



broadband vi

Broadband VI, LLC

Privacy Policy

and your California Privacy Rights

Effective Date: August 28, 2020

Broadband VI, LLC (“Broadband VI,” “Company,” “us,” “we,” or “our”) values the privacy and security of Subscriber Personal Information. This “Privacy Policy” describes the type of Personal Information Broadband VI collects, how it is used, disclosed, secured and options regarding certain uses of this information. This Privacy Policy applies to visitors and users of Broadband VI’s website (“Site”) and applicants and current or former Subscribers of our VoIP services and Standard and Premium Internet access services (collectively, “Services”) residing in the United States.

Any capitalized terms used herein shall have the same meaning as defined in the Broadband VI Service Agreements.

By using Broadband VI’s Site and Services, Subscribers consent to the data practices described in this Privacy Policy regarding the collection, use, disclosure, and disposal of your Personal Information. Broadband VI’s Site and Services are designed and targeted to United States audiences and are governed by and operated in accordance with the laws of the U.S. If Subscriber is not a U.S. citizen or does not reside in the U.S., Subscriber voluntarily consents to the collection, transfer, use, disclosure and retention of Subscriber Personal Information in the U.S. Subscriber also agrees to waive any claims that may arise under Subscriber’s own national laws.

Your California Privacy Rights

Generally, California residents are entitled by law to ask Broadband VI for a notice identifying the categories of Personal Information that Broadband VI that is shared with our Affiliates and/or other third parties for their marketing purposes the preceding year, and provide contact information for such Affiliates and/or third parties unless Broadband VI meets certain exceptions in the law. This Privacy Policy and Site meet those exceptions. Additionally, Broadband VI does not share Subscriber Information to Affiliates or third parties for their own marketing purposes. Therefore, a Subscriber residing in California with an established business relationship with Broadband VI, does not need information about Broadband VI’s opt-out and out-in policies of sharing Subscriber Personal Information with other companies (including our Affiliates) for their marketing purposes. If you have questions regarding our policy, Subscribers residing in California must send a written request via email or postal mail following the instructions below. **Broadband VI will not accept requests via the telephone or facsimile or respond to requests that are not labeled or sent properly, or do not have complete information.**

- For all requests, include Subscriber's full name, street address, city, state and zip code.
- In an email request, Subscriber must state **"Re: Your California Privacy Rights"** in the subject line and send Subscriber email to privacy@broadband.vi.
- In a postal request, Subscriber must send a letter or post card to:
PO Box 26304, Christiansted, VI 00824
Attention: Your California Privacy Rights

General Information

When Subscriber uses the Service, the Personal Information Subscriber sends and receives is transmitted over a wireless network, and may be subject to interception by unauthorized third parties who seek to do you harm. While it is Broadband VI's objective to take reasonable measures to reduce the risk that unauthorized third parties will be able to intercept the information Subscriber sends and receives through the Service, Broadband VI cannot and does not make any guarantee that transmissions over the Internet are 100% secure or error-free.

Broadband VI does not knowingly collect, solicit or use Personal Information from anyone under the age of 13. If Subscriber is under age 13, please do not attempt to register for the Services or send any Personal Information about yourself to Broadband VI. If Broadband VI learns that Broadband VI has collected Personal Information from a child under age 13, Broadband VI will delete that information as quickly as possible to the extent technically feasible. If Subscriber believes that its child under age 13 may have provided Broadband VI Personal Information, please contact Broadband VI at privacy@broadband.vi.

What types of information does this Privacy Policy cover?

Broadband VI collects various types of information about Subscribers and Subscribers' use of the Service via the Broadband VI website, Help Desk and call centers, postal mail, remote kiosks, the Broadband VI Facebook Page or other social network platforms or by other means, generally classified as Personal Information and Non-Personal Information. Generally, Broadband VI gathers and uses Personal Information internally in connection with providing the Service to Subscriber, including to personalize, evaluate and improve the Service and Broadband VI's ability to provide the Service to Subscriber, to contact Subscriber, to respond to and fulfill Subscriber requests regarding the Service, and to analyze how Subscriber uses the Service. Broadband VI may share Subscriber's Personal Information with its Affiliates and with other third parties as described below:

What Information does Broadband VI collect and how does Broadband VI use this Information?

