

PRIVACY POLICY

Effective Date: 1/1/2022

This Privacy Policy (“Privacy Policy”) describes how American Broadband & Telecommunications d/b/a American Assistance (“American Assistance,” “we,” “us,” or “our”) collects, uses, and discloses information from or about you, as well as your choices and options to control certain uses and disclosures. This Privacy Policy applies to our telecommunications and internet services, our website, and any American Assistance-branded apps (collectively, “Services”), as well as the Devices you use with our Services. Please take a moment to review the terms of our Privacy Policy, as they apply to you when you use the Services. American Assistance may change this Privacy Policy from time to time, so check this policy regularly for updates.

California Notice at Collection: California residents, please see the “What are your California resident privacy rights?” section below for further details on how we collect and use your personal information.

Contents

What types of Personal Information do we collect about you?
What are the sources of the Personal Information we collect about you?
How do we use the Personal Information we collect about you?
How do we sell, share, or allow access to your Personal Information?
How might you share your Personal Information with third parties?
What are your rights and our obligations related to your Customer Proprietary Network Information?
What are your advertising choices and consent options?
How do we store and protect Personal Information we collect about you?
Do we knowingly collect children’s information?
How will we let you know if this policy changes?
What are your California resident privacy rights?
How can you contact us?

What types of Personal Information do we collect about you?

Depending on how you interact with us or our Services, we may collect Personal Information from or about you, including, for example:

- **Identity and Contact Information**, such as your name, date of birth, mailing address, billing address, email addresses, and telephone numbers.
- **Lifeline Eligibility Information**, such as documentation of participation in an eligible government low-income or financial assistance program, documentation demonstrating proof of income, or your Social Security number, each of which will only be used to determine Lifeline eligibility.

- **Billing and Payment Information**, such as credit card, debit card, or checking account information, purchase and order history, and billing information related to your use of our voice and text services.
- **Correspondence Information**, including information you may provide to us when you communicate with us through our website, via email, over the phone, or through postal mail, such as questions, concerns, issues, or your intended or actual use of our Services, as well as records, including recordings, of your communications with us.
- **Usage Information**, such as information about your use of the Services, including the date and time of your use, frequency of use, and quantity of use, your interaction with our communications and advertisement, Wi-Fi usage, your activity on your Device, and Customer Proprietary Network Information (“CPNI”), as described in the CPNI section below.
- **Location Information**, such as the approximate location of your device when it is connected to or using Global Positioning Satellites (“GPS”), the wireless network of our underlying carriers, or other location technology.
- **Device and Computer Information**, including your internet protocol (“IP”) address, browser type, operating system, software version, and Device type, model, or identifier.
- **Information Stored on Devices**, including any content stored on your Device when you relinquish, exchange, return, or recycle your Device or provide it to us, our contractors, or our vendors for maintenance. You should remove or otherwise safeguard any Personal Information on your Device that you do not want accessed before giving your Device to us, our contractors, or our vendors. We are not responsible for any information on your Device.
- **General Information**, such as demographic information, media consumption, previous purchases, shopping habits, loyalty program information, lifestyle preferences and interests, and social media activity.

Personal Information does not include aggregate, de-identified, and anonymous information that is not reasonably capable of being associated with or linked, directly or indirectly, with you or your household.

What are the sources of the Personal Information we collect about you?

We may obtain Personal Information about you from a variety of sources, including, for example:

- **Information from You.** You may give us Personal Information, such as Identity and Contact Information, Lifeline Eligibility Information, Billing and Payment Information, Correspondence Information, and Information Stored on Devices when you: apply for, subscribe to, or purchase our Services; communicate with us using our contact information; or provide us with your Device.
- **Information We Collect Automatically.** We or our service providers may automatically or passively collect Personal Information, such as Usage Information, Location

Information, and Device and Computer Information, when you use or interact with our Services or your Device, including through the use of network management technology and third-party analytics and advertising tools, which may use cookies, web beacons, pixel tags, log files, local shared objects (Flash cookies), HTML5 cookies, or other technologies to automatically or passively collect information about your use of and interaction with the Services.

- **Information from Other Sources.** We may collect any category of Personal Information, including General Information, from affiliates, business partners (such as retailers where you purchase the Company's Services or Devices), and third parties (such as social media platforms, data aggregators, public databases, and other commercially available sources), which may include the information you provide those entities or that they automatically collect from you.

We may combine the various types of Personal Information we receive from or about you, including information you provide to us, information we automatically collect, and information from other sources, and use or share it as described in this Privacy Policy.

How do we use the Personal Information we collect about you?

