

American Assistance Privacy Policy

American Broadband & Telecommunications (referred to herein as “AB&T,” “American Assistance,” the “Company,” “We” and “Our”) is committed to protecting the privacy of its subscribers and visitors to its website. This Privacy Policy (“Policy”) describes how American Assistance will collect, access, use or disclose Customer Proprietary Information. It applies to our telecommunications services and our website (including our customer portal) (collectively, “Services”). It does not apply to third-party or affiliated services, which are governed by separate privacy policies. By using our Services, you consent to the terms of this Privacy Policy. For more information about our Services, please review our Terms and Conditions and Consumer Broadband Disclosure.

We may modify the terms of this policy from time to time, and will provide notice of any material changes in the manner required by law. Please check this page regularly for updates.

What is Customer Proprietary Information?

Customer Proprietary Information (Customer PI or Personal Information) includes Personally Identifiable Information (PII), Customer Proprietary Network Information (CPNI), and the content of your communications.

PII is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Personal Information does not include information that is not used to identify you, such as aggregate or anonymous information. Federal and state law require American Assistance to protect the confidentiality of Personal Information.

CPNI is information related to a subscriber’s use of American Assistance’s network (e.g., broadband traffic statistics, device identifiers, call detail information) and information contained within American Assistance subscribers’ voice-service bills. CPNI does not include directory information such as name, postal address, or telephone number. As American Assistance provides our Services to you, we obtain information about the quantity, technical configuration, type, location and destination of telecommunications services we provide to you, as well as some other information found on your American Assistance bills. This information may constitute CPNI, as defined by federal law. Any CPNI that American Assistance collects from you will be handled in accordance with federal law and this Privacy Policy. Under federal law, you have the right, and American Assistance has the duty, to protect the confidentiality of your CPNI.

What information do we collect and how do we collect it?

We collect Personal Information in a number of ways. We automatically collect information when you use our Services. We also collect information about you that you provide to us, or that we obtain from third-party sources.

Information that we automatically collect. We automatically collect certain types of information

when you use our Services. We may collect information about your American Assistance device, including but not limited to your device type, operating system version, signal strength, power status (on/off), and device identifiers. With your consent, we may also collect information related to your use of the device and the services you access through it, including but not limited to your call and data usage and history, your geolocation, the websites you visit, the apps you purchase, download, or use, and information about devices you tether to your American Assistance device. We may link information we automatically collect from you with Personal Information, including information you provide to us and information we gather from other sources. We may use software to follow your use of our

Services and other applications, including the use of cookies, web beacons, and other mechanisms, in addition to analysis of network and device information. For example, we may allow analytic service providers(s) to collect site click-stream and cookie data to help track the use of our Services on an aggregate or individual basis. We may also use cookies or other tracking mechanisms on our Services to facilitate your use of our Services.

Information you provide to us. You may give us Personal Information in a variety of ways, including when you sign up for our Services, enroll in Lifeline, communicate with customer care, register on www.americanassistance.com, or use our Services. The types of Personal Information we collect from you may include your name, postal address, telephone number, password, e-mail address, date of birth, last-4 digits of your social security number or other government identification number, demographics, activities, location information, and personal preferences. We also collect information you submit through the “Contact Us” page on our website. The information you may be asked to provide includes your name, e-mail address, phone number, and any questions or issues you submit through the “Contact Us” page. Do not submit any sensitive Personal Information (e.g., passwords, Social Security Numbers, medical information, or financial information) through the “Contact Us” page. Third-party providers, including third-party applications, may collect information from you as well, but unless otherwise noted, such collection and use of your information is governed by those third parties’ privacy policies—not this one.

Information collected from other sources. We may obtain Personal Information about you from other sources, including from commercially available sources such as data aggregators and public databases, as well as from our affiliates and partners (including preinstalled applications). This information may include your name, demographic information, interests and publicly-observed data, such as from social media and shopping behavior, or other information. We may combine this information with the information we collect from and about you to help us tailor our communications to you, to improve our Services, and to provide you with offers, promotions, and advertisements.

