

South Arkansas Telephone Company (SATCO) Privacy Policy

Scope and Consent

This Privacy Policy describes the information that SATCO may collect, use, process, disclose and/or store when you access SATCO's website located at www.sat-co.net and any associated URLs owned or controlled by SATCO (collectively, the "Website"), any content or features available on the Website and your interactions with SATCO in connection with such access including registrations for our events through the Website. Information collected may include your "Personal Information," which means information that identifies you as an individual, such as your name, address, telephone number, email address or other contact or identification information. The collection and processing of information on our Website as described in this Privacy Policy may be done on our behalf by third party vendors. Your use of the Website and/or any content or features available on the Website, including any registration for SATCO events through the Website, constitutes your acceptance of the terms of this Privacy Policy and your consent to our collection, use, processing, disclosure and/or storage of your information, including Personal Information, as stated in this Privacy Policy.

As used in this Privacy Policy, "SATCO" refers to SATCO. and its affiliates and references to "we," "our," "us" and similar terms in this Privacy Policy refer to SATCO.

If you do not understand or agree to this Privacy Policy, you should not access and use the Website.

Collection of Information

In order for you to access certain portions of the Website, attend SATCO events that use the Website for registration, or to receive responses to your inquiries or otherwise communicate with SATCO in connection with the Website, we may require that you complete a registration process or otherwise submit certain information to us. In such cases we may ask for your contact information and other Personal Information (e.g., your name, address, company, title, telephone number, email address and other contact information) and for an indication of the products, services and additional information in which you are interested. You may choose to not provide some or all of the requested information, although such choice may hinder our ability to communicate with you, prevent your registration to attend a SATCO event or to fully participate in a SATCO event, and/or result in

reduced access to content available from the Website or otherwise from SATCO.

SATCO may also collect information from your mobile app, browser, or other device used to access the Website, such as the following, and which may also include Personal Information:

- Browser and device information
- App or device usage data
- IP address
- MAC address
- Aggregated, anonymized, or de-identified information
- Demographic information and other similar information provided by you (e.g., language, occupation)

Any Personal Information we collect through the Website, including in connection with registration of a SATCO event, or from any mobile app, browser or other device used to access the Website, is subject to this Privacy Policy.

Cookies

A cookie is a small data file that may be used, for example, to collect information about Website and browsing activity. The Website uses cookies to track overall site use and may be used to provide you with additional information about our products, respond to your inquiries, or (if applicable) to authenticate registration. You can use your browser settings to manage your preferences for allowing use of cookies and to delete existing cookies.

Use of Personal Information

We may collect and/or process your Personal Information for the purposes and on the legal bases identified in the following situations.

If you visit our websites and online properties:

- Developing and improving our websites. We may process your Personal Information to analyze trends, track your usage of our websites and interactions with emails to the extent this is necessary for our legitimate interests to develop and improve our websites and to provide our users with more relevant and interesting content;
- Utilizing third-party service providers to provide Website analytics on an aggregated and anonymous basis. These third parties may use cookies, web beacons, and other technologies to collect information, which may include your IP address, content viewed and/or links accessed in order to provide such analytics. We may use or analyze the information to improve the online experience and interaction with our users.

- Promoting security of our websites. We process your Personal Information by tracking use of our websites, creating aggregated data, verifying accounts and activity, investigating suspicious activity, as well as violations of and enforcement of our terms and policies, to the extent this is necessary for the purpose of our legitimate interests in promoting the safety and security of the systems and application used for our websites, and protecting our rights and the rights of others;
- Providing and enabling personalized advertisements and content. We process your Personal Information to conduct marketing research, identify and advertise to you, provide personalized information about us on and off our websites, and other personalized content based upon your activities and interests to the extent it is necessary for our legitimate interests to advertise our websites or, where necessary, to the extent you have provided your prior separate consent.

