

Networking Planet Inc is dedicated to safeguarding personal information about our customers and employees. When we collect personal information about you, we will inform you in clear and conspicuous language of the purpose for which we are collecting and/or using the personal information, any third parties to whom we will disclose the information, the choices you have regarding limiting the use and disclosure of your personal information, and how you may contact Networking Planet Inc to review, correct, or dispute this personal information. Networking Planet Inc supports the operations of its affiliates, Networking Planet Inc (collectively “Networking Planet Inc”, “we”, “us”, or “our”). This Privacy Policy applies to each of the Networking Planet Inc entities. This Privacy Policy does not apply to services, products, or websites that do not display or link to this Privacy Policy or that have their own privacy statements. By subscribing to or using our services, including by accessing our web sites (the “Services”), you agree to our collection, use, disclosure, and other processing of your personal information as described in this Privacy Policy.

If you need a copy of this Privacy Policy in an alternative accessible format, please call us at +1-813-751-5123 or email us at privacy@NetworkingPlanet.com.

We will use your personal information only in ways that are compatible with the purposes for which we collected it from you or which you subsequently authorized, and we will provide you with notice before we use or disclose your personal information to third parties for a purpose other than that for which it was originally collected, except where such disclosure is required by law. We will take reasonable steps to ensure that all personal information we collect, retain, or use is relevant to its intended use, accurate, complete, and current.

When we host data for customers, we start with two simple principles:

- We use, disclose, and otherwise process personal information only to provide the services requested by our customer.
- We maintain reasonable robust security to protect it against unauthorized acquisition or use.

Networking Planet Inc’s obligations with respect to personal information for which Networking Planet Inc is a data processor, such as data that Networking

Planet Inc hosts for its customers, are further defined in Networking Planet Inc's contracts with its customers. Personal information obtained from our customers is processed in compliance with the terms and conditions set forth in our customer contracts and correspondence and our professional standards.

Networking Planet Inc recognizes that its commercial customers may also be subject to detailed privacy and information security regulations as a financial institution under the Gramm Leach Bliley Act, as a covered entity or business associate under HIPAA, or otherwise as an entity subject to privacy and information security laws and regulations. We can readily accommodate legal requirements to ensure appropriate privacy controls and support your compliance programs, and we enter into additional agreements, such as Business Associate Agreements, when appropriate and required by applicable law. Similarly, businesses with personal information originating in the European Union should rest assured that Networking Planet Inc complies with the data protection requirements applicable to it, and Networking Planet Inc enters into data processing agreements to support compliance with the General Data Protection Regulation where appropriate as well. If any of these statutory regimes applies to your business and the data to which Networking Planet Inc may have access in providing services to you, please let your account representative know so we may include any additional regulatory terms that may be appropriate.

Networking Planet Inc complies with the EU – U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework(s), as set forth by the U.S. Department of Commerce, regarding the collection, use and retention of personal information received from the European Union as well as where data is transferred from the United Kingdom and/or Switzerland. Networking Planet Inc annually certifies its adherence to the Privacy Shield Principles of notice; choice; accountability for onward transfer; security; data integrity and purpose limitation; access; and recourse, enforcement and liability. To learn more about the EU – U.S. Privacy Shield Framework and/or the Swiss-US Privacy Shield Framework, please visit <https://www.privacyshield.gov/EU-US-Framework>. To view Networking Planet Inc's certification, please visit <https://www.privacyshield.gov/list>.

Networking Planet Inc also requires any third-party service provider with whom we share or collect personal information, such as our agents, vendors, suppliers, subcontractors, and independent contractors, to provide written assurances that they provide privacy protections substantially similar to those

provided in this Privacy Policy, the EU – U.S. Privacy Shield Framework and the Swiss-US Privacy Shield Framework for personal information concerning citizens of the European Union, the United Kingdom and/or Switzerland, as applicable. Networking Planet Inc is responsible for ensuring that such third-party service providers process personal information from the EU, UK, and Switzerland in a manner consistent with the Privacy Shield Principles.

