

## **NAKED MOBILE PRIVACY POLICY SUMMARY**

**(Revised & Effective August 13, 2019)**

At Naked Mobile, we are committed to maintaining meaningful privacy protections for customers that are both easy to understand and effective. Our Privacy Policy is designed to inform you about the information we collect, how we use it, and your options about certain uses of information.

Naked Mobile's Privacy Policy applies to website visitors, app users, applicants and customers in the United States. It applies across the Naked Mobile family of companies and the products and services we provide. In addition, some Naked Mobile services and apps, such as CHILL have additional privacy practices that are presented separately. If there is a conflict between this Privacy Policy and the service-specific policies, the service-specific policy governs when you are using that service.

The Privacy Policy does not apply any time you give information to other companies. Some examples are:

- When you use a non-Naked Mobile Wi-Fi Service;
- When you download applications or make purchases from other companies while using our Internet or wireless services;
- When you go to a non-Naked Mobile website from one of our websites or applications (by clicking on a link or an advertisement, for example);
- When you give your information to another company;
- If you use public forums - such as social networking services, Internet bulletin boards, chat rooms, or blogs. That information is publicly available, and we cannot prevent distribution and use of that information by other parties;
- Information about your location, usage and the number you dial when you are out and about and roaming on the network of another company; and
- When you purchase or use non-Naked Mobile products (such as wireless devices, internet browsers and mobile applications) in combination with our services.

Below, we've summarized key elements from our full Privacy Policy for your convenience.

### **Information We Collect and How It Is Used**

We collect and use information when you interact with us, when you use our products and services, and when you visit our websites. This information is used to deliver, provide and repair products or services; establish and maintain customer accounts and billing records; contact you about our products and services and direct offers or promotions to you; monitor website statistics; and manage and protect our networks.

We may also obtain consumer information from outside companies who provide such data. We use this data and combine it with other information we have to help us analyze and model customer information, and predict customer preferences.

### **Information Provided To or Used By Third-Party Advertisers**

Naked Mobile provides advertising that is based on your interests in our websites, apps, and services that you visit on our Naked Mobile website. Naked Mobile may place cookies on your browser when you use our devices, visit our sites and others, use device identifiers or use similar technologies to collect information about your activities on our websites or apps. Although Naked Mobile uses cookies to place Naked Mobile ads on your device(s), Naked Mobile does not use or sell information it may have to third parties regarding your web activity or web sites that you may have visited for advertising purposes.

### **Information Sharing**

Naked Mobile shares information within our family of companies. You can limit our sharing of certain types of customer information, specifically, Customer Proprietary Network Information and certain credit information, for marketing services different from the ones you have.

We may also share information with third party business associates as described in the full Privacy Policy or in a separate service-specific policy. Any third party business associate will honor the choices Naked Mobile customers have made about the uses of their information when they receive and use this data.

Except as explained in our Privacy Policy, in privacy policies for specific services, or in agreements with our customers, Naked Mobile does **not** sell, license or share information that individually identifies our customers with others outside of Naked Mobile who are not doing work on Naked Mobile's behalf without your consent. We may share information with our vendors and partners for business purposes and when necessary for them to perform work on our behalf. Naked Mobile may also share certain non-personal identifiable information with outside companies, for example, to assist with the delivery of advertising campaigns, provide aggregate business and marketing insights, or share de-identified information.

### **Limiting the Sharing and Use of Your Information**

You have choices about how Naked Mobile shares and uses information as it relates to:

- Customer Information;
- Telemarketing;
- Marketing e-mail, postal mail and door-to-door calls;
- Information used for Naked Mobile online advertising; and
- Business and marketing insights.

### **Information Security**

Naked Mobile has technical, administrative and physical safeguards in place to help protect against unauthorized access to, use or disclosure of customer information we maintain.

### **Accessing and Updating Your Information**

You may correct inaccuracies in your information by calling a customer service representative or by accessing your online account and updating your information.

If Naked Mobile elects to use or disclose information that identifies you as an individual in a manner that is materially different from that stated in our policy at the time we collected that information from you, we will give you a choice regarding such use or disclosure by appropriate means, which may include use of an opt-out mechanism.

