

HOTWIRE COMMUNICATIONS PRIVACY POLICY

Last Updated: May 2024

This Privacy Policy describes the types of Personal Information that Hotwire Communications, Ltd. and/or its parents, subsidiaries, divisions, or affiliates (“Hotwire,” “we,” “our,” or “us”) collects from and about you when you use our services, how we may use and disclose such information, and your choices and legal rights with respect to such information. We ask that you carefully review this Privacy Policy, as it applies to your use of our services as well as the services owned, operated, and/or provided by Hotwire that display or link to this Privacy Policy (collectively, our “Services”).

By using our Services, you agree to the collection, use, and disclosure of your information as described in this Privacy Policy. If you do not agree, please do not use our Services.

For purposes of this Privacy Policy, “Personal Information” refers to information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you, and includes “personal data” or similar terms as defined in applicable law.

1. NOTICE AT COLLECTION OF PERSONAL INFORMATION

We collect the categories of Personal Information identified below. As indicated in the chart, some of these categories we “sell” or “share” (as such terms are defined in California law) for marketing and advertising purposes to business partners and third parties, such as data analytics providers, advertising technology vendors, and social media platforms as described in this Privacy Policy. We do not knowingly sell or share Personal Information about persons under the age of 18. You may also choose to enable online, where available, a universal tool that automatically communicates your opt-out preferences, such as the Global Privacy Control (“GPC”). We will process the GPC signal as a request to opt out.

A. Category of Personal Information Collected	Do we sell or share the category of Personal Information?
Identifiers/biographical information , including name, postal and email address, phone number, online identifiers, Internet Protocol (“IP”) address, and other similar identifiers.	Yes
Personal information categories listed in the <u>California Customer Records statute</u> , such as your bank account number or credit or debit card number.	No

Commercial information , including items purchased, obtained, or considered and other purchasing or consuming histories or tendencies.	Yes
Internet or other electronic network activity information	Yes
Geolocation data	No
Audio information (e.g., recorded calls with our customer service center)	No
Inferences , meaning inferences drawn from the above-listed categories of Personal Information to create a consumer profile reflecting consumer preferences or characteristics.	Yes
<p>Sensitive Personal Information, including social security, driver’s license, state identification card, or passport number, account log-in, financial account, debit card, or credit card, password, or credentials allowing access to an account</p> <p><i>We do not use or disclose such information for the purpose of inferring characteristics about you or for any purpose other than the limited permissible purposes set forth in the regulations implementing California law. Such purposes include providing our Services and verifying, maintaining the quality of, and improving our Services.</i></p>	No

B. The Business and Commercial Purposes for Which We Collect and Use Your Personal Information:

- To install, operate, and maintain the Services
- To process your payments and fulfill your orders
- To create, maintain, customize, and secure your account with us
- To communicate with you, including to respond to your inquiries/requests and request feedback from you, and to send you important updates and messages about changes to our Services, this Privacy Policy, and/or other applicable terms and conditions
- To review the usage of our Services
- To conduct analysis and develop and/or improve our products and Services
- To configure Service-related devices

- To determine whether applicable policies and terms of service are being violated
- To facilitate network management
- To monitor, protect, and maintain the security and integrity of our Services and our business, such as protecting against and preventing fraud, unauthorized transactions, claims and other liabilities
- To comply with applicable laws and regulations and respond to lawful requests and communications from law enforcement and other government officials
- To carry out sales and business transactions in which information held by us is among the assets transferred or is otherwise relevant to the evaluation, negotiation, or completion of the transaction
- To protect our rights, privacy, safety, property and/or those of others
- To fulfill any other purpose for which you provide your Personal Information or as explained to you at the point of information collection
- To provide you with customized content or targeted offers
- To send you information, newsletters, and marketing/promotional material from us and, or on behalf of, our marketing partners and affiliates

C. Retention

We will retain your Personal Information for as long as reasonably necessary to provide you with our Services that you request, for marketing purposes unless you opt out as described in our Privacy Policy, or otherwise where permitted or required in accordance with applicable law. We will retain and use your Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. What this means in practice will vary between different types of information, and when we consider our approach we take into account ongoing business or legal needs for the information, for example in relation to tax, health and safety, and potential or actual disputes or investigations.

