

WIRELESS ADVOCATES PRIVACY NOTICE

Our Commitment to Privacy

This privacy notice explains the categories of personal information we collect from our customers who are California residents (“you”), and the purposes for which such information will be used, the rights and choices that you have regarding your data, and how you may exercise your rights.

This notice is available on Wireless Advocates’ home page and at each place where California resident’s personal information may be requested.

Personal Information Collection and Use

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household (“personal information”). In particular, we have collect the following categories of personal information:

Category	Examples	Collected?
Identifiers	Name, shipping address, billing address, email address, phone number, account name, account number, contract number, SIMs, IMEIs, credit card number, online identifier, Internet Protocol address.	YES
Characteristics of protected classifications under California or federal law	Race, gender, ethnicity, disability status	NO
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, signature, billing address, mailing address, telephone number, credit card number. Some personal information included in this category may overlap with other categories.	YES

Commercial information	Records of products or services purchased, obtained or other purchasing or consuming histories.	YES
Biometric Information	Fingerprint, facial pattern, voice, typing cadence	NO
Inferences drawn from other personal information on this chart	Profile reflecting a person's consumer preferences or characteristics.	YES
Internet or other similar network activity	Information on a consumer's interaction with a Wireless Advocates Web site, application, or advertisement.	YES
Geolocation data	Physical location.	YES
Audio, electronic, visual, thermal, olfactory, or similar information	Recordings of a California Data Subject	NO
Professional or employment-related information	Place of work, current occupation, duration of occupation, position/title	NO
Education Information	Information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA)	NO

We obtain the above personal information from the following sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our website.
- Third-Party Sources. We are provided information about you from our third party partners such as: merchant partners and technology hosts.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order to purchase a new phone, we will submit such information to the appropriate carrier.

- To provide you with information, products or services that you request from us.
- To provide you with email alerts and other notices concerning our products or services.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our Web site and present its contents to you.
- As necessary or appropriate to protect the rights, property or safety of us, our consumers or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

We will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We will never sell or rent your personal information to third parties without your explicit consent. We may disclose your personal information to our service providers who are under contract and who help with our business operations. Our contracts require these service providers to only use your information in connection with the services they perform for us, and prohibit them from selling your information to anyone else. Examples of the types of service providers we may share personal information with include:

- Cloud storage
- Payment processing
- Transaction monitoring
- Security
- Document repository services
- Customer support
- Internet (e.g. ISPs)
- Data analytics
- Information Technology

Only upon your consent, which includes your agreement to this Consumer Notice, we will disclose your personal information to other businesses that will provide you with wireless services. You will have to contact those businesses to exercise your California Privacy Rights with respect to your personal information that those businesses have collected or may collect from you or other third-parties. We do not receive any of your personal information from those businesses.

California Privacy Rights

The California Consumer Privacy Act provides California residents with the following rights:

Right to Know. You have the right to know and see what data we have collected about you over the past 12 months, including:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information is collected;
- The business or commercial purpose for collecting your personal information;
- The categories of third parties with whom we have shared your personal information; and
- The specific pieces of personal information we have collected about you.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

This request is free.

Right to Delete. You have the right to request that we delete the personal information we have collected from you (and direct our service providers to do the same). There are a number of exceptions, which include, but are not limited to, when the information is necessary for us or a third party to do any of the following:

- Complete your transaction for which we collected your personal information;
- Provide you with product or service;
- Perform a contract between us and you;
- Protect your security and prosecute those responsible for breaching it;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity;
- Fix our system in the case of a bug;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interests that adheres to all other applicable ethics and privacy laws;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with a legal obligation; or
- Make other internal and lawful uses of the information that are compatible with the context in which you provided it.

This request is free.

Your Additional California Rights. Under California’s “Shine the Light” Law (Civ. Code Sec. §1798.83) you can request certain information about our disclosure of personal information to third parties for their own direct marketing purposes during the preceding 12 months. **We do not sell your personal information to third parties for direct marketing purposes.** The request under California’s “Shine the Light” law is free and may be made once in a 12-month period.

No Discrimination. We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you with a different level or quality of goods or services.
- Suggest that you may receive a difference price or rate for goods or services or a different level or quality of goods or services.

Exercising Your California Privacy Rights. To request access to or deletion of your personal information, or to exercise any other data rights under California law, please contact us using one of the following methods:

Toll Free Number: You may call our Toll Free Number 1-888-369-5931

Website: You may visit www.membershipwireless.com/ccpa to authenticate and exercise rights via our website and web form.

Your request must include sufficient information to enable us to reasonably verify that you are the person about whom we collected personal information (or their representative) and describe the request with sufficient detail for us to understand, evaluate, and respond to it. If you are a California resident, you may designate an authorized agent to make a request to access or a request to delete on your behalf. We will respond to your authorized agent's request if they submit proof that they are registered with the California Secretary of State to be able to act on your behalf, or submit evidence you have provided them with power of attorney pursuant to California Probate Code section 4000 to 4465. We may deny requests from authorized agents who do not submit proof that they have been authorized by you to act on their behalf, or are unable to verify their identity. We cannot respond to your request if we cannot verify your identity or authority to make the request. We will only use verification information to verify the requestor's identity or authority to make the request.

Any disclosures made will be regarding the previous twelve (12) month period preceding the receipt of your request. If applicable, our response may provide reasons why we cannot comply with your request.

Response Timing and Format. We aim to respond to a verified consumer request for access or deletion within 45 days of receiving that request. If we require more time, we will inform you of the reason and extension period in writing. We will confirm receipt of request to a verified customer within 10 days of receiving the same.

Retention of Personal Information

We will keep the personal information that you provide to us for the period of time that your account is active. We only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purpose of satisfying any legal, accounting, or reporting obligations or to resolve disputes.