

South Arkansas Telephone Company SATCO Home Mobile Application Privacy Policy

What is covered by this Privacy Policy

This Privacy Policy (the "Privacy Policy") covers SATCO's privacy and security policies for personal information collected by SATCO in connection with the SATCO. SATCO's Home mobile application (the App"). For this Privacy Policy, personal information refers to information relating to an identified or identifiable natural person with reference to a identifier, such as a name, an email address, an online identifier such as login credentials, or any other identifier by which that natural person may be contacted online or offline.

SATCO understands the importance of privacy and security and is committed to providing a secure environment to protect the personal and private information provided by you in connection with your use of the App. Accordingly, this Privacy Policy sets out:

- The personal information that is collected when you download, install, register for and/or use the App: and
- SATCO's practices associated with collecting, using, retaining, disclosing and protecting the information associated with your use of the App.

What is not covered by this Privacy Policy

This Privacy Policy DOES NOT apply to information:

- SATCO collects on its website; or
- SATCO may collect unrelated to SATCO's provision of the App.

Information collected on the SATCO website at www.sat-co.net is subject to SATCO's privacy policy in the footer of the website pages (accessible at <https://sat-co.net/images/documents/SATCO-Privacy-Policy.pdf>).

Personal information does not include information that has been anonymized or aggregated so that it can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

Privacy Policy applies for any use of App

This Privacy Policy applies to SATCO's policies and practices associated with the provision of the App described in the SATCO Home Mobile Application End User License Agreement (the "Agreement"). Please read this Privacy Policy carefully to understand SATCO's policies and practices regarding your information and how such information will be treated. If you do not agree with SATCO's policies and practices, you should not install, use or access the App. By accepting and agreeing to the Agreement, or by using or accessing the App, you agree to this Privacy Policy.

Children Under the Age of 16

The App is not intended for children under 16 years of age, and SATCO does not knowingly collect personal data of children under 16. If SATCO learns that personal data from a child under 16 has been obtained or received without verification of parental consent, SATCO will delete that information. If you believe SATCO might have any information from or about a child under 16, please contact SATCO at productprivacy@sat-co.net.

How SATCO Collects Your Information

SATCO collects and processes information provided directly by you when you install the App and register for an account to use the App. Specifically, this information includes:

- Your name, email address, password, location and your account number;
- Information about the equipment deployed at your premises that you choose to connect to the App such as the MAC address, serial number or other unique identifier for your router;
- Data insights SATCO attains based on correlation and analytics of your information collected in providing the App, which may be used in aggregated and dis-aggregated formats or to obtain trend analytics, to provide the App; and

- Use of the above-described collected information in aggregated and disaggregated formats to enhance our current App or to provide App features.

How SATCO Uses the Information

SATCO uses the information collected as described in this Privacy Policy, including personal information, to:

- Provide you with the App as described in the Agreement;
- Implement, improve and/or enhance the App, including to make future releases available to you;
- Carry out SATCO's rights SATCO from the Agreement between you and SATCO; and
- Fulfill any other purpose authorized by you and reasonably required for the App.

SATCO may also use the information collected as described in this Privacy Policy, including personal information, to inform you about goods and services that may be of interest to you. SATCO does not contact you unless and only to the extent expressly authorized by you in writing.

Disclosure of Information

SATCO does not sell or otherwise distribute or disclose you information to third parties other than as described or authorized in the Agreement, including this Privacy Policy.

SATCO discloses the information to its subsidiaries, affiliates and certain third-party vendors and contractors that provide development, integration, web hosting and consulting services to SATCO for the purpose of providing you with the App, to maintain, support, improve and/or enhance the App and to fulfill SATCO obligations associated with the App.

SATCO may be required to disclose information under certain circumstances:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request;
- To enforce SATCO rights arising from the Agreement entered into between you and SATCO;

- If SATCO believes disclosure is necessary or appropriate to protect the rights, property, or safety of SATCO, its customers or third parties: or
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SATCO assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which you and/or you subscriber held by SATCO are among assets transferred.

Your Choices About Our Collection, Use, and Disclosure of Information

The provision of the information described in this Privacy Policy is necessary in order for you to use the App.

Your information is retained and used as described in this Privacy Policy. In the event you delete your account for the App in accordance with the terms of the Agreement, your information will be deleted within 30 days of the deletion of such account or within such other timeline as may be mandated by applicable law. You will no longer be able to access the App when your account is deleted.

Accessing and Correcting Information

You can (a) access and review your information, including personal information, and (b) correct your information, by logging into the App and visiting the settings pages.

Data Security

All information you provide to us is stored on our secure servers behind firewalls, SATCO utilizes mechanisms such as intrusion detection systems, intrusion prevention systems, firewalls and encryption to secure information from accidental loss and from access, use, alteration, and disclosure.

SATCO deploys intrusion Detection System (IDS) and Intrusion Prevention System (IPS) to alert and proactively contain potential threats. Enhanced security visibility and coverage is enabled through added layers of firewall and IDS beyond the network perimeter. Management connections to servers are always authenticated and encrypted via Secure Shell (SSH) when administration access is required for troubleshooting, patch management, and upgrades.

SATCO runs automated vulnerability scanning on all perimeter systems to identify potential security risks. Scanning applications are regularly updated to remain current and up to date on important security vulnerabilities. Patches are applied to all relevant systems, unless a compensating control is implemented.

SATCO uses a variety of industry-standard security technologies and best practices to help protect information from unauthorized access, use, or disclosure. All data stored on the SATCO systems is encrypted following industry standards using the strongest keys and ciphers. All communications with the App are protected with industry standard security protocols.

You control access to your account and, as set forth in the Agreement, you are obligated to keep your login credentials and passwords secure and protected and maintained as confidential. Although SATCO implements measures that are reasonably designed to protect you, information may nevertheless be transmitted outside of SATCO's systems. Any such transmission of information is at your own risk, and SATCO is not responsible for any circumventions of any privacy settings or security measures provided.

Changes to this Privacy Policy

SATCO may update this Privacy Policy from time to time. If SATCO makes material changes to how SATCO treats personal information under this Privacy Policy, SATCO will notify you by email or other communication.

The date the Privacy Policy was last revised is identified at the end of this Privacy Policy. You are responsible for ensuring SATCO has an up-to-date active and deliverable email address for you and for periodically visiting this Privacy Policy to check for any changes.

Contact Information

To ask questions or comments about this Privacy Policy and SATCO's privacy practices for the Cloud Services, contact SATCO via e-mail at productprivacy@satco.net.