

# Privacy Policy

This Privacy Policy was updated on May 5th, 2023.

Trafalgar Wireless LLC (collectively “Trafalgar Wireless”, “we”, “us”, or “our”) acknowledges and respects the privacy of our users (“you” or “your”) and have prepared this privacy policy (“Privacy Policy”) to describe to you our practices regarding the Personal Information (as defined below) we collect from users of our products and services, including our wireless phone services, our website, our mobile application, and/or any other Trafalgar Wireless run platform (“Platform”). This Privacy Policy describes how Trafalgar Wireless collects, uses, shares and secures the Personal Information you provide. It also describes your choices regarding use, access and correction of your Personal Information.

By continuing to use the Platform, you agree that you have read and consent to the collection and use of your information in the manner we describe in this Privacy Policy. IF YOU DO NOT AGREE WITH ANY OF THE TERMS IN THIS PRIVACY POLICY, DO NOT USE THE PLATFORM.

If you have any questions, concerns or complaints about our Privacy Policy, our data collection or processing practices, wish to have your personal information updated or removed or if you want to report any security violations to us, please contact us at [accounts@trafalgarwireless.com](mailto:accounts@trafalgarwireless.com).

## Privacy Shield Framework

Trafalgar Wireless LLC is committed to both the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework and to the rights of both EU and Swiss individuals.

## Collection and Use of Personal Information

Personal Information is defined as data that can be used to identify or contact a single person. Personal Information includes any information you have actively or passively provided us in connection with your use of the Platform, e.g. when you communicate with us.

You may be asked to provide your personal information anytime you are in contact with us or an affiliated company through the Platform. We and our affiliates may share this Personal Information with each other and use such information in a manner consistent with this Privacy Policy. We may also combine your personal information with other information to provide and improve our products, services, content, and advertising. You are not required to provide the Personal Information that we have requested, but, if you choose not to do so, we may not be able to provide you with our products or services, access to our Platform, or respond to any queries you may have.

Here are some examples of the types of Personal Information we may collect and how we may use it:

### What Personal Information We Collect

When you use our Platform, sign up for an account, or interact with our company, we may collect a variety of information, including: (i) contact information, such as name, email address, mailing address, or phone number; (ii) demographic information, such as date of birth, age, and gender; (iii) financial and payment information, including credit card and payment card information; (iv) images, voice recordings or voiceprints, other biometric identifiers; (v) driver’s license number or Social Security Number; (vi) content from your communications with us, such as messages, mail, surveys,

images and videos; (vii) business information, such as company name and location; (viii) CDR traffic records related to sim cards and phone numbers, including date, time, and amount of data used, as well as location; (ix) Summary data such as SIM card totals, monthly charges, traffic SMS, and graphical reporting with business analytics; and (x) any other information you choose to provide us, including the reason for contacting us, subject to applicable laws and the terms of this Privacy Policy. If you are prompted to create an Account, we may ask you to create a username and password. We may collect this information from our Platform, from credit card information, and from other social media platforms, such as your login credentials, your “real” name, profile picture, and other information that you share or your social network shares with you.

We may collect information relating to any device used in connection with our Platform, such as (i) Phone number (MSISDN); (ii) Security pin; (iii) ICCID; (iv) log of which country Platform was used; (v) log of last network accessed; (vi) time and date of last use; (vii) quantity of traffic applied and which tariffs are applied; (viii) history of the actions of a SIM (activated/de-activated/suspended); (ix) any other information you choose to provide us.

Service and device information we collect may include call records, wireless location, websites visited, application and feature usage, network and device data including battery life and the apps on your device, product and device-specific information and identifiers, router connections, service options you choose, mobile and device numbers, video streaming and video packages and usage, movie rental and purchase data, TV and other video viewership, and other similar information.

We may collect information using application programming interface (API) which is a set of functions and procedures allowing the creation of applications that access the features or data of an operating system, application, or other service, as it helps us understand how you use our Platform and how our Platform can better serve you.

We collect information about your wireless location, including without limitation cell tower, Wi-Fi and Global Positioning Satellite (GPS) data) in different ways; for example, when your device connects to our network and through system and mobile applications on your device. You have choices about certain collection and uses of this information, which will be described below in the “Your Choices” section.

