

Back40 Broadband, LLC Data Privacy Policy

Data Privacy Practices for Wireless Internet Services

Last Modified: November 2020

Back40 Broadband, LLC. (“**Back40 Broadband**”, “**we**” or “**us**”) takes your privacy seriously. This policy describes how we use and protect information that we obtain from and about you. Please carefully review this Privacy Policy so you can make an informed decision about accessing or using wireless internet services delivered by Back40 Broadband (“**Internet Service**”, “**Service**”).

This Back40 Broadband Privacy Policy (“**Privacy Policy**”) describes our privacy practices with regard to the Internet Service. As a user of the Internet Service, you are referred to as “**you**” or “**Customer**.”

In the course of using the Internet Service, you may provide or make available to us personally identifiable information, which may include one or more of the following types of information: name, email address(es), postal mailing address, work/mobile/home telephone number, Internet Protocol (IP) address, media access control (MAC) address, and/or geolocation information from devices used to access the Internet Service. (collectively, “**Personal Information**”).

By accessing or using the Internet Service, you expressly consent to our use of Personal Information and our handling practices described in this Privacy Policy. If you do not want Personal Information to be used in the manner set forth in this Privacy Policy, please immediately stop your use of the Internet Service. You may send any questions or requests concerning this Privacy Policy to customercare@back40broadband.com

Any Personal Information you provide, or which may be available to us through your use of the Internet Service is subject to the terms of this Privacy Policy, and the Back40 Broadband Services Agreement.

What Does This Privacy Policy Cover?

This Privacy Policy explains how we collect, maintain, use, and disclose (including for commercial purposes), Personal Information and other information with respect to your access to and use of Internet Service, including:

- any software or services related to Internet Service, including maintenance, support, and billing that we may provide the features and/or services available through the Internet Service
- in conjunction with testing, validating or improving the security or performance of the Internet Service, or with respect to additional features, functions or applications.

Please see the Appendix at the end of this Privacy Policy for a table summarizing the data collected.

How Back40 Broadband Protects Information

Back40 Broadband uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of Personal Information. We cannot, however, ensure or warrant the security of any information you transmit to us or that is accessible to us to use as provided in this Privacy Policy. This is not a guarantee that such information will not be accessed, disclosed, altered, or destroyed by breach of any of Back40 Broadband’s physical, technical, or managerial safeguards.

If Back40 Broadband learns of a security systems breach that affects your or your Personal Information, we will attempt to notify you electronically through the contact information that you last provided to us so that you can take appropriate protective steps or as otherwise required by applicable law. Back40 Broadband may also post a notice on our web page (<http://back40broadband.com>) if a security breach occurs. Depending on where you live, you may have a legal right to receive in writing notice of a security breach.

Privacy Settings

Please be aware that no security measures are perfect or impenetrable. Additionally, Back40 Broadband cannot control the actions of other individuals with whom you may choose to share your information. Further, even after information posted on the Internet is removed, caching and archiving services may have saved that information and other users, or third parties may have copied or stored the information. This may include Personal Information.

Where We Store Your Information

The data that we collect from our Customers, including your Personal Data, is never transferred outside of the United States. When and where possible, any Personal Information stored in systems maintained or used by Back40 Broadband for the delivery of the Internet Service, will utilize encryption to protect your Personal Information.

Data Retention

Back40 Broadband will retain Personal Information we collect or access under this Privacy Policy, or process on your behalf, for as long as needed to provide the Internet Service to you and will retain and use your Personal Information beyond that point, as necessary, as permitted under this Policy or to comply with legal obligations, resolve disputes, and enforce our contractual relationships.

Information Back40 Broadband Collects About You for Our Own Purposes

We may collect data about you from a variety of ways.

User-Provided Information

When you become a customer of Back40 Broadband and use the Internet Service you may provide or make available Personal Information to Extreme for the purposes of delivering the Internet Service.

