

PRIVACY POLICY

Effective Date: January 1, 2020

This Privacy Policy (“Privacy Policy”) describes the types of information Global Connections Inc of America d/b/a StandUp Wireless (“StandUp,” the “Company,” “we,” “us,” or “our”) collects from or about you. It also explains how StandUp may use and disclose such information, as well as your ability to control certain uses and disclosures. This Privacy Policy applies to our telecommunications and internet products and services, our devices, our StandUp-branded apps, and our website, including your online account (collectively, “Services”). Please take a moment to review the terms of our Privacy Policy, as they apply to you when you use the Services. StandUp may change its Privacy Policy from time to time, so check this page regularly for updates.

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Personal Information We Collect About You

Depending on how you interact with us or our Services, we may collect Personal Information from or about you. “Personal Information” is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Personal Information does not include information that is not used to identify you, such as aggregate, de-identified, or anonymous information.

Information You Provide. Information we may collect that you provide us includes:

- **Identity Information**, such as your name, title, date of birth, gender, and preferred language.
- **Government-Issued Identification Information**, such as your Social Security number or government-issued identification information.
- **Lifeline Eligibility Information**, such as documentation of participation in an eligible government low-income or financial assistance program or documentation demonstrating proof of income, which will only be used to determine Lifeline eligibility.

- **Contact Information**, such as your mailing address, billing address, email addresses, and telephone numbers.
- **Payment Information**, such as credit and debit card information or other financial payment information, depending on the form of payment you choose.
- **Billing Information**, such as purchase and order history, billing information related to Call Detail Records, and IDs associated with billing and payments.
- **Account Profile Information**, such as your username or similar identifier and your account password.
- **Correspondence Information**, including information you may provide to us when you communicate with us through our website, via email, over the phone, or through postal mail, such as questions, concerns, and issues and your intended or actual use of our Services, as well as records of your communications with us.
- **Marketing and Communications Information**, such as your preferences in receiving marketing, promotions, and sales offers from us and our marketing partners.
- **Information on Device**, including any content stored on your Device when you relinquish, exchange, return, or recycle your Device or provide it to us or our vendors for maintenance. We do not access, use, disclose, share, sell, or retain this information, but you should remove or otherwise safeguard any Personal Information on your Device before giving your Device to us or our vendors.

Information We Automatically Collect. Information we may automatically collect about you includes:

- **“Customer Proprietary Network Information” or “CPNI”**, including information related to your use of the Company’s voice and text services, such as quantity of use, technical configuration, the types of Services you have, device location, and destination of communications (collectively, “Call Detail Records”) and related billing information.
- **Usage Information**, such as non-CPNI information about your use of the Services, including the date and time of your use, frequency of use, and the amount of data you use, and your activity on your device.
- **Online Activity Information**, such as information about your activity while using the Services, including websites you visit and activity on those sites, use of StandUp-branded preinstalled applications, apps you purchase, download, and use, and your interaction with our communications and advertisements. Review “Your Advertising Choices and Consent Preferences” below for more information.
- **Location Information**, such as the location of your device when it is connected to or using Global Positioning Satellites (“GPS”), the Company’s wireless network, or other location technology.
- **Device and Computer Information**, including your internet protocol (“IP”) address, browser type, operating system, software version, device type, model, or identifier, signal strength, power (on/off) status, and information about devices you tether to your device.

Information from Other Sources. Information we may collect about you from other sources includes:

- **Information from Affiliates, Partners, and Service Providers**, such as business partners, retailers where you purchased the Company’s Services or devices, analytics vendors, advertising networks, and search information providers, including the information you provide those entities or that they automatically collect.
- **Information from Trusted Third Parties**, including information from commercially available sources, such as social media platforms, public databases, or data aggregators, which may include your demographic information, media consumption, previous purchases, shopping habits, loyalty program information, lifestyle preferences and interests, social media activity, or information to validate or update the information we collect from or about you.

