



All business is personal.

Ruby Receptionists, Inc.

Privacy Notice

Last Updated February 16, 2022

Welcome to Ruby! This Privacy Notice explains how we at Ruby Receptionists, Inc. (“Ruby,” “us” or “we”) collect and use your information and the choices you have over your information. Please read this Privacy Notice carefully to understand our privacy practices. This Privacy Notice is governed by and part of our [Terms of Use](#). Any terms we use in this Privacy Notice without defining them have the definitions given to them in the Terms of Use. We may provide additional notices about our privacy practices, each of which is considered part of this Privacy Notice.

Tl; dr.

It’s all about trust. Ruby is working hard to keep your data safe and secure. We know that we earn your trust by protecting your privacy and the privacy of *your* customers, our Callers. Here is a summary of our privacy promise to you:

- * Caller information is safe with us. We keep all Caller Personal Information confidential, and we never share it with anyone unless you ask us to.
- * Customers can always log in to control the information associated with their account or submit a request to exercise your privacy rights. Callers can work directly with Ruby’s Customers to exercise their privacy preferences.
- * You decide how we communicate. Ruby will only send you marketing messages if and how you want to hear from us.
- * Ruby only works with service providers and affiliates that meet or exceed our own privacy standards.

Call Ruby.

If you have questions or would like to request changes to how we handle your data or share a concern, please contact us at privacy@ruby.com or call us toll free 866-611-7829.

Scope.

This Privacy Notice describes how we collect and treat information collected through our Services, which includes our virtual receptionist services, chat services, applications and software (“**Software**”), ruby.com and other website and online channels we own or operate (the “**Site**”), and your other interactions with Ruby as a subscribing customer (“**Customer**”), a caller interacting with Ruby by telephone, text, live chat, or other Software features (“**Caller**”), or as a visitor.

Ruby interacts with Callers as a service provider under the instructions of our Customers. This Privacy Notice **does not** apply to our Customers’ websites or any third-party services or platforms. Any collection

or use of a Caller's Personal Information is subject to the respective Customer's privacy practices, not ours. Callers should direct any privacy-related questions to the Customer they contact via our Services.

Your Consent.

By visiting the Site or using our Services in any manner, you consent to this Privacy Notice and our privacy practices. Your use of our Services is subject to this Privacy Notice and our Terms of Use, including its applicable limitations on damages and the provisions regarding resolution of disputes. If you do not agree with this Privacy Notice, do not access or use the Services.

What is Personal Information?

As used in this Privacy Notice, "**Personal Information**" means information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual consumer or household, such as:

- Identifiers (e.g., name, address, telephone number, email address, username);
- Sensitive Personal Information (e.g., government identification number; racial or ethnic origin; religious beliefs; health information; contents of messages when Ruby is not the recipient);
- Protected classification information (e.g., race, citizenship, marital status, medical condition, sex, sexual orientation, veteran or military status);
- Biometric information (e.g., voice, keystrokes, behavioral or biological characteristics);
- Internet or other similar activity (e.g., browsing history, content interactions);
- Employment-related information (e.g., current or past employment);
- Non-public educational information, including information protected under the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99);
- Commercial information (e.g., products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies); and
- Inferences drawn from Personal Information to create a profile about preferences, characteristics, trends, predispositions, behavior, attitudes, intelligence, and aptitudes.

Personal Information **does not** include (i) publicly available information; (ii) aggregate information, meaning data about a group or category of services or users from which individual identities and other Personal Information has been removed; or (iii) deidentified information that cannot be easily linked back to the individual.

Categories and Sources of Personal Information.

The specific categories of Personal Information we collect about you and the manner of collection depends on how you use our Services, such as a current or potential new Customer or a Caller leaving a message for one of Ruby's Customers. During the preceding 12 months, we have collected (i) identifiers, (ii) employment-related information, (iii) sensitive Personal Information contained in Callers' messages to our Customers, (iv) commercial information, and (v) internet or similar activity.

Ruby collects your Personal Information (a) with your consent; (b) if we have a legitimate interest in doing so; or (c) as authorized or required by law. Ruby collects Personal Information from these sources:

Callers. Ruby interacts with Callers as a service provider to our Customers:

- * Ruby collects Personal Information from Callers via phone, chat, text-to-chat, or other channels as needed to provide our Services to the Customer.
- * If you are a Caller contacting one of our Customers, we may collect your contact information or other identifiers, as well as sensitive Personal Information like the contents of the Caller's message to the Customer they are contacting. We collect this information to support our Customers in their efforts to assist you.