Personal Information

Personal Information is the information Subscriber provides to Broadband VI voluntarily or passively through Subscriber use of the Service and/or website, and which is directly associated with or reasonably linked to a specific person, computer or device. For example, through the registration process, when the equipment to provide the Service is installed, maintained or upgraded at Subscriber's premises, when Subscriber contacts Broadband VI regarding the Service, and through Subscriber account settings, Broadband VI collects Personal Information such as Subscriber name, email address, phone number, billing address and billing information (such as credit card account number or other financial account information), service address, and the nature of any of Subscriber devices or other property making use of the Service. Personal Information also includes customer proprietary network information ("CPNI") which is collected and used to provide VoIP services. CPNI includes any information that relates to the quantity, technical configuration, type, destination, location, and amount of use of our VoIP service, such as call detail, logs, and specifics regarding your VoIP account. Please note that by law, CPNI does not include a subscriber's name, postal address, or telephone number.

Subscriber may be required to provide certain Personal Information to Broadband VI in order to register with Broadband VI, to assist Broadband VI in improving Subscriber's Service or troubleshooting problems Subscriber is experiencing with the Service, Subscriber computer or device, or otherwise to improve the quality of the Service. Broadband VI will communicate with Subscriber if Subscriber has provided Broadband VI the means to do so. For example, if Subscriber has given Broadband VI Subscriber's email address or phone number, Broadband VI will email or call Subscriber about Subscriber use of the Service or product improvements or upgrades, and other transactional information about Subscriber Service. Broadband VI may also combine Subscriber Personal Information with additional Personal Information obtained from Broadband VI Facebook Pages or other social network platforms, its Affiliates, its Operational Service Providers (third party owned companies that provide or perform services on Broadband VI's behalf, to help serve Subscriber better and to perform functions in order to support Broadband VI businesses and operations), or other companies, such as credit bureaus, background check firms, and marketing research companies. Some forms of Non-Personal Information as described below will be classified as Personal Information if required by applicable law or when such information is directly associated with or reasonably linked to a specific person, computer or device, or is combined with other forms of Personal Information.

Non-Personal Information

Website Information, Use of Cookies and other Similar Tracking Technology

When you visit Broadband VI's website, Broadband VI will collect various types of Non-Personal Information, such as information on Broadband VI server logs from Subscriber's browser or device, which may include Subscriber IP address, unique device identifier, "cookie" information, the type of browser and/or device you're using to access the Service, and the page

or feature Subscriber requested. (IP Address and device identifiers are traditionally classified as Non-Personal Information, unless Broadband VI is required to do so otherwise under applicable law.) “Cookies” and “web beacons” are text file identifiers Broadband VI transfers to Subscriber’s browser or device that allow Broadband VI to recognize Subscriber’s browser or device and tell Broadband VI how and when pages and features on the Broadband VI website are visited, by how many people, and other activity on the website. Subscriber can change the preferences on Subscriber’s browser or device to prevent or limit Subscriber’s device’s acceptance of cookies, web beacons or other similar technology, but this may prevent Subscriber from taking advantage of some of the features on the Broadband VI website, or accessing certain functions and conveniences. If Subscriber clicks on a link to a third-party website or service, such third party may also transmit cookies to Subscriber. Again, this Privacy Policy does not cover the use of cookies or other such tracking technology by any third parties, and Broadband VI is not responsible for their privacy policies and practices. Broadband VI also uses Personal Information and Non-Personal Information to enhance the Broadband VI website and Broadband VI Service offerings. For example, such information can tell Broadband VI how often visitors use a particular feature of the Broadband VI website and which products and services are most interesting to current and potential customers, and Broadband VI can use that knowledge to make the website useful and interesting to as many users as possible and to enhance and refine Broadband VI’s Service offerings. Broadband VI will continue to conduct analytics on Broadband VI website performance; Subscriber may not opt-out of this use of cookies or other Personal Information or Non-Personal Information. Technology is improving every day and to improve Broadband VI’s Services’ operation and function Broadband VI may introduce new technologies and monitoring techniques without advance notice or consent from Subscriber. Broadband VI may also use third party providers to conduct such internal analyses.

Network Information

Broadband VI also collects Network Information, information about Subscriber access to, and use of, the Broadband VI Network, which may or may not be directly associated with or reasonably linked to a specific person, computer or device. For example, Broadband VI may collect information about the performance of the Provider Equipment installed on Subscriber property or at Subscriber premises, when Subscriber is using the Service, the various devices Subscriber is using to access the Service, the amount of data Subscriber is transmitting and receiving, the content of the data Subscriber are transmitting and receiving, the websites Subscriber is visiting, and any other information that is transmitted over the Broadband VI Network. Broadband VI may also aggregate Network Information from multiple customers and Broadband VI will share such aggregated Non-Personal information about the overall performance of the Broadband VI Service and the Broadband VI network with our Affiliates and other third parties. Aggregated information does not identify a specific individual, computer or device. We use Network Information to monitor and enhance the performance of the Broadband VI network. Broadband VI will not monitor the content of the websites viewed or email communications as part of Broadband VI’s standard network management.

