breaches
- provide you personalized advertising



We may share your information with third parties who provide services on our behalf to help with our business activities. These companies are authorized to use your personal information only as necessary to provide these services to us.

These services may include:

- Fulfilling orders and delivering packages
- Payment processing and Chargeback Representment
- Providing customer support
- Sending marketing communications
- Fulfilling subscription services
- Designate a cell network

We may also disclose your personal information:

- in response to lawful requests by public authorities, including to meet national security or law enforcement requirements;
- as required by law, such as to comply with a subpoena, or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud;
- if Tello is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information;
- to any other third party with your prior consent to do so.

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## Online adverts for Tello

In our efforts to match our products with the people interested in them, we use advertising services belonging to third party vendors, such as Google. Your visit on our website is likely to be a result of this third party service provided to us (AdWords,

DoubleClick, etc), as well as a source to be exposed to future ads based on your past visits and interests. To opt out the use of cookies you should visit the Network Advertising Initiative opt-out page.

Our presence across the Internet is the outcome of this matching of users' preference and products available. In order to reach the right audience, the external companies we collaborate with (like Google or Quantcast) may use certain information to establish consumers' habits: visits to a website, goods and services to determine or predict our visitors' characteristics, behavior, or preferences.

Data collected from visits to our websites is matched by external companies to larger pools of data (from more websites) to deliver ads to people with similar browsing pattern to our visitors. Thus, consumers receive more relevant ads and advertisers benefit from more effective advertising.

Such data collected DOES NOT INCLUDE our visitor's name, address, email address, telephone number. More information on how Google stores such data in the user's browser (using a "cookie") can be found [here](#).

Our Site includes links to other web sites whose privacy practices may differ from those of Tello. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Web site you visit.

Our web site also includes Social Media Features, such as the Facebook Like button. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

If you have given your consent, we will use the data you provide us to notify you of offers or products that may be of interest to you, but at no time will we provide your data to third parties for their own direct marketing activities.

If you wish to subscribe to our newsletter(s), we will use your name and email address to

send the newsletter to you. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, accessing the email preferences in your account settings page or you can contact us at [customerservice@tello.com](mailto:customerservice@tello.com).

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## **My Tello mobile apps**

In order to use the service through My Tello mobile app, you need to first open an account on Tello.com, build your own plan or buy Pay As You Go credit. Next, you'll need to decide if you want to bring your own phone to Tello or buy a new one. Once your phone is activated on Tello you can start making calls, texting or surfing the web. My Tello app is free to download in order to make national calls using your Plan balance and national and international calls using your Pay As You Go balance. The hereby Privacy Policy applies.

### **Access & Changes**

In order to access My Tello mobile app, you need to log in with your Tello phone number & password registered in the online account or using the social media login available. We will try to keep you logged in, so you can skip entering such details every time you use the app. If you delete the app, your online account with us will not be affected in any way.

We do not share app-tracking results with third parties, and we will only use these results to provide you with information you may be interested in. Also, to constantly improve the service and solve application crashes, we send some technical and non-personal data to our servers.

If you want to correct or complete your personal information associated with the app, you need to go to My Information tab in the app menu.

### **Personal data we collect**

Personal data is any kind of data that can identify you as an individual. In order to

provide you with the service via the app, we collect the following information: personal info such as name, email address, phone number; contacts phone numbers; financial information (user payment info), and several app interactions events.

### **How we use personal data**

The app uses information collected by Tello.com:

- to calculate the cost of calls and texts; the app imports your phone Contacts automatically. We use the Contact details solely for the purpose of calculating the cost of calls and texts. We do not collect or store such info, but only access it to display it in the app and optimise your user experience.
- to deliver the calling service; the app uses your phone's microphone to read your audio message and transfer it to the other party you are talking to. The app has NO audio Record function.
- to deliver the service according to Tello.com account settings
- to remember information from the first time you logged into the app, so you will not have to re-enter it every time you use the app;

When you log into the app you provide:

- Your email registered on Tello.com
- Your Tello password

### **Third Parties**

We will not transfer any personal data from the account associated with the app to third parties. Also, to constantly improve the service and solve application crashes, we send some technical and non-personal data to our servers.

### **Data that is read by the App**

The data read by My Tello app is the IP, the country and the device specifications. In-app purchase requires the app to read the payment data necessary to process payment, but

that is not collected or stored.

## **Sensitive permissions**

In order to provide you the best service, My Tello app imports your phone Contacts automatically. We do not collect or store such info, but only access it to display it in the app and optimise your user experience.

In order to deliver the calling service, the app uses your phone's microphone to read your audio message and transfer it to the other party you are talking to. The app has NO audio Record function.

## **Security**

For added protection of your balance you have the possibility to logout the app after each session. Otherwise, we'll try to keep you logged in, for an easier access to the app. In-app purchases are verified & secured. Please consider that anyone who accesses your phone can also access your app.

## **Updates to this Policy**

We reserve the right to update or modify this Policy according to legal requirements or service updates, with or without notice.

We use mobile analytics software to allow us to better understand the functionality of our Mobile Software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.

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## **Obtaining Your Consent**

By using our website, you give Tello permission to collect information about the pages

served to you as an anonymous user for the purpose of calculating aggregate site statistics. By consenting to our Cookie Policy you allow Tello to save your data as stipulated in our Privacy & Cookie Policy for the following 6 months.

If you register with Tello, you authorize Tello to use the information you provide in order to personalize the information we deliver to you and to use your demographic information when calculating aggregate customer data. Tello may occasionally amend this policy. We suggest that you bookmark this page and check to see if it has changed from time to time. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective.

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## Questions?

If you wish to change any information you have made available when registering, or have questions about our Privacy Policy, you can contact us at:  
[customerservice@tello.com](mailto:customerservice@tello.com)

Tello  
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Atlanta, GA, 30338  
United States