

CLARO ENTERPRISE SOLUTIONS, LLC

PRIVACY POLICY

Last updated: 03/03/2026

Introduction

Claro Enterprise Solutions, LLC (“Company” or “We”) respects your privacy and is committed to protecting it through our compliance with this Privacy Policy (the “Policy”).

This Policy describes the types of information we may collect from you or that may you provide when you visit the website <http://www.USClaro.com> (our “Website”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

Please read this Policy carefully our policies and practices and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This Policy may be updated from time to time (see **Changes to Our Privacy Policy**). Your continued use of this Website after we make changes is deemed to be successfully accepted for those changes, so please check the Policy for updates.

Children’s Online Privacy

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information to us via the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this website or through any of its features, or provide any information about yourself to us, your name, address, number, telephone or email address. If we learn we have collected or personal information from a child under 13 without verification of parental consent, we will use efforts to delete that information.

If you believe we have any information from or about a child under 13, please contact us at Legal@USClaro.com by mail to:

Claro Enterprise Solutions, LLC
Office of Privacy: Legal Department, 3350 SW 148th Ave #400, Miramar, FL 33027

California residents may have additional rights regarding the collection and use of their personal information. Please see the **California Consumer Privacy Act Disclosure** for more information.

Information We Collect About Website Users and How We Collect It

We collect various types of information from and about users of our website, including information:

- by which you may be identified, such personally as name, postal address, e-mail address, telephone number, or any other identifier by which you may be contacted online or voluntarily when you provide it directly to us (“personal information”);
- that is about you, but which does not identify you; and/or that is about your internet connection, the equipment you use to access our Website and details of your use thereof, automatically as you navigate through the site. Information collected may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing, and patterns, including:

- Details of your visits to our website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and third-party websites or other online services (behavioral tracking). For information on how you can opt out of behavioral tracking on this website and how we respond to web browser signals and other mechanisms that mechanisms enable consumers to exercise about behavioral tracking, please contact us at Legal@USClaro.com.

The information we collect automatically helps us to improve our Website and to deliver a better and more personalized service, including enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, which we use to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have your adjusted browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security

settings for Flash cookies, see **Choices About How We Use and Disclose Your Information**.

- **Web Beacons.** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened.

an email and for other related website statistics (for example recording, the popularity of certain website content and verifying system and server integrity).

How We Use Your Information

We use information that we collect about you that or you provide to us, including any personal information:

- To present our website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for you provide it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may provide information that we collect:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To fulfill the purpose for which you provide it. For any other purpose found by us when you provide the information.
- With your consent.

We may also reveal your personal information:

- To comply with any court order, law, or legal process, include to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes ex-changing information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

We strive to provide you choices regarding the information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings on Adobe's website. If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.
- **Promotional Offers from the Company.** If you do not wish to have your email address/contact information used by the Company to promote our own or third parties'

products or services, you can opt-out by checking the relevant box located on the form on which we collect your data (the *Contact Us* or similar form) or by sending us an email stating your request to Legal@USClaro.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to us as a result of a product warranty, registration, product service experience or other transactions.

California residents may have additional personal information rights and choices. Please see the

California Consumer Privacy Act Disclosure for more information. [Data Security](#)

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provided to us is stored on our secure servers behind firewalls.

Unfortunately, the transmission of information via the internet is completely not secure. Although we do our best to protect your personal information, we guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Changes to Our Privacy Policy

It is our policy to post any changes we make to this Policy on this page with a notice that the Policy has been updated on the website home page. If we make material changes to how we treat our users' personal information, we will notify you by a notice on the website home page. The date the Policy was last identified revised is at the top of the page. You are responsible for ensuring we have an up-to-date active and periodically deliverable email address for you, and for visiting our Website and this Policy to check any changes for any changes.

Call Monitoring and Recording.

If you communicate with us by telephone, we may monitor and/or record the call.

Notice to European Users

This website and the services on this Website are for targeted users in the United States of America. Any information you enter on this website may be transferred outside of the European Union to the United States of America which is not offered an equivalent level of protection to that in the European Union. In particular, you are advised that the United States of America use a

sectoral model of privacy protection that on a mix of legislation, governmental regulation, and self-regulation. Article 26 of the European Union's Data Protection Directive (Directive 95/46/EC, 1995 O.J. (L 281) 31) allows for transfer of personal data from the European Union to a third country if the individual has unambiguously given his consent to the transfer of personal information, regardless of the third country's level of protection. By using this Website or the services, you consent to the transfer of all such information to the United States of America which may not offer an equivalent level of protection to that required in the European Union and to the processing of that information by the Company on its servers located in the United States of America as described in this Policy.