Children. We do not knowingly solicit children to purchase our products and services to children or knowingly collect information from children under 13 years of age. If you allow a child to use your device or our services, you should be aware that their personal information could be collected as described in this policy.

How do we use your information?

We may use the information we collect from you in the following ways:

- To provide our Services, manage our network, and protect the security or integrity of the Services, our business, and other customers.
- To develop new products or services.
- To contact you about American Assistance or third-party products, services, and offers that we believe you may find of interest.

- To personalize your experience of our Services and to allow us to deliver the type of content and product offerings in which you are most interested.
- To allow us to better serve you in responding to your customer service requests. To quickly process your transactions.

- To administer a contest, promotion, survey or similar purposes (including retention and winback marketing).
- To contact you by e-mail, phone, or direct mail.
- To respond to legal process and emergencies.
- For any other legitimate business purpose within the course of our customer-carrier relationship.

We may also use your Personal Information as described to you at the point of collection, with your consent. Where required, we will seek and obtain your consent to use your CPNI or other Personal Information for marketing purposes. If you would like to restrict the Company's use of your CPNI or other Personal Information for the marketing of certain products or services, you may contact us at 1.877.266.7212.

How do we protect information?

We maintain a variety of physical, electronic, and procedural safeguards. These safeguards help protect your Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Be sure to use a strong password to access your information on www.americanassistance.com and not one you use for other services.

Do we disclose the information we collect to outside parties?

Subject to applicable legal restrictions on our use of Personal Information, applicable federal and state law, and your instructions to us, American Assistance may disclose information we collect from and about you to third parties as follows (or as otherwise described to you at the point of collection):

- **Affiliates.** We may share your Personal and non-Personal Information with affiliated entities for certain business purposes.
- **Agents.** We may share your Personal Information with third parties who perform services on our behalf.
- **Third Party Verification Services.** We may share limited Personal Information (e.g., name, postal address, phone number, or credit card information) about you with non- American Assistance entities to assist with identity verification, payment transactions and to prevent fraud and identity theft. These third party verification services are governed by those entities' separate privacy policies and not this policy.
- **Other Third Parties with Your Consent.** We may share your Personal Information with other third parties with your consent. For example, you may permit American Assistance to share your Personal Information with other third parties so that they may contact you about their products and services. The use of the information you agree to share will be

subject to those third parties' separate privacy policies.

- **Business Transfers.** Your Personal Information may be disclosed as part of any merger, acquisition, sale of company assets or transition of service to another provider. In the unlikely event of an insolvency, bankruptcy or receivership, your Personal Information may also be transferred as a business asset.

- **Protection of American Assistance and Others.** We may access, monitor, use or disclose your Personal Information or communications to do things such as: to comply with valid legal requests; in case of emergency, to protect our rights, property, or safety or those of our customers; to protect against fraud, malice, abuse, or illegal activity; to defend ourselves in court or other proceedings; to report to credit bureaus or collection agencies or to obtain payment for previously-billed products and services; where authorized by you; or to share with outside auditors or regulators.

De-identified or aggregated information. We may share Personal Information that is de-identified or in an aggregated form that does not directly identify you to improve our products, support our business, provide customer service, advertise our products, conduct market research, assist with research studies, assist with municipal or other government activities (e.g., planning), or to prepare internal or external reports. If we do so, we will take measures as required by federal law to protect de-identified data from re-identification.

Your use of third party applications and services. When using our Services, you may choose to use services and products offered by third parties, such as third party applications. When you leave our network, you may also use mobile roaming services provided by third parties. Your use of such services and applications may result in these third parties collecting your Personal Information and obtaining information from American Assistance, including location information (when applicable). You may also choose to give your Personal Information directly to third parties when using our wireless services or devices. The Personal Information you give to a third party will be subject to that third party's terms, conditions and policies—not this Privacy Policy. You should always review a third party's privacy policy and terms of service before providing your Personal Information to them or using their services or products.