Except as otherwise prohibited by law or regulation, and subject to applicable instructions from you to us, we may use your Personal Information for a variety of business and commercial purposes, including for:

- **Verifying Eligibility and Subscribing You to Our Services.** To verify your identity and eligibility for the Lifeline program and subscribe you to our Services, including to execute requests to port your phone number.
- **Providing, Improving, and Maintaining Our Services.** To provide, improve, and maintain our Services, including to: initiate and render our Services; maintain the accuracy of the information we collect; track, measure, and analyze the usage and operations of our Services; maintain, manage, optimize, and resolve problems with our wireless networks, information technology, and our Services; develop and improve our business, content, products, and Services; and interact with third-party services, at your request.
- **Customer Service.** To respond to questions and comments about your account and Services, to communicate with you about your account status and technical issues, and for training or quality assurance purposes.
- **Billing and Payments.** To complete your purchases, including billing and payment processing, which may involve the use of cookies.
- **Prevention and Detection of Unlawful and Unauthorized Use.** To prevent and detect fraud, abuse, and other unlawful and unauthorized use of our Services, including to investigate possible violations of and enforce our Terms and Conditions and any other contracts, and to otherwise protect the security or integrity of the Services, our business and property, and our rights and interests, and those of you, our other customers, our service providers, and other businesses.

- **Complying with Legal and Regulatory Obligations.** To comply with our legal and regulatory obligations, including responding to legal process, such as subpoenas, court orders, and search warrants.
- **Emergency Situations.** To respond to 911 requests and for other emergencies or exigencies in cases involving danger of death or serious physical injury to you or any other person.
- **Marketing and Advertising.** To serve you promotional offers, content, advertisements, and other marketing about our Services, or those of our affiliates, partners, and third parties, through our website, applications, social media, direct mail, email, or manual, autodialed, or prerecorded calls and texts, each with your consent, where necessary, including by.
- **Contests, Surveys, and Message Boards.** To administer and enable you to participate in contests, surveys, polls, and message boards, where you have agreed to this.

We may use your Personal Information as otherwise disclosed and explained to you at the point of collection and with your consent, where necessary.

How do we share or allow access to your Personal Information?

Except as otherwise prohibited by law or regulation, and subject to applicable instructions from you to us, we may share or allow access to your Personal Information for necessary business and commercial purposes, including, for example:

- **Business Purposes.** With our parent, subsidiary, and affiliate companies for business, operational, and legal purposes.
- **Provide, Improve, and Maintain Our Services.** With service providers that provide business, professional, or technical support functions for us and help us provide, improve, and maintain our Services, such as by administering activities on our behalf, including network operations, website hosting, database management, information technology, billing and payment processing, customer service, analysis of our Services, and selling and delivery of our Services. We do not authorize Service Providers to use or disclose the Personal Information they collect, except as necessary to perform services on our behalf, and require them to protect the confidentiality and security of the Personal Information they receive consistent with this Privacy Policy.
- **Protect Our Services and Users.** With governmental authorities or other entities if we believe disclosure is necessary or appropriate to: protect against fraudulent, malicious, abusive, unauthorized, or unlawful use of our Services; protect our network, databases, Services, Devices, users, and employees from physical or financial harm; and investigate violations of our Terms and Conditions or other contracts.
- **Legal Rights and Obligations.** With governmental authorities, auditors and third-party identity verification services, credit bureaus or collection agencies, and other entities to the extent necessary to: respond to subpoenas, court orders, search warrants, or other legal process; respond to requests for cooperation from law enforcement or other

government entities, including pursuant to the Communications Assistance for Law Enforcement Act, which may require that monitor or facilitate monitoring and otherwise disclose the nature and content of communications transmitted through the Services or Devices without any further notice or liability; comply with legal and regulatory obligations, including identity verification, fraud and identify theft protection, and protection, advancement, or defense of our rights or the rights of others; recover payment for previously-billed Services; and facilitate or verify the appropriate calculation of taxes, fees, or other obligations due to local, state, or federal governments and governmental agencies.

- **Sale or Transfer of Business or Assets.** With our professional advisers in connection with a corporate transaction, such as a sale, assignment, divestiture, merger, bankruptcy, consolidation, reorganization, liquidation, or other transfer of the business or its assets. If another entity acquires American Assistance or any of our assets, your Personal Information may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties. Should such sale or transfer occur, we will use reasonable efforts to try to require that the buyer or transferee use your Personal Information in a manner that is consistent with this Privacy Policy.
- **Emergencies.** With governmental authorities or other entities or individuals in emergency situations involving danger of death or serious physical injury to you or any other person, to respond to 911 requests, and for other emergencies or exigencies.
- **Commercial Marketing Purposes.** With our affiliates, service providers, or marketing partners for our marketing and advertising purposes, including when we use our marketing partners' analytic and advertising tools, such as cookies, web beacons, pixel tags, log files, local shared objects (Flash cookies), HTML5 cookies, or other technologies that automatically or passively collect Personal Information from your use of our Services.

