

## ELESS ® MZM WIRELESS, VIDEO & BROADBAND SOLUTIONS

## **Privacy Policy**

This policy applies to the collection, use, disclosure and protection of Personal Data, relating to customers of Eddy Wireless LLC and all of its subsidiaries and related entities ("Eddy Wireless"), suppliers of Eddy Wireless, and website users. This policy is effective as of January 1, 2004.

"Personal Data" means information pertaining to specific individuals, or by which specific individuals can be identified, including by name, identification number, address, or other personal characteristics or attributes. Personal Data does not include aggregated statistics, compilations, anonymous data, or other derivative data that does not, alone or with other data, identify a specific individual. "Data Subject" means an individual who is the subject of personal data.

**Basic Principles**: Eddy Wireless will not collect or maintain Personal Data that is not relevant to or not required for the conduct of Eddy Wireless business and will take reasonable steps to assure that Personal Data remains accurate.

Personal Data will be treated as confidential, and sufficient internal procedures and controls will be employed to prevent unauthorized access, disclosure, use, copying, modification, destruction. Personal Data maintained by Eddy Wireless will not be used for purposes that are incompatible with the purposes for which it was collected. Personal Data will not be transferred to third parties, except as required for the conduct of Eddy Wireless business, and only to third parties who have agreed in writing to protect the privacy of Personal Data.

On-line Registration: If you decide to register with an Eddy Wireless web site, you will be asked to provide your name, company, country, and email. Eddy Wireless uses the information that you provide to us during registration to enhance your experience. This may include presenting promotional offers online or via email with your consent or in accordance with applicable law, tailored to your previous purchases. Eddy Wireless does this to try and make your experience with us more productive and efficient.

**Personal Data Accuracy and Completeness**: Eddy Wireless endeavors to maintain Personal Data accurately and relies on its customers, suppliers, and other third persons who give Eddy Wireless Personal Data, to ensure that the Personal Data they provide to us is complete and accurate, and to notify us of updates and changes to Personal Data as required from time to time.

**Opting Out Of Email Communications with Eddy Wireless**: You can choose not to receive emails from Eddy Wireless at any time by simply sending an email, including your name and email address, to <a href="mailto:remove@eddywireless.com">remove@eddywireless.com</a> and we'll remove you from all mailings.

Eddy Wireless will treat all Personal Data in our possession as confidential, and maintain internal procedures and controls designed to prevent unauthorized or unlawful processing of data and against accidental loss or, destruction of, or damage to, Personal Data.

**Security**: Personal Data in Eddy Wireless's custody or control is protected by appropriate technology, policies and procedures designed to prevent unauthorized use, access, disclosure, modification, copying or destruction and to maintain the integrity, availability and privacy of Personal Data.

Eddy Wireless will only process Personal Data fairly and lawfully and will not use Personal Data in Eddy Wireless possession for purposes that are incompatible with the purposes for which Eddy Wireless receives the Personal Data.

Eddy Wireless uses the Personal Data that Eddy Wireless collects about you: to process orders; to help us to improve our site and your online experience; to provide you with information about our products and services; for ordering, customer support, payment, processing and service purposes; to transact business with us; for credit checks, collections and related billing or credit purposes; and as otherwise allowed by law.

Online Ordering: If you place an order online, we need to know your name, email address, mailing address, credit card number, and the credit card's expiration date. We may also ask you for certain credit history and tax information. This allows us to process and fulfill your orders and keep you up-to-date on the status of your order.



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Literature Requests, Samples, Software Downloads: When you request literature, Product Samples, or a free software download, we may ask for your name, address, and email address so we can fulfill your request. In some cases, the collection of additional information may be required as part of the offer.

Cookies: Eddy Wireless may also collect Personal Data concerning website users through the use of "cookies" in order to provide better customer service. "Cookies" are files that websites place on users' computers to identify the user and enhance the website experience. Internet browsers can generally be set to warn you if cookies are used and whether you wish to accept them. Turning off cookies will not prohibit you from using any Eddy Wireless web site; it may however limit your use of the sites.

Eddy Wireless will not transfer Personal Data to third parties, except as required in our business, and provided those third parties preserve the confidentiality and maintain appropriate security of Personal Data and use it only for the purposes provided.

**Third Parties**: Eddy Wireless maintains collaborative relationships with vendors, subcontractors, strategic partners, and others who assist Eddy Wireless and our customers in the conduct of our respective businesses. From time to time Eddy Wireless may transfer Personal Data to these parties to enable them to work with Eddy Wireless, but Eddy Wireless requires that they maintain the privacy of Personal Data in a manner satisfactory to Eddy Wireless and consistent with applicable law.

Eddy Wireless will ensure that whenever Personal Data is transferred to foreign countries, it will remain adequately protected.

It is Eddy Wireless policy not to transfer Personal Data to any entity, individual, or organization located in countries that do not provide an adequate level of data protection, unless:

- You have given your consent;
- The transfers are needed to enter into or perform a contract with you;
- The transfers are needed for the conclusion or performance of a contract concluded in your interest;
- The transfers are made pursuant to approved written contracts or a set of binding corporate rules which protect your rights; or
- The transfers are permitted under applicable law.

Personal information transferred to another country may be subject to all the laws of that country, including laws related to national security and anti-terrorism, which may permit law enforcement or regulatory agencies to obtain access to information held by private businesses.

Eddy Wireless will deal fairly with each person whose Personal Data is in Eddy Wireless custody or control.

**Enforcement**: Persons who have questions or believe their Personal Data is not handled in accordance with this Privacy Policy should contact the Company's privacy official at Eddy Wireless Compliance Services <a href="mailto:compliance@eddywireless.com">compliance@eddywireless.com</a> who will review the issue in an effort to resolve the issue quickly and amicably.

## **Legal Requirements**

- This Privacy Policy is issued by Eddy Wireless and applies exclusively to facilities of Eddy Wireless, LLC. and its subsidiaries and related entities.
- Eddy Wireless may change this Privacy Policy from time to time as it deems appropriate. This Policy is made public on our website and is current at the date written above.
- This policy is designed to comply with the Safe Harbor Privacy Principles as set forth by the U.S. Department of Commerce in consultation with the European Commission that are available to U.S. companies under the European Commission's directive on data protection. As Eddy Wireless LLC. is a U.S. company, it has voluntarily decided to comply with the U.S.-EU Safe Harbor Framework and certify its adherence to the Safe Harbor Privacy Principles. To learn more about the Safe Harbor program, please visit <a href="http://www.export.gov/safeharbor/">http://www.export.gov/safeharbor/</a>
- This document describes Eddy Wireless privacy policy. However, this policy does not grant or create any additional rights or remedies for the Data Subjects or any additional obligations on the part of Eddy Wireless other than those obligations required by applicable law, including the U.S.-EU Safe Harbor Framework.