

## **PRIVACY POLICY**

This privacy policy (“Privacy Policy”) explains how personal information is collected, used, and disclosed by Community Wireless Communications, LLC and ANPI Business, LLC dba Community Wireless Communications (“Community Wireless,” “we,” or “us”) with respect to your access and use of the websites located at [www.CommunityWireless.com](http://www.CommunityWireless.com), [www.phaxio.com](http://www.phaxio.com), [www.vitelity.com](http://www.vitelity.com) and [www.bettervoice.com](http://www.bettervoice.com) (collectively, “Sites”), Community Wireless Connect mobile applications (“Mobile App”), and any other online or mobile services that link to or post this Privacy Policy (collectively, the “Services”). It also describes your choices regarding the use, access, and correction of your personal information.

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to change the provisions of this Policy at any time. We will alert you that changes have been made by indicating at the top of this Policy the date it was last updated. If we propose to make any material changes, we will notify you by means of a notice on this page prior to the change becoming effective. We encourage you to periodically review this Policy for the latest information on our privacy practices.

## **WHAT IS PERSONAL INFORMATION?**

The term “personal information” means information that specifically identifies an individual (such as your name, user name, address, or e-mail address) or information about that individual that is directly linked to personally identifiable information. Personal information does not include “aggregate” information, which is data we collect about the use of the Services or about a group or category of users, from which individual identities or other personal information has been removed. This Privacy Policy in no way restricts or limits our collection and use of aggregate information.

## **WHAT PERSONAL INFORMATION DO WE COLLECT?**

### **Active Collection**

We collect information from you in various ways when you visit the Services. For example, we collect the information you voluntarily provide to us, such as when you use the Services, send us an email or provide or request information. Such information may include personal information, such as your name or email address. Personal and demographic information may also be collected if you provide such information in connection with leaving comments or sending an email to us.

When you establish an account for Services, we collect information such as your name, address, and telephone number, as well as information used for credit checks, billing, and payment, and any other information we may need to establish and service your account. When you first order your Services, and when you request any subsequent changes or updates to your Services, Community Wireless may collect information about the service options that you have chosen. Community Wireless may also collect your personal information when you contact us: for example if you ask for support or maintenance, have questions about your bill, send us e-mails, respond to our surveys or e-mails, engage in chat sessions with us, register for information, contact us regarding your individual access requests, or participate in promotions or contests.

### **Passive Collection**

When you use the Sites, some information may be automatically collected, such as your Internet Protocol (IP) address, your operating system, the browser type, and the address of a referring website. We and our service providers may also collect certain information through the use of cookies, flash cookies (LSO), local storage, web beacon, scripts, eTags, and other tracking technologies to better inform our engagement efforts with you.

Cookies are small data files stored on your hard drive to simplify and improve your experience. Cookies may be used to remember some of your personalization preferences, including your username and password (if you choose to store them). We also use information obtained from cookies to improve the Sites and to make decisions concerning advertising, product offerings, and services. Web beacons are small, invisible graphic images that may be used on the Site or in emails relating to the Site to collect certain information and monitor user activity on the Site, such as to count visits, understand usage effectiveness, and to tell if an email has been opened and acted upon.

Most web browsers support cookies, and users can control the use of cookies at the individual browser level. Please note that if you choose to disable cookies, it may limit your use of certain features or functions on our Sites. To manage flash cookies (LSO), please [click here](#).

### **Interested-Based Advertising**

Third-party advertisers and other organizations may use their own cookies and similar technologies to collect information about your activities on our digital properties and/or the advertisements you have clicked on. This information may be used by them to serve advertisements that they believe are most likely to be of interest to you based on the content you have viewed. Third-party advertisers may also use this information to measure the effectiveness of their advertisements. If you would prefer to not receive personalized ads based on your browser or device usage, you may generally express your opt-out preference to no longer receive tailored advertisements. Please note that you will continue to see advertisements, but they will no longer be tailored to your interests.

