

Privacy Policy

CABLEWAY S.A. ("CABLEWAY" or "us" or "we") takes your privacy matters very seriously. Please read the following to learn more about our Privacy Policy ("Policy"). This Policy details how we receive, collect and use information in connection with our **LocalTransfer** application for iPhone and the service this App provides ("LocalTransfer" or "the App" or "the Service").

COLLECTION AND USE OF INFORMATION

LocalTransfer **DOES NOT** collect personally identifiable information about you. In other words, LocalTransfer does not collect information such as your name, address or email address. Furthermore, LocalTransfer does not use or collect your precise geographic location.

When you first register to LocalTransfer you need to provide your mobile phone number that acts as an Id that is needed to provide service to your iPhone. This user Id is submitted and stored in a secure central database. This number is also used to forward calls received in your subscribed local numbers.

From time to time, when the App registers to our servers, it submits:

- the assigned user Id that allows us to identify you as a unique user
- a Push Notification token that allows us to send you Push notifications to your device. Push notifications are sent when a subscription is about to expire or you run out of talking minutes for example.

Push notifications Service is a mechanism provided by Apple that allows us to submit notifications to individual devices. The service is provided by Apple in a way that we are only allowed to send push notification to our LocalTransfer app in registered users. If a user uninstalls our LocalTransfer App, we can no longer submit push notifications to that device. Push notification can also be disabled by the user in the configuration panel of his iPhone.

The commercial transaction when you subscribe to a local number is handled entirely by the PayPal, and no personal information is disclosed to us. In other words, we do not receive your username, name, last name, email, address, phone, nor payment method.

LocalTransfer also keeps a log file of your subscriptions and calls received. Calls are stored as Call Detail Record (CDR - see http://en.wikipedia.org/wiki/Call_detail_record). These are industry standard records used by all phone companies. We maintain this information in order to better understand network behavior and trends, detect potential outages and technical issues. All log analysis is done in an anonymous, aggregate, non-personally identifiable manner. We may also look into a specific Call Detail Record in response to a customer support request. We maintain CDRs for a period of no more than 30 months.

Audio calls received are transmitted directly to the user. **WE DO NOT RECORD ANY PART OF YOUR CALL.**

The App will request permission to access your address book. If allowed by you, no information from your address book will be submitted to us. The main reason for accessing your address book is to display the name of the calling party when an incoming call arrives (by trying to match the calling party number with one in your address book). It is also accessed when you need to store a new entry in the address book from the number received.

SHARING AND DISCLOSURE OF INFORMATION

We do not rent, sell, or share any information about the user with any third-parties. We may disclose your Personal Information if we believe such action is necessary to comply with the law or legal process served on us. CABLEWAY also reserves the right to disclose Personally Identifiable Information and/or non-personally-identifiable information that CABLEWAY believes, in good faith, is appropriate or necessary to enforce our Terms of Service, take precautions against liability, to investigate and defend itself against any third-party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of LocalTransfer service, and to protect the rights, property, or personal safety of CABLEWAY, our users or others.

We may from time to time ask you to provide information on your experiences which will be used to measure and improve quality. You are at no time under any obligation to provide any of such data. Any and all information which is voluntarily submitted in feedback forms any survey that you accept to take part in is used for the purposes of reviewing this feedback and improving LocalTransfer service.

CHILDREN'S PRIVACY

LocalTransfer App and Service is not intended for or designed to attract anyone under the age of 13 and we do not intentionally or knowingly collect personal information from anyone under the age of 13 (or older in some jurisdictions). We encourage parents to be involved in the online activities of their children to ensure that no information is collected from a child without parental permission.

SECURITY

We take reasonable precaution to protect your information from misuse, loss and unauthorized access. Although we cannot guarantee that your information will not be subject to unauthorized access, we have physical, electronic, and procedural safeguards in place to protect your information. Data is stored on our servers and protected by secured networks to which access is limited to a few authorized employees and personnel. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure.

BUSINESS TRANSITIONS

In the event that we go through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of our assets, your information will likely be among the assets transferred. As part of such a transaction the new entity will be required to commit to the same level of protection of your information as described in this Privacy Policy. If we cannot obtain such a commitment, we will not perform the business transition.

CHANGES TO POLICY

From time to time, we may revise this Policy. We reserve the right to update or modify this Policy, or any other of our policies or practices, at any time with or without notice. We will post the revised Policy on the Site, so that users can always be aware of what information we collect, how the information is used and under what circumstances such information may be disclosed. You agree to review the Policy periodically so that you are aware of any modifications. Your continued use of the site indicates your assent to any changes and signifies your agreement to the terms of our Policy. If you do not agree with these terms, you should not use the LocalTransfer.

CONTACT INFORMATION

Please direct all questions in connection with this Policy via e-mail to support@localcalltransfer.com.

Date Last Modified:

This Privacy Policy was last modified April 28th, 2016