As a service provider to our Customers, Ruby only collects and uses a Caller's Personal Information as instructed by the Customer or as permitted by law.

Customers. Ruby collects and uses Personal Information from our Customers with consent and according to the Customer's instructions, as follows:

- * When you sign up as a Customer, Ruby will collect information about your company such as name, email, phone, and other identifiers for yourself or your employees.
- * A Customer may provide Ruby with their employee's identifiers or employment-related information to include the employee in the Customer's list of potential call recipients, grant the employee access to our Software or other Services, or include the employee in our marketing communications. A Customer or an employee may opt-out of receiving marketing communications from Ruby at any time. If you opt-out of marketing communications Ruby may continue to send you product and support messages to keep you updated on the Services you receive.
- * Ruby collects any information a Customer submits via the mobile application, Customer portal or other Software, such as account profile information and any Personal Information included in communications with us related to the Customer's subscription or our Services.
- * If a Customer syncs their own software, like contact lists, calendars, or billing software, with our Software, Ruby will access this information to provide enhanced Services as requested by the Customer. For example, if caller ID indicates to one of our receptionists that you know the caller, the receptionist may answer in a more familiar tone or change the questions asked before transferring the incoming call to you.
- * Customers that collect technical information about their Callers' online activities may share that information with us. We may combine this information with other data to gather feedback about the Software and to run reports on behalf of our Customers. We only use information Customers provide to us in our capacity as a service provider as permitted by our agreements with Customers or as permitted by law. Note that Customers may use this information for their own purposes according to their own privacy practices. If you have any questions about a third-party advertisement or targeted content, you should contact the third party directly.

Note that the Customer is solely responsible for ensuring the Customer is authorized to share Personal Information with Ruby for any purpose. Ruby reserves the right to refuse Customer instructions to collect or process Personal Information about another individual without their

consent or in a manner or for a purpose that Ruby determines violates others' privacy or publicity rights, or otherwise violates Ruby's Terms of Use, and such instructions may result in termination of Services at our option. Ruby is not responsible for the privacy practices of any of our Customers or any third party.

Your Inquiries. If you contact Ruby as a potential new Customer, Site visitor, or for any other reason, we will collect Personal Information from you to respond to your inquiry:

- * If you request information about our Services, our eBooks, or other resources we offer through an online form, by text, email, the Site's chat feature, or by phone, we will collect your name, email address and other contact information as needed to provide you with the information you request. We collect this information with your consent, and we use it for the purposes stated at the time of collection, to provide you with our Services, and to communicate with you or send you direct marketing communications.
- * If you participate in a phone call with a member of Ruby's team, we may record the call. We engage in call recording for quality monitoring, training, to improve our Services, and for other internal business purposes. You will be notified if your call is being recorded. By staying on the line after receiving the notification, you consent to the call recording. If you do not consent to call recording, you may end the call or ask to not be recorded.

Ruby's Affiliates. Ruby works closely with professional associations and other companies offering complementary services (our "Affiliates") to identify existing and potential new Customers using Affiliate services:

- * Professional associations of which you are a member, advertisers, and analytics companies may provide us with your contact information or your internet or similar activity across different platforms. Ruby uses this information to streamline our online marketing efforts.
- * Our Affiliates help us identify mutual Customers to offer and provide Services enhancements like single sign on between Ruby and other platforms or software integrations.
- * Ruby has a contractual relationship with certain unaffiliated websites to share reviews and other public content, which may then be shared on our Site. For example, if you post a review of Ruby on TrustPilot, we may share your review or comment and username on the Site.

Ruby cannot control and will not be held liable for the way other individuals or businesses may use the content you post publicly on any website. Ruby is not responsible for the privacy practices of any of our Affiliates or other third parties.

Automatically from your use of the Site or Software. Ruby may automatically collect technical information, which may include some Personal Information, from your use of the Site or Software, such as:

- * Device information (e.g., IP address, operating system, browser type, device ID, mobile network information, caller ID)
- * Usage details (e.g., traffic data, search queries, content interactions)
- * Stored information (e.g., metadata)

- * Data collected from cookies and other technologies to track use of our Site. Please read our [Cookie Notice](#) for more information about how we use cookies.

Ruby collects this information to achieve our legitimate interest of providing and improving our Services. We may also use this information to deliver targeted advertising.