If you are a customer, business partner, or express interest in our solutions:

- Provide you with services through web-based applications or other contracted services as specified in the applicable terms of service, terms and conditions and/or order form for the purpose of performing the contract with you according to any applicable terms;
- Handling contact and user support requests. If you fill out a “Contact Me” web form, request user support, or if you contact us by other means, we will process your Personal Information for the performance of our contract with you and to the extent it is necessary for the purpose of our legitimate interests to fulfill your request and communicate with you;
- Managing user registrations. We process your Personal Information by managing your registration for user accounts for one or more SATCO subscription or service for the purpose of performing the contract with you according to any applicable terms of service, terms and conditions and/or order form;
- Managing event registrations and attendance. We process your Personal Information to plan and host an events or webinars that you register to participate in or access on our systems, including related communication with you before, during or following the event or webinar, on basis of the performance of delivering the event or webinar to you based on the program and/or agenda and related follow-up, surveys or feedback requests;
- Sending marketing communications. We process your Personal Information to send you marketing information, product recommendations and other non-transactional communications (e.g., marketing newsletters, SMS, or push notifications) about us and our affiliates and partners, including information about our products, services, promotions or events as necessary for our legitimate

interests to conduct direct marketing or to the extent you have provided your prior separate consent;

- Managing visitors to our sites. We will process your Personal Information for security reasons, to register who visited our offices and who signed the non-disclosure agreement that visitors may be required to sign.

If you are an applicant for a job opening or position through our web-based applications:

- For reviewing your job interest and application. Evaluate information you provide in any web form relating to your application and/or interest in job opportunities at SATCO;
- For communications with you about your application and interest. Use your information to communicate with you in relation to your application and/or interest in job opportunities at SATCO, answer questions you may raise, or to provide information to you; and
- To analyze and improve our service. We may use or analyze the information to improve the online experience for job applicants and interaction with our users.

As to all users, with respect to our legal obligations:

- Complying with legal obligations. We may process your Personal Information when cooperating with public and government authorities, courts or regulators and otherwise in accordance with our legal obligations under applicable laws for any reason under such laws, including without limitation to the extent this requires the processing or disclosure of Personal Information to protect our rights, is necessary for our legitimate interests to protect against misuse or abuse of our websites, to protect personal property or safety, to pursue remedies available to us and limit our damages, to comply with a judicial proceedings, court order or legal process, and/or to respond to lawful requests.

Disclosure of Personal Information

We do not sell or rent Personal Information to third parties. We do not share your Personal Information with third parties that are not owned by us or under our control or direction except as described in this Privacy Policy and, if you have requested or purchased services from us, to the extent reasonably necessary to provide, enhance, analyze and improve such service pursuant to specific terms of service or other contract or agreement to which you are a party.

We may disclose Personal Information with third parties as set forth below.

- To affiliates of SATCO for the purposes described in this Privacy Policy;
- To our authorized service providers and suppliers who provide services to us such as website hosting, data analysis, information technology and related infrastructure services, customer service, email delivery, auditing and similar services for the purpose of enabling them to provide such services;
- To third parties to permit them to send you marketing and other communications you have elected to receive, subject to your designated communication preferences;
- To third parties for purposes of which we provide specific notice to you at the time of collection;
- In connection with subscription services to web-based applications as specified in the applicable terms of service for such applications; and
- As necessary or appropriate to comply with legal processes and/or to respond to requests from governmental authorities or to protect the rights, property or personal safety of SATCO or its employees, or for other safety reasons.

Security and Storage

We are committed to maintaining the security of your Personal Information and take what we believe are reasonable and industry-recognized safeguards designed to protect against accidental, unlawful or unauthorized access, disclosure or use. Nevertheless, transmissions over the Internet are never entirely secure and we cannot guarantee the security or the preservation of the integrity of any transmitted data. Please consider this fact before transmitting via the Website any Personal Information or information that you consider confidential.

The Personal Information we collect may be stored and processed in servers in the United States and wherever SATCO and our service providers have facilities around the globe and in accordance with local laws. By submitting or registering Personal Information via the Website you consent to such storage and processing in such locations. If you do not consent, do not submit your Personal Information or continue with registration of SATCO events.