Automatically Collected Information

As the Internet Service is a digital service, some information is also automatically collected by systems that monitor security and network performance to aid in the delivery of the Internet Service. Information such as your IP address, MAC address, and other information relating to activity while using the Internet Service. **We do not log or monitor individual website activity or other transactional activity while you are using the service, nor is any data decrypted by us..**

The Ways Back40 Broadband Uses and Discloses Information About You

Our Use of Your Personal Information

Back40 Broadband may use Personal Information we collect to process your requests or transactions, to provide you with information or services you request, to inform you about other information, events, promotions, products or services we think will be of interest to you, to facilitate your use of, and our administration and operation of, the Internet Service, to comply with Back40 Broadband's legal obligations as an

Internet Services Provider and for the purpose for which we may reasonably understand the information was provided or made available by you.

For example, we may use the information we collect to:

- send you a welcoming email and to contact you about your use of the Internet Service, to provide other services, products or information you request and to complete any transactions in connection therewith.
- respond to your emails, submissions, comments, requests or complaints and provide you with support.
- request feedback and to enable us to identify, develop, customize and improve the Internet Service.
- Collect and analyze usage and performance data regarding the Internet Services
- achieve the purpose for which we may reasonably understand the information was provided or made available to us.

Back40 Broadband may use automatically collected information or Personal Information for a number of reasons related to the Internet Service, including to monitor the effectiveness of the Internet Service, including aggregate usage metrics such as total bandwidth consumed, peak usage times and to ensure Service security and permitted usage of the Service

Service Providers

Back40 Broadband may share your Personal Information with our employees, agents and contractors for legitimate business reasons, including to companies that provide services to us, such as our outside contractors or agents who help us install, support, and manage our Internet Service. However, these service providers may only use your Personal Information to provide us with a specific service and not for any other purpose.

Other Commercial Purposes

Back40 Broadband will never sell, distribute, or otherwise provide your Personal Information to third parties for any purpose not already listed within this Privacy Policy.

Compliance with Laws and Legal Requirements

We may disclose Personal Information in the good faith belief that we are lawfully authorized or required to do so, or that doing so is reasonably necessary or appropriate to comply with the law or with legal process or authorities, respond to any claims, or to protect the rights, property or safety of the Internet Service, our employees or the public, including without limitation disclosures intended to protect Back40 Broadband or Customers from fraudulent, abusive, inappropriate or unlawful use of the Internet Service.

Deidentified Information

We will use your deidentified data to meet Federal Communications Commission reporting requirements as an internet services provider.

Other Transfers

We may disclose or transfer information about you, including your Personal Information, to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

Choices You Have Regarding the Use of Your Personal Information

You may, of course, decline to share your Personal Information with us in which case you should immediately cease using the Internet Service.

You may “opt out” of receiving email from us for promotional and marketing purposes by clicking on the unsubscribe link included at the bottom of our marketing emails, or by contacting us via email or phone. Opting out of receiving email sent for promotional and marketing purposes does not limit or affect our ability to send you service and account-related emails or to collect, access, use, disclose or transfer your Personal Information as otherwise described in this Privacy Policy.

To protect your privacy and security, we take reasonable steps to verify your identity before granting you account access or making corrections to your information.

Changes and Updates to This Privacy Policy

This Privacy Policy may be revised periodically without further notice to you and any such modification will be reflected by a “Last Modified” date above. We may not notify you of any changes to this Privacy Policy except by posting a new Privacy Policy on our website. (<http://back40broadband.com/privacy>) Please revisit this page to stay aware of any changes. In the event that the modifications materially alter your rights or our obligations hereunder, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address, if we have one on file, or generate a pop-up or similar notification when you access our Services for the first time after such material changes are made. Your continued use of the Services after the revised Privacy Policy has become effective indicates that you have read, understood and agreed to the current version of the Privacy Policy.

Back40 Broadband Contact Information

Please contact us with any questions or comments about this Privacy Policy, your Personal Information, our third-party disclosure practices, your consent choices, or to exercise your privacy rights, by email at customercare@back40broadband.com or by mail at:

Back40 Broadband, LLC

PO Box 128

Belgium, WI. 53004-0128

Data We Collect About You

Customer Provided Information	Full Name
	Mailing Address
	Home/Work/Mobile phone number(s)
	Email Address(es)
	Credit Card (for automatic payment)
	Bank account number (for auto pay)
Automatically Obtained Information	IP Address
	Equipment MAC Address
	Geo Location information
	Traffic counters and statistics