

## **M-22 Internet Project, LLC Privacy Policy**

Effective date: July 1, 2013

We at M-22 Internet Project, LLC (the “Project”) know you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. **By using our “Service” (as defined in your Service Agreement) or accessing our website in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.**

Remember that your use of the Service is at all times subject to your Service Agreement, which incorporates this Privacy Policy. Any terms we use in this Privacy Policy without defining them have the definitions given to them in your Service Agreement.

**When you use the Service, the data you send and receive is transmitted over a wireless network, and may be subject to interception by unauthorized third parties who seek to do you harm. While it is our objective to take reasonable measures to reduce the risk that unauthorized third parties will be able to intercept the information you send and receive through the Service, we cannot and do not make any guarantee that unauthorized third parties will not intercept data you send and receive using the Service.**

**We recommend that you encrypt all data you send or receive using the Service.**

We do not knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at [privacy@m22project.com](mailto:privacy@m22project.com).

### **What types of information does this Privacy Policy cover?**

We collect information about You and Your use of the Service. The information we collect includes personally identifiable information you provide to us (which we call “Personal Information”), information we may collect when you use the Service (which we call “Network Information”), and information we may collect when you interact with our website (which we call “Website Information”). Collectively, we refer to Personal Information, Network Information and Website Information as “Covered Information”.

This Privacy Policy covers Covered Information, but it does not cover the practices of companies we don’t own or control, or people that we don’t manage. We gather various types of Covered Information and we use Covered Information internally in connection with providing the Service to you, including to personalize, provide, and improve the Service and our ability to provide the Service to you, to allow you to set up a user account and profile, to contact you, to respond to and fulfill your requests regarding the Service, and to analyze how you use the Service. In certain cases, we may also share some Covered Information with third parties, but only as described below.

### **Will the Project ever change this Privacy Policy?**

We are constantly trying to improve the Service, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by placing a notice on [www.m22project.com](http://www.m22project.com), by sending you an email, or by some other means. Please note that if you’ve opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Service after any changes to the Privacy Policy have been posted, you are agreeing to all of the changes. Regardless of when it is collected, our use of information we collect will be subject to the Privacy Policy in effect at the time such information is used.

## **What Information does the Project collect and how does the Project use this Information?**

### **Personal Information**

Personal Information is the information you provide to us and which is directly associated with a specific person or entity. For example, through the registration process, when the equipment to provide the Service is installed, maintained or upgraded at your premises, when you contact us regarding the Service, and through your account settings, we may collect Personal Information such as your name, email address, phone number, billing address and billing information, service address, and the nature of any of your devices or other property making use of the Service. You may be required to provide certain Personal Information to us in order to register with us, to assist us in improving your Service or troubleshooting problems you are experiencing with the Service, or otherwise to improve the quality of the Service.

We may communicate with you if you've provided us the means to do so. For example, if you've given us your email address or phone number, we may email or call you about your use of the Service or product improvements or upgrades.

### **Network Information**

Network Information is information we may collect about Your access to, and use of, our network, which may or may not be directly associated with a specific person or entity. For example, we may collect information about the performance of the Provider Equipment installed on your property or at your premises, when you are using the Service, the devices you are using to access the Service, the amount of data you are transmitting and receiving, the content of the data you are transmitting and receiving, the websites you are visiting, and any other information that is transmitted over our network.

We use Network Information to monitor and enhance the performance of our network. Generally, we will only monitor and preserve the following Network Information:

- When you are using the Service;
- The amount of data you are transmitting and receiving through the Service; and
- General information regarding the performance of the Provider Equipment installed on your property or at your premises, and its interaction with the rest of our network.

However, we reserve the right to, and may, monitor, access, review and preserve any Network Information in the following situations:

- In response to an inquiry from you or another Authorized User on your account regarding your or their use of the Service or problems you or they are experiencing using the Service;
- If we have reason to believe you are using the Service in violation of your Customer Agreement or any applicable law or regulation;
- If we have reason to believe your use of the Service is negatively affecting other customers of ours; or
- When we are required by law or legal process to do so, or when we have a good faith belief that we are required by law or legal process to do so.

### **Website Information**

Website Information is information we may collect whenever You interact with our website. Website Information includes information on our server logs from your browser or device, which may include your IP address, device identification, "cookie" information, the type of browser and/or device you're using to access the Service, and the page or feature you requested. "Cookies" are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features on our website are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device's acceptance of cookies, but this may prevent you from taking advantage of some of the features on our website. If you click on a link to a third party website or service, such third party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of

cookies by any third parties, and we are not responsible for their privacy policies and practices.

We use Website Information to enhance our website and our service offerings. For example, Website Information can tell us how often visitors use a particular feature of our website and which products and services are most interesting to current and potential customers, and we can use that knowledge to make the website useful and interesting to as many users as possible and to enhance and refine our service offerings.

### **Will the Project share any of the Covered Information?**

The Project will neither rent nor sell Covered Information in personally identifiable form to anyone. However, we may share your Covered Information with entities we control, are controlled by, or are subject to common control with (such entities, our "Affiliates") and with other third parties as described in this section:

**Information the Project may share with its Affiliates.** The Project relies on various Affiliates in order to provide the Service to you. We may share any information available to the Project with any of our Affiliates, so that we and our Affiliates can provide the Service to you and continue to improve the offerings we make available to our customers.

**Agents:** We and our Affiliates contract with other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you; for example, we may use a payment processing company to receive and process your ACH or credit card transactions for us, or we may contract with third parties to assist us in optimizing our network. Unless we tell you differently, we do not grant our agents any right to use the Covered Information we share with them beyond what is necessary to assist us.

**Business Transfers:** We may choose to buy or sell assets, or we may be sold. In these types of transactions, customer information is typically one of the business assets that would be transferred. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Covered Information could be one of the assets transferred to or acquired by a third party.

**Protection of the Project and our Affiliates:** We reserve the right to access, read, preserve, and disclose any information we have access to if we believe doing so will protect the interests, rights and/or property of the Project or our Affiliates, or the safety of our respective agents and employees.

**When Required by Law or in Response to Legal Process:** We reserve the right to access, read, preserve, and disclose any information to which we have access if we are required by law or legal process to do so, or if we have a good faith belief that we are required by law or legal process to do so.

### **Is Covered Information secure?**

Your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Covered Information by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Covered Information we hold in our records, but unfortunately, we cannot and do not guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

### **What Covered Information can I access?**

Generally, you may access the following Personal Information:

- your username and password
- your email address
- your telephone number; and
- your billing address

By contacting us at [privacy@m22project.com](mailto:privacy@m22project.com), or through any online access portal we may create to enable you to view and modify your account settings, you may access, and, in some cases, edit or delete the Personal Information above.

The information you can view, update, and delete may change. If you have any questions about viewing or updating information we have on file about you, please contact us at [privacy@m22project.com](mailto:privacy@m22project.com).

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of Covered Information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to: [privacy@m22project.com](mailto:privacy@m22project.com).

### **What choices do I have?**

You can always opt not to disclose information to us; however, certain information we collect from you is necessary for us to provide the Service to you.

You may be able to add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. Some information may remain in our records after it is modified, amended or deleted by you or us. We may use any aggregated data derived from or incorporating your Covered Information after you update or delete it, but not in a manner that would identify you personally. We may also maintain Covered Information regarding you and your use of the Service after you are no longer our customer.

### **What if I have questions about this policy?**

If you have any questions or concerns regarding our privacy policies, please send contact us at [privacy@m22project.com](mailto:privacy@m22project.com), and we will try to respond to your questions or concerns.