We may collect the information you provide about others such as names, mailing address, email addresses, and phone numbers. When you provide us with Personal Information about your contacts we will only use this information for the specific reason for which it is provided. If you believe that one of your contacts has provided us with your Personal Information and you would like to request that it be removed from our database, please contact us at [accounts@trafalgarwireless.com](mailto:accounts@trafalgarwireless.com).

We will use such Personal Information to provide our Platform, perform our services, link your account with us to your social networking account, or for anti-fraud purposes.

In certain jurisdictions, we may ask for a government issued ID in limited circumstances and when required by law.

### **How We Use Your Personal Information**

We may use your Personal Information to: (i) Respond to comments, requests and questions made while you use or visit our Platform, deliver and maintain any services or products you have requested from the Platform, and provide account related services; (ii) Operate and monitor the usage and performance of the Platform including research and analysis (involving non-directly identifying)

aggregate information about users to determine the marketing and advertising efforts of Trafalgar Wireless, its trusted affiliates, independent contractors and business partners; (iii) Improve the quality of experience when you interact with our Platform, including auditing, data analysis, research, and the testing of different page designs to see which performs better; (iv) Inform you of other products or services available from Trafalgar Wireless, its partners, and affiliates, and your eligibility for those products and services; (v) Provide maintenance, support, or customer service; (vi) Help diagnose problems with the Platform and to enhance the Platform for an optimal user experience; (vii) Measure credit and payment risk; (viii) Comply with and enforce applicable legal requirements; (ix) Send newsletters, surveys, offers, and other promotional materials related to our Platform and for other marketing purposes; (x) review billing records; (xi) create, develop, operate, deliver, and improve our products, services, content, and advertising, and for loss prevention and anti-fraud purposes; and (xiii) manage and protect our networks, services, and users from fraudulent, abusive, or unlawful uses.

We may measure and monitor network performance and the network connection of the Platform to secure and improve your, or our, services and products. For example, Trafalgar Wireless devices may include system software that gathers information about network and device conditions, including the location of network handoffs. If you contact us for service support, we may access information about your device or its settings to customize our technical support.

When you contact us or we contact you, either via email or telephone, we may monitor or record that communication or keep a record of the transaction to help us train employees or other support resources or systems and to better serve you. We may also collect web addresses of your servers to deliver any SMS communication to you. When you communicate with us, we may use artificial intelligence guided by humans, such as chat bots, to respond to your inquiry. Be advised that if you communicate with us through third-party services like public social media platforms, your communications are also governed by these companies' privacy policies.

We obtain information from third-party companies such as demographic and interest data (gender, age range, education level, sports enthusiast, or frequent diner), as well as information such as device type, carrier, city and state. We use this data and combine it with other information we have about you to help make marketing offers more relevant to you, and to help us better analyze customer information for business modeling purposes.

We may use your Personal Information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services. For example, we may use date of birth to determine the age of our users, and we may use that information to deny service to users that do not meet our minimum user requirements.

From time to time, we may use your Personal Information to send important notices, such as communications about changes to our terms, conditions, and policies. Because this information is important to your interaction with us, you may not opt out of receiving these communications. If you would like to unsubscribe to any other types of emails, follow the instructions at the bottom of each email and we will remove you from our subscribers list.

We may also use Personal Information for internal purposes such as auditing, data analysis, and research to improve our products, services, and customer communications. We may occasionally ask users of our service to complete online surveys and opinion polls about their activities, attitudes, and interests. These surveys help us better serve you and improve the usefulness of the service.

If you are an administrator of the account, you may import your contacts from another device or program. Moreover, we may ask you if you wish to invite your colleagues from your same domain. If

you indicate that you would like to invite them, we will send them an invitation from you to activate an account and join the Platform.

We may post user content or feedback on the Platform from time to time. If you make any comments on a blog, social network service, wall or forum associated with the Platform, you should be aware that any information you submit there can be read, collected, or used by other users of these forums, and could be used to send you unsolicited messages. We are not responsible for the information you choose to submit in these blogs and forums.

If you email us through the website, we may ask you for additional information so we can respond to your requests, questions, and comments with relevant information. If you choose to correspond with us via email, we may retain the content of your email messages, your email address and our response to you.

