



Privacy Policy And Your California Privacy Rights

Updated and Effective July 01, 2022

Our commitment to privacy

Our Privacy Policy (“Policy”) was developed as an extension of our commitment to combine the highest quality products and services with the highest level of integrity in dealing with our clients and partners. This Policy is designed to assist you in understanding how we collect, use, disclose and safeguard the Personal Information you provide to us and to assist you in making informed decisions when using our Site and Services. This Policy will be continuously assessed against new technologies, new laws or government policies, our business practices and our customers' needs.

This Policy applies to visitors and users of MWI’s website, www.metrowireless.com (“Site”), and applicants, current and former residential and commercial/business customers of our high speed internet access services, VoIP and other telephony services (individually, a “Service” and collectively, “Services”) residing in the United States. All such visitors, users, applicants, current and former residential and commercial/business customers are collectively, “Customers” “you,” “your.”

Any capitalized terms used herein shall have the same meaning as defined in the MWI Service Agreements.

By using MWI’s Site and Services, Customers consent to the data practices described in this Privacy Policy regarding the collection, use, disclosure, and disposal of your Personal Information. MWI’s Site and Services are designed and targeted to United States audiences and are governed by and operated in accordance with the laws of the U.S. If Customer is not a U.S. citizen or does not reside in the U.S., Customer voluntarily consents to the collection, transfer, use, disclosure and retention of Customer Personal Information in the U.S. Customer also agrees to waive any claims that may arise under Customer’s own national laws.

Your California Privacy Rights Under the Shine The Light Act

Generally, California residents that have a business relationship with MWI are entitled by the “Shine the Light Act” (“Act”) to ask for information identifying the categories of Personal Information that MWI shared with our Affiliates and/or other third parties for their marketing purposes the preceding year, and provide contact information for such Affiliates and/or third parties **unless** MWI meets certain exceptions in the Act. This Privacy Policy and Site meet those exceptions. Importantly, MWI does not target or knowingly provide Services to California residents, nor does MWI share Customer Personal Information with Affiliates or third parties for their own marketing purposes. If you are a person residing in California and you believe that you

have an established business relationship with MWI and have questions MWI regarding our policy regarding the Act, you must send your questions via email or postal mail following the instructions below.

MWI will not accept requests via the telephone or facsimile or respond to requests that are not labeled or sent properly, or do not have complete information.

- For all requests, include Customer's full name, street address, city, state and zip code.
- If sent via email request, Customer must state "**Re: Your California Privacy Rights**" in the subject line and send Customer email to DMCA@metrowireless.com
- If sent via postal request, Customer must send a letter or post card to:
23840 Dequindre Rd, Warren, MI 48091
Attention: Your California Privacy Rights

1. General Information.

When Customer uses the Service, the Personal Information Customer voluntarily sends and receives is transmitted over a wireless network, and may be subject to interception by unauthorized third parties. While it is 's objective to take reasonable measures to reduce the risk that unauthorized third parties will intercept the information Customer sends and receives through the Service, MWI cannot and does not make any guarantee that transmissions over the Internet are 100% secure or error-free.

MWI does not knowingly collect, solicit or use Personal Information from anyone under the age of 13. If Customer is under age 13, please do not attempt to register for the Services or send any Personal Information about yourself to MWI. If MWI learns that MWI has collected Personal Information from a child under age 13, MWI will delete that information as quickly as possible to the extent technically feasible. If Customer believes that its child under age 13 may have provided MWI Personal Information, please contact MWI at support@metrowireless.com.

2. What type of Personal Information do we collect and how do we use it?

Generally, Personal Information is information Customer provides to MWI voluntarily or passively through Customer's use of the Services and/or Site, that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. For the purposes of this Privacy Policy, we also define Personal Information to include such information related to our commercial/business Customers and their end users.