Sources of Personal Information We Collect

We may obtain Personal Information about you from a variety of sources and in a variety of ways.

Information from You. You may give us Personal Information, such as Identity Information, Government-Issued Identification Information, Lifeline Eligibility Information, Contact Information, Payment Information, Billing Information, Account Profile Information, Correspondence Information, and Marketing and Communications Information when you:

- Apply for or subscribe to our Services;
- Create an online account with us;
- Purchase products and Services from us;
- Communicate with us, including through our “Contact Us” page (do not submit any sensitive Personal Information, such as passwords, Social Security numbers, health information, or financial information, through the “Contact Us” page);
- Subscribe to our mailing lists or otherwise agree to receive marketing communications from us;
- Participate in our sweepstakes and promotions; or
- Complete our surveys or rate our products and Services.

Information from Your Use of Our Services. When you use or interact with our Services, we may automatically collect Personal Information, such as CPNI, Usage Information, Online Activity Information, Location Information, and Device and Computer Information, using our network management technology and third-party analytics and advertising tools, which may use cookies, web beacons, pixel tags, log files, local shared objects (Flash cookies), HTML5 cookies, or other technologies to automatically or passively collect information about your use of and interaction with the Services. Review “Your Advertising Choices and Consent Preferences” below for more information.

Information from Third Parties and Publicly-Available Sources. We may collect Personal Information from affiliates, partners, service providers, and third parties, including social media platforms, data aggregators, public databases, and other commercially available sources.

We may combine the various types of Personal Information we receive from or about you, including information you provide to us, information we automatically collect through our

Services, and information from third party sources, and use or share it as described in this Privacy Policy.

Our Use of Your Personal Information

Except as otherwise prohibited by law or regulation, and subject to your instructions to us, StandUp may use your Personal Information for the business purposes and commercial marketing purposes described below.

Business Purposes. We may use your Personal Information for the following business purposes:

- **Verify Eligibility and Subscribe You to Our Service.** To verify your eligibility for the Lifeline program and subscribe you to our service, including to execute requests to port your phone number.
- **Provide Services.** To provide you with our Services, including to initiate and render our Services, to maintain and manage our network, to anticipate and resolve problems with our network, information technology, and Services, to optimize our Services for devices, operating systems, web browsers, and apps, and to interact with third party services, at your request.
- **Administration.** To conduct analysis to understand the usage and operations of our Services, to develop new products or services, to improve our business, content, products, and Services, to determine compensation for our employees and agents, for training or quality assurance, and to process your Lifeline application and/or renewal.
- **Customer Service.** To respond to your questions and comments, send messages about your account status, alert you about technical issues, or otherwise contact and communicate with you when necessary.
- **Billing and Payments.** To process your purchases, including through use of cookies, bill and collect for purchases, complete payments, confirm your orders, and deliver products or Services to you.
- **Prevention and Detection of Unlawful and Unauthorized Use.** To prevent and detect fraud, abuse, and other unlawful and unauthorized use of our Services, including to investigate possible violations of and enforce our Terms and Conditions and any other contracts, and to otherwise protect the security or integrity of the Services, our business and property, and our rights and interests, and those of you, our other customers, and other carriers.
- **Comply with Legal and Regulatory Obligations.** To comply with our legal and regulatory obligations which arise from time to time, including responding to legal process, such as subpoenas, court orders, or search warrants.
- **Emergency Situations.** To respond to 911 requests and for other emergencies or exigencies, in cases involving danger of death or serious physical injury to you or any other person.

