

BBG'S SAFE HARBOR PRIVACY POLICY

Policy Statement

BBG Communications, Inc. and its affiliates (collectively "BBG"), respect the privacy and values the confidence of our customers, employees and others who entrust us with their personal information. For this reason, BBG adheres to both (i) the set of data protection principles developed by the United States Department of Commerce and the European Commission and the Frequently Asked Questions issued by the Department of Commerce on July 21, 2000 (the "EU Framework") and (ii) the set of data protection principles developed by the United States Department of Commerce and the Federal Data Protection and Information Commissioner of Switzerland and the Frequently Asked Questions issued by the Department of Commerce of February 6, 2009 (the "Swiss Framework").

Scope

BBG provides international telecommunications services, including public telephony, calling card, long distance operator assistance, credit card processing, billing, collection and wireless telecommunication services.

BBG processes casual-use voice services from European Union ("EU") or Swiss telephone users making long distance calls from payphones and hotels. This process includes the collection of billing information and desired call destination from End Users (defined below) which eventually result in the creation of call detail records and include the date, time, duration, number dialed and billing number. This call detail information is collected from EU or Swiss telephone equipment operators, and local and long distance carriers and is used by BBG for calculating commissions and reporting this information via a secured website to sales representatives and customers; otherwise the information is restricted to authorized personnel, technical staff and network administrators. Call detail records do not contain personally identifiable information. An End User's name and credit card number are collected when calls are billed to a credit card, and BBG processes the payment and charges the caller's credit card. Certain related entities in the EU and Switzerland have also contracted with BBG to provide telecommunications support services and may also submit human resource information to BBG which is used only for internal purposes, stored in a secure location and not shared with third parties.

This policy (this "Policy") applies to all Personal Information (defined below) of End Users received by BBG regardless of format. For the purposes of this policy, "End Users" includes (i) individuals, with respect to the EU, and (ii) individuals and entities with respect to Switzerland. BBG will not share or disclose Personal Information with third parties unless required to do so by law and will establish and maintain business procedures that are consistent with this Policy.

Safe Harbor Principles of the EU and Swiss Frameworks

BBG has adopted the seven principles, present in both the EU and Swiss Frameworks, of notice, choice, onward transfer (transfer to third parties), access, security, data integrity and enforcement (the "Safe Harbor Principles") with respect to End User name and credit card

number information and human resource data to be transferred to the U.S. from operations in the EU and Switzerland ("Personal Information").

1. **Notice**: This Policy informs End Users about the purposes for which we collect and use Personal Information, how to contact us, the parties to which that information may be accessible, and the choices and means, if any, that BBG offers End Users for limiting the use and disclosure of such data.
2. **Choice**: BBG does not share End User names and/or credit card numbers with third parties, or use such data for a purpose other than the purpose for which it was originally collected, such as in connection with payment processing and authorization involving financial institutions and processing companies. For human resource data, BBG does not share such information with third parties or use such information for a purpose other than that for which the data was originally collected or subsequently authorized by the End User. As BBG does not share Personal Information with third parties, there is no need to offer End Users the opportunity to opt-out from having such data disclosed. Should the need ever arise, BBG will provide End Users with reasonable mechanisms to exercise their choice to opt-out from having such data disclosed.
3. **Onward Transfer (Transfer to Third Parties)**: Prior to disclosing Personal Information to a third party (other than as disclosed in this Policy), should the need ever arise, BBG will apply the notice and choice principles detailed above. BBG will obtain assurances from third parties that they will safeguard the personal data consistently with this Policy or any other EU adequacy finding, or as an alternative, BBG may enter into a written agreement with such third party requiring that the third party provide at least the same level of personal data protection as is maintained by BBG.
4. **Access**: Upon request, BBG will grant End Users reasonable access to Personal Information that it holds about them and BBG will take reasonable steps to permit End Users to correct, amend or delete information that is demonstrated to be inaccurate or incomplete.
5. **Security**: BBG will take reasonable precautions to protect Personal Information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.
6. **Data Integrity**: BBG will use Personal Information only in ways that are compatible with the purpose for which it was collected or subsequently authorized by the End User. BBG will take reasonable steps to ensure that Personal Information is reliable for its intended use, accurate, complete and current.
7. **Enforcement**: BBG will assure compliance with the Safe Harbor Principles by: (i) committing to investigate and attempt to resolve complaints regarding violations of its published privacy policy directly with the complainant, and in the events that the complaint cannot be resolved by BBG internally, the complainant may submit the

matter to binding arbitration before the American Arbitration Association in San Diego, California; (ii) having an assessment procedure, whereby outside compliance audits (in connection with internal audits) will be conducted; and (iii) subjecting its employees who violate this Policy to discipline.

How to Contact Us

BBG has a privacy officer ("Privacy Officer") who is responsible for BBG's compliance with and enforcement of this Policy. BBG's Privacy Officer is available to any of its customers, or others who may have questions concerning this Policy or data security practices. Relevant contact details are as follows:

BBG Communications, Inc.
1658 Gailes Blvd., Suite B
San Diego, California 92154
Tel. (619) 661-6661
Fax. (619) 710-1442
Attention: Privacy Officer

Changes to this Safe Harbor Privacy Policy

BBG may amend this Safe Harbor Policy, from time to time, by posting a revised policy on this website. BBG will only amend this Safe Harbor Policy in a manner consistent with the requirements of the Safe Harbor Principles. This Policy is effective as of August 15, 2011.