### **Opt-Out Mechanism**

Naked Mobile respects your privacy and we are committed to complying with all federal and state laws and regulations regarding telemarketing and other direct marketing efforts. Our goal is to provide customers the ability to proactively manage their preferences with respect to Naked Mobile marketing communications.

You may also manage your preferences by contacting Customer Service (dial \*611 from your Naked Mobile phone or dial 1 (877) 235-5110 from any phone). If your information changes, please notify us of the new name, addresses, and telephone number(s). If you feel that you have been contacted by Naked Mobile after selecting that you do not want to be contacted by Naked Mobile for marketing purposes please email [cpo@nakedmobile.com](mailto:cpo@nakedmobile.com) to resolve the issue.

**Please note that, although you may elect not to receive marketing communications from us, if you subscribe to our services or buy our products, you will continue to receive invoices, customer-service notices, transactional notices, and similar communications. Please also note that not all marketing communications you receive on your device are sent or authorized by Naked Mobile. When you provide your mobile number or other contact information to others, you may receive unwanted calls, text messages, or e-mails on your device. We take steps to reduce unsolicited advertising to our customer's devices, but we cannot block all such advertisements or unwanted communications.**

If you would like to add your number to the National Do Not Call Registry, applicable to all telemarketers, you may do so by calling 1 (888) 382-1222, or online at [www.donotcall.gov](http://www.donotcall.gov).

## **NAKED MOBILE PRIVACY POLICY**

Naked Mobile is a brand product of Smith Bagley, Inc., dba Cellular One of North East Arizona. This Privacy Policy ("Policy") describes how Naked Mobile ("Naked Mobile") will collect, access, use or disclose your personal information. It applies to all of our products, services, and web sites ("Services").

The primary focus of Naked Mobile's Privacy Policy is to ensure that all customers and website visitors' personal information, which we term "customer identifiable information," is kept private at all times. As the term suggests, "customer identifiable information" is information which can be associated with a specific individual or entity, including for example, a customer's name, date of birth, address, telephone number, e-mail address and sensitive information such as credit card information. The subject titles listed below are sequentially explained in more detail in this Naked Mobile Privacy Policy:

**INFORMATION COLLECTED;  
TYPES OF INFORMATION WE COLLECT;  
HOW WE COLLECT INFORMATION;  
USE OF PERSONAL INFORMATION;  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI);  
INFORMATION WE SHARE;  
NETWORK AND INFORMATION SECURITY;  
ADVERTISEMENTS;  
OUR PRIVACY COMMITMENTS;  
INFORMATION CHOICES AND CHANGES;  
CHILDREN;  
CONTACTING US; and  
UPDATING THIS POLICY.**

## **INFORMATION COLLECTED**

We collect personal information about you in various ways. We may also get information from other sources, including from affiliates, and may combine it with information we collect about you. Personal information does not include information that is not used to identify you, including aggregate or anonymous information.

**Information You Give Us.** The personal information we collect includes information you give us, such as name, postal address, telephone number, e-mail address, date of birth, social security number or other government identification number, demographics, activities, location information, and personal preferences. You may give us information in a variety of ways, including when you sign up for services, or communicate with Customer Care.

**Information That We Automatically Collect.** We automatically receive certain types of information whenever you use our services. We may collect information about your device such as the type, version of operating system, signal strength, whether it is on and how it is functioning, as well as information about how you use the device and services available through it, such as your call and data usage and history, your location, web sites you have visited, applications purchased, applications downloaded or used, and other similar information. We may link information we automatically collect with personal information, such as information you give us at registration or check out. We may use systems or tools to follow your use of our services and other applications, including using cookies, web beacons and other mechanisms, along with analysis of network and device information. For example, we allow collection by analytic service provider(s) of site click-stream and cookie data to help us track aggregate and individual use of our services. We sometimes use cookies to enable features on our sites, such as the ability to save your shopping cart or set preferences. Advertisers and advertising networks that serve ads on our sites may also use their own mechanisms, including cookies. These third party cookies or tools are governed by the privacy policies of the entities placing the ads and are not subject to this Policy.

## **TYPES OF INFORMATION WE COLLECT**

We may collect different types of information based on your use of our products and services and on our business relationship with you.