When you purchase products or apply for service with us, we may obtain credit information about you from outside credit reporting agencies to help us with customer authentication and credit-related decisions. If you lease your residence, we may have information about how to reach your landlord and whether landlord permission is required to install our facilities.

### **Collection and Use of Non-Personal Information**

We also collect data in a form that does not, on its own, permit direct association with any specific individual so that we cannot use it to identify or contact you. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

We may collect information such as occupation, language, zip code, area code, unique device identifier, referrer URL, public location, time zone, and other details, so that we can better understand user behavior and improve our Platform, products, services, and advertising. We may collect revenue information and summaries, including tariffs and historical information on tariffs.

We may collect information regarding customer activities from our products, services, and any Trafalgar Wireless Platform. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our products, services, and Platform are most effective and popular. This will help Trafalgar Wireless improve our service. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.

We may collect and store details of how you use our services. This information may be used to improve the relevancy of results provided by our Platform. In limited instances, to ensure the quality of our Platform over the Internet, such information could be associated with your IP address.

We may create anonymous data records from Personal Information by excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to analyze request and usage patterns so that we may enhance the content of our services, improve Platform navigation and collaborate with the research professionals in the industry. We reserve the right to use anonymous data for any purpose and disclose anonymous data to third parties in our sole and absolute discretion.

If we do combine non-personal information with Personal Information, the combined information will be treated as Personal Information for as long as it remains combined.

## **Cookies and Other Technologies**

Our Platform, email messages, and advertisements may use "cookies" and other technologies such as pixel tags, clear GIFs, and web beacons. Cookies are small bits of information that the Platform places on your computer's hard drive. These technologies help us better understand user behavior, streamline the user experience, tell us which parts of our Platform people have visited, and facilitate and measure the effectiveness of our services and Platform altogether. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that internet protocol (IP) addresses or similar identifiers are considered Personal Information by local law, we also treat these identifiers as Personal Information. Similarly, to the extent that non-personal information is combined with Personal Information, we treat the combined information as Personal Information for the purposes of this Privacy Policy.

You can choose to limit the transmission of this data in your account preferences or via your web browser. If you do not accept cookies or other similar technologies, you may be unable to utilize the full functionality of the Platform.

We also use cookies and other technologies to remember Personal Information when you use our website, online services, and Platform altogether. Knowing your contact information, hardware identifiers, and information about your computer or device helps us reduce bugs and coding errors to provide you with the best customer service possible. Collecting user usage data allows us to prioritize the aspects of our Platform that are used more frequently and to generate statistics about how the Platform is being used.

As is true of most internet services, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyze trends, to administer the Platform, to learn about user behavior on the Platform, to improve our products, services, and Platform, and to gather demographic information about our user base as a whole. We may use this information in our marketing and advertising efforts and services.

Pixel tags enable us to send email messages in a format which customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

In some of our email messages, or as a feature of the Platform, we use a "click-through URL" linked to content on our Platform or the website of third parties. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our Platform. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in email messages or on the Platform. If you click on another third-party link, you will be directed to that third party's website. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third-party websites. These other websites may place their own cookies or other files on your computer, collect data, or solicit Personal Information from you. You are subject to the privacy policies of those third parties where applicable.

## **Disclosure to Third Parties**

Trafalgar Wireless LLC is committed to both the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework and to the rights of both EU and Swiss individuals.

At times we may make certain Personal Information available, consistent with applicable law, to a third party as follows: (i) With affiliates, parent entities and subsidiaries of Trafalgar Wireless; (ii) With business partners, alliance partners or other third-party business providers that co-sponsor services, work with, or on Trafalgar Wireless's behalf, and group account holders, discount and rewards programs, third-party verification services, and business transfers; (iii) We may share your information with third parties who provide services on our behalf to help with our business activities. These companies are authorized to use your Personal Information only as necessary to provide these services to us. These services may include providing cloud computing infrastructure, payment processing, services in the nature of marketing, employee recruitment, or payroll management; (iv) In certain situations, Trafalgar Wireless may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose your Personal Information as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request; and (v) If Trafalgar Wireless is involved in a merger, acquisition, or sale of all or a portion of its assets. We may also disclose your Personal Information to any other third party with your prior consent.

Before sharing Personal Information with third parties, we will take all reasonable measures to ensure that the third parties will abide by this policy. If you do not want us to share your Personal Information with these companies, contact us at [accounts@trafalgarwireless.com](mailto:accounts@trafalgarwireless.com).

