

## Online Privacy Policy

Effective date: May 25, 2018

This Privacy Policy tells you how we collect, use and share information including Personal Information we collect on our AP Wireless websites that link to this Privacy Policy. (each, a “Site”) effective as of the date posted above. By using the Site and submitting information you agree that we may use and disclose your information according to the terms of this Policy.

“Personal Information”, is any information that enables us to identify you, directly or indirectly, such as your email address, name, shipping and billing address, telephone number, company name, credit card information, any form of identification number or one or more factors specific to your physical, physiological, mental, economic, cultural or social identity.

By accessing this Site and making use of our services you explicitly agree to the terms of this Privacy Policy and our Terms of Use.

For the purposes of the EU General Data Protection Regulation 2016/679 (the “GDPR”), the data controller is AP Wireless Infrastructure Partners, LLC, whose registered office is at 4250 Executive Square, Suite 900, La Jolla, CA 92037 United States.

### Information collected and how it is used.

We automatically collect information when you visit the Site including your device’s IP address, and statistics about how you use the Site. This may include the pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from the page. We do not treat this information as Personal Information, except where the information can identify you when associated with other Personal Information we hold or where we are required to do so under applicable law.

You may browse our Site anonymously or you may choose to provide information to us. We collect information that you submit when visiting the site including registration information (your name, email or postal address, telephone number and user name and password), contact information if you contact us with an inquiry (email address, telephone number), or payment information (name, billing and shipping address, card information, email and telephone number). We may also collect information from you about properties

you control in connection with entering into a business transaction with you. When you provide data to us we expect that it will be accurate and current.

We use your Personal Information according to the terms of the Privacy Policy in effect at the time of our use. We will process your Personal Information where (1) you have provided your consent which can be withdrawn at any time, (2) where the processing is necessary for the performance of a contract to which you are a party, (3) where we are required by law, (4) where processing is required to protect your vital interests or those of another person, or (5) where the processing is necessary for the purposes of our legitimate commercial interests, except where such interest are overridden by your rights and interests. We use the collected information for our legitimate commercial interests, such as to improve our Site, grow our business and to offer our own, our affiliates' or third-party products or services that we think you may find of interest. This may include the following:

- To respond to your requests
- To provide services to you including customer services issues
- To send communications to you about our current services, new services that we are developing, and opportunities that may be available to you
- To alert you to new features or enhancements to our services
- To communicate with you about your transactions or potential transactions with us
- If you are an existing customer, to administer your account including processing of payments
- To expand our business
- To ensure that our Site and our services function in an effective manner for you
- To keep our Site safe and secure
- To measure or understand the effectiveness of advertising and outreach.

We use your contact information to respond to your inquiries or to provide information on products or services to you. We endeavor to collect only such information that is reasonably necessary to perform services for you or to respond to your inquiries.

We use cookies and similar technology to collect aggregate (non-personal) information about Site usage by all of our visitors and to help us remember you and your



preferences when you revisit the Site. Some cookies are essential for the operation of our Site (“Essential Cookies”). These cookies enable services you have specifically asked for. These cookies remain on your device only until you close your browser after visiting our Site. Some cookies are used to collect anonymous information on the pages visited (“Performance Cookies”). For example, we might use Performance Cookies to keep track of which pages are most popular, which method of linking between pages is most effective, and to determine why some pages are receiving error messages. These cookies remain on your device only until you close your browser after visiting our website. Some cookies remember choices you make to improve your experience (Functionality Cookies”). These Functionality Cookies remain on your device for an extended period of time. When you revisit our website, we recognize Functionality Cookies and remember your preferences or can automatically log you on to the website. Personal information on our system may be associated with Functionality Cookies but the cookies themselves do not contain any of your personal information. Finally, we may use “Behaviorally Targeting Advertising Cookies” which collect information about your browsing habits to make advertising relevant to you and your interests. Further general information about cookies and how they work is available at [www.allaboutcookies.org](http://www.allaboutcookies.org). European Union visitors can visit [www.youronlinechoices.com/uk](http://www.youronlinechoices.com/uk) for more information on this type of cookie.

We may from time to time allow selected third parties to place cookies through the Site to provide us with better insights into the use of the Site or user demographics or to provide relevant advertising to you. These third parties may collect information about a consumer’s online activities over time and across different websites when he or she uses our website. We may also permit third party service providers to place cookies through our Site to perform analytic or marketing functions where you are notified of them and you have consented to the usage. We do not control the use of such third-party cookies or the resulting information and we are not responsible for any actions or policies of such third parties.

We do not use technology that recognizes a “do-not-track” signal from your web browser.