To opt-out of interest-based advertising by participating companies in the following consumer choice mechanisms, please visit:

- Digital Advertising Alliance (DAA)'s self-regulatory opt-out page and mobile application-based "AppChoices" download page
- European Interactive Digital Advertising Alliance (EDAA)'s consumer opt-out page
- Network Advertising Initiative (NAI)'s self-regulatory opt-out page

In the mobile environment, most mobile operating systems offer device-based opt-out choices that are transmitted to companies providing interest-based advertising. To set an opt-out preference for a mobile device identifier (such as Apple's IDFA or Android's GAID), visit the device manufacturer's current choice instructions pages, or read more about sending signals to limit ad tracking for your operating system [here](#).

Please note that these settings must be performed on each device (including each web browser on each device) for which you wish to opt-out, and if you clear your cookies or if you use a different browser or device, you will need to renew your opt-out preferences.

## **Collection from Third Parties**

We obtain information about you from third parties in order to:

We collect or receive information about you and your activity from third parties [including other users of our sites and services, advertisers, business partners, and vendors], as follows:

We may also combine the information we collect about you with demographic, geolocation, and interest-based segment data, along with event-based data, cookie information, and hashed email addresses from third-party providers.

## **Mobile App**

We collect certain information such as device identifier, user settings, and the operating system when you use our mobile services or applications. We may collect and store information about your location. We may use the location information to enhance location-related features of the services. If you do not want us to collect location information, you may disable the feature at the device level.

## **HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT?**

Community Wireless may use your personal information in order to install, configure, operate, support, and maintain your Services, including, but not limited to, any of the following purposes, business activities, and/or needs:

- Provide the Services or information you request, and to process and complete any transactions in connection therewith;
- To respond to your emails, questions, comments, requests, and complaints, and provide customer service and support;
- Request feedback and to otherwise contact you about your use of the Sites and the Services;
- To monitor and analyze the Sites and the Services usage and trends, and to personalize and improve the Site, the Services and our users' experiences on the Site and the Services, and to increase the Site's and the Services' functionality and user-friendliness;
- To provide you with news and information about the services we think will be of interest to you;
- To send you confirmations, updates, security alerts, and support and administrative messages and otherwise facilitate your use of, and our administration and operation of, the Site and the Services; and
- To notify you about important changes to the Sites and the Services.
- To comply with applicable laws and regulations.

## **WITH WHOM DO WE SHARE PERSONAL INFORMATION WITH?**

We share your personal information according to this Privacy Policy, with your consent or as necessary to provide you the services you request, as well as to operate our business. The ways in which we share your personal information are set forth below.

## **Service Providers**

We share your information with third parties such as vendors, consultants, and other service providers who provide services on our behalf or to help with our business activities. Typically, we make these disclosures only when the disclosure is necessary to provide your Services or to conduct a legitimate business activity related to your Services.

Some business customers have purchased Services through our third-party agents or master agents. These agents collect all required customer information necessary to order your Services. They have an ongoing contractual relationship with us and the customers who purchase our Services through their agency. These agents retain access to customer information located on our systems for business purposes related to providing service to the end customer. The privacy policies of these agents or master agents will govern their use of customer information.

## **Business Transitions**

In the event we (or our parent company) enters into a merger, acquisition, or sale of all or a portion of its assets, we may transfer the information as part of such transaction. If, as a result of the business transition, this Privacy Policy, you can find those changes in the places indicated in the “Notification of Changes to this Policy” section above.

## **Software and Configuration**

By collecting and maintaining your information in support software tools, we may use the information you provide to assist you with technical support. The information collected in the support software is available only to authorized personnel for maintaining and supporting your use of our Services. We may also provide customer contact and support pages that you can use to communicate with us about technical support. We use the information provided by you on these pages to support your use of our Services.

We may also provide software directly or through third parties for your use in connection with our Services. These programs may be subject to their own terms of service and other policies. We recommend that you carefully read such third-party terms and policies to understand how they may use your personal information.

In certain cases, we may configure your Service or Service-related equipment to resolve a technical support issue or otherwise render or deliver your Service. We may perform these configurations at your request and may do so at your location remotely.