Contact Information

To ask questions or comment about this Policy and our privacy practices, contact us at: Legal@USClaro.com or by mail to:

Claro Enterprise Solutions, LLC
Office of Privacy: Legal Department, 3350 SW 148th Ave #400, Miramar, FL 33027

CALIFORNIA CONSUMER PRIVACY ACT DISCLOSURE

Last updated: 03/03/2026

This disclosure is adopted to comply with the California Consumer Privacy Act of 2019, as amended by the California Privacy Rights Act of 2022, (“CCPA”). This disclosure is our online privacy policy required by Cal. Civ. Code 1798.130(a)(5). The CCPA and this disclosure apply solely to individuals who are California residents. Any terms defined in the CCPA have the same meaning when used disclosure in this disclosure. Any capitalized terms used, but not defined, here, have the same assigned meaning to them in the Policy.

If you are a California resident you may have certain rights under the California Consumer Privacy Act (Cal. Civ. Code §1798.100 et seq.) regarding your personal information, including:

- The right to request the specific pieces of personal information we collected about you; the categories of personal information we collected; the categories of sources used to collect the personal information; the business or commercial purposes for collecting your personal information; and the categories of third parties with whom we share your personal information each as it pertains to our activities in the preceding twelve (12) months;
- The right to request, on legitimate grounds, deletion of your personal information that we collected;
- The right to request correction of inaccurate personal information;
- The right to have someone you authorize make a request on your behalf; and
- The right not to be discriminated against for exercising any of these rights.

We also must provide in this online disclosure certain details about our collection and handling of categories of personal information. The information that follows provides the types of personal information we may collect about California residents who are subject to the CCPA, the sources from which we collect it, and the ways in which we use and disclose it.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could linked be linked, directly or reasonable, with a particular consumer or device indirectly (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Categories of Personal Information We Collect

- Personal identifiers, including those listed in California Civil Code Section 1798.80(e): this includes items such as your legal name; aliases; telephone number; email address; postal address; account name; online identifier; device identifier; or IP address.
- Characteristics of protected classifications: this means characteristics about you which may be

protected under state or federal law such as date of birth/age; gender; military or veteran status; marital status; nationality; citizenship; or information obtained about you with respect to requests for leave made pursuant to state or federal law.

- **Biometric information:** this means information related to an individual's physiological, biological, or behavioral characteristics, such as a fingerprint, voice recordings or keystroke patterns and rhythms.
- **Professional or Employment information:** is information related to your professional experiences or other employment-related information such as title; salary; employment files; references.
- **Education information:** this means information related to your education history, such as details of your education and qualifications.
- **Financial details:** this includes bank account numbers; debit/credit card numbers; cardholder or account holder name and details; transaction details; and account log-in numbers.
- **Commercial Information:** this means information and records regarding transactions completed by you, such as records of personal property, products and service purchased, obtained or considered and purchasing or consuming histories or tendencies.
- **Internet or other electronic network activity information:** means information regarding your activity on the internet or another electronic network, such as your browsing history, search history, information regarding your interaction with a website, application or an online advertisement
- **Geolocation data:** means information derived from a device that can be used or is intended to be used to locate your physical location, such as an Internet Protocol (IP) location.
- **Inferences:** means any derivation of information, data, assumptions, or conclusions drawn from any of the above categories used to create a profile reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Categories of Sensitive Personal Information We Collect

- **Identification Numbers:** this means any information that reveals an individual's identity such as social security number, driver's license number, state identification card number, permanent resident card identification number or passport number.
- **Health Information:** this means any personal information collected and analyzed concerning an individual's health, such as information we obtain to process requests for leave for an employee's health condition.
- **Background Information:** means any information that reveals an individual's racial or ethnic origin and citizenship or immigration status.

- **Precise Geolocation Data:** means any data that is derived from a device and used or intended to be used to locate an individual.
- **Sensory Information:** this means audio, electronic, visual, and similar information, such as call and video recordings.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you when you provide it to us (e.g., where you contact us via email or telephone, or by any other means).
- Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our website. For example, from submissions through our Website portal or Website usage collected details automatically.
- From third parties that interact with us in connection with the services we perform.

Use of Personal Information

Business and Commercial Purposes for Use of Personal Information

- **Marketing/Prospecting:** communicating with you via any means (including via email, telephone, text message, social media, post or in person) subject to ensuring that such communications are provided to you in compliance with applicable law; and maintaining and updating your contact information where appropriate.
- **Operation of our Sites:** operation and management of our Sites; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our Sites.
- **IT operations:** management of our communications systems; operation of IT security; and IT security audits.

- Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations.
- Financial management: sales; finance; corporate audit; and vendor management.
- Research: conducting market or customer satisfaction research; and engaging with you for the purposes of obtaining your views on our products and services.
- Security: physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where you access our electronic systems).
- Investigations: detecting, investigating, and preventing breaches of policy, and criminal offences, in accordance with applicable law.
- Legal compliance: compliance with our legal and regulatory obligations under applicable law.
- Legal proceedings: establishing, exercising, and defending legal rights.
- Improving our products and services: identifying issues with existing products and services; planning improvements to existing products and services; and creating new products and services.
- Risk Management: Audit, compliance, controls and other risk management.
- Fraud prevention: Detecting, preventing and investigating fraud.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing notice to you.

Categories of Third Parties to Whom Personal Information is Disclosed

- You and, where appropriate, your family, your associates, and your representatives.
- Third party service providers (such as payment services providers; shipping companies; etc.).
- Governmental, legal, regulatory, or other similar authorities and/or local government agencies, upon request or where required.
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.
- Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

- Accountants, auditors, financial advisors, lawyers and other outside professional advisors, subject to confidentiality.

To request a listing of the individual third parties with whom your personal information has been disclosed, please refer to the section “How to Submit a Request for Access to the Personal Information”.

Retention

We take reasonable steps designed to ensure that your personal information is only processed for the minimum period necessary for the purposes set out in this disclosure. The criteria for determining the duration for which we will retain your personal information are as follows:

We will retain copies of your personal information in a form that permits identification only for as long as we maintain an ongoing relationship with you (e.g., while you remain an employee, or where you are still receiving services from us); or your personal information are necessary in connection with purposes set out in this disclosure plus the duration of any applicable limitation period under applicable law; and where required. In addition, if any relevant legal claims are anticipated/brought, we may continue to process your personal information for such additional periods as are necessary in connection with that claim.

During the periods noted above we will restrict our processing of your personal information to storage of, and maintaining the security of, that information except to the extent that that information needs to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods above, each to the extent applicable or permitted by applicable law, have concluded, we will 1) permanently delete or destroy the relevant personal information, or 2) archive your personal information so that it is beyond use; or 3) anonymize the relevant personal information.

No Sale of Personal Information

We do not sell your personal information to third parties. If you obtain products or services from us, we may need to provide certain of your personal information to outside parties who we use to provide those products and services to you.

Right to Access the Personal Information We Have Collected About You

You have the right to access the personal information we have collected about you, with certain limited exceptions. Some of those exceptions are the following:

- You must be a resident of California. The rights discussed in this Online Privacy Policy are rights granted under the California Consumer Privacy Act to California residents. If you are not a California resident, this policy does not apply to you.
- You must provide sufficient information to us to verify your identity. Before disclosing any

information about what personal information we may have collected about an individual, we need to be able to verify that the person making the request is indeed that individual. We also need to verify that you are a California resident. The methods we use to verify your identity can vary depending upon the types of transactions you have initiated through us in the past.

- There is a 12-month limit on your right to access the personal information we have collected. We are required to provide information about your personal information that we have collected in the past 12 months.

How to Submit a Request for Access to the Personal Information We Have Collected About You

You can request access to the personal information we have collected about you by submitting a request:

- Submitting an email request to Legal@USClaro.com
- By mail: Office of Privacy: Legal Department, 3350 SW 148th Ave #400, Miramar, FL 33027

You will need to provide us with your name, your residence address in California, a method of contacting you by phone or email, and a brief description of the context under which you believe we may have collected your personal information.

Right to Delete/Correct Your Personal Information

You have the right to request that we delete/correct any personal information about you that we have collected from you. Our obligation to delete/correct your personal information is subject to certain conditions and exceptions. For example, we need to be able to verify your identity, as explained above, and your residence address in California.

Also, we are not required to comply with your request to delete your personal information if it is necessary for us or our service provider to maintain your personal information in order to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business or employment relationship with you, or otherwise perform a contract between you and us.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to California Penal Code Section 1546.

- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent.
- To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information. If we are able to verify your identity, and to the extent the exceptions do not apply, then we will delete/correct your personal information and direct any service providers to delete/correct your personal information from their records.

Right to Equal Service

We cannot and will not discriminate against you because you exercised any of your rights under the California Consumer Privacy Act. This means, for example, that we will not:

- Deny you any goods or services because you exercised these rights
- Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties, because you exercised these rights
- Provide a different level or quality of goods or services to you because you exercised these rights
- Suggest that you receive a higher price or rate for goods or services or a lower level or quality of goods or services because you exercised these rights.

We do need to collect certain personal information in order to provide services to you and/or to employ you, so if you do not want to provide that necessary personal information, we will not be able to provide you with those services and/or employ you.