COLLECTION OF YOUR PERSONAL INFORMATION

Types Of Information We Collect About You. Personal information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal information does not include anonymous, aggregated, or de-identified information that cannot personally identify you, your accounts, or devices. We may collect the following different types of personal information about you, your associated accounts, or your devices based on your use of our Services, as well as your business relationship with us or with our third parties:

Personal Identifiers. Personal identifiers are personal information that identifies a person such as name, physical and email addresses, telephone numbers, date of birth, Social Security number, driver's license numbers, credit cards or financial accounts.

Credit and Financial Information. Credit and financial information are specific types of personal information that relate to your (or your employer's) financial or commercial relationship with us, including banking information and payment history related to your business account or employee relationship.

Network and Device Information. Network and device information is collected when you use our Services. Certain information such as Advertising IDs and persistent device identifiers may directly or indirectly identify you or your device and may be considered a type of personal information. Device identifiers include information that identifies the devices connected to the Internet such as the IP address(es) assigned to the connection and the MAC addresses in use. Network and device information also may include connection performance information, amount of bandwidth used, times and dates of connection, call records, websites and URLs visited, advertisements clicked, browsing history, domain type, interaction with a website, IP addresses, and device data (e.g., operating system, software configurations). For example, as part of network operations and when you visit a Networking Planet Inc website, we automatically collect certain information such as your domain type, your IP address, and click stream information as well as record

your interaction with a Networking Planet Inc website (e.g., movement of cursor) to gauge the effectiveness of our websites, improve our online operations, enhance your online experience with customized content, and focus our marketing efforts to better meet the needs of our customers. We may collect cookies, web beacons and similar technology. Please refer to our Cookie Policy below.

Location Information. Location information is collected when you provide it directly to us and when you use our Services. Location information may include your physical address, zip code, and a physical address associated with an IP address. Certain types of location information may be considered personal information.

Sensory data. Information including electronic, visual, and audio information may be collected when you contact us, or when we contact you, including through our customer service line, such as voice recordings, or may be collected from employees through security video monitoring depending on the facilities in which they work or visit. For training or quality assurance, we may also monitor or record our customer service calls with you.

How We Collect Personal Information. We may collect personal information for those purposes specified in this Privacy Policy, and as otherwise permitted by law. We may collect personal information through a business office, over the phone, or online. You may choose to provide personal information to us through several interactions such as by:

- Ordering a product or service from us
- Sending us an email
- Registering to receive information about our products or services
- Responding to customer service inquiries
- Applying for a job or a grant, or
- Entering a contest.

We may also collect personal information about you from trusted agents who are authorized to sell our products and services, or from employees of our Affiliates. "Affiliates" refers to any of the Telephone and Data Systems, Inc. owned companies. When we receive personal information from Affiliates, we will use and disclose such information in accordance with the notices provided by the applicable Affiliate and the choices made by the individuals to whom such personal information relates.

We may also collect personal information about you that helps us better serve your special needs and interests, such as when you respond to questions, surveys, or other customer service-related inquiries. You can always choose not to provide certain personal information to us, but we may not be able to provide you with certain services or features as a result.

SENSITIVE PERSONAL INFORMATION

We do not generally collect sensitive personal information, including personal information about personality and private life, racial or ethnic origin, nationality, political opinions, membership in political parties or movements, religious, philosophical or other similar beliefs, membership in trade unions or professions or trade associations, physical or mental health, genetic code, addictions, sexual life, property matters or criminal record (including information about suspected criminal activities). You are not required to provide any sensitive personal information to use any of our services. Certain protected classification characteristics may be collected about employees from time to time as may be required by applicable law.

TECHNICAL INFORMATION AND COOKIE POLICY

As part of network operations and when you visit a Networking Planet Inc website, we may automatically collect certain information such as your domain type, your IP address, and click-stream information to gauge the effectiveness of our websites, improve our online operations, enhance your online experience with customized content, and focus our marketing efforts to better meet the needs of our customers.