Preinstalled third party applications. American Assistance may partner with some third-party application developers or send American Assistance Firmware upgrades to you from time to time to enhance your American Assistance experience. These applications may or may not be branded as American Assistance applications and will be preinstalled on your device when you obtain it from the Company or sent to you over the air (FOTA) from time to time. These applications may require American Assistance to share certain Personal Information with the third-party application for them to function. When you use these applications, they may also share certain Personal Information with American Assistance, which American Assistance may use to provide you with enhanced Services, to market our offerings to you, or for any other purposes consistent with this policy. When you first subscribe to our Services, you will be given a choice to permit sharing Personal Information to facilitate the functioning of these applications. You may decline to opt-in to sharing Personal Information with these applications at that time or later by Contacting Us at 1.877.266.7212 and following any required instructions. If you decline to opt-in, you may not be able to use these third party applications, and certain features of these applications may not function.

By clicking the download button and installing the My Balance app., you are confirming the content and are allowing us to send you SMS, email, or other messages on behalf of the American Broadband and Telecommunications Company in regards to updating you on the remaining minutes your device has on a daily basis.

Third-party compliance with American Assistance Privacy Policy. If we use any of the third parties as noted above, and those third parties require the use of Personal Information, we require that such third parties take reasonable steps to protect the confidentiality of that information. If you would like to restrict the disclosure of your Personal Information for the marketing of certain products or services, you may Contact Us at 1.877.266.7212.

How can you opt-out, remove or modify information you have provided to us?

If you would like to change your privacy choices, you may do so at any time by contacting customer service at 1.877.266.7212.

How will you let me know if this policy changes?

If we decide to change our privacy policy, we will post those changes on this page. We may modify the terms of this policy from time to time, and will notify of any material changes in the manner required by law. We may also seek your consent to have any changes to our privacy policy apply retroactively to information we collected from you prior to the change in policy. Please check this page regularly for updates.

What if I visit or use a third-party website, application, or service?

In an attempt to provide you with increased value, we may include third party links in our Services. These linked sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these linked sites (including if a specific link does not work).

What special rights apply to California consumers?

The California "Shine the Light" law, California Civil Code Section 1798.83, entitles California consumers to request information concerning whether a business has disclosed Personal Information to any third parties for that business' direct marketing purposes. American Assistance may share Personal Information between American Assistance affiliates and marketing agents for marketing purposes. We do not share your Personal Information with unaffiliated third parties for their own independent marketing purposes without your consent. California residents may request the categories of Personal Information American Assistance shared with its affiliates during the previous calendar year, if any. To make your request for information or to opt-out of the disclosure of Personal Information to third parties for their direct marketing purposes, send an email to [EMAIL]. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

Written requests may be sent to:

American Assistance
Attn.: Customer
Service PO Box 577
Toledo, OH 43604 American

Assistance will respond to these requests within 30 days. Requests that come to American Assistance through means other than email or mail to the above-listed addresses may result in a

delayed response.

Questions and feedback

We welcome your questions, comments, and concerns about privacy. Please send us any and all feedback pertaining to privacy, or any other issue.

American Assistance Consumer Broadband Disclosure

American Broadband & Telecommunications (referred to herein as “AB&T,” “American Assistance,” the “Company,” “We” and “Our”) supports the Open Internet, and is committed to offering reliable access services that will allow our customers to take full advantage of all of the lawful content and services available on the Internet. At the same time, we are committed to an excellent customer experience, and we may engage in reasonable network management practices on our broadband Internet access services and devices (the “Services”).

The purpose of this disclosure is to provide information regarding the network management practices, the performance characteristics, and the commercial terms of our broadband Internet services to enable you to make informed choices regarding the purchase and use of our services, in accordance with the open Internet policies and rules of the Federal Communications Commission. This document is intended to be informational and does not replace or alter the legal terms and conditions of our service, which can be found here.