2. PERSONAL INFORMATION WE COLLECT

There are several ways we may obtain Personal Information about you, including through (A) information you provide to us; (B) information we automatically collect; (C) information we receive from third parties; and (D) combining information from different sources. This includes data that identifies you personally whether directly or indirectly.

A. Information You Provide

We collect Personal Information as listed in the above Notice at Collection from you as follows:

- **When You Use our Services.** When you sign up for an account, Hotwire collects the Personal Information you provide, including: your name, service address, billing address, e-mail address, telephone number, Social Security number, bank account and/or credit card number, logins and passwords to Services, security questions and codes, and other account information. We may also collect and keep other information about your account with us, such as billing and payment history, customer service interactions, and equipment. Hotwire also collects complaint information and maintains records of research efforts concerning subscriber satisfaction, obtained from subscriber interviews and questionnaires.
- **When You Make a Purchase.** If you purchase a product, subscription, or service from us, we or our third-party payment processors collect a payment card number and related financial information (such as CVV, expiration date, and billing address), or other payment method.

B. Information We Automatically Collect

When you visit and interact with our Services, we or our third-party advertising and analytics partners and service providers may use a variety of technologies, such as cookies, tags, SDKs or scripts, to collect certain information regarding your activity.

The specific types of information that we and our partners and service providers may automatically collect when you visit and interact with our Services include:

- **Device and Browser Information.** This includes your device's IP address browser type, and operating system.
- **Location Information.** When you access our Services from a mobile device, your device's approximate location (derived from your device's IP address or other signals) may be collected.
- **Usage Information.** When you interact with our Services, certain information may be collected, including the date and time of your visit, the pages you view immediately before and after you access our Services, the areas or pages of our Services that you visit, the amount of time you spend viewing or using our Services, recordings of chat sessions (including with the involvement of bots), and other Service usage information. We (or our third-party vendors) may use tools and software to monitor and record information (including screenshots and videos) about your interactions with our Services, including keystrokes, mouse movements, form field entries, and overall engagement with our Services.
- **Marketing Information.** If you receive an email from us, information may be collected about your interactions with the message (e.g., whether you opened, forwarded, or clicked through to our site).

- **Third-party analytics technologies.** We may use third-party analytics and tracking tools to better understand who is using our Services, how people are using them, and how to improve their effectiveness as well as the effectiveness of any related content.

Cookies and Other Similar Technologies: “Cookies” are text files that are placed on your browser by the websites that you visit. Cookies are used for various purposes, including to distinguish you from other users, make your site navigation more efficient, help remember your preferences, enhance your browsing experience, and improve the use and functionality of our sites and related content. They can also enable the delivery of relevant and personalized advertisements to you across the Internet.

Please note that cookies (and other similar technologies) provided by third parties may be placed on our sites and the providers of these technologies may combine information collected from your interaction(s) with our Services with information they collect from other sources and use the combined information for analytics and/or advertising purposes.

To learn more about your choices regarding the automatic collection and use of your information as you use our Services, please see the Your Privacy Choices and Rights section below.

C. Information We Receive from Third Parties

We may receive Personal Information from other sources. Our third-party sources may include:

- **Our Business Partners**, including companies that co-sponsor our promotions.
- **Our Marketing/advertising and analytics partners**, including online advertising networks and analytics providers.
- **Social Media Platforms** (note that the information we receive from such platforms is dependent upon their policies and your settings on the platforms).
- **Other Companies** that provide Personal Information to supplement what we already know about you, including data aggregators.

D. Combination of Information

Hotwire may combine Personal Information, collected as a part of regular business records, with Personal Information obtained from third parties for the purpose of creating an enhanced database to use in marketing efforts and other activities.

3. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose each category of your Personal Information that we collect (as listed in the Notice at Collection) to the following categories of recipients for business purposes:

- **Our Service Providers.** We disclose your Personal Information to our service providers that provide business, professional, marketing, analytics, or technical support services to us, help us operate our business and the Services, or administer activities on our behalf. We require our service providers to only use your Personal Information in connection with providing services to Hotwire.
- **Our Research Partners.** We disclose your Personal Information to our research partners, including those that administer surveys or conduct research projects in partnership with us or on our behalf.

We may disclose certain categories of your Personal Information that we collect (as listed in the above Notice at Collection) to the following categories of recipients for commercial purposes:

- **Our Business Partners.** We disclose your Personal Information to other companies with whom we partner to provide services or other offerings to you and carry out other related activities. For example, we may disclose your Personal Information to a third party that co-sponsors a promotion. **Our Analytics Partners.** We disclose your Personal Information to our partners that assist us in performing analytics and help us measure the effectiveness of our Services' content and our marketing and advertising efforts.
- **Our Marketing and Advertising Partners.** We disclose your Personal Information to third parties for marketing and advertising purposes, including social media platforms, third-party advertising networks, and other parties that assist us in serving and optimizing our advertisements.

In certain circumstances, we may disclose each category of your Personal Information (as listed in the above Notice at Collection) to:

- **Competent Governmental, Regulatory, and Public Authorities.** We may disclose your Personal Information to government and law enforcement authorities, in each case to comply with legal or regulatory obligations or requests.
- **Relevant Third Parties as Part of a Corporate Transaction.** In the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with a bankruptcy or similar proceeding), we may disclose or transfer your Personal Information to certain third parties, such as the acquiring entity and its advisers.
- **Other Third Parties.** We will disclose your Personal Information to other third parties at your direction or with your consent. Additionally, we will disclose your Personal Information as we believe necessary or appropriate to: (a) comply with applicable law; (b) enforce our terms and conditions; (c) protect our operations; (d) protect our rights, privacy, safety, or property, and/or those of you or others; and (e) allow us to pursue available remedies or limit damages that we may sustain.

In addition, Hotwire sometimes discloses Personal Information about our customers to our affiliates or to others (such as employees, contractors, and/or agents for internal business purposes) as well as outside auditors, professional advisors and franchise authorities with or without your written consent if necessary to render the Service or to conduct a legitimate business activity related to the Service.

We may disclose your Personal Information for other reasons that we will describe at the time of information collection or prior to disclosing your information.

Please note that we may de-identify or aggregate Personal Information so that it will no longer be considered Personal Information and disclose such information to other parties for purposes consistent with those described in this Privacy Policy.

4. YOUR PRIVACY CHOICES AND RIGHTS

You have the ability to make certain choices about how we use your Personal Information, as follows:

A. Privacy Rights and Requests

Depending on your U.S. state of residence, you may have certain rights in relation to your Personal Information, including:

- **Right to Know:** You may have the right to know what Personal Information we have collected about you, including the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information (including the names of such third parties), the categories of Personal Information disclosed to third parties, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected about you. Please note that we may not be required to respond to your requests “to know” or access specific pieces of Personal Information more than twice in any 12-month period.
- **Right to Data Portability:** You may have the right to access your information in a portable format.
- **Right to Delete:** You may have the right to request that we delete Personal Information that we have collected from you, subject to certain exceptions.
- **Right to Correct:** You may have the right to correct inaccurate Personal Information that we may maintain about you, subject to appropriate verification.
- **Right to Opt Out of Certain Types of Personal Information Uses and Disclosures:** We use and disclose to third parties Personal Information for analytics and advertising purposes. Accordingly, you may have the right to opt out of the “sale” or “sharing” of your Personal

Information, or the use and disclosure of your Personal Information for “targeted advertising” (as these terms are defined in applicable law).

Please note that, where permitted under applicable law, we may decline a request if we are unable to verify your identity (or an agent’s authority to make the request) and confirm the Personal Information we maintain relates to you.