Ruby only collects, uses, retains, and discloses Personal Information as reasonably necessary and proportionate to provide the Services or for other purposes that we disclose to you and are compatible with the context of how we collected the Personal Information. In addition to the specific uses described above, Ruby might also use your Personal Information to (i) monitor your compliance with any of your agreements with us; (ii) protect your privacy and enforce this Privacy Notice; (iii) if we believe it is necessary, to identify, contact, or bring legal action against persons or entities who may be causing injury to you, to us, or to others; (iv) comply with a law, regulation, legal process, or court order; or (v) fulfill any other purpose to which you consent. Ruby will update this Privacy Notice or otherwise notify you before we collect additional categories of Personal Information or use your Personal Information for purposes that are incompatible with the purpose stated at the time of collection.

No Payment Processing.

Ruby charges Customers fees to use the Services and sometimes facilitates payments from Callers to Customers as a Services feature. Ruby always uses a PCI-DSS compliant payment processors like [Square](#) or [Stripe](#) to collect, process, and store payment information, subject to the payment processor's policies and terms. Ruby is not a payment processor and we do not store payment information or process payments or receive, transmit, or otherwise handle or process any funds as part of the Services. If a Customer pays for Services by ACH payment, the Customer's banking institution processes the payment. Any questions related to payment by ACH should be directed to your banking institution.

Children's Privacy.

Our Services are designed for adults, not children. Ruby does not knowingly collect Personal Information online from children under 16 without verification of parent or guardian consent. If we discover that a child under 16 has provided us with Personal Information without parent or guardian consent, we will delete such information from our systems. If you believe we might have any information collected online from a child under 16, or if you become aware of any unauthorized submission of information to Ruby, please contact us at privacy@ruby.com or 866-611-7829.

Any Personal Information Ruby collects from a Caller who is a child under age 16 is collected in our role as a service provider to the Customer and subject to the Customer's privacy practices and legal compliance. Please contact the Customer if you have questions or concerns.

Retaining Personal Information.

As a service provider to our Customers, Ruby retains Caller data until the Customer deletes it or instructs us to do so. Customer account information is retained while the account is active and after the Customer cancels the account. Over the years we have learned that many Customers who cancel our Services will reengage with us at some point, and retaining Customer account data makes the reengagement process easier for everyone. Personal Information on our marketing lists is retained until you opt-out or we

determine that the information no longer serves our business purposes. For example, if you have never been a Customer and you do not interact with the marketing content we send you for two years, we will remove your Personal Information from our marketing lists. Other types of data are retained and disposed of according to our company policies. Ruby may retain Personal Information for longer if it may be the subject of a legal claim or may otherwise be relevant for future litigation. We periodically review and delete or deidentify unnecessary data.

Disclosing Personal Information.

Ruby will only disclose Personal Information as described in this section, with your permission, or as required by law. In the preceding 12 months, Ruby has disclosed Personal Information in the categories of (i) identifiers, (ii) employment-related information, (iii) sensitive Personal Information; (iv) commercial information, and (v) internet or similar activity.

Ruby may disclose Customer Personal Information for a business purpose to:

- * **Affiliates.** Ruby works closely with our Affiliates to identify mutual or shared Customers and offer enhanced, integrated, or co-branded Services to those Customers. If a Customer uses an integrated Affiliate service with our Services, Ruby and the Affiliate may disclose Personal Information collected about or on behalf of the Customer to one another to provide the integrated Services. We may also disclose the Personal Information we collect about you to these Affiliates or to our parent company or subsidiaries. For example, we share Personal Information for customer support purposes, marketing, or technical operations.
- * **Professional Associations.** If a Customer is a member of a professional association with which we have a referral or affinity agreement, Ruby may pay a referral fee to your professional association and, if requested by the association, disclose the Customer name and contact information and the type or amount of our Services used by the Customer that is an association member.
- * **Service Providers.** Vendors that provide us with services (collectively, “**Service Providers**”) may have receive Customer Personal Information to perform their contractual obligations. Our Service Providers include but are not limited to telecom providers, marketing companies, IT service providers, billing processors, and email and data hosting providers. For example, Ruby may share Customer identifiers to register the Customer’s phone number or SMS campaign with our telecom provider, subject to [Twilio’s terms and conditions](#). We prohibit our Service Providers from selling or disclosing the Personal Information we provide, and we require all Service Providers to maintain confidentiality standards that are commercially reasonable to ensure the security of your Personal Information. The type of information that we provide to a Service Provider will depend on the service that they provide to us. To learn more about our Service Providers, read our [Data Processing Agreement](#).
- * **Advertisers.** We disclose Customer information to service providers we use advertising purposes (collectively, “**Advertisers**”) to serve targeted advertisements on social media and other platforms. We may directly share Customer company names with the Advertiser or allow the Advertiser to collect and analyze cookie data from your use of our Site (see our [Cookie Notice](#)) to assist us with behavioral advertising.