The specific types of first party and third-party cookies placed by the Site and the purposes they perform are described in the table below:

Type of Cookies	Who serves these cookies	How to Refuse
<b>Strictly Necessary Cookies</b>	- AP Wireless	These cookies are strictly necessary to deliver the Site and therefore



<p>These are cookies that are required for the operation of the Site. They include, for example, cookies that enable you to log into secure areas of our websites, use a shopping cart or make use of e-billing.</p>		<p>cannot be refused. They can be deleted or blocked using your browser settings, however.</p>
<p><b>Performance and Functionality Cookies</b></p> <p>These are used to recognize you when you return to the Site. This enables us to personalize our content for you and remember your preferences (for example, your choice of language or region), but are non-essential to the performance of the Site.</p>	<ul style="list-style-type: none"> <li>- AP Wireless</li> <li>-</li> </ul>	<p>These cookies can be deleted or blocked using your browser settings.</p>
<p><b>Analytical or Customization Cookies</b></p> <p>These cookies collect information about how users access and move through the Site. We use this information in either aggregate form to help us to improve the way the Site works, or to personalize the Site to your interests.</p>	<ul style="list-style-type: none"> <li>- AP Wireless</li> <li>- Google Universal Analytics</li> </ul>	<p>These cookies can be deleted or blocked using your browser settings.</p> <p>Alternatively, please follow the links below to opt-out:</p> <ul style="list-style-type: none"> <li>- Google Universal Analytics <a href="https://tools.google.com/dlpage/ga/optout">https://tools.google.com/dlpage/ga/optout</a></li> </ul>



<p><b>Advertising Cookies</b></p> <p>These cookies are used to make the advertising displayed on the Site more relevant to you. These cookies prevent ads reappearing and ensure that ads are properly displayed. Certain third party cookies may track users over different websites and will provide ads relevant to your interests.</p>	<ul style="list-style-type: none"> <li>- Quantcast</li> <li>- Doubleclick</li> </ul>	<p>These cookies can be deleted or blocked using your browser settings.</p> <p>Alternatively, please follow the links below to opt-out:</p> <ul style="list-style-type: none"> <li>- Quantcast: <a href="https://www.quantcast.com/opt-out/">https://www.quantcast.com/opt-out/</a></li> <li>- Doubleclick: <a href="https://www.google.com/settings/ads/plugin">https://www.google.com/settings/ads/plugin</a></li> </ul> <p>In addition, you can exercise advertising cookie choices by visiting:</p> <ul style="list-style-type: none"> <li>- <a href="http://www.aboutads.info/choices/">http://www.aboutads.info/choices/</a>,</li> <li>- <a href="http://www.networkadvertising.org/choices/">http://www.networkadvertising.org/choices/</a>; or</li> <li>- <a href="http://youronlinechoices.com/">http://youronlinechoices.com/</a>.</li> </ul>
<p><b>Social Media Cookies</b></p> <p>These cookies allow us to integrate social media functions into the Site and may also be used for advertising purposes.</p>	<ul style="list-style-type: none"> <li>- Twitter</li> <li>- YouTube</li> </ul>	<p>These cookies can be deleted or blocked using your browser settings (see How to Control Cookies, below).</p> <p>Alternatively, please follow the links below to opt-out:</p> <ul style="list-style-type: none"> <li>- Twitter: <a href="https://twitter.com/personalization">https://twitter.com/personalization</a></li> <li>- YouTube: <a href="https://support.google.com/ads/answer/2662922?hl=en-GB">https://support.google.com/ads/answer/2662922?hl=en-GB</a></li> </ul>



### Children's Privacy.

This Site is not designed nor intended to be attractive to use by children under the age of 13. We do not knowingly collect from children under the age of 13. If you are under 13 please do not submit any information to us.

### Accessing your information and your choices.

You can update, amend or delete your information at any time by contacting us at [privacy@apwip.com](mailto:privacy@apwip.com). We may request information from you to validate your identity and will comply with your request within 20 days. If you request that your information be deleted, there may be circumstances where, for legal or compliance reasons, we are not permitted to delete information. We will advise you of that if the situation arises.

You can choose not to receive emails from us by “unsubscribing” using the instructions in any email you receive from us. This will not stop us from sending emails about your account or your transactions with us.

You can choose to delete or block cookies by setting your browser to either reject all cookies or to allow cookies only from selected sites. If you block cookies performance of the Site may be impaired and certain features may not function at all.

### Sharing your information.

We may reveal Personal Information about you to unaffiliated third parties: (1) if you request or authorize it; (2) if the information is provided to help complete a transaction for you; (3) if the information is provided to comply with the law, applicable regulations, governmental and quasi-governmental requests, court orders or subpoenas, to enforce our Terms of Use or other agreements, or to protect our rights, property or safety or the rights, property or safety of our users or others (e.g., to a consumer reporting agency for fraud protection etc.); (4) if the disclosure is done as part of a purchase, transfer or sale of services or assets (e.g., in the event that substantially all of our assets are acquired by another party, customer information may be one of the transferred assets); (5) if the information is provided to our agents, outside vendors or service providers to perform functions on our behalf (e.g., analyzing data, providing marketing assistance, providing customer service, processing orders, etc.); or (6) as otherwise described in this Privacy Policy.