We may store small data files known as cookies, or other similar technologies, on your computer or mobile browser when you visit one of our websites. Cookies allow us to personalize and protect your service by collecting and storing information that will identify you when you visit a website. Cookies also allow us to collect 'website usage' information when you visit our websites, including IP address, web browser and operating system types, webpages visited on our websites, time spent on our webpages, and return visits to our websites. We may combine the website usage information with your personal information in order to provide a more customized online experience to you and to provide advertising about goods and services that

may be of particular interest to you. These same cookies may also be used by our advertising partners on other websites to display advertisements based on the preferences you demonstrate through your online activities. We do not track user click stream or other information resulting from activity on sites that are not operated by Networking Planet Inc. For further information about how to opt-out of behavioral advertising on the Internet, please see <http://www.networkinplanet.com/choices/>.

You may be able to disable cookies on your computer; however, if you do so, you may limit your experience on Networking Planet Inc's websites. You can set your browser to delete cookies or to tell you before you accept one. Look in your browser's Options or Preferences menu for settings relating to cookies.

"Do Not Track" signals are options available on your browser to tell operators of websites that you do not wish to have your online activity tracked. Our websites operate no differently if these "Do Not Track" signals are enabled or disabled. Our Internet Services do not allow any third parties to collect personal information about your online activities over time or across websites for their own purposes.

THIRD PARTY WEBSITES

Networking Planet Inc is not responsible for the privacy practices, including the use of cookies, employed by third-party websites, including those linked to or from our website or for the content contained therein. Third-party websites and services you are able to access on the Internet are outside the control and limits of this Privacy Policy. You should check the privacy policies (if available) of third-party websites before submitting any personal information as the privacy practices of other websites may be different from ours. Personal information collected on these other websites is collected by that third-party website and is governed by that website's policy.

USE OF YOUR PERSONAL INFORMATION/ DATA INTEGRITY

We may use your personal information to provide you with and manage the services you request, communicate with you to maintain customer relations or to suggest new products and services that may be of interest to you, personalize the content we deliver, conduct industry or consumer surveys, manage, improve and troubleshoot our network and services, enforce

our Terms of Use and customer contracts, or for any purpose otherwise permitted or required by law.

When you want to set up an account with Networking Planet Inc, in order to determine your credit worthiness, we may use some of your personal information to request a credit report from a credit-reporting agency based on a permissible purpose consistent with the Fair Credit Reporting Act.

Networking Planet Inc uses the information collected on its websites to provide you with information you request. When you use our websites to order products or services, or to request information about them, we may use the information we have about you as we would use the same information obtained offline; for example, to evaluate your service needs and contact you regarding additional services you may find useful. You may also submit applications for employment online, and we will use the personal information you provide to consider you for employment.

We will not use your personal information for a purpose other than the purpose for which it was originally collected or subsequently authorized without your consent. We will not use sensitive personal information for a purpose other than the purpose for which it was originally collected or subsequently authorized unless you have provided your affirmative and express (opt-in) consent.

When you provide us with your personal information, we collect that for certain purposes that are required or permitted by applicable law, and Networking Planet Inc may access or disclose personal information without further notice or your consent in order to: (i) investigate, protect or defend the legal rights or property of Networking Planet Inc (including enforcement of our agreements); (ii) protect the safety and security of customers or members of the public including acting in urgent circumstances; (iii) protect against fraud or for risk management purposes; or (iv) comply with the law or legal process such as a subpoena. Networking Planet Inc will provide its customers with prompt notice of law enforcement requests or demands for their data to the fullest extent allowed by applicable law so that the customer may assert any defenses or other legal interests that it wishes.

If Networking Planet Inc sells all or part of its business or makes a sale or transfer of all or a material part of its assets or is otherwise involved in a

merger, transfer, or liquidation of all or a material part of its business, your personal information may be transferred to the party or parties involved in the transaction.

If we obtain personal information from a third party, our use of that personal information is also governed by this Privacy Policy.

If you submit an employment application, resume or similar information about yourself, it will be used only for the purpose of considering you for employment or such other purpose as requested by you.

Networking Planet Inc does not make decisions that have legal effects on individuals due solely to automated processing of personal information.