- * **Law Enforcement**, and other governmental agencies, as permitted or required by law. Additionally, if, in Ruby’s sole discretion, Ruby perceives that a Caller is an imminent threat to their own physical safety or the physical safety of another person then Ruby may disclose a Caller’s Personal Information to law enforcement.
- * **Other Third Parties**, as permitted by applicable law. Ruby may disclose Customer, Caller or any other Personal Information collected to other third parties, for example: (i) if we go through a business transition (e.g., merger, acquisition, or sale of a portion of our assets); (ii) to comply with a legal requirement or a court order; (iii) when we believe it is appropriate in order to take action regarding illegal activities or prevent fraud or harm to any person; (iv) to exercise or defend our legal claims; or (v) for any other reason with your consent.
- * **Aggregated and Deidentified Information**. We reserve the right to share aggregated, anonymized, or deidentified information about any individuals with nonaffiliated entities for marketing, advertising, research or other purposes, without restriction.

Controlling Your Personal Information.

Ruby gives Customers the ability to directly control the Personal Information we collect and hold about you through our Services:

- * **Your Account**. You have the option to access, correct or update, or delete certain Personal Information through your account settings. If you require assistance, please contact us at privacy@ruby.com.
- * **Emails**. We may send you informational or support emails related to your Customer account. Depending on your communication preferences, we may also send you marketing emails. If you do not wish to receive emails from us, you can unsubscribe or change your preferences via the links provided in the emails or send a request to privacy@ruby.com. Note that if you opt-out of marketing communications, we may still send you non-promotional communications, such as those about your account or our ongoing business relations.
- * **Device Settings**. You can control the data we collect through cookies and related technologies by adjusting your device settings or your cookie preferences on the Site.
- * **Texting**. If you provide us with your wireless phone number, you consent to Ruby sending you informational or service text messages. However, we will only send you marketing text messages if you opt-in to receive these notifications from us. For all text messages, the number of texts you receive will depend on the Services you use and the information you request from us. You can unsubscribe from our text messages by replying STOP or UNSUBSCRIBE to any of these text messages. Messaging and data charges may apply to any text message you receive or send. Please contact your wireless carrier if you have questions about messaging or data charges.
- * **Opt-Out of Interest Based Ads**. You may limit our use of information collected from or about your mobile device for purposes of serving online behavioral advertising to you by going to your device settings and selecting “Limit Ad Tracking” (for iOS devices) or “Opt-Out of Interest-Based Ads” (for Android devices).
- * **Block Location Tracking**. You can stop all collection of information by an app by uninstalling it. You can also reset your device Ad Id at any time through your device settings, which is

designed to allow you to limit the use of information collected about you. You can stop all collection of precise location data through an app by uninstalling the app or withdrawing your consent through your device settings.

- * **Do Not Track.** Do Not Track signals are signals sent through a browser informing us that you do not want to be tracked. Currently, our systems do not recognize browser “do-not-track” requests.

Depending on where you reside, you may be entitled to additional controls over your Personal Information. Please contact privacy@ruby.com if you have questions about exercising your privacy rights. Residents of California, the European Union, and Canada may review the applicable supplemental notices below.

Consumer Privacy Requests.

If you are a Caller, please direct any privacy-related requests or inquiries to the Customer you contact via our Services. Otherwise, if you wish to exercise your privacy rights beyond the methods available through the Services, or if you want to express concerns, lodge a complaint, or request information, please submit a verifiable Consumer Privacy Request:

- * using our online [Consumer Privacy Request](#).
- * by email at privacy@ruby.com.
- * toll free at 866-611-7829.

Note that if you are a Caller or we otherwise collect or process your Personal Information in our capacity as a service provider or processor to a Customer, we may need to relay your request to that Customer for fulfillment.