If you are interested in exercising one or more of the rights outlined above you can contact us at dataprotection@hotwiremail.com or 800-355-5668. Please put the statement “Your Privacy Rights” in the subject field of your email. We may take steps to verify your identity before responding to your request by asking you a series of questions about your previous interactions with us. Submitting a privacy rights request does not require you to create an account with us.

We will not discriminate against you if you decide to exercise your privacy rights.

B. Agent Requests

Only you, or someone legally authorized to act on your behalf, may submit a request related to your Personal Information. You may also submit a request on behalf of your minor child.

Depending on your U.S. state of residence, you may authorize someone to make a privacy rights request on your behalf (an authorized agent). Authorized agents will need to demonstrate that you’ve authorized them to act on your behalf. Hotwire retains the right to request confirmation directly from you confirming that the agent is authorized to make such a request, or to request additional information to confirm the agent’s identity.

C. Opt-Out Requests

You may request to opt out of the sale or share of your Personal Information, or of targeted advertising, you can email us at dataprotection@hotwiremail.com.

Submitting an opt-out request does not require you to create an account with us.

Alternatively, you can use certain preference signals to exercise your sale and sharing opt-out right automatically with all businesses that you interact with online, including Hotwire. If you enable a browser-based opt-out preference signal, such as Global Privacy Control (GPC), upon receipt or detection, we will treat the signal as a valid request to opt out of the sale or sharing of personal information linked to that browser and any consumer profile we have associated with that browser. Please note that if you use different browsers or browser profiles, you will have to enable the signal on each browser or profile.

D. Right to Appeal

Depending on your U.S. state of residence, you may have the right to appeal a decision we have made in connection with your privacy rights request. To appeal a decision, please contact us at dataprotection@hotwiremail.com or 800-355-5668.

5. CABLE ACT

The Federal Cable Communications Policy Act of 1984 and the Cable Television Consumer Act of 1992 contain certain provisions regarding the collection and disclosure of personally identifiable information by cable television operators. This section describes these restrictions and summarizes certain rights available to you under the Cable Act.

Under the Cable Act, we may collect and disclose personal information about you with your prior written or electronic consent. We also may disclose from time to time, without such consent, personal information collected through our cable system if necessary to render, or conduct a legitimate business activity related to, a cable service or other service provided to you.

The Cable Act also permits us to disclose lists of our subscribers to third parties from time to time for purposes other than those referred to above. Those lists may contain your name and address, so long as we have given you the opportunity to prohibit or limit such disclosure and we do not also reveal, directly or indirectly, the extent of any viewing or other use of the services we provide to you or the nature of any transaction you make using those services. This permits us, among other things, to disclose your name and address to charities, advertisers, direct mail marketers and telemarketers for use in telephone or mail solicitations, market research or other purposes. Although this policy gives us the option, Hotwire does not currently share our customers' personal information with any third-parties to use for their own purposes including marketing their own services. Nevertheless, you have the right to opt-out of being included on such a list. To elect not to be included on any such list, send your request to dataprotection@hotwiremail.com.

The Cable Act may prohibit disclosure of personal information about you as a cable subscriber to a governmental entity unless the disclosure is required by a court order and the following two special requirements are met: you have been given the opportunity to appear and contest in court any claims made in support of the court order sought by the governmental authority; and in the court proceeding, the governmental authority has offered clear and convincing evidence that you are reasonably suspected of engaging in criminal activity and that the information sought would be material evidence in a case against you.

Under the Cable Act, cable subscribers have the right to inspect our records that contain personally identifiable information about them and to have a reasonable opportunity to correct any errors in such information. If you wish to exercise this right, please contact us at dataprotection@hotwiremail.com, and we will contact you to arrange a mutually convenient time during our regular business hours.

The Cable Act provides you with a cause of action for damages, attorneys' fees and costs in Federal District Court if we violate the Cable Act's limitations on the collection, disclosure, and retention of personally identifiable information about you.