## **Business Partners**

With your consent, we may share your information with business partners and other third parties in order to allow them to provide you with offers, promotions, ads, or products and services that we think you may enjoy. If you do not want us to share your personal information with these companies, please contact us as indicated at the end of this Privacy Policy.

## **Required by Law**

We make every reasonable effort to protect customer privacy as described in this Privacy Policy. Nevertheless, we may be required by law to disclose personal information about a customer without his

or her consent and without notice in order to comply with lawful requests (such as a subpoena, court order, or search warrant) from government authorities, including requests from national security agencies or law enforcement.

### **Aggregate Data**

We may share aggregated data that no longer identifies individual users and other de-identified information for regulatory compliance, market analysis, and other business purposes.

### **MARKETING PREFERENCES**

We send customers service-related announcements from time-to-time. For example, we may send you an e-mail announcement about a pricing change, a change in this Privacy Policy, or new features of your Service. You may not opt-out of these service-related communications.

You may sign-up to receive emails, newsletters, or other communications from us. If you would like to discontinue receiving this content, you may update your marketing preferences by using the "Update Profile" link found in emails we send to you. Some customers may have access to update their email preferences within their customer portal. Additionally, you may contact us at support@cwgo.net. or 812-256-3701 to update your email preferences.

### **LINKS TO OTHER WEBSITES, SOCIAL MEDIA FEATURES**

Our Sites and Services include social media features, such as Facebook "Like" button and Twitter re-tweets, as well as share buttons or interactive mini-programs. These features collect the user's IP address, the pages visited on the site or service, and set cookies to enable the features to function properly. Social media features are either hosted by a third party or hosted directly on the Website. Interactions with these features are governed by the privacy notices of the social media companies that provide them.

### **SECURITY**

We take the security of our customers' personal information seriously. We follow industry-standard practices to protect your personal information from unauthorized access. However, no system can be guaranteed to be 100% secure. If you have questions about the security of your personal information, or if you have reason to believe that the personal information that we hold about you is no longer secure, please contact us immediately as described in the Privacy Policy.

### **Web Security**

We utilize several encryption methods to ensure that the data you submit on any of the Community Wireless sites is secure. Through this "secure session," information that you input into our online order form will be sent and will arrive privately and unaltered at our server. This security prohibits access to your information by other companies and Internet users.

### **CHILDREN**

We do not knowingly collect personally identifiable information from individuals under 13 years of age. If you are a parent or guardian of such a child and become aware that your child has provided personal

information to us, please contact us as described in this Privacy Policy and we will take reasonable steps to immediately remove any such information.

### **ACCESS TO INFORMATION**

If you would like to find out what personal information, we have about you, update your personal information, or if you would like to delete your information, you may do so by contacting us as described in this Privacy Policy. Note that Community Wireless may not be able to delete certain information if Community Wireless is legally required to retain the information under applicable laws. In some circumstances, you may also directly update your information via your Community Wireless-provided web login.

We will correct our records on a going-forward basis when the personal information we have collected about you is inaccurate. Please note we have no control over information appearing in the directory lists or directory assistance services of directory publishers or directory assistance providers not affiliated with Community Wireless.

Please note that for personal information about you that we have obtained or received for processing on behalf of our Client (controllers who determined the means and purposes of processing) all such requests should be made to Client directly. We will honor and support any instructions they provide us with respect to your personal information.

### **RETENTION OF INFORMATION**

We maintain your personal information in our regular business records while you are a customer of your Services. We may also maintain this information for a period of time after you are no longer a customer if the information is necessary for the purposes for which it was collected or to satisfy our legal requirements and/or obligations. These purposes typically include business, legal, or tax purposes. If there are no pending requests, orders, or court orders for access to this personal information, we may destroy the information once it becomes unnecessary to those purposes for which it was collected.

### **CONTACT US**

If you have any questions or concerns regarding this Privacy Policy, please contact Customer Service at (866) 629-8200 or [support@cwgo.net](mailto:support@cwgo.net). You may also write to:

Attn: Privacy Dept.  
Community Wireless Communications, LLC  
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