Ruby may only legally fulfill a Consumer Privacy Request when we have sufficient information to verify that the requester is the person or an authorized representative of the person about whom we have collected Personal Information, and to properly understand, evaluate, and respond to the request. We do not charge a fee to process or respond to a verifiable request unless we have legal grounds to do so, such as requests that are excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

California and Certain Other U.S. States.

This section provides the disclosures and notices required under the California Consumer Privacy Act of 2018 (“**CCPA**”) and offers informational notices to residents of Virginia, Colorado, Nevada, and other U.S. states with laws providing similar protections. The following paragraphs apply solely to residents of the State of California and other states to the extent the same legal protections apply (each a “**Consumer**”). Consumers may exercise the following rights over their Personal Information, subject to our receipt of a verifiable **Consumer Privacy Request** and any exceptions and limitations that may apply:

- * **Right to Disclosure.** You have the right to request that we disclose information to you about our collection and use of your Personal Information over the past 12 months, such as (a) the categories of Personal Information we have collected about you; (b) the categories of sources for the

Personal Information we have collected about you; (c) our business purpose for collecting or selling that Personal Information; (d) the categories of third parties with whom we share that Personal Information; and (e) if we sold or disclosed your Personal Information for a business purpose, two separate lists stating (i) sales, identifying the Personal Information categories that each category of recipient purchased; and (ii) disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained. Depending on the laws that apply to you, Ruby may only be required to respond to a certain number of disclosure requests within a 12-month period.

- * **Right to Correct.** You have the right to request that we correct inaccurate Personal Information about you in our systems. If you become aware that the Personal Information that we hold about you is incorrect, or if your situation changes (e.g., you change address), please inform us and we will update our records.
- * **Right to Access.** You have the right to request a copy of your Personal Information, along with details about the types of Personal Information we process, why we process it, and any third parties we work with to collect Personal Information on our behalf (also called a data portability request). We provide copies of the requested pieces of Personal Information in a portable and readily usable format. Please note that some laws prohibit Ruby from disclosing copies of certain pieces of Personal Information (e.g., government identification numbers, financial account information, and passwords or security questions and answers) because the disclosure would create a substantial, articulable, and unreasonable risk to the security of the information, our business systems, or your account. If you are a resident of the State of California, your request is limited to specific pieces of Personal Information we have collected about you over the past 12 months, and we are only required to respond to two such requests within a 12-month period.
- * **Right to Deletion.** You have the right to request that we delete any of your Personal Information that we collected from you and retained, with certain exceptions. Ruby may permanently delete, deidentify, or aggregate the Personal Information in response to a request for deletion. If you submit a right to deletion request, we will confirm the Personal Information to be deleted prior to its deletion, and we will notify you when your request is complete.
- * **Limited Use and Disclosure of Sensitive Personal Information.** Ruby does not seek to collect sensitive Personal Information about any individual, but we may collect some sensitive Personal Information in the course of providing our Services, such as the contents of a Caller's message to a Customer. Ruby only uses this sensitive Personal Information to provide our Services to the Customer, and in no case do we disclose any sensitive Personal Information for the purpose of inferring characteristics about you. If this ever changes in the future, we will update this Privacy Notice and provide you with methods to limit use and disclosure of sensitive Personal Information.
- * **Do Not Sell My Personal Information.** Ruby does not sell your Personal Information to third parties for monetary or other valuable consideration. If this changes in the future, we will update this Privacy Notice and provide you with a method to opt-out.
- * **Do Not Share My Personal Information.** To provide you with optimal service and inform you of opportunities to enhance your experience with Ruby, we may share data about our Customers with our Affiliates for cross-contextual behavioral advertising purposes. In most cases the data we share in this manner is not protected as Personal Information under applicable privacy laws.

Customers can learn more about this data sharing or opt-out within the scope of the Customer's privacy rights by submitting a [Do Not Sell or Share My Personal Information](#) request.

- * **Right to Opt-Out of Automated Processing.** Ruby does not use automated processing of Personal Information or "profiling" to provide the Services. If this changes in the future, we will update this Privacy Notice and provide you with a method to opt-out.
- * **Right to Nondiscrimination.** We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by law, we will not (a) deny you goods or services, (b) charge you different prices or rates for goods or services, (c) provide you a different level or quality of goods or services, (iv) retaliate against you as an employee, applicant for employment, or independent contractor for exercising your privacy rights; or (d) suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services, because you exercised a right under the CCPA.
- * **Right to Disclosure of Marketing Information.** California's Shine the Light Act (Civil Code sections 1798.83-1798.84) entitles California residents to request certain disclosures regarding Personal Information sharing with affiliates and/or third parties for marketing purposes.