Our description of these network management practices—and those of our underlying carriers—are for informational purposes only and are subject to change at any time. Please check back regularly for updates. American Assistance strives to keep its customers fully informed of the Company’s network operations by taking the following steps:

* * *

Congestion Management. American Assistance strives to provide our customers with superior access to the Internet via the resale of our underlying carriers’ networks. However, because bandwidth is a limited resource, it is essential that American Assistance and American Assistance’s underlying carriers reasonably manage network resources to promote the use and enjoyment of the Internet by all of our customers. American Assistance uses industry-standard methods to allow our customers to get the optimum use from our network, while preventing our customers from being subjected to risks that degrade service. As a reseller, we have very limited ability to influence the network management decisions of our underlying carriers. When congestion occurs, subscribers may experience reduced throughput or speed compared to non-congested times. Your data may be subject to our underlying carriers’ network management and open Internet practices.

Management of Your Service. No matter which American Assistance Internet service offering you choose, you may access and use the legal content, applications and services of your choice regardless of their source. You may also connect with your choice of technically-compatible devices, so long as they are legal, permitted by the underlying carrier of American Assistance to which you seek to connect your device to, and do not disrupt American Assistance’s networks or harm other users. For more information, you can review our Terms of Service here.

Privacy and Security. American Assistance takes the security of our subscribers very seriously. Our underlying carrier(s) proactively monitor network activity to help guard against a wide range of security threats, including viruses, botnets, worms, distributed denial of service attacks, SPAM, and other harmful activity. However, due to the inherent nature of the Internet as an open global communications vehicle, and our role as a reseller, we

cannot guarantee that information, during transmission through the Internet or while stored on our system or otherwise in our care, will be safe from intrusion by others, such as hackers. We therefore urge our customers to employ their own industry-standard tools and generally accepted best practices and policies to protect themselves from spam, phishing, and other unwanted or harmful online content and activities. More information on American Assistance’s Privacy Policies may be found here.

Performance Characteristics. American Assistance offers mobile broadband Internet access service using its underlying carriers’ LTE, 4G, and 3G networks. These networks are designed to be suitable for real-time applications, including voice and video applications. However, actual network experience may vary depending on a variety of technical, geographic, environmental, and other factors.

Speed, as used here, means the average rate at which data packets are successfully delivered to their destination on the communications network. Latency, as used here, is the time that a data packet takes to travel from one point to another on the Internet, expressed in terms of round-trip time. Typical speeds—expressed in megabits per second (“Mbps”)—and round-trip latency—expressed in milliseconds (“ms”)—are as follows:

| Technology | Download Speed (in Mbps) | Upload Speed (in Mbps) | Average Latency (in ms) Round-trip |
|-------------------|---------------------------------|-------------------------------|---|
| 3G | .6 to 1.4 | .35 to .8 | Less than 120-160 |
| 4G LTE/LTE Plus | 5 to 30 | 2 to 5 | Less than 50-60 |

American Assistance may advertise speeds and latency up to maximum speeds expected to be achieved through the device over our underlying carriers’ networks. Several factors—including capacity constraints, network availability, environmental conditions, your device, whether you are tethering from a separate device, or the network management practices of our underlying carriers—may impact the actual speed and latency that you experience at any given time.

Traffic Information. We may monitor traffic for our own internal purposes, including, but not limited to, billing, internal metrics, and preventing fraud, abuse, and illegal activity on our network, as permitted by law. We do not monitor traffic information through deep-packet inspection. We do not share any traffic information with unaffiliated third parties for non-network management purposes without your consent.

Commercial Terms. American Assistance has a variety of service plans to meet your individual needs and budget. We are continually working to develop our services to meet your internet access demands now and in the future. When we offer new online services, we will provide the characteristics, capabilities and terms of such new service offerings to allow you to make knowledgeable choices about which services make the most sense for you. Red Pocket will continue to provide you with accurate and relevant information in plain language so you can make informed choices. Information regarding our service plans can be found here.

Redress. Questions and concerns regarding American Assistance Internet service may be addressed to us using the contact outlined in our Terms of Use, available [here](#).

Puerto Rico Customers: If you are a Puerto Rico customer and we cannot resolve your issue, you may notify the Telecommunications Regulatory Board of Puerto Rico of your grievance. Mail: 500 Ave. Roberto H. Todd (Pda. 18Santurce), San Juan PR 00907-3981; Phone: 1-787-756-0804 or 1-866-578-5500; Online: www.jrtpr.gobierno.pr.

Last updated: August 2018