The following are the different ways and reasons we collect Customer Personal Information:

Registration process, billing, and administration: Customer name, email address, phone number (wireless and wireline), billing address and billing information (such as credit card account number or other financial account information), service address, and the nature of any of Customer devices or other property making use of the Service. Personal Information also includes Customer proprietary network information ("CPNI")

which is created by virtue of your relationship with MWI when you subscribe to our VoIP services or other telephony services. CPNI includes any information that relates to the telephony services purchased (including specific calls you make and receive), quantity, technical configuration, type, destination, location, and amount of use of our VoIP service, such as call detail, logs, and specifics regarding your VoIP account (such as billing information). Please note that by law, CPNI does not include a customer's name, postal address, or telephone number. We will also use this same Personal Information for the installation, troubleshooting, maintenance of the Services, and servicing of equipment.

Social Network Platforms:

Some forms of information as described below will be classified as Personal Information if required by applicable law or when such information is directly associated with or reasonably linked to a specific person, computer or device, or is combined with other forms of Personal Information.

Website Information, Use of Cookies and other Similar Tracking Technology:

When you visit MWI's Site, MWI will collect information on MWI server logs from Customer's browser or device, which may include Customer IP address, unique device identifier, "cookie" information, the type of browser and/or device you're using to access the Service, and the page or feature Customer requested. Cookies" and "web beacons" are text file identifiers MWI transfers to Customer's browser or device that allow MWI to recognize Customer's browser or device and tell MWI how and when pages and features on the MWI website are visited, by how many people, and other activity on the website. Customer can change the preferences on Customer's browser or device to prevent or limit Customer's device's acceptance of cookies, web beacons or other similar technology, but this may prevent Customer from taking advantage of some of the features on the MWI website, or accessing certain functions and conveniences. If Customer clicks on a link to a third party website or service, such third party may also transmit cookies to Customer. Again, this Privacy Policy does not cover the use of cookies or other such tracking technology by any third parties, and MWI is not responsible for their privacy policies and practices. MWI also uses Personal Information and Non-Personal Information to enhance the MWI website and MWI Service offerings. For example, such information can tell MWI how often visitors use a particular feature of the MWI website and which products and services are most interesting to current and potential customers, and MWI can use that knowledge to make the website useful and interesting to as many users as possible and to enhance and refine MWI's Service offerings. MWI will continue to conduct analytics on MWI website performance; Customer may not opt-out of this use of cookies or other Personal Information or Non-Personal Information. Technology is improving every day and to improve MWI's Services' operation and function MWI may introduce new technologies and monitoring techniques without advance notice or consent from Customer. MWI may also use third party providers to conduct such internal analyses.

Network Information: MWI also collects Network Information, information about Customer access to, and use of, the MWI Network, which may or may not be directly associated with or reasonably linked to a specific person, computer or device. For example, MWI may collect information about the performance of the Provider Equipment installed on Customer property or at Customer premises, when Customer is using the Service, the various devices Customer is using to access the Service, the amount of data Customer is transmitting and receiving, the content of the data Customer are transmitting and receiving, the websites Customer is visiting, and any other information that is transmitted over the MWI Network. MWI may also aggregate Network Information from multiple customers and MWI will share such aggregated Non-Personal information about the overall performance of the MWI Service and the MWI network with our Affiliates and other third parties. Aggregated information does not identify a specific individual, computer or device. We use Network Information to monitor and enhance the performance of the MWI network. MWI will not monitor the content of the websites viewed or email communications as part of MWI's standard network management.

Generally, MWI will only monitor and preserve the following Network Information:

- When Customer is using the Service;
- How Customer is using the Service, such as monitoring traffic patterns regarding websites visited, amount of data being sent or received, or other activity;
- The amount of data Customer is transmitting and receiving through the Service; and
- General information regarding the performance of the Provider Equipment installed on Customer's property or at Customer's premises, and its interaction with the rest of MWI's network.

However, MWI reserves the right to, and may, monitor, access, review and preserve any Network Information and/or content in the following situations:

- In response to an inquiry from Customer or another Authorized User on Customer's account regarding Customer or their use of the Service or problems Customer or they are experiencing using the Service;
- If MWI has reason to believe Customer is using the Service in violation of Customer's Service Agreement or any applicable statutes, rules, ordinances or regulations;
- If MWI has reason to believe Customer use of the Service is negatively affecting other Customers; or
- When MWI is required by law or legal process to do so, or when MWI a good faith belief that MWI is required by law or legal process to do so.