We do not sell or knowingly allow third parties to access your Personal Information.

How might you share your Personal Information with third parties?

When using your Device and our Services, you may choose to install, access, or use services offered by third parties, such as websites, applications, and the networks of other carriers (such as when you are roaming). In some cases, our Services may have links to websites operated by third parties, plugins for social media services, or third-party advertisements. When you interact with third-party services, you may be consenting to those third parties accessing, collecting, using, or disclosing your Personal Information through your Device or our Services or directing us to share or allow access to your Personal Information by those third parties, such as your IP address, browsing activity, or location information. Those services operate independently of our Services, and your Personal Information will be governed by their terms and conditions, including their privacy policies, not this Privacy Policy. We encourage you to review the privacy policies of any third-party services that you use to better understand their

privacy practices. You may be able to restrict or disable the use and disclosure of certain information, such as your location information, using settings available on your Device or through the third-party services.

What are your rights and our obligations related to your Customer Proprietary Network Information?

Customer Proprietary Network Information (CPNI) is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications services you purchase from us, as well as the related billing information. CPNI does not include directory information such as name, postal address, or telephone number. Under federal law, you have the right, and we have the duty, to protect the confidentiality of your CPNI. When we share your CPNI with our service providers, we require them to take reasonable measures to protect the confidentiality of that information. We are permitted to use or disclose your CPNI for certain purposes without further notice or consent from you, including: to provide you with our Services; to market service offerings to you related to the services you purchase; to protect American Assistance, you, other subscribers, and other carriers from fraud, abuse, or unlawful use of the Services; and in an aggregate form. We also may use your CPNI, or share it with affiliates and third-party agents, for the purpose of offering you communications-related products and services, packages, discounts, and promotions that may be different from the types of services you have already purchased. You have the right to opt-out of use of your CPNI for marketing purposes and can submit an opt-out request by contacting us at 1.877.266.7212 or enroll@americanassistance.com. Opting out will not affect our provision of Services to you or our use of your CPNI for permitted purposes. If you chose to opt-out, your choice is valid until you choose to opt-in. You may also contact us to correct your CPNI or request that we disclose your CPNI to you. We will not disclose your CPNI except when provided with your password, and we may implement other authentication measures. If you do not provide a password, we may not release your CPNI to you except by sending it to your address of record or by calling you at your telephone number of record. Be sure to use a strong password with our Services and not one you use for other services. We may disclose your CPNI to any “authorized user” that you have designated to us in writing or to any person who is able to provide us with your password.

What are your advertising choices and consent options?

You have certain choices and consent options related to the use and disclosure of your Personal Information for advertising purposes. Exercising these choices and options will not affect our provision of Services to you. Please note that these choices and options may not prevent you from receiving all advertising; you may continue to receive generic advertising from us or interest-based advertising from third parties, depending on how they operate. We are not responsible for informing third parties with whom we may have already shared your Personal Information, including our affiliates, business partners, and service providers, of any opt-out

requests pursuant to this section or for removing information from or causing information to be removed from the databases or records of such entities.

Interest-Based Advertising. You have choices and options concerning interest-based advertising on our Services or across other websites and online services as follows:

- To opt out of collection and use of your Personal Information for interest-based advertising by companies participating in the Digital Advertising Alliance (“DAA”), please visit optout.aboutads.info or click on the DAA icon when you see it on an online ad.
- To opt out from the use of Personal Information about your online activities for interest-based advertising by Network Advertising Initiative (“NAI”) member companies, please visit optout.networkadvertising.org.
- To opt-out of the use of your mobile device ID for targeted advertising, please visit www.aboutads.info/appchoices.
- To prevent your Personal Information from being used by Google Analytics to measure and improve our marketing and advertising and understand the use of our Services, including through Google AdWords, Google Display Network Impression Reporting, DoubleClick Platform Integrations, and Google Analytics Demographics and Interest Reporting, add the Google Analytics opt-out plugin to your browser, available at tools.google.com/dlpage/gaoptout.
- To manage flash cookies, visit Adobe’s [Global Privacy Settings Panel](#).
- You may be able to adjust your browser, computer, or device settings to disable cookies, remove or prevent the storage of HTML5, or control other advertising and analytics technology to stop or reduce the amount of interest-based advertising you receive, but doing so may prevent you from using certain features of our Services.

Marketing Communications. You have the option to opt-out from being contacted with marketing communications, including manual, autodialed, and prerecorded calls and texts, emails, and direct mail, as follows:

- Send us an e-mail at enroll@americanassistance.com.
- Call us at 1.877.266.7212.
- Unsubscribe from our email communications following the unsubscribe instructions contained within our emails.
- Reply “STOP” to our text messages.