Consumers may exercise these rights over their Personal Information, subject to our receipt of a verifiable [Consumer Privacy Request](#), as well as any exceptions and limitations that may apply. Please note that CCPA privacy rights do not apply where Ruby collects and uses your Personal Information in a business-to-business context when you are acting as an employee to a Customer or potential Customer in the performance of your job duties.

Canada.

We adopted this section to provide supplemental information in compliance with Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA"). This section applies solely to residents of Canada where PIPEDA applies ("**Canadian Consumers**"). PIPEDA gives Canadian Consumers specific rights regarding Personal Information offering details on an identifiable person without the inclusion of name, title, telephone number, and business address of an employee of a business or organization. The following paragraphs describe PIPEDA rights and explain how to exercise those rights.

- * **Right to know** why we collect, use, and distribute the Personal Information we process. We have set the required notices in this Privacy Notice. We may provide you with additional notices about other ways we process your Personal Information, such as by sending you a notice via email or by other means of communication.
- * **Right to expect** us to collect, use, or disclose Personal Information responsibly and not for any other purpose other than which you consented. We set your expectations in this Privacy Notice and collect express or implied consent at various stages of collection or processing. If we collect or use your Personal Information based on your consent, we will also notify you of any changes and will request your further consent as needed. You may withdraw your consent at any time with reasonable notice by contacting us at privacy@ruby.com.
- * **Right to accuracy** of your Personal Information. We take steps to reasonably ensure that your Personal Information we are using is accurate. In most cases, we rely on you to ensure that your information is current, complete, and accurate. We provide methods for you to correct, update, and delete inaccurate Personal Information in your account, and we will provide you with

reasonable assistance to ensure that your Personal Information is accurate in our systems and with our service providers.

- * **Right to access** your Personal Information. Upon written request and identity authentication, we will provide you with your Personal Information under our control, information about the ways in which that information is being used and a description of the individuals and organizations to whom that information has been disclosed. We will make the information available within 30 days or provide written notice where additional time is required to fulfil the request. If limited by law or potential infringement on another's privacy rights, we may not be able to provide access to some or all of the Personal Information you request. If we must refuse an access request, we will notify you in writing, document the reasons for refusal, and outline further steps that are available to you.

Canadian Consumers may exercise these rights over their Personal Information, subject to our receipt of a verifiable [Consumer Privacy Request](#), as well as any exceptions and limitations that may apply.

European Economic Area and United Kingdom.

We adopted this section to comply with the General Data Protection Regulation (“**GDPR**”) and its counterpart regulation applicable to residents of the United Kingdom. This section applies solely to residents of the EEA and the United Kingdom (“**Data Subjects**”). Ruby collects and processes Personal Information of Data Subjects who are Callers as a processor to our Customers. If you are a Data Subject, you have the following rights in relation to the Personal Information we hold about you:

- * **Right to know** how we process your Personal Information. We have set the required notices in this Privacy Notice. We may provide you with additional notices about other ways we process your Personal Information, such as by sending you a notice via email or by other means of communication.
- * **Right to access** your Personal Information. Upon request, we will provide you with a copy of your Personal Information, along with details about the types of Personal Information we process, why we process it, and any third parties we work with to collect Personal Information on our behalf. We may have one or more legally valid reasons to refuse your request in whole or in part, for example, to protect the rights of other individuals.
- * **Right to restrict processing** of your Personal Information. You can request that we restrict the processing of your Personal Information if: (a) the data is inaccurate; (b) the processing is unlawful; (c) we no longer need the Personal Information; or (d) you exercise your right to object.
- * **Right to rectify your Personal Information.** If you become aware that the Personal Information that we hold about you is incorrect, or if your information changes, please inform us and we will update our records.
- * **Right to data portability.** In some circumstances, we are required to provide your Personal Information to another organization at your request and in a structured, commonly used machine-readable format, so that the other organization can read and use it.
- * **Right to erasure** (a.k.a. the “**right to be forgotten**”). Upon your request, and in certain circumstances and where we are required to do so by law, we are required to delete or anonymize your Personal Information. This right is not absolute, and we may be entitled to retain and process your Personal Information despite your request. If you make this request, we balance certain legal,

contractual, and business interests against your right to request the deletion of your Personal Information.

