

California Privacy Notice

Last Revised on: September 15, 2022

This California Privacy Notice (“Notice”) supplements the information in our Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopted this Notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Notice.

This Notice explains how we collect, use, and share your Personal Information and how to exercise your rights under the CCPA.

“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.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“Personal Information”). Personal Information does not include publicly available information from government records or deidentified or aggregated consumer information that cannot be reasonably linked to you.

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES

C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete.
- Indirectly from you. For example, from observing your actions on our Website.
- From public records, such a public property records.

Use of Personal Information

We may use or disclose the Personal Information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our services, we will use that Personal Information to respond to your inquiry.
- To send communications to you about our current services, new services that we are developing, and opportunities that may be available to you as well as to alert you to new features or enhancements to our services.
- To communicate with you about your transaction with us, or potential transaction with us. If you are an existing customer, to administer your account including processing of payments. We may also save your Personal Information to facilitate the relationship and future opportunities.
- To provide, support, personalize, and develop our Website, products, and services.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our Website users/consumers is among the assets transferred.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your Personal Information to a third party for a business purpose. When we disclose Personal Information for a business purpose, we enter into a contract that describes

the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, the Company has disclosed the following categories of Personal Information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Service providers.
- New owners in the event of a change of ownership or control of all or part of our portfolio.
- Legal and regulatory entities to comply with contractual or legal requirements or requests and to protect our and others' rights property and safety.

Sales of Personal Information

In the preceding twelve (12) months, the Company had not sold Personal Information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights. The CCPA rights described below do not apply to information collected in the employment context about our current, former or prospective employees or contractors (who receive separate disclosures under the CCPA) or to information collected about California business contacts (employees, owners, directors, officers, or contractors of companies, sole proprietorships, and other entities collected in the context of conducting due diligence regarding, or providing or receiving a product or service to or from, such companies, sole proprietorships, or entities). California business contacts have the right to tell us not to sell their information; please see below for how to exercise this right.

Right to Know our Information Practices and to Access Specific Information (Data Portability Rights)

You have the right to request that we disclose to you the Personal Information that we collect, use, or disclose. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- Information Collection Practices. When you request disclosure about our Information Collection Practices, we will disclose the categories of Personal Information we collected about you in the prior 12 months, the sources and commercial purpose for collecting the information and whether the information was sold or disclosed for a business purpose.
- Information Sharing Practices. When you request disclosure about our Information Sharing Practices we will disclose the categories of Personal Information we have

disclosed to third parties for a business purpose and the categories of Personal Information we have sold and the categories of third parties receiving such information during the prior 12 months.

- **Specific Information About You.** When you request disclosure of the specific pieces of Personal Information we collected about you (also called a data portability request) during the prior 12 months, we will provide you with a secure copy of the Personal Information we collected about you during the prior 12 months. We will require enhanced identity verification to complete this type of request for your security.

Right to Request Deletion

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see **Exercising Access, Data Portability, and Deletion Rights**), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies. We will require enhanced identity verification to complete this type of request for your security.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
4. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
5. Comply with a legal obligation.
6. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing us at privacy@apwip.com
- Calling us at 888-232-2740

Under the CCPA, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. The request must include your full name, current residence address, email address, telephone number and whether you are a business contact or a current, former or prospective employee.
- Describe which type of disclosure you are requesting with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- Provide a signed Declaration of Identity if the request is for deletion of Personal Information or Specific Information About You.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Changes to Our Notice

We reserve the right to amend this privacy Notice at our discretion and at any time. When we make changes to this Notice, we will post the updated Notice on the Website and update the Notice's date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which AP Wireless collects and uses your information described here and in the **Privacy Policy**, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 888-232-2740

Email: privacy@apwip.com