For United States residents, we undertake marketing only in compliance with the CAN-SPAM Act, the Telephone Consumer Protection Act, and other applicable law. For European Union residents, we undertake marketing outreach only with your expressive affirmative consent and in compliance with applicable data privacy laws. European Union residents will not be added to the marketing lists unless they have already provided express affirmative consent consistent with applicable data protection laws.

COLLECTION AND USE OF CHILDREN'S PERSONAL INFORMATION

Networking Planet Inc Services are intended for adults. In order to respect the privacy of children online, Networking Planet Inc does not knowingly collect, maintain or process personal information submitted by children under the age of 18, and we will promptly delete any such personal information when we become aware that it was collected inadvertently.

If we do collect age information, and users identify themselves as under the age of 18, the site will block such users from providing personal information.

SHARING OF YOUR PERSONAL INFORMATION / ONWARD TRANSFER

We will not disclose your personal information without your consent outside of Networking Planet Inc, such as service providers who help initiate, render, bill and collect for our products and services, other than as described in this Privacy Policy. No data that we host or process for our customers is used for our marketing purposes or the marketing purposes of any other party.

We will not share or sell any personal information collected through the Networking Planet Inc Services with any external parties for their own purposes without your consent. Personal information that we collect from you may be shared with Affiliates and third parties for the purposes of marketing our products and services. However, Networking Planet Inc may sell your personal information to third parties in order to enforce our rights under our customer contracts or the Terms of Use. For example, we may sell past-due accounts receivable as an asset in an effort to collect for unpaid services. Networking Planet Inc will obtain written assurances from its agents that they will safeguard personal information consistently with this Privacy Policy. Affiliates and third parties are permitted to obtain and process only the personal information they need and are prohibited from using it for any purpose other than those permitted by law or with your consent. When we use service providers to assist us in processing your personal information, we require that they comply with this Privacy Policy and maintain appropriate privacy and security measures. Where we have knowledge that a third party is using or disclosing personal information in a manner contrary to this Privacy Policy, Networking Planet Inc will take reasonable steps to prevent or stop the use or disclosure.

YOUR PRIVACY RIGHTS

Accessing Your Personal Information. Networking Planet Inc takes reasonable measures to assure that the personal information we use about you is reliable, accurate, complete, and current. Customers who wish to review and/or edit their personal information may do so by contacting us using the information listed at the end of this Privacy Policy. We will make reasonable good faith efforts to provide you with access to your personal information upon request either to correct or amend your personal information if it is inaccurate or incomplete or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes.

We may decline to process requests for personal information that are unreasonably repetitive or systematic, require disproportionate technical

effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not legally required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

Networking Planet Inc provides customers with the ability to authorize individuals (“Authorized User”) to make inquiries, limited changes, or both, in order to maintain their account. Customers may specify the type of information and changes that the Authorized User is approved to request. Customers may add or remove an Authorized User from their account at any time.

We ask customers and their Authorized Users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests. If you or your Authorized User contacts us via phone, you will be asked to provide your name, the account Personal Identification Number (“PIN”) (if the account is PIN protected; otherwise you will be asked to provide other information for the purposes of identity verification), and the billing address ZIP code before we are able to assist you. You or your Authorized User will be asked to present a valid photo ID when requesting account information while at a business office.

As a processor of personal information on behalf of our customers, we do not provide direct access to personal information we may host or process on behalf of our business customers. If we receive a data subject access request for a customer’s data, we will direct the requester to the business customer to properly place the request.

Communication Preferences. If you do not want Networking Planet Inc to use your personal information to contact you for marketing or solicitation purposes (excluding notices about your existing account), Networking Planet Inc customers may simply opt-out of the marketing emails by using the unsubscribe option at the bottom of the marketing email or make this request to info@NetworkingPlanet.com. When writing to us, please specify which contact methods (phone calls, mail, bill inserts, or email messages) you would prefer that we do not use to communicate to you for the purposes outlined above. Keep in mind that restricting contact methods may make it more difficult for us to keep you informed about new products and services that can

be of benefit to you. You can revoke these options at any time by contacting us using one of the methods provided in this Privacy Policy.

These choices do not apply to the display of online advertising or the receipt of transactional and service communications that are considered part of certain Networking Planet Inc services, which you may receive periodically unless you cancel the service.