Generally, Broadband VI will only monitor and preserve the following Network Information:

- When Subscriber is using the Service;
- How Subscriber is using the Service, such as monitoring traffic patterns regarding websites visited, amount of data being sent or received, or other activity;
- The amount of data Subscriber is transmitting and receiving through the Service; and
- General information regarding the performance of the Provider Equipment installed on Subscriber's property or at Subscriber's premises, and its interaction with the rest of Broadband VI's network.

However, Broadband VI reserves the right to, and may, monitor, access, review and preserve any Network Information and/or content in the following situations:

- In response to an inquiry from Subscriber or another Authorized User on Subscriber's account regarding Subscriber or their use of the Service or problems Subscriber or they are experiencing using the Service;
- If Broadband VI has reason to believe Subscriber is using the Service in violation of Subscriber's Service Agreement or any applicable statutes, rules, ordinances or regulations;
- If Broadband VI has reason to believe Subscriber use of the Service is negatively affecting other Subscribers; or
- When Broadband VI is required by law or legal process to do so, or when Broadband VI a good faith belief that Broadband VI is required by law or legal process to do so.

How is Personal Information used for marketing and advertising purposes?

Broadband VI will use Personal Information to send Subscriber marketing and advertising messages related to Broadband VI's Service and website using Subscriber's email address, postal address, or telephone number (for voice, texts, automated and pre-recorded calls).

Broadband VI may deliver a marketing or advertising message based on Subscriber visits to Broadband VI website, which will be general advertising or "Contextual Advertising," which is advertising based on the subject matter or the content of the specific website page or subject matter. Broadband VI may also send Subscriber "First Party Advertising," which is advertising or marketing that is customized or personalized based on a history of Subscriber's use of our Services (possibly combined with information from our Facebook fan page or other social network platforms). First Party Advertising is based solely on a combination of information Broadband VI collects from Subscriber – not from Subscriber's visits to other websites across the Internet. Broadband VI may use CPNI for its own First Party Advertising for products/services a Subscriber has already purchased. We will need your consent before using CPNI for marketing

or advertising unrelated services. Subscriber may opt-out of First Party Advertising but not Contextual Advertising. No Personal Information is used to deliver Contextual Advertising; it automatically will appear based on the content or webpage Subscriber is viewing. And Subscriber may continue to receive general advertising if Subscriber opts-out of First Party Advertising, it will not be customized or personalized for Subscriber.

Broadband VI does not provide third party “Network Advertising,” which is advertising based on Subscriber’s overall Internet usage across different third-party websites or online services. Multiple third-party websites and online services are involved in this tailored or personalized advertising process, in essence a “network” of advertising providers. Because Broadband VI does not provide network ads, Broadband VI does not recognize the “Do Not Track” settings on various Internet browsers. Broadband VI does not engage or allow third parties to track you across the Internet and across time for advertising purposes.

The Broadband VI Site and/or Facebook Pages (or other social networking platforms) may contain a variety of content and functionality and may provide links to other third-party websites or online services. Despite such links, this Privacy Policy applies only to Broadband VI and our Affiliates. The presence of a link does not constitute or imply Broadband VI’s endorsement, recommendation, or sponsorship of the content, goods, services, business or privacy practices on such websites or online services. Broadband VI encourages Subscribers to be aware and informed when Subscribers leave Broadband VI’s website and Broadband VI’s Facebook Pages, or any other social networking platforms.

If you receive advertising or marketing communications from one or more Affiliates, you must opt-out individually from each of the Affiliates from which you are receiving brand-specific marketing communications. Your instructions to limit the use of your information for these purposes will be processed as soon as reasonably practicable.

Subscriber’s Personal Information will only be disclosed to third parties (including Broadband VI’s Affiliates) as listed in this Privacy Policy, if Broadband VI has received your consent at the time Broadband VI will collect your Personal Information or prior to the disclosure of any Personal Information. Broadband VI reserves the right to fully use, disclose and process any Non-Personal Information collected from Subscriber in any manner as well as any information Subscriber makes public via Broadband VI Services or website. Broadband VI will not rent, sell or disclose Personal Information to anyone not related to Broadband VI for marketing or promotional purposes, unless in connection with a potential or actual sale, merger or a corporate restructuring by or of Broadband VI. (See “For Business Transfers” below for more information.) Broadband VI will share Subscriber Personal Information with its Affiliates and with other third parties as described in this section for the following reasons:

- **To Our Affiliates.** Broadband VI relies on various Affiliates in order to provide the Service to Subscribers. These are companies that are related to Broadband VI by

common ownership or control. Broadband VI may share Personal Information and Non-Personal Information with any of its Affiliates for business, operational, promotional and/or marketing and advertising purposes.