6. CUSTOMER PROPRIETARY NETWORK INFORMATION (“CPNI”)

Section 222 of the Communications Act gives you a right to confidentiality of your CPNI (information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service, and related billing information), and requires us to protect the privacy of that information. Hotwire may use, disclose, or permit access to your CPNI without notifying you, to provide, install, and repair the services you have ordered, for billing and collection, for emergency services, and for protection of our network and our subscribers against fraud, abuse, and unlawful use. Hotwire also may be compelled to disclose CPNI or other personal information in compliance with government taxing or regulatory authorities or pursuant to law enforcement directives or court order.

From time to time we may use your CPNI to offer you related products and services by using information about the telephone services you have already purchased from Hotwire. We may also share CPNI, without your prior consent, with Hotwire’s affiliates and agents for administrative and marketing purposes, but only for communications-related services. Hotwire, and its agents or affiliates, are permitted to use CPNI to market new communications services to which you do not currently subscribe, but only after providing you with written or electronic notice and the opportunity to “opt-out” of such use. Hotwire is required to provide you with this “opt-out” notice every two years, and will wait 30 days after providing such notice before assuming you have approved the use or disclosure of CPNI. Your decision to restrict our use of your CPNI will not affect the service you receive from Hotwire. If you wish to “opt-out” of Hotwire’s use of your CPNI for marketing purposes, please notify Hotwire, in writing, at 2100 West Cypress Creek Road, Fort Lauderdale, FL 33309, or e-mail to dataprotection@hotwiremail.com, or call us at 800-355-5668. You may contact us at any time in the future to restrict the use of your CPNI at no cost. If you elect not to restrict the use of your CPNI, Hotwire may use it for any of the purposes described above.

Except as otherwise indicated herein, and as required under applicable law, Hotwire will provide you with prior written, electronic, or oral notice and obtain your affirmative consent before sharing your CPNI with joint venture partners and independent contractors for marketing purposes.

You may receive marketing information from Hotwire even if you restrict Hotwire’s use of your CPNI. These materials are developed without use of CPNI.

In the event that there is an unauthorized disclosure of your CPNI, Hotwire is required to notify law enforcement of the breach of your CPNI. Under federal law, Hotwire is required to wait at least seven (7) business days after notifying law enforcement officials before it can notify you of such a breach. Relevant investigating agencies may direct Hotwire to wait even longer prior to providing you with notice of the breach of CPNI.

Unless you have requested an unlisted or unpublished number, Hotwire may release your name, address, and telephone number for listing in directories or for directory assistance services, including to unaffiliated third parties.

7. EXTERNAL LINKS

Our Services may have links to third-party services, which may have privacy policies that differ from our own. We are not responsible for the practices of such sites.

8. CHILDREN'S PRIVACY

Our Services are intended for a general audience. We do not direct our Services to children under eighteen (18), nor do we knowingly solicit or collect any Personal Information from children under the age of eighteen (18). If you are a parent or legal guardian and think that your child has given us data, or you have you can contact us in writing or by email as provided below under the section titled "How to Contact Us." Please mark your inquiries "Children's Privacy Information Request." If we learn that a minor has provided Personal Information through our Services, we will use reasonable efforts to remove such information from our files.

9. DATA SECURITY

Hotwire takes reasonable security precautions to protect Personal Information collected on the Services through unauthorized access, use, and disclosure. However, we cannot guarantee that security precautions will prevent every unauthorized attempt to access, use, or disclose customers' Personal Information.

10. NOTICE AND CHANGES TO PRIVACY POLICY

We reserve the right to modify this policy at any time. We will notify customers of any material changes via written mail, electronic mail, or other means permitted by law. If the changes are found to be unacceptable, a customer has the right to cancel the Service. Continuing to use the Service following notice of modification will be considered by Hotwire to be your acceptance of the change.

11. HOW TO CONTACT US

If you have any questions or concerns about this Privacy Policy or the practices described herein, you may contact us at dataprotection@hotwiremail.com or by mail to 2100 West Cypress Creek Road, Fort Lauderdale, FL 33309 or by phone at 800-355-5668.