Your instructions to opt-out from these communications will be processed as soon as reasonably practicable. If you receive marketing communications from one or more of our affiliates, business partners, or service providers, you must opt-out from those communications with those entities directly.

Do Not Track. Because Do Not Track (“DNT”) and similar signals do not yet operate according to common, industry-accepted standards, our Services may not respond to DNT signals.

How do we store and protect Personal Information we collect about you?

We maintain reasonable physical, technical, and procedural safeguards to help protect against loss, misuse, or unauthorized access, disclosure, alteration, or destruction of your Personal Information. We encrypt sensitive information (such as financial payment information) and transmissions involving customer accounts. We also encrypt and hash all passwords. We only retain your Personal Information for as long as we believe is reasonably necessary to fulfill the purposes for which we collected it, including for any legal, accounting, or reporting purposes, as well as to resolve disputes and enforce our agreements. The Personal Information we collect from or about you is stored on servers in the United States, subject to the laws of the United States. Electronic access to the databases and physical access to the servers on which this Personal Information is stored are restricted to those employees, agents, contractors, service providers, and other third parties who have a business need for such access. They will only access and use your Personal Information based on our instructions and they are required to keep your Personal Information confidential. While we take reasonable steps to help ensure the integrity and security of our network and servers, we cannot guarantee their security, nor can we guarantee that your communications and information will not be intercepted while being transmitted over our underlying carriers' network or the Internet.

Do we knowingly collect children's information?

Our Services are not directed toward children and we do not knowingly collect Personal Information from children under 13. If you are a parent or guardian of a child under 13 that has provided us with Personal Information without your consent, please contact us at 1.877.266.7212 or at enroll@americanassistance.com to request deletion of the child's information.

How will we let you know if this policy changes?

We reserve the right to modify this Privacy Policy at any time. When we do, we will post the changes on this page and will indicate at the top of this page the date those terms will become effective. We will give you advance notice of any materially adverse changes and may give you advanced notice of all other changes, but reserve the right to make such modifications immediately if required. It is your responsibility to regularly check this page to determine if there have been changes to the Privacy Policy and to review such changes.

What are your California resident privacy rights?

Your Rights. If you are a California resident, you can take advantage of the following rights:

- **Access Request** – You may request, up to two times each year, that we disclose to you the categories and specific pieces of Personal Information that we have collected about you, the categories of sources from which your Personal Information is collected, the

business or commercial purpose for collecting your Personal Information, the categories of Personal Information that we disclosed for a business purpose, any categories of Personal Information that we sold about you, the categories of third parties with whom we have shared your Personal Information, and the business or commercial purpose for selling your Personal Information, if applicable.

- **Deletion Request** – You may request that we delete any Personal Information that we have collected from you, subject to lawful exceptions to such deletion requests.
- **Third-Party Sharing Opt-Out Request** – You may request to opt out of our sharing of your Personal Information with third parties for the third parties’ direct marketing purposes.

To take advantage of the foregoing rights, please visit and complete our contact us at 1.877.266.7212, enroll@americanassistance.com, or American Assistance, Attn.: Customer Service, 1480 Ford Street, Maumee, OH 43537. Your authorized agent may submit such requests on your behalf, after submission of proof of authorization, in accordance with California law. If you exercise any of the foregoing rights, we will not discriminate against you, such as by denying you access to our Services or restricting your access to Services of certain pricing or quality.

Personal Information Disclosures. For purposes of compliance with the California Consumer Privacy Act (CCPA), in addition to other details described in this privacy policy, we make the following disclosures:

- We collect the following categories of Personal Information: *identifiers, financial information associated with you, characteristics of protected classifications under California or federal law, commercial information, internet or other electronic network activity information, geolocation data, audio and visual information, professional or employment-related information, and inferences drawn from the other information to create a profile about consumers.* The sources of this Personal Information and business and commercial purposes for collecting this Personal Information are described above.
- We disclose the following categories of Personal Information for a business purpose: *identifiers, financial information associated with you, characteristics of protected classifications under California or federal law, commercial information, internet or other electronic network activity information, geolocation data, audio and visual information, professional or employment-related information.*

How can you contact us?

If you have any questions or concerns about this Privacy Policy or how we treat your Personal Information, please contact us using the following information:

Email: enroll@americanassistance.com

Phone: 1.877.266.7212 or 611 from your device during normal business hours: Monday through Friday, 8AM-11PM EST and Saturday, 10AM-6PM EST (Closed on Sunday)

Mail: American Assistance, Attn.: Customer Service, 1480 Ford Street, Maumee, OH 43537