- **To Operational Service Providers:** Broadband VI and its Affiliates contract with other companies and people to perform tasks or services on Broadband VI's behalf and need to share Subscriber Personal Information to provide products or services to Subscribers. For example, Broadband VI may use a payment processing company to receive and process Subscriber's ACH or credit card transactions for Broadband VI, or Broadband VI may contract with third parties to assist Broadband VI in optimizing Broadband VI's network. Unless Broadband VI tells Subscriber differently, Broadband VI does not grant its Operational Service Providers any right to use the Personal Information Broadband VI shares with them beyond what is necessary to assist Broadband VI.
- **For Business Transfers/Restructuring:** Broadband VI may choose to buy or sell assets, or Broadband VI may sell assets or be sold. In these types of transactions, customer Personal Information is typically one of the business assets that would be disclosed and transferred. Also, if Broadband VI (or Broadband VI's assets) are acquired, or Broadband VI goes out of business, enter bankruptcy, or go through some other change of control, including restructuring, re-organization or financing arrangements, Personal Information could be one of the assets disclosed, transferred to or acquired by a third party.
- **For Protection of Broadband VI, and Our Affiliates, Employees, Operational Service Providers, Users and Subscribers and Public Safety:** Broadband VI reserves the right to access, read, preserve, and disclose any Personal Information Broadband VI has access to if Broadband VI believes doing so will implement and/or enforce the Service Agreement, Website Terms of Use Agreement, Privacy Policy or any legal document; protect our Network(s), website(s), and company assets; protect the interests, rights, property, and/or safety of Broadband VI or Our Affiliates, employees and officers/directors, Operational Service Providers, Users and Subscribers, agents, third party licensors or suppliers, or the general public.
- **When Required by Law or in Response to Legal Process:** Broadband VI reserves the right to access, read, preserve, and disclose any Personal Information to which Broadband VI has access if Broadband VI is required by law or legal process to do so, or if Broadband VI has a good faith belief that Broadband VI is required by law or legal process to do so.

Is Subscriber Personal Information secure?

Broadband VI endeavors to protect the privacy of Subscriber's account and other Personal Information Broadband VI holds in its records using reasonable administrative, technical and physical security measures. However, Broadband VI cannot and do not guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may

compromise the security of Personal Information at any time. Subscriber's account is protected by a password for Subscriber privacy and security. It is Subscriber's responsibility to prevent unauthorized access to Subscriber's account and Personal Information by selecting and protecting Subscriber password and/or other sign-on mechanism appropriately and limiting access to Subscriber computer, tablet or device and browser by signing off after Subscriber has finished accessing Subscriber's account. Subscriber is required to notify us immediately if Subscriber's password or account has been disclosed to a person whose name does not appear on Subscriber's account, even if you have allowed such disclosure. Subscriber understands, acknowledges and agrees that Subscriber is solely responsible for any use of Broadband VI Services via Subscriber's username and password.

Additionally, if Subscriber contacts Broadband VI, Broadband VI will ask Subscriber for verification of Subscriber's identification and account. Broadband VI will not send an email or text, nor should Subscriber respond to any email or text communications asking for any sensitive or confidential Personal Information, such as social security number, bank account or credit card account number, or a driver's license number. If Subscriber receives an email or text requesting any such information from Broadband VI or someone that claims they are with Broadband VI or Our Affiliates please contact our Privacy Administrator immediately at privacy@broadband.vi. For Broadband VI's IT Support Services as detailed in our Service Agreement, the code that allows Broadband VI to access Subscriber's computer desktop to help you resolve technical problems is limited only for that specific session. Broadband VI is not able to access Subscriber's Computer without Subscriber's knowledge, affirmative consent and involvement.

What Personal Information can Subscribers access, modify and/or delete?