If you request to not be contacted by phone for marketing or sales purposes, please note that the Networking Planet Inc Do Not Call List restricts these types of phone contacts from Networking Planet Inc only, so you may continue to receive calls from other companies. If you would like to add your number to the National Do Not Call List, you may do so by calling 1-813-751-5123 or visiting www.donotcall.gov.

CONTROLLING UNSOLICITED EMAIL (“SPAM”)

Networking Planet Inc is concerned about controlling unsolicited email or “spam.” While Networking Planet Inc and its vendors maintain controls to help prevent this activity, there is no currently available technology that will totally prevent the sending and receiving of unsolicited email. Using junk email tools and being cautious about the sharing of your email address while online will help reduce the amount of unsolicited email you receive. For more information about this and other related topics go to the Federal Trade Commission’s website at <http://www.onguardonline.gov>.

CALIFORNIA PRIVACY RIGHTS

Under the California “Shine the Light” Law, a business subject to California Civil Code section 1798.83 is required to disclose to its customers, upon request, the identity of any third parties to whom the business has disclosed “personal information” regarding that customer within the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to:

Networking Planet Inc , Attn: Legal Dept., 3959 Van Dyke Rd Ste 278, Lutz, FL 33558

Please note that California businesses are only required to respond to a customer request once during the course of any calendar year.

The California Consumer Privacy Act of 2018 (“CCPA”) provides current California residents with certain qualified rights regarding their personal information as defined by the CCPA (“CCPA PI”). Networking Planet Inc respects the rights of our California resident customers to exercise these rights, including to:

- Be informed about categories of CCPA PI collected; the sources of that information; the business purpose of collecting and using that information; and the categories of third parties with whom CCPA PI is sold or shared if applicable.
- To request to receive information regarding CCPA PI collected by Networking Planet Inc over the past 12 months.
- To request the erasure of your CCPA PI held by us.
- To opt-out of the sale of CCPA PI by us to third parties.
- To be free from discrimination for exercising your privacy rights under the CCPA.

Depending on your relationship to Networking Planet Inc, some of these rights may not apply to you. Moreover, Networking Planet Inc does not sell personal information and has not done so in the preceding twelve (12) months. Further, requests to exercise privacy rights related to data that Networking Planet Inc hosts or processes on behalf of its business customers should be directed to that business. If you, or your designated agent, would like more information about these rights or would like to submit a request, you may contact us by calling at 813.751.5123, or email us at privacy@NetworkingPlanet.com. We will need to request certain information from you to verify your identity and the authenticity of the request prior to responding.

SECURITY OF YOUR PERSONAL INFORMATION

Networking Planet Inc leverages ITIL based practices to manage mission critical data centers and customer infrastructure 24/7/365. Our facilities are SSAE 18 audited to ensure that independent reviewers conclude that our customers’ data is secure, available, and compliant up to these reasonable and rigorous industry standards.

Networking Planet Inc has designed these and other reasonable technical and organizational security safeguards to protect against such risks as loss or unauthorized access, destruction, use, alteration, modification, or disclosure of personal information. You should understand that the open nature of the Internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data is intended. Cybersecurity threats are also constantly evolving, and while we strive to maintain robust protections, no one can guarantee the absolute security of data accessible via the Internet.

Our policies restrict access to personal information to Networking Planet Inc employees, employees of Affiliates, and authorized third parties who need to know that information in order to operate, develop or improve our services; and our policies require that these individuals be bound by confidentiality obligations and may be subject to discipline, including termination, if they fail to meet these obligations. We do not guarantee that our safeguards will always work.

Our policies require us not to store personal information beyond what is necessary for business purposes, including for internal service evaluation and quality assurance purposes, except as otherwise required by law.

ENFORCEMENT OF THIS PRIVACY POLICY

Networking Planet Inc conducts compliance audits of our relevant privacy practices to verify adherence to this Privacy Policy. Any employee that Networking Planet Inc determines is in violation of this Privacy Policy may be subject to disciplinary action up to and including termination of employment.