We will only transfer your Personal Information to trusted third parties who provide sufficient guarantees in respect of the technical and organizational security measures governing the processing to be carried out and who can demonstrate a commitment to compliance with those measures.



Where third parties are processing Personal Information on our behalf, they will be required to agree, by contractual means or otherwise, to process the Personal Information in accordance with the applicable law. This contract will stipulate, amongst other things, that the third party and its representative shall act only on our instructions, or as permitted by law.

We may share your information with our affiliated companies.

We do not share your information with third parties for their marketing purposes.

We may disclose your non-private, aggregated, or otherwise non-personal information, such as usage statistics of our Products, to our affiliates and third parties.

### Security.

We use reasonable technical, administrative and physical measures to protect information contained in our system against misuse, loss or alteration. The personal information that you provide to us is stored on servers, which are located in secured facilities with restricted access, and protected by protocols and procedures designed to ensure the security of such information. We use standard SSL technology to protect information being transferred to our site. However, no server, computer or communications network or system, or data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect user information, we cannot ensure or warrant the security of any information you transmit to us. If we receive instructions using your log-in information we will consider that you have authorized the instructions.

Where we store your information.

The information and data that we collect from you may be transferred to, and stored at, our servers within the United States of America. It may also be processed by staff operating in the United States or in your home country who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing.

### Links to other sites.

We may permit others to link to this Site or to post a link to their site on ours. We do not endorse these sites and are not responsible for other sites or their privacy practices. Please read their privacy policies before submitting information.

### Changes to the Privacy Policy.

As we grow and change we may amend this Privacy Policy. The Policy in effect at the time you use the Site governs how we may use your information. If we make material



changes we will post the revised Policy and the revised effective date on this Site. Please check back here from time to time to review any changes.

### EU-US Privacy Shield.

AP Wireless complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of Personal Information from European Union member countries. We have certified that we adhere to the Privacy Shield Principles of notice, choice, accountability for onward transfer, security, data integrity and purpose limitation, access, and recourse, enforcement and liability. If there is any conflict between the policies in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

In compliance with the EU-US Privacy Shield Principles, AP Wireless commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this Privacy Notice should first contact AP Wireless at:

AP Wireless Infrastructure Partners, LLC  
4250 Executive Sq  
Suite 900  
La Jolla, CA 92037 USA  
Attn: Privacy

AP Wireless has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles to AAA a non-profit alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint, or if we have not addressed your complaint to your satisfaction, please contact or visit AAA ([www.adr.org](http://www.adr.org)) for more information or to file a complaint. AP Wireless also commits to cooperate with EU data protection authorities (DPAs) with regard to human resources data transferred from the EU in the context of the employment relationship. Under certain limited conditions, you may also invoke binding arbitration before the Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission. AP Wireless is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

Some types of Personal Information may be subject to other privacy-related requirements and policies, which are consistent with the Privacy Shield. For example, Personal Information regarding and/or received from AP Wireless customers is also subject to any specific agreement with, or notice to, said Customer, as well as additional applicable laws and professional standards, and personal information regarding our personnel is subject to internal human resource policies.





You may request that we correct, update, or amend the Personal Information we hold about you. Contact us in the manner described below to update your information. Please know that before we can make any changes to your information, we must confirm and authenticate that you are the data subject making the request for changes. If we deny your request, you will have the opportunity to appeal it, or appeal any other unresolved inquiries, complaints, and disputes.

Subject to any legislation which might, from time to time, oblige us to store Personal Information for a certain period of time, we will respect your wishes to correct inaccurate Personal Information. Otherwise, we will hold your information Personal Information for as long as we believe it will help us to achieve our aims as detailed in this Privacy Policy.

You can ask us whether we are keeping Personal Information about you and you can ask to receive a copy of that Personal Information. Before sending you any Personal Information, we will ask you to provide proof of your identity. If you are not able to provide proof of your identity, we reserve the right to refuse to send you any Personal Information. We will respond as quickly as we can to your requests for details of Personal Information we hold about you.

#### Your European privacy rights

For individuals within the EEA only. Under the GDPR, in certain circumstances, you have the right to: (a) request access to any Personal Information we hold about you and related information, (b) obtain without undue delay the rectification of any inaccurate Personal Information, (c) request that your Personal Information is deleted provided the Personal Information is not required by AP Wireless for compliance with a legal obligation under European or Member State law or for the establishment, exercise or defense of a legal claim, (d) prevent or restrict processing of your Personal Information, except to the extent processing is required for the establishment, exercise or defense of legal claims; and (e) request transfer of your Personal Information directly to a third party where this is technically feasible.

In addition, where you believe that AP Wireless has not complied with its obligation under this Privacy Policy or European law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner's Office.

#### Contacting us.

This Site is owned and operated by AP Wireless Infrastructure Partners, LLC. You can contact us at AP Wireless Infrastructure Partners, LLC, 4250 Executive Square, Suite 900, La Jolla, CA 92037.