Generally, Subscriber may access the following Personal Information in Subscriber's account:

- Full name
- Username and password
- Email address
- Telephone number
- Billing and Service address
- Account and billing information

By contacting Broadband VI at privacy@broadband.vi, or through any online access portal and/or via telephone, Broadband VI may enable Subscribers to view, access and modify Subscriber account settings, and in some cases, edit or delete the Personal Information listed above. For example, Broadband VI may retain historic email, billing and/or Service addresses for security and verification purposes and Subscribers may not delete such information even after the subscription expires or terminates. Current Subscribers may not delete any Personal Information because such information is necessary to provide and bill for the Service; Subscribers

may only update or modify Personal Information. When Subscriber updates Personal Information, however, Broadband VI may maintain a copy of the unrevised information in Broadband VI's records for internal security reasons and recordkeeping. Some information may remain in Broadband VI's records after it is modified, amended or deleted by Subscriber or Broadband VI. Broadband VI may use any aggregated data derived from or incorporating Subscriber's Personal Information after Subscriber updates or deletes it, but not in a manner that would identify Subscriber personally. Broadband VI may also maintain Personal Information regarding Subscriber and Subscriber's use of the Service after Subscriber is no longer a Broadband VI customer as required by Broadband VI's business practices, by law, and/or tax reporting purposes. The information Subscriber can view, update, and delete may also change. If Subscriber has any questions about viewing or updating information Broadband VI has on file about Subscriber, please contact Broadband VI at support@broadband.vi.

What third party disclosure choices do Subscribers have?

Subscriber can always choose not to disclose Personal Information to Broadband VI; however, certain Personal Information is necessary for Broadband VI to provide the Service to Subscriber. Subscriber may opt out of sharing Personal Information with Our Affiliates only for marketing or advertising purposes, but not for business or operational purposes. Subscriber may opt out of email marketing and advertising from Broadband VI or its Affiliates using the "Unsubscribe" mechanism in each email. Before Broadband VI sends Subscriber a text for any reason, or sends Subscriber a pre-recorded call that contains advertising or marketing information, Broadband VI will secure Subscriber's prior written express consent, which can be given via a voice recording, email, text message, postal mail, or telephone key press. Non-telemarketing pre-recorded calls do not require Subscriber's prior express consent in writing, unless they are sent to a wireless device. Subscriber understands, acknowledges and agrees that such texts and pre-recorded telemarketing calls may be sent using an autodialer and are not conditioned on your purchase of the Service. Subscriber may opt out of receiving text messages any time by replying "STOP" or "UNSUBSCRIBE" to the text message. Subscriber may opt out of receiving pre-recorded calls by the opt-out instructions in the call. Subscriber can also request to be added to Broadband VI's company-specific Do Not Call list to opt-out of advertising and marketing calls of all types. However, Subscriber will continue to receive calls related to debt-collection and Subscriber's current Service. Subscriber may also opt-out of First Party Advertising, but not Contextual Advertising, as detailed in the "Use of Personal Information for Marketing or Advertising Purposes" section above. Subscriber may not opt out of Broadband VI's use of cookies or other similar technology, or use of Subscriber's Personal Information and Non-Personal Information for Broadband VI's internal analytics used to monitor activity on Broadband VI's website, measure Broadband VI's Service performance, or to operate and protect the Broadband VI Network.

Will this Privacy Policy ever change?

Yes, Broadband VI is constantly working to improve the Service, so Broadband VI will need to update this Privacy Policy from time to time as Broadband VI's business practices change and service offerings increase, and/or there are changes in local, state or federal laws. Additionally, Broadband VI will also make stylistic, organizational and/or grammatical changes to present Broadband VI privacy practices in a user friendly easy to read manner. Broadband VI will alert Subscribers to any such changes by placing a notice on www.BroadbandVIinternet.com with the effective date of the revised Privacy Policy, and/or by sending Subscribers an email, or by some other means to the extent required by law. Please note that if Subscribers have not provided Broadband VI with Subscriber's email address or Subscriber has not updated Subscriber contact information, those legal notices will still govern Subscriber use of the Service, and Subscriber is still responsible for reading and understanding all notices posted on Broadband VI's website. Subscriber's continued use of the Service or website after notice of any changes have been provided will indicate Subscriber's acceptance of such changes, except where further steps are required by applicable law.

Use of Subscriber's Personal Information is primarily governed by the Privacy Policy in effect at the time Subscriber subscribed to the Service or visited the Broadband VI website. If Broadband VI elects to use or to disclose Personal Information that identifies Broadband VI as an individual in a manner that is materially different than that stated in the Privacy Policy in effect at the time you subscribed to the Service or visited the Broadband VI Site, Broadband VI will provide Subscriber with an opportunity to consent to such use or disclosure. Depending on the circumstances, that consent may include an opt-out.

What if you have questions or comments about this Privacy Policy?

If you have any questions or concerns regarding Broadband VI's privacy practices and policies, please contact Broadband VI at privacy@broadband.vi.

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