Commercial Marketing Purposes. We may use your Personal Information, including your Identity Information, Contact Information, CPNI, Usage Information, Online Activity Information, Location Information, Device and Computer Information, and Marketing and Communications Information for the following commercial marketing purposes:

- **Generic Advertising.** To advertise our products and Services to you through non-targeted website ads, direct mail, email, or manual, autodialed, or prerecorded calls and texts, each with your consent, where necessary.
- **Interest-Based Advertising.** To serve you promotional offers, content, advertisements, and other marketing about our products and Services or those of our affiliates, partners, and third parties, tailored to your interests, on websites, applications, social media, and online services you use or through direct mail, email, push notifications, or manual, autodialed, or prerecorded calls and texts, each with your consent, where necessary. We may combine the information we receive from and about you to improve our interest-based advertising to you and to serve promotional offers, content, advertisements, and other marketing to people whose interests or characteristics are similar to yours.
- **Surveys, Sweepstakes, and Message Boards.** To administer and enable you to participate in surveys and polls, sweepstakes, contests, and giveaways, and message boards, where you have agreed to this. We may sometimes use a Service Provider to conduct surveys and polls or sweepstakes, contests, and giveaways, but they will be prohibited from using your Personal Information for any other purpose.
- **Analyze and Maintain Accuracy.** To track the use of our Services, to better understand who is using our Services and how our Services are being used, to measure, analyze, and optimize the effectiveness of our marketing and advertising, and to maintain the accuracy of the information we collect.
- **Aggregate and De-Identify.** To create aggregate or de-identified datasets.

We may use your Personal Information as otherwise described to you at the time of collection, with your consent. Review “Your Advertising Choices and Consent Preferences” below for more information.

How We Share, Sell, or Allow Access to Your Personal Information

Except as otherwise prohibited by law or regulation, and subject to your instructions to us, StandUp may share, sell, or allow access to your Personal Information for the business purposes, commercial marketing purposes, and additional purposes described below.

Business Purposes. We may share your Personal Information for the following limited business purposes:

- **Affiliates.** With our affiliates for business, operational, and legal purposes.
- **Service Providers.** With Service Providers that provide business, professional, or technical support functions for us, help us operate our business and provide the Services you request from us, or administer activities on our behalf, including network operations, website hosting, database management, billing and payment processing, sending and receiving communications, analysis of our Services, and delivery of products and Services. We do not authorize Service Providers to use or disclose the information, except as necessary to perform services on our behalf.
- **Protect Our Services and Users.** With governmental authorities or other entities if we believe disclosure is necessary or appropriate to protect against fraudulent, malicious,

abusive, unauthorized, or unlawful use of our products and Services, to protect our network, databases, Services, devices, users, and employees from physical or financial harm, and to investigate violations of our Terms and Conditions or other contracts.

- **Legal Rights and Obligations.** With governmental authorities, auditors and third-party identity verification services, credit bureaus or collection agencies, and other entities to the extent necessary to respond to subpoenas, court orders, search warrants, or other legal process, in response to a request for cooperation from law enforcement or another government agency, to comply with legal and regulatory obligations, including identity verification, to prevent fraud and identify theft, to protect, advanced, or defend our rights or the rights of others, to recover payment for previously-billed products and Services, to facilitate or verify the appropriate calculation of taxes, fees, or other obligations due to any and all local, state, or federal governments and governmental agencies, and as otherwise permitted and required by law or regulation.
- **Emergencies.** With governmental authorities or other entities in cases involving danger of death or serious physical injury to you or any other person, to respond to 911 requests, and for other emergencies or exigencies.
- **Caller ID.** With the individuals or entities you call or text, limited to your name and telephone number.

Commercial Marketing Purposes. We may share or sell your Personal Information with our affiliates or select marketing partners for our or their commercial marketing purposes. We may also allow these marketing partners to access Personal Information from your use of our Services when we use their analytic and advertising tools, such as cookies, web beacons, pixel tags, log files, local shared objects (Flash cookies), HTML5 cookies, or other technologies that automatically or passively collect information. These third parties may use your Personal Information to deliver generic or interest-based advertisements and marketing to you about their products or services or the products or services of their marketing partners. They may also share or sell your personal information with their affiliates, service providers, and partners. We do not have access to, or control over, the use of your information by these third parties. The collection and use of your information by third parties is subject to those third parties' privacy policies. If you wish to stop communications from such third parties, you will need to contact those third parties directly. Review "What are your advertising choices and consent options?" below for more information. You can opt out of our sharing or selling of your Personal Information for commercial marketing purposes by visiting and completing our Do Not Sell My Personal Information form or submitting a request in writing using the contact information provided in the "Your Access, Deletion, and Consent Options" or "California Consumer Privacy Rights" sections below.