E-mail information:

If you choose to correspond further with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same protections for these electronic communications that we employ in the maintenance of information received by mail and telephone.

What are cookies?

Cookies are a feature of Web browser software that allows Web servers to recognize the computer used to access a Web site. Cookies are small pieces of data that are stored by a user's Web browser on the user's hard drive. Cookies can remember what information a user accesses on one Web page to simplify subsequent interactions with that Web site by the same user or to use the information to streamline the user's transactions on related Web pages. This makes it easier for a user to move from Web page to Web page and to complete commercial transactions over the Internet. Cookies should make your online experience easier and more personalized.

How do we use information we collect from cookies?

We use Web site browser software tools such as cookies and Web server logs to gather information about our Web site users' browsing activities, in order to constantly improve our Web site and better serve our customers. This information assists us to design and arrange our Web pages in the most user-friendly manner and to continually improve our Web site to better meet the needs of our customers and prospective customers.

Cookies help us collect important business and technical statistics. The information in the cookies lets us trace the paths followed by users to our Web site as they move from one page to another. Web server logs allow us to count how many people visit our Web site and evaluate our Web site's visitor capacity. We do not use these technologies to capture your individual email address or any personally identifying information about you although they do permit us to send focused online banner advertisements or other such responses to you.

3. Is Personal Information Used For Marketing And Advertising Purposes?

MWI will use Customer Personal Information to send marketing and advertising messages related to our own Services and Site using Customer's email address, postal address, or telephone number (for voice, texts, automated and pre-recorded calls).

MWI may deliver a marketing or advertising message based on Customer visits to MWI website, which will be general advertising or "Contextual Advertising," which is advertising based on the subject matter or the content of the specific website page or subject matter. MWI may also send Customer "First Party Advertising," which is advertising or marketing that is customized or personalized based on a history of Customer's use of our Services (possibly combined with information from our Facebook fan page or other social network platforms). First Party

Advertising is based solely on a combination of information MWI collects from Customer – not from Customer’s visits to other websites across the Internet. [

Occasionally, MWI may also use the information we collect to notify you about important changes to our Web site, new services and special offers we think you will find valuable. As our valued client, you may notify us of your desire not to receive these offers by e-mailing: support@metrowireless.com.

MWI is limited to how we can use your CPNI for marketing purposes. We may use CPNI for our own First Party Advertising for products/services a Customer has already purchased. We will need your consent before using CPNI for marketing or advertising unrelated services. Customer may opt-out of First Party Advertising but not Contextual Advertising. No Personal Information is used to deliver Contextual Advertising; it automatically will appear based on the content or webpage Customer is viewing. And Customer may continue to receive general advertising if Customer opts-out of First Party Advertising, it will not be customized or personalized for Customer.

MWI does not provide third party “Network Advertising,” which is advertising based on Customer’s overall Internet usage across different third party websites or online services. Multiple third party websites and online services are involved in this tailored or personalized advertising process, in essence a “network” of advertising providers. Because MWI does not provide network ads, MWI does not recognize the “Do Not Track” settings on various Internet browsers. MWI does not engage or allow third parties to track you across the Internet and across time for advertising purposes.

4. How do we secure information transmissions?

When you send confidential personal credit card information to us on our Site, a secure server software which we have licensed encrypts all information you input before it is sent to us. The information is scrambled enroute and decoded once it reaches our Web site.

Other email that you may send to us may not be secure unless we advise you that security measures will be in place prior to your transmitting the information. For that reason, we ask that you do not send confidential information such as Social Security, Tax Identification Numbers, or any financial account numbers to us through an unsecured email.

5. How do we protect your Personal Information?

MWI endeavors to protect the privacy of Customer’s account and other Personal Information using reasonable administrative, technical and physical security measures. However, MWI cannot and do not guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of Personal Information at any time. Customer’s account is protected by a User ID and password for Customer’s privacy and security. It is Customer’s responsibility to prevent unauthorized access to Customer’s account and Personal Information by selecting and protecting Customer password and/or other sign-on

mechanism appropriately and limiting access to Customer computer, tablet or device and browser by signing off after Customer has finished accessing Customer's account. Customer is required to notify us immediately if Customer's password or account has been disclosed to a person whose name does not appear on Customer's account, even if you have allowed such disclosure. Customer understands, acknowledges and agrees that Customer is solely responsible for any use of MWI Services via Customer's username and password.