At times we may make certain non-personal information available to third parties for reasons other than providing the services on the Platform. We may disclose non-personally identifiable aggregate statistics regarding user behavior as a measure of interest in, and use of, our service and Platform to third parties in the form of aggregate data, such as overall patterns or demographic reports, which do not describe or identify any individual user. Information relating to aggregate statistics may be collected through the use of third-party cookies and other third-party tracking devices. We may share aggregated information that does not include Personal Information and we may otherwise disclose non-identifying Information and log data with third parties for industry analysis, demographic profiling, and other purposes. Any aggregated information shared in these contexts will not contain your Personal Information.

## **Service Providers**

We use your Personal Information to provide, maintain, protect, and improve the Platform, to authenticate you as a user, to communicate with you, and to assist you in using the Platform. We may combine your Personal Information with non-personal information and aggregate it with information collected from other users to attempt to provide you with a better experience, to improve the quality and value of the Platform, develop or train our Artificial Intelligence system and to analyze and understand how our Platform is used. We will not share, rent, or sell your Personal Information to other parties, except to our service providers as set forth herein.

We may match information collected from you through different means or at different times, including both Personal Information and Platform usage information, and use such information along with information obtained from other sources, including (without limitation) any of our other websites and third parties. We may send you notices (for example, in the form of emails, mailings, and the like), and

otherwise correspond with you about products, services, companies, events sponsored by us and others, and other information that we think might interest you.

We may share Personal Information with, agents, contractors, controllers, third party individuals and other companies to assist us in providing the services, or who provide ancillary services such as information processing, extending credit, fulfilling customer orders, manufacturing products, delivering products, managing and enhancing customer data, providing customer service, assessing customer interest in our products operation and maintenance of the service, database management, web analytics, and improvement of the services, and conducting customer research or satisfaction surveys. These third parties have access to your Personal Information and other information collected as set forth in this policy, only to perform these tasks on our behalf and are obligated not to disclose your Personal Information or use it for any other purpose. Said third parties may be located anywhere in the world. Furthermore, your private information may be transferred and processed in the United States of America.

#### **Our Obligations When Transferring Your Personal Information to an Agent or Controller (Onward Transfers)**

The following two paragraphs constitute a legally binding commitment to you from Trafalgar Wireless.

When transferring Personal Information to a third party acting as a controller, we must comply with the Notice and Choice Principles (“Principles”). We must also enter into a contract with the third-party controller that provides that such data may only be processed for limited and specified purposes consistent with the consent provided by the individual and that the recipient will provide the same level of protection as the Principles and will notify us if it makes a determination that it can no longer meet this obligation. The contract shall provide that when such a determination is made, the third-party controller ceases processing or takes other reasonable and appropriate steps to remediate.

When transferring Personal Information to a third party acting as an agent, we must: (i) transfer such data only for limited and specified purposes; (ii) ascertain that the agent is obligated to provide at least the same level of privacy protection as is required by the Principles above; (iii) take reasonable and appropriate steps to ensure that the agent effectively processes the Personal Information transferred in a manner consistent with the organization’s obligations under the Principles; (iv) require the agent to notify us if it makes a determination that it can no longer meet its obligation to provide the same level of protection as is required by the Principles; (v) upon notice, including under (iv), take reasonable and appropriate steps to stop and remediate unauthorized processing; and (vi) provide a summary or a representative copy of the relevant privacy provisions of its contract with that agent to the Department of Commerce or its designated agent upon request.

Should Trafalgar Wireless fail to abide by this obligation Trafalgar Wireless may be liable to you for any onward transfers made that was not in compliance with this provision.

#### **Other**

It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for us to disclose your Personal Information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law.

We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect our property and rights and the rights of our suppliers, or other third parties, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical, or legally actionable activity. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all Personal Information we collect to the relevant third party.

Our organization and activities are subject to investigatory and enforcement powers of the Federal Trade Commission, the Department of Transportation, and the Department of Commerce, and we comply with the Fair Information Practices act, the CAN SPAM Act and the California COPPA Act. It may be possible, under certain conditions, for you to invoke binding arbitration under Annex I of the Privacy Shield Act. We adhere to the Individual Redress Principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. Individuals must have enforceable rights against data users, and recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

### **Protection of Personal Information**

Trafalgar Wireless LLC is committed to both the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework and to the rights of both EU and Swiss individuals.