Our employees, agents, and Affiliates are trained regarding their responsibilities to safeguard your privacy. They are required to adhere to a Code of Business Conduct, this Privacy Policy, and Networking Planet Inc's policies which support our commitment to protecting customer privacy. If employees or third parties become aware of practices that raise privacy concerns, they are required to report them to their supervisors or to contact Networking Planet Inc's Incident Response Team.

PRIVACY SHIELD COMPLIANCE

Networking Planet Inc complies with the EU – U.S. Privacy Shield Framework regarding the collection, use, and retention of personal information from the European Union as well as where data is transferred from the United Kingdom and/or Switzerland. Networking Planet Inc has certified to the U.S. Department of Commerce that it adheres to the Privacy Shield Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement with respect to all personal data transferred from the EU, United Kingdom, and Switzerland to the US within the scope of its certification. To learn more about the EU – U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework(s), and to view Networking Planet Inc’s certification, please visit <https://www.privacyshield.gov/list>.

CHANGES TO THIS PRIVACY POLICY

We will occasionally update this Privacy Policy to reflect changes in our services, or from customer feedback or legal requirements. When we post changes to this Privacy Policy, we will revise the “last updated” date at the bottom of this Privacy Policy. If there are material changes to this Privacy Policy or in how Networking Planet Inc will use your personal information, we will make reasonable attempts to notify you directly. We encourage you to periodically review this Privacy Policy.

DISPUTE RESOLUTION

Any questions or concerns regarding the use or disclosure of personal information should be directed to Networking Planet Inc at the address given below. Networking Planet Inc will investigate and attempt to resolve disputes regarding use and disclosure of personal information by reference to the principles contained in this Privacy Policy. If you are unsatisfied with the way we have responded to any concerns about our handling of your personal information, the matter may be dealt with through the American Arbitration Association for all personal information, except that any disputes involving personal information from the European Union must follow the procedures below.

Networking Planet Inc voluntarily complies with the EU – U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework and is subject to the investigatory and enforcement powers of the Federal Trade Commission.

Any person in the EU, UK or Switzerland who is not satisfied with Networking Planet Inc's compliance with the EU – U.S. Privacy Shield or Swiss – U.S. Privacy Shield may contact Networking Planet Inc by mail at: Networking Planet Inc IT Solutions, Attn: Legal Dept., 525 Junction Road, Madison, WI 53717, or by email at: privacy@NetworkingPlanet.com to resolve such complaints. Networking Planet Inc will process any such complaint within 45 days of receipt. If you believe that such-complaint has not been resolved, you may first try and settle the dispute by mediation, administered by the International Centre for Dispute Resolution under its Mediation Rules, before resorting to arbitration, litigation, or some other dispute resolution procedure. The rules governing these procedures and information regarding how to file a claim free of charge can be found here: <https://go.adr.org/privacysshield.html>. If you remain dissatisfied, you may contact your national Data Protection Authority in the country where you reside. Networking Planet Inc agrees to cooperate and comply with the U.S. Department of Commerce in resolving such disputes. If you remain dissatisfied and meet the pre-arbitration requirements of Annex I Part C of the EU – U.S. Privacy Shield Framework or Annex I Part C of the Swiss – U.S. Privacy Shield Framework, as applicable, you may invoke binding arbitration pursuant to procedures in Annex I of the EU – U.S. Privacy Shield Framework Principles or Annex I of the Swiss – U.S. Privacy Shield Framework found here: <https://www.privacysshield.gov/EU-US-Framework>.

CONTACTING US

Networking Planet Inc welcomes your comments regarding this Privacy Policy. If you have questions about this Privacy Policy or believe that we have not adhered to it, please contact us by emailing us at privacy@networkingplanet.com or by writing to us at the following address: Networking Planet Inc IT Solutions, Attn: Legal Dept., 3959 Van Dyke Rd Ste 278, Lutz, FL 33558

Any questions or concerns regarding the use or disclosure of personal information should be directed to Networking Planet Inc at the address given above.

Web-Based Agreements:

- [Web-Based Master Services Agreement](#)

Last Update: January 23, 2023