- * **Right to object** to certain processing of your Personal Information. Upon your request, and in certain circumstances and where we are required to do so by law, we will limit our processing of your Personal Information as you request.
- * **Right to not be subject to Automated Decision-Making (“ADM”).** Ruby does not use ADM to provide the Services. All decisions made on the Services which produce legal effects are the result of human decision-making. If this changes in the future, we will update this posting to describe our use of ADM and your options to exercise your privacy rights related to your Personal Information processed using ADM.

Data Subjects may exercise these rights over their Personal Information, subject to our receipt of a verifiable [Consumer Privacy Request](#), as well as any exceptions and limitations that may apply. If you are a resident of the EEA and you believe we are unlawfully processing your Personal Information, you also have the right to complain to [your local data protection supervisory authority](#). If you are a resident in Switzerland, you have the right to complain to the [Swiss data protection authorities](#). Callers who are residents of the EEA or Switzerland should direct their privacy inquiries related to the Customer they contacted via Ruby’s Services.

Ruby’s Data Security.

Ruby employs reasonable and appropriate security procedures and practices to help protect your Personal Information from unauthorized or illegal access, destruction, use, modification, or disclosure. The Platform and our other Services are designed with data security in mind to continuously protect your data and our systems. Ruby maintains internal policies to govern the collection, processing, and handling of data. Access to Personal Information is limited to employees and contractors as needed to perform their job functions. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations. We also ensure that our employees, contractors, and agents responsible for handling privacy inquiries are informed of applicable legal requirements and we restrict access to those who need that information to process it.

However, no transmission of data over the Internet is 100% secure, and we cannot guarantee that unauthorized third parties will not defeat our security measures or use your Personal Information for improper purposes. Clients that create an account on the Platform are responsible for maintaining the confidentiality of their username and password. We encourage you to take steps to protect against unauthorized access to your account and device by choosing a robust password and signing off after each session. Ruby is not responsible for any lost, stolen, or compromised passwords, or for any activity on your account via unauthorized activity.

If you sign up for receptionist services, we will issue a call forwarding number to you. It is your choice as a Customer whether to share your call forwarding number with others. We are not responsible for any lost, stolen, or compromised passwords or call forwarding numbers, or for any activity on your account via unauthorized activity.

Consent to Cross-Border Data Transfers.

Ruby is owned and operated in the United States and our privacy practices are governed by United States law. We use technical infrastructure in the United States and other countries to provide our Services to Customers and their Callers wherever they are located as agreed to under our Terms of Use. As such, we must sometimes transfer data across jurisdictional boundaries. If you use our Services from outside of the U.S., please be aware that the Personal Information we collect about you may be transferred to, processed, stored, and used in the U.S. or other jurisdictions.

The United States, European Economic Area Member States, and other countries all have different privacy laws. When your information is moved from your home country to another country, the laws and rules that protect your Personal Information in the country to which your information is transferred may be different from those in the country in which you live. For example, the circumstances in which law enforcement can access personal information may vary from country to country. If your information is in the United States, it may be accessed by government authorities in accordance with US law. Ruby does not warrant that our Services are appropriate or authorized for use in any other jurisdictions. You are solely responsible for determining whether your use of our Services complies with applicable laws.

Ruby employs legally valid transfer mechanisms for all cross-border transfers of Personal Information. To the extent that Ruby is deemed to transfer Personal Information from the EEA to outside of the EEA, we do so on the legal basis that such transfer is necessary to provide you with the Services you have chosen to use.

By allowing us to collect Personal Information about you, you consent to the transfer and processing of your Personal Information as described in this section.

Third Party Platforms.

Our Services may contain links to platforms owned or operated by third parties. Ruby has no ability to control, and we are not responsible for, the privacy and data collection, use, and disclosure practices of third-party platforms. If you choose to access the Site from a social networking website, we may receive Personal Information about you from such social networking website, as governed by the terms of use and privacy notice of that website. We may retain this Personal Information with the information we collect from you by other means. We encourage you to read the privacy statements of each online service that collects your Personal Information.

Updates.

If we make material changes to how we treat your Personal Information, we will post the revised Privacy Notice on this page. Your continued use of the Services after we make changes is deemed to be your acceptance of those changes. The date that this Privacy Notice was last revised is identified at the top of the page. You are responsible for periodically visiting this Privacy Notice to check for any changes.