We take the security of your Personal Information very seriously. Our online services protect your Personal Information during transit using encryption such as Secure Sockets Layer (SSL). When your personal data is stored by us, we use computer systems with limited access housed in facilities using physical security measures. We restrict access to Personal Information to those employees, contractors, and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations. Data is stored in encrypted form including when we utilize third-party storage. All transactions are processed through a gateway provider and are not stored or processed on our servers.

We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored "personal data" (as defined in applicable state statutes on security breach notification) to you via email or conspicuous posting via the Platform in the most expedient time possible and without unreasonable delay, insofar as consistent with (i) the legitimate needs of law enforcement, or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system. While we endeavor to protect the security and integrity of sensitive Personal Information provided to the Company, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be safe from intrusion by others. In the event of a data breach and consistent with the above we will notify users over email within seven (7) business days after becoming aware and a data breach.

Identity theft and the practice currently known as "phishing" are of great concern to us. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, request your credit card information, login information, or national identification numbers in a non-secure or unsolicited email or telephone communication. For more information about phishing, visit the Federal Trade Commission's website.

### **Integrity and Retention of Personal Information**

We intend to make it easy for you to keep your Personal Information accurate, complete, and up to date. We will retain your Personal Information for the period necessary to fulfill the services and other purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. All authorized users may review, update, correct, or delete the Personal Information in their account by making edits via the Platform. If you would like us to delete your account in our system, please contact us at [accounts@trafalgargarwireless.com](mailto:accounts@trafalgargarwireless.com) with a request that we delete your Personal Information from our database. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes.

### **Access to Personal Information**

You can help ensure that your contact information and preferences are accurate, complete, and up to date by updating your account preferences. For other Personal Information we hold, we will provide you with access for any purpose including to request that we correct the data if it is inaccurate or delete the data if we are not required to retain it by law or for legitimate business purposes. We may decline to process requests that are frivolous/vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. Access, correction, or deletion requests can be made by email in the contact us page on our website.

### **Your Choices**

We offer you choices regarding the collection, use and sharing of your Personal Information. We will periodically send you newsletters and e-mails that directly promote the use of our Platform. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Service or Privacy Policy.

If you decide at any time that you no longer wish to accept cookies from our Platform for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Consult your browser’s technical information. If you do not accept cookies, however, you may not be able to use all portions of the Platform or all functionality of the Platform. If you have any questions about how to disable or modify cookies, please contact your web browser provider.

Mobile device operating systems have a location setting. When you turn this setting to “off,” the device stops collecting your location and stops transmitting location information to apps and other services on the device. Other device settings allow you to stop the transmission of location data to individual apps on your device.

We may use certain location information we collect, such as information about the location of Wi-Fi access points, to help improve location accuracy in our services or apps. If you do not want us to use

your Wi-Fi router information, you should change your router's name so that it contains the terms "nomap" or "optout" in the name.

Marketing emails you receive from us include an unsubscribe instruction (usually found at the bottom of the email) that you may use to opt out of receiving future marketing-related emails.

You may request that we delete your Personal Information, but please note that we may be required to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements).

When we delete any information, it will be deleted from the active database, but may remain in our archives. We may retain your information for fraud prevention or similar purposes.

While we and others give you the choices to control the information collected and used as described in this Privacy Policy, there are many web browser signals and other similar mechanisms that can indicate your choice to disable tracking, and we may not be aware of or honor every mechanism.

This Privacy Policy addresses only our use and disclosure of information we collect from and/or about you on the services. If you disclose information to others or authorize us to do the same under this Privacy Policy, the use and disclosure restrictions contained in this Privacy Policy will not apply to any third party. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable.

Trafalgar Wireless LLC will offer EU individuals whose personal information has been transferred to us the opportunity to choose whether the personal information it has received is to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. An individual may opt-out of such uses of their personal information by contacting us at [accounts@trafalgarwireless.com](mailto:accounts@trafalgarwireless.com).