Additionally, if Customer contacts MWI via Site, telephone or in person, MWI will ask Customer for verification of Customer's identification and account.

MWI will not send an email or text, nor should Customer respond to any email or text communications asking for any sensitive or confidential Personal Information, such as social security number, bank account or credit card account number, or a driver's license number. If Customer receives an email or text requesting any such information from MWI or someone that claims they are with MWI or Our Affiliates please contact our Privacy Administrator immediately: support@metrowireless.com. For MWI's IT Support Services as detailed in our Services Agreement, the code that allows MWI to access Customer's computer desktop to help you resolve technical problems is limited only for that specific session. MWI is not able to access Customer's Computer without Customer's knowledge, affirmative consent and involvement.

We utilize encryption/security software to safeguard the confidentiality of personal information we collect from unauthorized access or disclosure and accidental loss, alteration or destruction.

1. Evaluation of information protection practices

Periodically, our operations and business practices are reviewed for compliance with corporate policies and procedures governing the security, confidentiality and quality of our information.

2. Employee access, training and expectations

Our corporate values, ethical standards, policies and practices are committed to the protection of customer information. In general, our business practices limit employee access to confidential information, and limit the use and disclosure of such information to authorized persons, processes and transactions.

6. *How can Customers access, correct or delete your information?*

Generally, Customer may access the following Personal Information in Customer's account:

- Full name

- Username and password
- Email address
- Telephone number; and
- Billing and Service address
- Account and billing information

By contacting MWI at support@metrowireless.com, or through any online access portal and/or via telephone, MWI may enable Customers to view, access and modify Customer account settings, and in some cases, edit or delete the Personal Information listed above. MWI will retain historic email, billing and/or Service addresses for security and verification purposes and Customers may not delete such information even after the subscription expires or terminates.

Existing Customers may not delete any Personal Information because such information is necessary to provide and bill for the Services; Customers may only update or modify the following Personal Information:

- Username and password
- Email address
- Telephone number; and
- Billing and Service address
- Account and billing information

7. Do we disclose Personal Information to third parties?

Customer's Personal Information will only be disclosed to third parties (including MWI's Affiliates) as listed in this Privacy Policy, and if MWI has received your consent at the time MWI collects your Personal Information or prior to the disclosure of any Personal Information. MWI reserves the right to fully use, disclose and process any non-Personal Information collected from Customer in any manner as well as any information Customer makes public via MWI Services or Site.

- **To Our Affiliates and Resellers.** MWI relies on various Affiliates and Resellers in order to provide the Services to Customers. Affiliates are companies that are related to MWI by common ownership or control. Resellers are independent third party businesses that will offer MWI's Services to either their own customers, or operate as agents to MWI and sell our Services. MWI may share Personal Information and non-Personal Information with any of our Affiliates and Resellers for business, operational, promotional and/or marketing and advertising purposes related to our Services.

- **To Our Operational Service Providers:** MWI and its Affiliates contract with other companies and people to perform tasks or services on MWI's behalf and need to share Customer Personal Information to provide products or services to Customers. For example, MWI may use a payment processing company to receive and process Customer's ACH or credit card transactions for MWI, or MWI may contract with third parties to assist MWI in optimizing MWI's network. Unless MWI tells Customer differently, MWI does not grant its Operational Service Providers any right to use the Personal Information MWI shares with them beyond what is necessary to assist MWI.
- **For Business Transfers/Restructuring:** MWI may choose to buy or sell assets, or MWI may sell assets or be sold. In these types of transactions, customer Personal Information is typically one of the business assets that would be disclosed and transferred. Also, if MWI (or MWI's assets) are acquired, or MWI goes out of business, enter bankruptcy, or go through some other change of control, including restructuring, re-organization or financing arrangements, Personal Information could be one of the assets disclosed, transferred to or acquired by a third party.
- **For Protection of MWI, and Our Affiliates, Employees, Operational Service Providers, Users and Customers and Public Safety:** MWI reserves the right to access, read, preserve, and disclose any Personal Information MWI has access to if MWI believes doing so will implement and/or enforce the Service Agreement, Website Terms of Use Agreement, Privacy Policy or any legal document; protect our Network(s), website(s), and company assets; protect the interests, rights, property, and/or safety of MWI or Our Affiliates, employees and officers/directors, Operational Service Providers, Resellers, Customers, agents, representatives, third party licensors or suppliers, or the general public.
- **When Required by Law or in Response to Legal Process:** MWI reserves the right to access, read, preserve, and disclose any Personal Information when MWI is required by law or legal process to do so, or if MWI has a good faith belief that MWI is required by law or legal process to do so.