We will keep personal information about you for as long as we provide solutions to you, as long as you work for or with us, or as long as we are addressing a concern, question, complaint, or request you have made to us, as applicable to our interactions with you. If we have a contract or other agreement with you, we will follow the retention obligations of that agreement.

We may keep data longer if we have a legal obligation to keep it or to maintain necessary records for legal, financial, compliance, or other reporting obligations, and to enforce our rights and agreements. We also may keep data about you for statistical analysis or research purposes.

Certain California Privacy Rights

This Privacy Policy describes how we may share Personal Information, if at all, for marketing purposes, as explained above under “Disclosure of Personal Information.” You may contact us with any questions or to request a list of third parties to whom we may disclose Personal Information for marketing purposes and the categories of information we may disclose.

European Privacy Rights

We adhere to applicable data protection laws in the European Union (“EU”). In accordance with the General Data Protection Regulation (“GDPR”), users who are located in the EU have the following rights:

- request access to the personal information we process about you;
- request that we correct inaccurate or incomplete personal information about you;
- request deletion of personal information about you;
- request restrictions, temporarily or permanently, on our processing of some or all personal information about you;
- request transfer of personal information to you or a third party where we process the data based on your consent or a contract with you, and where our processing is automated; and
- opt-out or object to our use of personal information about you where our use is based on your consent or our legitimate interests.

To exercise one or more of these rights, please see **“Managing Your Personal Information”** below. We will aim to respond to your request within 30 days. It is important that your request contains reasonable details in order for us to adequately respond. We will honor the requests you make related to your rights as applicable law allows, which means in some cases there may be legal or other official reasons that we may not be able to address the specific request you make related to your rights.

International Data Transfers

If you are located in the European Economic Area (“EEA”), Switzerland, or another country that requires legal protections for international data transfer, we may transfer, access, or store personal information about you outside of the EEA, Switzerland, to the United States or such other country that requires legal protections for international data transfer. When we do, we will ensure that an adequate level of protection is provided for the information by using one or more of the following approaches:

- Where we use service providers in the United States, we may transfer personal information pursuant to other organizations that participate in Privacy Shield for transfers from the EEA or Switzerland to the U.S.
- We may transfer personal information to countries that have privacy laws that have been recognized by the country from which the data are transferred as providing similar protections for the data.
- We may enter into written agreements with recipients that require them to provide the same level of protection for the data.
- We may rely on other transfer mechanisms approved by authorities in the country from which the data are transferred.

Managing your Personal Information

If you would like to correct, update, delete, or request access to the Personal Information that you have provided to us, please submit the following email to

privacy@sat-co.biz

For your protection, we will only implement requests with respect to Personal Information about you (not anyone else), and we may need to verify your identity before implementing your request. We will comply with your request as soon as reasonably practicable and in accordance with applicable law. We may need to retain certain information for recordkeeping purposes, as required under applicable legal obligations. Some of your information may remain within our systems and other records or archives, in compliance with applicable law.

Third Party Websites and Services

This Privacy Policy does not address, and we are not responsible for, the policies and practices of third parties or other organizations that are not SATCO service providers, including policies and practices related to privacy and security, data collection, processing, use, storage, and disclosure. Such parties include any third party operating any site or service to which the Website links (and the inclusion of a link on the Website does not imply endorsement of the linked site or service), and any mobile or other application provider, social media platform, operating system provider, wireless service provider, or device manufacturer, in each case used in connection with your use of the Website.

Contact Information

If you have any questions about this Privacy Policy, please contact us at:

South Arkansas Telephone Company

Attn: Legal Department

403 W. Main Street
Hampton, AR 71744

Or, contact us by email at: privacy@sat-co.net

To correct, update, delete, or request access to the Personal Information that you have provided to us, please see **“Managing Your Personal Information”** above.

Revisions and Updates

We may change this Privacy Policy from time to time, including as required to keep current with new legislation. The “Last Updated” section at the bottom of this page states when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy and your use of the Website following such update constitutes your acceptance of the revised Privacy Policy. We encourage you to periodically review this Privacy Notice to stay informed about how we collect, use, and share personal information.

Last updated: August 16, 2021