

# Privacy Policy

For purposes of this AirCell Privacy Policy, "AirCell," "we," "us," and "ours" shall mean AirCell, Inc. Please note that this Privacy Policy does not apply to information that we handle on behalf of our customers in our role as a service provider. Such information is governed by the terms of the applicable customer agreement; if you have questions about the processing of your information or to exercise any applicable legal rights, please contact AirCell.

AirCell understands the importance of protecting your personal information. This Privacy Policy applies only to AirCell's treatment of data collected online at this website ("Site"), or otherwise noted herein, and does not apply to any offline data collection practices or to the data collection practices of any third parties, AirCell customers, or any entities affiliated with AirCell. The use of an AirCell website constitutes your acknowledgement of this Privacy Policy.

## 1. Changes to this Policy

AirCell's policies and procedures for handling customer information have been created with the understanding that Internet technologies are still evolving and that Internet business methods are continuing to evolve to meet the needs and opportunities of the changing technologies. As a result, AirCell's policies and procedures are subject to change. The most recent version will be posted to the website and users acknowledge the policy as it exists when the customer uses the site.

## 2. What personal information do we collect?

We collect personal information to provide our services and solutions, to conduct our business, and to improve our products, services, and customer service, and for certain other purposes explained below.

The type of personal information we collect will depend on the purpose for which it is collected and used. We will collect personal information to the extent that is reasonably necessary for that purpose.

The types of personal information that we might collect include, but are not limited to, the following:

- name;
- title or position;
- company name and details;
- business address;
- e-mail address;
- phone number;
- fax number;
- information that you provide to us through customer surveys; and
- information when you register for AirCell events and seminars.

If your organization is a customer of AirCell and you do not agree to provide us with your personal information, this may limit our ability to provide our services and solutions to your organization.

This paragraph will only be applicable to the extent that you have applied for employment using our website. If you apply for employment with AirCell, we also collect personal information including details contained in letters of application and CV/résumé, previous employment background, education history, work-related licenses, certifications, or other professional credentials, and language(s) and other relevant skills. You may also voluntarily choose to provide other relevant personal information as part of your application. If you intend to provide us with personal information of a reference or any other third party as part of your application for employment, it is your responsibility to obtain consent from that third party prior to providing the personal information to us.

### **3. How do we collect personal information?**

We collect personal information directly from you in various situations, including but not limited to the following:

- when you place purchase orders;
- when we respond to your inquiries and requests;
- during conversations or email exchanges between you and our representatives;
- when we obtain feedback from you about our solutions and services;
- when we conduct our administrative and business functions;
- when you register for our events, workshops and seminars or subscribe to our mailing lists and newsletters;
- when we market our solutions and services to you;
- through your access and use of our websites; and
- if you apply for employment with us.
- We also obtain personal information through third parties. For example, we may collect personal information from public databases, business partners, or third parties that provide list enhancement or similar services, to the extent permitted by applicable law.

We also supplement the personal information that you provide to us with information we receive from other companies in the Syndeo Group of companies to offer you a more consistent and personalized experience in your interactions with AirCell.

Where possible, we will inform you what information you are required to provide to us and what information is optional.

### **4. For what purposes do we collect, hold, use, and disclose personal information?**

We will use your personal information only for the purposes for which it was collected or agreed with you. We collect, hold, use, and disclose personal information for purposes including but not limited to the following:

- to send communications about our products and services, including product updates;
- to establish, manage, and maintain our business relationships;
- to respond to inquiries and requests;
- to develop, provide, and improve our services and solutions;
- to inform you about our services and solutions;
- to obtain feedback from you on our services and solutions;
- to provide you with a more personalized experience when you interact with us;
- to conduct administrative and business functions;
- to update our records and keep contact details up to date;
- to enable you to subscribe to our website, newsletters and mailing lists and to register for AirCell events, workshops, and seminars;
- as permitted by law, to send email marketing communications;
- to process your application for employment with us, evaluate whether your qualifications may be suitable for other employment positions with AirCell, and for employment-related purposes if you are hired;
- to assess the performance of our websites and to improve its operation;
- to process and respond to privacy complaints;
- to comply with any law, rule, regulation, lawful and binding determination, decision, or direction of a regulator; industry codes to which we subscribe or which apply to us, in cooperation with any governmental authority of any country; or as we otherwise believe to be necessary or appropriate under applicable law.

## **5. To whom do we disclose personal information?**

We disclose your information, including personal information, as follows:

- To other visitors of our website when you post comments or questions on public forums that we make available. We urge you to exercise caution when deciding to post any personal information online.
- To our affiliates and to other Syndeo companies in order to offer you a more consistent and personalized experience in your interactions with Syndeo. If we share information with our affiliates and Syndeo companies, their use and disclosure of your information will be subject to this Privacy Policy.
- To contractors, suppliers, and other third parties who provide business, marketing, and other services to us;
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock;
- To regulators, courts/tribunals, and other governmental authorities of any country, or other recipients as we believe to be necessary or appropriate under applicable law; and
- Where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Privacy Policy, or as evidence in litigation in which AirCell is involved.

## **6. How do we store and secure personal information?**

We have instituted commercially reasonable processes that are designed to safeguard your personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information in our possession is secure.