We may provide aggregate information about our customers, sales, Web site traffic patterns and related Web site information to our affiliates or reputable third parties, but this information will not include Personal Information, except as otherwise provided in this Privacy Policy.

8. *What about other Web Sites linked to our Web Site?*

We are not responsible for the practices employed by Web sites or online services linked to or from our Site nor the information or content contained therein. Often links to other Web sites or services are provided solely as pointers to information on topics that may be useful to the users of our Site.

The presence of a link does not constitute or imply MWI's endorsement, recommendation, or sponsorship of the content, goods, services, business or privacy practices on such websites or online services.

Please remember that when you use a link to go from our Web site to another Web site, our Privacy Policy is no longer in effect. Your browsing and interaction on any other Web site and online services, including Web sites which have a link on our Web site, is subject to that Web site's own terms and conditions and privacy policies. Please read over those rules and policies before proceeding.

9. What disclosure choices do Customers have?

Customer can always choose not to disclose Personal Information to MWI; however, certain Personal Information is necessary for MWI to provide the Service to Customer. Customer may opt out of sharing Personal Information with Our Affiliates only for marketing or advertising purposes, but not for business or operational purposes. Customer may opt out of email marketing and advertising from MWI or its Affiliates using the "Unsubscribe" mechanism in each email. Before MWI sends Customer a text for any reason, or sends Customer a pre-recorded call that contains advertising or marketing information, MWI will secure Customer's prior written express consent, which can be given via a voice recording, email, text message, postal mail, or telephone key press. Non-telemarketing pre-recorded calls do not require Customer's prior express consent in writing, unless they are sent to a wireless device. Customer understands, acknowledges and agrees that such texts and pre-recorded telemarketing calls may be sent using an autodialer and are not conditioned on your purchase of the Service. Customer may opt out of receiving text messages any time by replying "STOP" or "UNSUBSCRIBE" to the text message. Customer may opt out of receiving pre-recorded calls by the opt-out instructions in the call. Customer can also request to be added to MWI's company-specific Do Not Call list to opt-out of advertising and marketing calls of all types. However, Customer will continue to receive calls related to debt-collection and Customer's current Service. Customer may also opt-out of First Party Advertising, but not Contextual Advertising, as detailed in the "Use of Personal Information for Marketing or Advertising Purposes" section above. Customer may not opt out of MWI's use of cookies or other similar technology, or use of Customer's Personal Information and Non-Personal Information for MWI's internal analytics used to monitor activity on MWI's website, measure MWI's Service performance, or to operate and protect the MWI Network.

10. *Your consent and changes to our Privacy Policy.*

By using our Site and Services you consent to our collection and use of your Personal Information as described in this Policy.

MWI is constantly working to improve our Site and Services, so MWI will need to update this Privacy Policy from time to time as MWI's business practices change and service offerings increase, and/or there are changes in local, state or federal laws. Additionally, MWI will also make stylistic, organizational and/or grammatical changes to present MWI privacy practices in a user friendly easy to read manner. MWI will alert Customers to any such changes by placing a notice on MWI's Site and App with the effective date of the revised Privacy Policy, and/or by

sending Customers an email, or by some other means to the extent required by law. Please note that if Customers have not provided MWI with Customer's email address or Customer has not updated Customer contact information, those legal notices will still govern Customer use of the Service, and Customer is still responsible for reading and understanding all notices posted on MWI's website. Customer's continued use of the Service or website after notice of any changes have been provided will indicate Customer's acceptance of such changes, except where further steps are required by applicable law.