

## Services Privacy Notice

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## 1. Introduction

Bell Techlogix, Inc., a Delaware corporation headquartered at 4400 W 96th Street, Indianapolis, Indiana 46268, provides Managed IT Services to businesses. This Notice governs our processing of Customers' and their Users' personal information, as part of providing the Managed IT Services, as a Service Provider/Processor under our Customers' documented instructions, usually provided in the MSA and/or DPA.

We process business-related personal information and do not target consumers or household users. Our Customers, acting as Businesses/Controllers, are responsible for managing their Users' personal information and compliance with applicable privacy regulations. Users should direct privacy rights requests to the relevant Customer; Bell Techlogix will assist the Customer as legally required. Bell Techlogix is not responsible for the privacy or data security practices of our Customers, which may differ from those set out in this Notice.

The categories of personal information processed by Bell Techlogix may vary depending on the Service being used. The MSA and any other underlying agreement, such as a DPA, between Bell Techlogix and the Customer takes precedence when in conflict with this Notice.

With the exception of having access to password in combination with account log-in (which combination is considered sensitive personal information under CCPA), we do not require processing of sensitive personal information in providing the Services. If we provide Services that require performing password resets for Users, we temporarily generate a new password, which the User is prompted to change upon their next log in. We do not have access to the User's original password or the password that the User chooses after we perform the reset, but we do have access to the reset password that we provide the User. If screen sharing is necessary to provide the Services to you, close out any screens or content with any data which Bell Techlogix is not required to see to provide the Services. For example, close out any emails or documents with sensitive Personal information or any other confidential information prior to screensharing. Do not submit Sensitive Personal information when entering a ticket or otherwise in receiving Services.

## 2. Definitions

**Business:** In the context of the CCPA, an entity that determines the purposes and means of processing consumers' personal information. In the context of this Notice, the Business is the Customer.

**Controller:** In the context of the GDPR, an entity that determines the purposes and means of processing personal information. In the context of this Notice, the Controller is the Customer.

**Customer:** Businesses which have signed an agreement, typically an MSA, with Bell Techlogix to receive Services.

**DPA (Data Processing Agreement/Addendum):** An agreement that Bell Techlogix enters into as necessary for the lawful data transfer and processing under GDPR.

**MSA (Master Services Agreement):** The contract between Bell Techlogix and the Customer for the provision of Services by Bell Techlogix to Customer.

**Notice:** This Services Privacy Notice describes Bell Techlogix's processing of personal information in providing the Services.

**Processor:** In the context of the GDPR, an entity that processes personal information on behalf of the Controller. In the context of this Notice, Bell Techlogix is the Processor.

**Subprocessor:** In the context of this Notice, Subprocessor means any third party engaged by Bell Techlogix to process personal data in connection with providing the Services. A Subprocessor processes Personal Data only as necessary for the provision of our Services and the purposes set forth in this Notice.

**SCCs (Standard Contractual Clauses):** Agreements that Bell Techlogix enters into as necessary for the lawful transfer and processing of personal data under the GDPR.

**Service Provider:** In the context of the CCPA, an entity that processes information on behalf of a Business. In the context of this notice, Bell Techlogix is the Service Provider.

**Services:** Managed IT Services provided by Bell Techlogix to businesses, as specifically defined in the SOW.

**SOW (Statement of Work):** A contract that details specific Services provided to each Customer.

**Users:** The Customer's employees, contractors, and others who receive Services under the MSA.

**Website:** Bell Techlogix's website at [www.belltechlogix.com](http://www.belltechlogix.com).

**"We", "our", or "us":** Bell Techlogix, Inc., a Delaware corporation with headquarters at 4400 W 96th Street, Indianapolis, Indiana 46268.