### **Children & Education**

We understand the importance of taking extra precautions to protect the privacy and safety of children using our products and services. Children under the age of thirteen (13), or equivalent minimum age in the relevant jurisdiction, are not permitted to create accounts. However, it is not possible for us to independently verify the age of our customers. It is the responsibility of every parent to monitor his or her child's online activities. This Platform is not directed to children. We do not knowingly collect Personal Information from children. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, please contact us. If we become aware that a child has registered for the service and has provided us with Personal Information, we will delete such information from our files.

### **Location-Based Services**

To provide location-based services on our platform we, our partners, third-party servicers, and licensees may collect, use, and share precise location data, including the real-time geographic location of your computer or device. Where available, location-based services may use GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, and other technologies to determine your devices' approximate location. By accepting the terms and conditions you have consented to transmission of your location data. This location data is not anonymous, could personally identify you, and is used by us and our affiliates to provide and improve our Platform.

### **International transfer**

Trafalgar Wireless LLC is committed to both the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework and to the rights of both EU and Swiss individuals.

Your information may be transferred to, and maintained on, computers located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to provide information to us, we may transfer said Personal Information to local or foreign processing centers and process it there.

### **International Users**

All the information you provide may be transferred or accessed by entities around the world as described in this Privacy Policy. Personal Information, relating to our services and Platform, regarding individuals who reside in a member state of the European Economic Area is subject to the Privacy Policy and we make all reasonable efforts to remain in compliance with European Privacy laws.

Trafalgar Wireless LLC, complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union to the United States. Trafalgar Wireless LLC has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program please visit <https://www.privacyshield.gov/>, and to view our certification, please visit <https://www.privacyshield.gov/list>

In compliance with the Privacy Shield Principles, Trafalgar Wireless LLC commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Trafalgar Wireless LLC at: [accounts@trafalgarwireless.com](mailto:accounts@trafalgarwireless.com).

Trafalgar Wireless has further committed to refer unresolved Privacy Shield complaints to JAMS, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit <https://www.jamsadr.com/submit/> for more information or to file a complaint. The services of JAMS are provided at no cost to you.

Finally, as a last resort and in limited situations, EU individuals may seek redress from the Privacy Shield Panel, a binding arbitration mechanism.

We will also make reasonable efforts to abide by the Asia-Pacific Economic Cooperation (APEC) Cross Border Privacy Rules System (CBPR). The APEC CBPR system provides a framework for organizations to ensure protection of Personal Information transferred among participating APEC economies.

Residents living outside the United States should investigate local privacy laws and are only licensed to use our products if our products are in compliance with local laws.

## **Our Company-Wide Commitment to Your Privacy**

To make sure your Personal Information is secure, we communicate our privacy and security guidelines to our employees and strictly enforce privacy safeguards within the company.

### **Privacy Questions**

If you have any questions or concerns about our Privacy Policy or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please contact us. You can always contact us by phone at the number found on the contact us section of our website.

All such communications are examined, and replies are issued where appropriate as soon as possible. If you are unsatisfied with the reply received, you may refer your complaint to the relevant regulator in your jurisdiction. If you ask us, we will endeavor to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

We may update this Privacy Policy from time to time. When we change the Policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.

You may contact us by email at [accounts@trafalgargarwireless.com](mailto:accounts@trafalgargarwireless.com)

Or by mail at: 2870 Peachtree Road, Suite 288, Atlanta, GA30305, USA.

### **Tracking**

We track our customers over time and across third-party websites to provide targeted advertising and we do not respond to Do Not Track (DNT) signals. If you set the DNT signal on your browser so that third parties (particularly advertisers) know you do not want to be tracked, we will not recognize the signal and take appropriate actions.

Third parties that have content embedded on our Platform, including our websites or applications, may set cookies on a user's browser and/or obtain information about the fact that a web browser visited a specific website from a certain IP address. Third parties may be able to collect other personally identifiable information provided or collected by us from our websites and applications.

### **Notice for Minors**

We may offer interactive services which allow you to post content to share publicly or with coworkers, friends, and family. At any time, you can delete or remove content you have posted using the deletion or removal options within our Platform. If you have questions about how to remove content in a specific service or if you would like additional assistance with deletion, you can contact our support team directly. Although we offer deletion capability for our services, you should be aware that the removal of content may not ensure complete or comprehensive removal of that content or information posted through the Platform.