



## PRIVACY POLICY

Effective January, 2024

E4 CONNECT, INC., an Oregon corporation (together with its affiliates and distribution partners, "Company"), has issued this PRIVACY POLICY (the "Policy") to inform Company's subscribers and other users of Company's broadband and telecommunication services (each, a "User," and in the plural, "Users") regarding how Company protects, treats, and uses certain information collected from Users. By using any of Company's services, each User is deemed to have read and agreed to be bound to the terms and conditions set forth in this Policy. Further, Company reserves the right to modify this Policy at any time; Company will endeavor to provide prior notice of such modifications and in all events will provide any prior notice required by applicable laws and/or regulations ("Applicable Laws"); each modification becomes effective when posted on Company's website unless otherwise designated; and a User's continued use of Company's services after such modification constitutes acceptance of such modification.

**1. COLLECTION OF PII.** Company collects "PII" (defined in Section 1.1) when a User: (i) orders, updates, or manages services or equipment provided by Company; (ii) responds to a voluntary customer survey; or (iii) requests changes to the services provided by Company through contacting one of Company's customer service representatives or otherwise. Company may also collect a User's email address for various purposes, such as when a User asks a question or provides feedback to Company. Company's website located at <https://e4connect.com> (the "Website"), however, is purely informational and does not collect PII or place "Cookies" (defined in Section 1.4).

**1.1 Definition.** "PII" means personally identifiable information that establishes the identity of an individual or entity through either direct or indirect means. Examples of PII include: (i) names, (ii) physical addresses; (iii) email addresses; (iv) telephone numbers; (v) social security numbers, (vi) credit or financial data; and (vii) other identifying numbers and codes.

**1.2 Emails from Company.** Company may also collect PII when a User clicks on links in marketing e-mail messages from Company. Such links help Company to understand Users' interests and to determine which Users may be benefited by further information. A User can at any time elect not to continue receiving marketing email messages from Company by clicking on the opt-out link provided in each such message.

**1.3 Children.** Company does not knowingly collect PII from children under thirteen (13) years of age. Should a User whom Company knows to be under thirteen (13) years old disclose PII to Company, Company will use that information only to inform the child that Company must have parental consent to receive PII.

**1.4 Third-Party Websites.** Through use of Company's services, a User may access third-party websites that do not operate under this Policy. Because those websites may use collected PII for different purposes, Company strongly recommends that Users examine the privacy policies of the applicable third-party websites before accessing them because Company is unable to control, and is not responsible for, how those third parties collect, use, or share Users' information. Specifically, third-party websites may collect both PII and non-personally identifiable information, including through placement of small text files on Users' hard drives, which files collect information about Users' activities for a variety of purposes, including, without limitation, the provision of customized content and information about goods and services of possible interest to Users ("Cookies").

## 2. USE AND DISCLOSURE OF PII.

**2.1 Use.** Company uses collected PII to: (i) send subscribers bills; (ii) credit subscribers with payments; (iii) deliver and confirm delivery of requested services and products; (iv) respond to questions, complaints, and requests for changes in services; (v) resolve service and maintenance problems; (vi) protect the security of Company equipment and services; (vii) ensure compliance with Applicable Laws; (viii) prevent the unauthorized reception of services; (ix) investigate activities that violate Company terms, conditions, and/or policies; and (x) other related purposes. Subject to a User's right to opt out of receiving marketing emails as described in Section 1.2, Company may also use PII to send Users program and/or service listings, new product or service offerings, special announcements, and other information that may be helpful to Users.

**2.2 Disclosure.** Company does not disclose User's PII to third parties without a User's permission except: (i) for purposes related to the reason the information was collected (e.g., credit checks and provision of requested services or equipment); (ii) for complying with Applicable Laws and responding to requests for information from government and/or judicial officials investigating illegal activity; (iii) in the event of a bankruptcy or a sale of assets of Company; (iv) for enabling, improving, or expanding services to Users; (v) for protecting and defending the rights, personnel, and property of Company and third parties; and (vi) for protecting the personal safety of Users and/or the public. Company may also disclose PII to affiliates of Company and contractors of Company; provided, however, such contractors agree to not further disclose such PII, to use such PII only for fulfilling the purposes of the contract with Company, and to otherwise not use the PII in violation of this Policy or Applicable Laws.

**2.3 Cooperation with Law Enforcement.** Company hereby notifies Users that Company cooperates with law

enforcement authorities, legal processes, government and regulatory requests, and third parties in the investigation and enforcement of violations of Applicable Laws, acceptable use policies, and intellectual property rights, which cooperation may include providing such parties with usernames, IP addresses, and other PII about Users.

### **3. MONITORING, RETENTION, AND SECURITY OF PII.**

**3.1 Monitoring.** Company does not routinely monitor the online activities of Users except for measurements of system utilization, general statistical analyses, and the preparation of billing records and logs. Company, however, expressly reserves the right to monitor bandwidth, usage, and content of individual Users from time to time to: (i) improve Company's services; (ii) identify violations of Company policies; and (iii) protect Company's network and other Users.

**3.2 Retention.** Company plans to store PII about a User only as long as required by Applicable Laws, as necessary to fulfill the purpose for which the information was collected, or as advisable to respond to requests or circumstances requiring continued access to the information, whichever is longer. Such time period could be as long as seven years for information necessary for tax and accounting purposes. Once retention of the respective PII is no longer necessary, Company will take commercially reasonable steps to destroy such information.

**3.3 Security.** Company takes the security of PII very seriously. While no website or service provider can guarantee complete security, Company employs and regularly updates its security technologies and procedures to protect the confidentiality of PII as required by Applicable Laws and in accordance with commercially reasonable industry practices.

**4. NEVADA.** Nevada law allows subscribers to "opt out" of the sale of certain personal information, called "covered information." Company currently does not sell such covered information and has no plans to change that practice. If a subscriber desires to be notified if Company changes that practice, such subscriber must contact Company and provide the subscriber's name and email address. Company will then notify such subscriber of any change in its policy on sale of covered information so that such subscriber can elect to opt out. If a subscriber's email address changes in the interim, such subscriber must provide Company with a new valid email address in order to receive the requested notice.

**5. COMPANY'S CONTACT INFORMATION.** For any questions regarding this Policy or otherwise, please contact Company at 800-624-0082.