**"You" or "your":** Refers to Users.

### 3. What We Process

Examples of personal information that we may process include:

- a) Real Name
- b) Postal address
- c) Unique personal identifier
- d) Online identifier
- e) IP address
- f) Geolocation
- g) Precise Geolocation
- h) Account name
- i) Email address
- j) Telephone number
- k) Signature
- l) Products or services purchased, obtained, or considered
- m) Browsing history, search history, information on a User's interaction with a website, application
- n) Call recordings
- o) Videos of you, for example as on a Teams recording
- p) Account log-in in combination with password (only as part of performing a password reset)

## 4. Our Purpose in Processing

We may process personal information for the following purposes:

- a) **Quality Assurance:** For quality assurance purposes, for example when you call a Bell Techlogix analyst, and the call is recorded for quality assurance purposes.
- b) **Services Security and Fraud Prevention:** To maintain the security of our Services, including security monitoring, and to investigate and prevent potential fraud and illegal activities involving our Services, systems, and networks. This includes securing networks and systems from unauthorized access, scams, and malicious code.
- c) **Compliance Monitoring:** To monitor compliance with contractual obligations.
- d) **Legal and Policy Compliance:** To comply with applicable laws and to investigate violations of law or breaches of our internal policies, and to protect the rights and interests of Bell Techlogix and others. For example, we may monitor browsing, communications activity, or location when using our devices or systems if there is suspicion of involvement in phishing scams or illegal activities.
- e) **Service Administration:** To administer our Services, manage billing, and handle contract management. This also includes analyzing, developing, improving, and optimizing our Services.
- f) **User Satisfaction:** To improve the quality of our Services, for example as through User satisfaction surveys.
- g) **Business Operations:** Activities related to mergers and acquisitions, finance and accounting, business consulting, and dispute resolution.
- h) **Business Efficiency:** To conduct our business more effectively and efficiently, such as for reporting or analytics, business continuity, accounting, or financial planning.
- i) **Legal Obligations and Rights:** Where necessary, to comply with laws and regulations, under judicial or other legal authorization (e.g., responding to a subpoena), to protect your vital interests (or those of another person), or to exercise or defend the legal rights of Bell Techlogix.

## 5. Our Retention of Personal Information

We retain personal information where we have an ongoing legitimate business need to do so (for example, to provide a user with a Service that was requested or to comply with applicable legal, tax, business, or operational, or accounting requirements).

## 6. Sharing of Personal Information

We do not sell personal information. We share personal information with the following categories of recipients:

- a) **Third-Party Service Providers:** We share personal information with service providers that support our business operations, including IT, security, and communications infrastructure, data storage, and business continuity services.
- b) **Legal and Regulatory Bodies:** We may disclose personal information to law enforcement, regulatory agencies, courts, or other third parties when we believe it is necessary to comply with applicable laws or regulations, to exercise or defend our legal rights, or to protect the vital interests of any person.
- c) **Your Organization or Employer:** If you access our Services through an MSA administered by your organization or employer, your personal information may be accessed by authorized administrators of your organization or employer.
- d) **Consent-Based Sharing:** We may share personal information with any person when you have provided consent or as permitted by applicable data protection laws.
- e) **Professional Advisors:** We share personal information with auditors, financial advisors, legal representatives, and similar agents who provide advisory services to us, under contractual or legal obligations to use the data solely for legitimate business purposes.
- f) **Legal Compliance:** We disclose personal information to comply with legal obligations, such as responding to court orders, administrative or judicial processes, subpoenas, or government audits.
- g) **Public Authorities:** We may disclose personal information in our response to lawful requests by public authorities for purposes such as tax, health and safety, national security, or law enforcement.
- h) **Legal Claims:** We share personal information as necessary to establish, exercise, or defend against potential or actual legal claims.
- i) **Vital Interests:** We may disclose personal information where necessary to protect your vital interests or those of another person.
- j) **Business Transfers and Potential Buyers:** In the event of a potential or actual sale, assignment, corporate reorganization, or other transfer of all or part of our business, we may disclose personal information to potential buyers and their advisors during the due diligence process. This is to allow them to evaluate the business and its assets. Upon completion of such a transaction, personal information may be transferred to the acquiring entity.

We do not share Personal information with third parties for cross-context behavioral advertising. Third parties with access to Personal information are subject to contractual or regulatory requirements to keep Personal information confidential. We resell certain products and sublicense certain software to provide alongside the Services. These products and software are governed by the privacy policies of their respective vendors or licensors, which differ from this Notice.