Access to your personal information is limited to authorized individuals who have a legitimate business need to access your personal data in furtherance of as part of their job duties and responsibilities.

AirCell's website is linked to the internet, and as the internet is inherently insecure, we cannot provide any assurance regarding the security of any transmission of information you communicate to us online. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

## **7. Direct marketing**

To the extent permitted by applicable law, we may send you direct marketing communications and information about our services and solutions that we consider may be of interest to you. We may send communications in various forms, including mail, SMS, fax, and email, in accordance with applicable laws.

If you do not wish to receive direct marketing communications from AirCell, you may opt-out of receiving them by using the opt-out mechanisms provided in those communications.

We will try to comply with your request(s) as soon as reasonably practicable. Please also note that if you do opt-out of receiving marketing-related communications from us, we may still send you important administrative messages, and you cannot opt-out from receiving administrative messages.

## **8. How can you access and correct personal information?**

You have a right to ask us to update, correct or delete your personal information. If you wish to access, correct, update, suppress, or delete your personal information that has been previously provided to us, please send a written request to: [support@aircell.us](mailto:support@aircell.us)

Please note that we may need to retain certain personal information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion.

We would appreciate it if you would keep your personal information accurate. Please update your personal information whenever your details change.

## **9. Using our websites**

When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer or mobile device. This enables us to distinguish you from other users of our website and recognize your computer or mobile device. This helps us to provide you with a better experience when you browse our website. We also use cookies to measure traffic patterns and to determine which areas of our website have been visited. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them, however, note that our website requires cookies to operate effectively. If you continue using our website, you accept the use of cookies. Our website does not respond to web browser do-not-track signals.

In order to help ensure that appropriate data protection and privacy considerations are applied to your access and use of our website in accordance with applicable laws, we are required to identify the country from which you access and use our website. By accessing and using our website: (i) you warrant and represent that you have not taken any measures whatsoever to obscure your internet protocol address (which is the electronic addresses of computers or mobile devices connected to the internet) ("IP address") in such a way as to make it impossible for our systems to identify the country from which you access and use our website; and (ii) you warrant, represent, and agree that should you access and use our website in contravention hereof, you do so entirely at your own risk and you disclaim any rights you may contend to have with respect to your country's data protection and privacy considerations. You further hold AirCell harmless against any claims, including claims made by relevant authorities, arising out of your deliberate actions to obscure your IP address.

We may use Flash local shared objects (LSOs) and other technologies to, among other things, collect and store information about your use of an AirCell website. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also control Flash LSOs by going to the Global Storage Settings Panel and following the instructions (which may include instructions that explain, for example, how to delete existing Flash LSOs (referred to "information" on the Macromedia site), how to prevent Flash LSOs from being placed on your computer or mobile device without you being asked, and (for Flash Player 8 and later) how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with our online content.

Any activity you participate in on our website may be monitored. We log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyze trends, administer the website, track users' movements, and gather broad demographic information.

We use third parties such as network advertisers to serve advertisements on third-party websites or other media (e.g., social networking platforms). This enables us and these third parties to target advertisements to you for products and services in which you might be interested. Third-party ad network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to

you. These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this one. We may provide these third-party advertisers with information, including personal information, about you.

Users in the United States may opt out of many third-party ad networks. For example, you may go to the Digital Advertising Alliance ("DAA") [Consumer Choice Page](#) for information about opting out of interest-based advertising and their choices regarding having information used by [DAA companies](#). You may also go to the Network Advertising Initiative ("NAI") [Consumer Opt-Out Page](#) for information about opting out of interest-based advertising and their choices regarding having information used by [NAI members](#). If you are in the EU, you may opt-out of certain third party cookies that we and other websites may use for targeting through <http://www.youonlinechoices.eu> or [www.aboutads.info](http://www.aboutads.info).

Opting out from one or more companies listed on the DAA [Consumer Choice Page](#) or the NAI [Consumer Opt-Out Page](#) will opt you out from those companies' delivery of interest-based content or ads to you, but it does not mean you will no longer receive any advertising through our Site or on other websites. You may continue to receive advertisements, for example, based on the particular website that you are viewing (i.e., contextually based ads). Also, if your browsers are configured to reject cookies when you opt out on the DAA or NAI websites, your opt out may not be effective. Additional information is available on the DAA's website at [www.aboutads.info](http://www.aboutads.info) or the NAI's website at [www.networkadvertising.org](http://www.networkadvertising.org).

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party website and we are not responsible for the privacy policies or the content of any third-party website. The inclusion of any link does not imply endorsement by AirCell of such site or the contents thereof. Use of or reliance on any external links is at your own risk.

## **10. Retention period**

We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required and/or permitted by law.

## **11. Changes to our Privacy Policy**

We may change this Privacy Policy from time to time. Any updated versions of this Privacy Policy will be posted on our website. Please review this page regularly.

## **12. Contacting us**

If you have any questions or concerns about how your personal information is being handled by AirCell, please contact us as follows:

Email: [support@aircell.us](mailto:support@aircell.us)

AirCell, Inc.

Attn: Legal Department

300 Cardinal Drive, Suite 110

Saint Charles, IL 60175

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