Aggregate and De-Identified Information. We may also share aggregate or de-identified information, which does not constitute Personal Information, with third parties for the following purposes:

- to measure, analyze, and improve our products or Services;
- to track to the use of our Services;
- to better understand who is using our Services and how our Services are being used;
- to understand who is using our Services;

- for marketing and analytic purposes;
- to assist universities, laboratories, think tanks, and other entities that conduct networking, social, behavioral, environmental, and other types of scientific research;
- to assist municipalities, government, or other entities that may use this data for purposes, such as municipal and transportation planning and emergency and disaster response coordination; or
- to complete or provide additional information for external reports.

Additional Purposes. We may share your Personal Information with external parties for the following additional purposes:

- **Sale or Transfer of Business or Assets.** With our professional advisers in connection with a corporate transaction, such as a sale, assignment, divestiture, merger, bankruptcy, consolidation, reorganization, liquidation, or other transfer of the business or its assets. If another entity acquires the Company or any of our assets, your Personal Information may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the buyer or transferee use your Personal Information in a manner that is consistent with this Privacy Policy.
- **Other Circumstances.** We may also use your Personal Information in other circumstances, as disclosed and explained to you at the point of collection and with your consent, where necessary.

How You Might Share Your Personal Information with Third Parties

When using our Services, you may choose to use or access services offered by third parties, such as websites, applications, retailers, or the networks of other carriers (such as when you are roaming). In some cases, our Services may have links to websites operated by third parties or plugins for social media services, such as the Facebook Like button. When you interact with third-party services, you may be providing your Personal Information to those third parties or they may be automatically collecting your Personal Information, such as your IP address or browsing activity. Those services operate independently of our Services, and your Personal Information will be governed by their privacy policies, not this Privacy Policy. We encourage you to review the privacy policies of any third-party services that you use to better understand their privacy practices.

Your Advertising Choices

Interest-Based Advertising. To understand your choices related to interest-based advertising on our Services or across other websites and online services, please review the following:

- To opt out of collection and use of your Personal Information for interest-based advertising by companies participating in the Digital Advertising Alliance (“DAA”), please visit optout.aboutads.info or click on the DAA icon when you see it on an online ad.

- To opt out from the use of Personal Information about your online activities for interest-based advertising by Network Advertising Initiative (“NAI”) member companies, please visit optout.networkadvertising.org.
- To opt-out of the use of your mobile device ID for targeted advertising, please see www.aboutads.info/appchoices.
- We use Google Analytics to Measure and Improve Marketing and Advertising and Understand Use of Our Services, including the following Google Analytics features: Google AdWords, Google Display Network Impression Reporting, DoubleClick Platform Integrations, and Google Analytics Demographics and Interest Reporting. To prevent your Personal Information from being used by Google Analytics for these purposes, add the Google Analytics opt-out plugin to your browser, available at tools.google.com/dlpage/gaoptout.
- You may be able to adjust your browser, computer, or device settings to disable cookies, remove or prevent the storage of HTML5, or control other advertising and analytics technology to stop or reduce the amount of interest-based advertising you receive, but doing so may prevent you from using certain features of our Services.
- To manage flash cookies, visit Adobe’s Global Privacy Settings Panel.

Please note that exercising these choices may not prevent you from receiving all advertising; you may continue to receive generic advertising from us or interest-based advertising from third parties, depending on how they operate.

Do Not Track. Because Do Not Track (“DNT”) and similar signals do not yet operate according to common, industry-accepted standards, we do not respond to DNT signals.