## 7. Our Use of Artificial Intelligence (AI)

Bell Techlogix leverages AI technology in providing the Services. Our employees receive mandatory training on responsible AI use. We conduct diligence on our vendors to confirm that their AI practices are consistent with our dedication to responsible AI use.

To govern our AI initiatives and ensure ongoing adherence to our standards, Bell Techlogix has instituted an AI Governance Committee. This committee is responsible for overseeing AI strategies, overseeing compliance with our privacy commitments, and addressing any ethical considerations related to AI deployment in providing Services.

## 8. Our Security Practices

We have implemented cybersecurity practices designed to protect personal information processed as part of providing the Services. These measures, which are generally aligned with NIST 800-53 standard, govern areas of security applicable to the Services. All Bell Techlogix employees undergo mandatory annual training in cyber security. All Bell Techlogix employees also undergo mandatory one-time privacy training. Bell Techlogix employees are all also required to sign confidentiality agreements which obligate them to protect confidential information and to sign our cybersecurity policies. Additionally, Bell Techlogix has a Services Data Privacy Policy and Standard which all Bell Techlogix employees are required to acknowledge and accept. While Bell Techlogix implements these security measures to protect personal information, no measure can guarantee absolute security.

## 9. California Residents' Privacy Rights (CCPA/CPRA)

### 9.1 California Privacy Rights

Users who are residents of the state of California may be entitled to specific privacy rights under applicable data protection laws. These rights may include access to your personal data, deletion of personal information, the right to know about the personal information collected, and the right to opt-out of the sale of personal information.

If Bell Techlogix processes your personal information as a Service Provider on behalf of our Customer, please contact the applicable Customer directly to exercise your privacy rights. Bell Techlogix will assist the Customer in responding to your request as required by applicable law.

The specific privacy laws applicable in California are:

- California Consumer Privacy Act (CCPA)
- California Privacy Rights Act (CPRA)

For convenience, we collectively refer to these laws as the "CCPA" due to their similarities in protecting your privacy rights.

## 9.2 Categories of Personal Information Processed in the Prior 12 Months

Below are the categories of Personal Information, and Sensitive Personal Information, under the CCPA and a response on if we collected and processed that category as part of providing the Services generally in the prior 12 months. Specific Services may involve processing different categories of personal information. If you wish to confirm what categories of your personal information were processed in the prior 12 months as part of a specific Service, please contact the applicable Customer directly.

Category Name	Description	Collected and Processed in Prior 12 Months
Identifiers	Includes real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	Yes- Real Name, postal address, unique personal identifier, online identifier, IP address, email address, and account name, and telephone number.
Personal Information Categories in Records	Covers name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	Yes- Real name, signature (on contracts and other documents), address, telephone number
Protected Classification Characteristics	age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information.	No
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes- services and products purchased, obtained, or considered

Category Name	Description	Collected and Processed in Prior 12 Months
Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
Internet or Other Electronic Network Activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes- interaction with <a href="http://www.belltechlogix.com">www.belltechlogix.com</a> , please see our Website Privacy Policy. Additionally, we collect information about devices and use of our Services, including data obtained through cookies and similar technologies.
Geolocation Data	Physical location or movements.	Yes- IP Address
Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes-Call recordings as part of receiving our Services.
Professional or Employment-Related Information	Current or past job history or performance evaluations.	No
Non-Public Education Information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
Inferences Drawn from Other Personal Information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No
Sensitive Personal Information	Includes social security number, driver's license, state identification card, passport number, account log-in, financial account, debit card, or credit card number in combination with any	Yes- If we perform Services that involve performing password resets for Users, we temporarily generate a new password, which the User is prompted to change



Category Name	Description	Collected and Processed in Prior 12 Months
	required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer's mail, email, and text messages; genetic data.	upon their next log in. We do not have access to the User's original password or the password that the User chooses after we perform the reset, but we do have access to the reset password that we provide the User.

## 10. EEA, EU, and UK Individuals' Privacy Rights (GDPR)

### 10.1 GDPR Privacy Rights

Users located in the European Economic Area (EEA), United Kingdom (UK), European Union (EU), and Switzerland may be entitled to specific privacy rights under applicable data protection laws. These rights may include access to your personal data, rectification of inaccuracies, erasure, restriction of processing, data portability, and the right to object to processing.

If Bell Techlogix processes your personal data as a Processor on behalf of our Customer, please contact the applicable Customer directly to exercise your privacy rights. Bell Techlogix will assist the Customer in responding to your request as required by applicable law.

The specific privacy laws applicable in these regions are as follows:

- EEA: General Data Protection Regulation (GDPR)
- UK: UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018
- EU: General Data Protection Regulation (GDPR)
- Switzerland: Federal Act on Data Protection (FADP)

For convenience, we collectively refer to these laws as "GDPR" due to their similarities in protecting your privacy rights.

At Customer's request, Bell Techlogix enters into Standard Contractual Clauses (SCCs) and Data Processing Agreements (DPAs) as necessary for the lawful transfer and processing of Personal Data under the GDPR. These agreements are utilized when processing Personal Data of our Customers within the European Economic Area (EEA), European Union (EU), United Kingdom (UK), and Switzerland. As the Data Controller, it is Customer's responsibility to request SCCs and DPAs be in place with Bell Techlogix as necessary.

## 10.2 Subprocessor Engagement

Bell Techlogix engages Subprocessors to process Personal Data as necessary for the provision of our Services and the purposes set forth in this Notice. We may utilize different Subprocessors for specific Services. For details, please refer to the DPA between Bell Techlogix and Customer. We will inform Customers of any new general Subprocessor engagements through an amendment to the DPA if applicable, and/or an update to this Notice. If applicable, Customers have the right to object to new Subprocessors as per the terms of their MSA and DPA with Bell Techlogix.

## 11. Data Processing Agreements

For Customers subject to GDPR or other data protection regulations that require a Data Processing Agreement (DPA), as the Data Controller it is the Customer's responsibility to request a DPA and/or Standard Contractual Clauses (SCCs) from Bell Techlogix. We will enter into DPAs and/or SCCs as necessary for the lawful processing of personal data, upon request by Customer.

To request a DPA and/or SCCs, the Customer should contact their Bell Techlogix Service Delivery Manager.

## 12. Our Processing in India

In providing Services, we engage in the sharing and processing of personal information with our wholly owned subsidiary, Bell Techlogix India Private Limited ("Bell Techlogix India"), which is based at Prestige SkyTech, Sky One, Wing A 15th Floor, Prestige Sky Tech, ISB Road, Nanakramguda, Hyderabad- 500032. Bell Techlogix India processes personal information on our behalf and adheres to our documented instructions. Bell Techlogix India Private Limited adheres to a Data Protection Addendum ("DPA") and Standard Contractual Clauses ("SCCs") with Bell Techlogix Inc. The processing activities carried out by Bell Techlogix India are for the same purposes as those described within this notice. For Customers in regulated industries, if required we ensure that personal information is only processed within the United States. Any requirement to this effect is set out in the Customer's MSA or SOW.

## 13. Updates to this Notice

This Notice is subject to occasional revision, and if we make any substantial changes in the way we use personal information under the Notice, we will take appropriate measures to inform our Customers, consistent with the significance of the changes we make. We will obtain consent to any material Notice changes if and where this is required by applicable data protection laws. The date of the most recent update to this Notice can be found by checking the "last updated" date displayed at the top of this Notice.

## 14. Contact Us

You may contact us with any questions about this Notice by using the form linked below. Please provide enough information in your contact submission to permit us to respond and explicitly state in your submission that it is a "Privacy Practice Inquiry." Please contact us by filling out the Contact Us Form on <https://belltechlogix.com/contact-us/> and selecting "Privacy" in the "Inquiry Type" drop down. If you are an existing Customer, you may also contact your Bell Techlogix Service Delivery Manager.

You may also contact us via mail by sending an inquiry to:

Bell Techlogix, Inc.

Attn: General Counsel

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