CPNI Disclosure

Under federal law, you have the right, and StandUp has the duty, to protect the confidentiality of your CPNI. The Company is permitted to use or disclose your CPNI for certain purposes without further notice or consent, including to provide you with our Services, to protect you, other subscribers, the Company, and other carriers from fraud, abuse, or unlawful use of the Services, and in an aggregate form. The Company does not use your CPNI for other purposes.

You can request access to your CPNI by calling 1-800-544-4441 or emailing support@standupwireless.com. We will not disclose your Personal Information when you call us except when you provide a password. If you do not provide a password, we may not release your Personal Information to you except by sending it to your address of record or calling you at your telephone number of record. Be sure to use a strong password with your online account profile and not one you use for other services. We may disclose your Personal Information to an authorized agent that you have designated in writing to us.

Your Access, Deletion, and Consent Options

We offer the following choices and consent options related to how we handle your Personal Information:

- You may request, up to two times each year, that we disclose to you the categories and specific pieces of Personal Information that we have collected about you, the categories of sources from which your Personal Information is collected, the business or commercial purpose for collecting your Personal Information, the categories of Personal Information that we disclosed for a business purpose, any categories of Personal Information that we sold about you, the categories of third parties with whom we have shared your Personal Information, and the business or commercial purpose for selling your Personal Information, if applicable.
- You may correct select Personal Information we have collected from you, such as your Contact Information, Payment Information, and Account Profile Information, using the contact information below or by logging-on to your account at www.standupwireless.com.
- You may request that we delete any Personal Information that we have collected from you, subject to exceptions to such deletion requests for our business purposes.
- You may update your contact information or opt-out of being contacted with marketing communications (including manual, autodialed, and prerecorded calls and texts; emails; and direct mail) using the contact information below, by replying “STOP” to our text messages, or by unsubscribing from our email communications following the unsubscribe instructions contained within our emails.
- You may request to opt out of our sale of your Personal Information to third parties, and to our affiliated companies that do not share the same brand name, for their direct marketing purposes. If you opt out, it means that we will not share your Personal Information with such third parties to use for their purposes going forward unless you later direct us to do so. To opt out, visit and complete our [Do Not Sell My Personal Information](#) form or submit a request in writing using the contact information below.
- Your authorized agent may submit a request on your behalf, after submission of proof of authorization.

To take advantage of any of the foregoing choices and options, please contact us at 1-800-544-4441, support@standupwireless.com, or StandUp Wireless, PO Box 2418, Norcross, GA 30091. If you exercise any of the foregoing rights, we will not discriminate against you, such as by denying you access to our products or Services or restricting your access to products or Services of certain pricing or quality.

Your instructions to limit the use of your Personal Information will be processed as soon as reasonably practicable. Limiting our use may not prevent you from receiving all advertising; you may continue to receive generic advertising from us or interest-based advertising from third parties, depending on how they operate. We are not responsible for informing third parties (including our affiliates, service providers, or partners) with whom we have already shared your Personal Information of any changes requested pursuant to this section, or for removing information from or causing information to be removed from the databases or records of such entities. If you receive marketing communications from these entities, you must opt-out directly with those affiliates. Opting out will not affect our provision of Services to you.

California Consumer Privacy Rights

Your Rights. If you are a California resident, you can take advantage of the following rights:

- You may request, up to two times each year, that we disclose to you the categories and specific pieces of Personal Information that we have collected about you, the categories of sources from which your Personal Information is collected, the business or commercial purpose for collecting your Personal Information, the categories of Personal Information that we disclosed for a business purpose, any categories of Personal Information that we sold about you, the categories of third parties with whom we have shared your Personal Information, and the business or commercial purpose for selling your Personal Information, if applicable.
- You may request that we delete any Personal Information that we have collected from you, subject to lawful exceptions to such deletion requests.
- You may request, up to one time each year, information about our sharing of Personal Information about you with third parties for the third parties' direct marketing purposes. We will not share Personal Information about you with third parties for their direct marketing purposes if you instruct us not to do so.
- You may request to opt out of our sale of your Personal Information to third parties, and to our affiliated companies that do not share the same brand name, for their direct marketing purposes. If you opt out, it means that we will not share your Personal Information with such third parties to use for their purposes going forward unless you later direct us to do so. To opt out, visit and complete our [Do Not Sell My Personal Information](#) form or submit a request in writing using the contact information below.
- Your authorized agent may submit a request on your behalf, after submission of proof of authorization, in accordance with California law.

To take advantage of any of the foregoing rights, please contact us at 1-800-544-4441, support@standupwireless.com, or StandUp Wireless, PO Box 2418, Norcross, GA 30091. If you exercise any of the foregoing rights, we will not discriminate against you, such as by denying you access to our products or Services or restricting your access to products or Services of certain pricing or quality.

Personal Information Disclosures. For purposes of compliance with the California Consumer Privacy Act, in addition to other details described in this privacy policy, we make the following disclosures:

- We collect the following categories of Personal Information:
Identifiers, financial information associated with you, characteristics of protected classifications under California or federal law, commercial information, internet or other electronic network activity information, geolocation data, audio and visual information, professional or employment-related information, and inferences drawn from the other information to create a profile about consumers.
- We disclose the following categories of Personal Information for a business purpose:
Identifiers, financial information associated with you, characteristics of protected classifications under California or federal law, commercial information, internet or other electronic network activity information, geolocation data, audio and visual information, and professional or employment-related information.

- We sell the following categories of Personal Information: *Identifiers, commercial information, internet or other electronic network activity information, geolocation data, and inferences drawn from the other information to create a profile about consumers.*

How We Protect Your Personal Information

We maintain reasonable physical, technical, and procedural safeguards to help protect against loss, misuse, or unauthorized access, disclosure, alteration, or destruction of your Personal Information. We encrypt and hash all passwords and encrypt the transmission of all online account communications and sensitive information (such as credit card information) in a secure way. We only retain your Personal Information for as long as we believe is reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements we are subject to, as well as to resolve disputes and enforce our agreements. The Personal Information we collect from or about you is stored on servers in the United States, subject to the laws of the United States. Electronic access to the databases and physical access to the servers on which this Personal Information is stored are restricted to those employees, agents, contractors, service providers, and other third parties who have a business need for such access. They will only access and use your Personal Information on our instructions and they are required to keep your Personal Information confidential. If third parties require the use of CPNI or other Personal Information, we require that such third parties take reasonable measures to protect the confidentiality of that information. While we make every effort to help ensure the integrity and security of our network and servers, we cannot guarantee their security, nor can we guarantee that information you supply will not be intercepted while being transmitted over our network or the internet.

Children's Information

Our Services are not directed toward children and we do not knowingly collect Personal Information from children under 13. If you are a parent or guardian of a child under 13 that has provided us with Personal Information without your consent, please contact us at 1-800-544-4441 or at support@standupwireless.com to have the child's information deleted.

Privacy Policy Changes

We reserve the right to modify this Privacy Policy at any time. When we do, we will post the changes on this page and will indicate at the top of this page the date those terms will become effective. We will give you advance notice of any material changes by email, where possible, but reserve the right to make such modifications immediately if required. It is your responsibility to regularly check this page to determine if there have been changes to the Privacy Policy and to review such changes.

How to Contact Us

If you have any questions or concerns about this Privacy Policy or how we treat your Personal Information, please contact us using the following information:

Email: support@standupwireless.com

Phone: 1-800-544-4441 or 611 from your device during normal business hours:

Monday – Saturday: 8AM – 10PM EST

Sunday: 9AM – 6PM EST

Mail: StandUp Wireless
PO Box 2418, Norcross, GA 30091