**Account Information.** Account information includes:

- **Contact Information** that allows us to communicate with you. We get this information when you order or register for our services. This would include information like your name, address, telephone number and e-mail address.
- **Billing Information** related to your financial relationship with us, such as the services we provide to you, the telephone numbers you call and text, your payment history, your credit history, your credit card numbers, social security number, security codes and your service history.

**Technical & Usage Information.** Technical and usage information related to the services we provide to you, including information about how you use our networks, services, products or websites. Some examples include:

- **Equipment Information** that identifies the equipment on our networks, such as equipment type, device IDs, device status, serial numbers, settings, configuration and software.

- **Network Performance & Usage Information** about the operation of the equipment, services and applications you use on our networks. Examples of this might include wireless device location, the number of text messages sent and received, voice minutes used, calling and texting records, bandwidth used, and resources you use when uploading, downloading or streaming data to and from the Internet. We also collect information like transmission rates and delays, data associated with remote monitoring services and security characteristics.
- Some Network Performance & Usage Information and some Billing Information is **Customer Proprietary Network Information or "CPNI."** Unique rules apply to CPNI. Go to CPNI below to learn more about what it is, how we use it and the choice you can make about that use.
- **Web Browsing & Mobile Application Information** such as IP addresses, URLs, data transmission rates and delays. We also learn about the pages you visit, the time you spend, the links or advertisements you see and follow, the search terms you enter, how often you open an application, how long you spend using the app and other similar information.

**Location Information** includes your ZIP-code and street address, as well as the whereabouts of your wireless device. Location information is generated when your device communicates with cell towers, WiFi routers or access points and/or with other technologies, including the satellites that comprise the Global Positioning System.

Other companies may also be able to locate your device. For example, your handset manufacturer and your operating system provider may be able to locate your device. If you download mobile applications, those apps may be able to obtain your location directly from your handset or the operating system. Mobile applications that give you access to your employer's network may also give your employer the ability to locate your device. We urge you to review policies of all providers.

Accuracy of wireless location information may differ. It depends on the technology we are using. For example, we can locate your device based on the cell tower that is serving you. The range could be up to 1,000 meters in any direction from the tower in urban areas, and up to 10,000 meters in rural areas. Wi-Fi networks provide more accurate location information, associating you with the place where the network is located - like a coffee shop or areas within or around that place.

Services such as 411, 911, a "friend locator" application or a navigation/mapping application, require more precise information. So for those we use a more precise estimate of location by associating the service cell tower ID with other information, like the latitude and longitude of the tower, radio frequency parameters, GPS information and timing differences in radio signals. Depending on a variety of factors, those methods may estimate the location of your device to within 30 to 1000 meters.

Other companies may also be able to locate your device.

We collect information about you in the following ways:

**Information You Provide.** We collect information that you provide when you apply for, purchase, or use our services or products, such as your personal contact and billing information, credit information, or other information you may provide to us.

We collect information that you provide when you use our products or services or otherwise interact with us. For example, some of the ways you may provide information to us include:

- Sign up for or purchase our services or buy products, such as personal contact information, billing, and credit information, the devices you have on your account and their unique IDs, your phone number(s) and SIM card number(s).
- Email, call, or otherwise communicate with our customer service representatives.
- Enter information on our websites, such as to fill out surveys, pay for products or services, and apply for a job.
- When you use our services on a phone provided to you by an account holder.
- We may also record your calls, e-mails, or other communications with us.

**Information We Collect Automatically.** We automatically collect a variety of information associated with your use of your device and our products and services, some of which may be associated with you or another user on your account.

We may automatically collect your information when you use your mobile device or our products, services, or websites, including:

- Your phone number and device identifier.
- The location of your device on our network and the GPS location of your device.
- Details about calls and text messages you send and receive, such as the time, date and phone number you are calling.
- Details about your use of our data services, including data used and remaining on your plan.
- Information on the use of other data services, such as ringtone and application purchases.

**Cookies and Web Beacons.** We may also collect information about you by using cookies, web beacons or similar technologies when you visit our websites or access the Internet through our services or devices. Examples of the types of information collected include:

- IP address, browser type, date, and time.
- Web page(s) visited.
- Routing information when using our services to access the Internet at a Naked Mobile Hotspot or from your wireless device.
- If you use a voice-controlled application, that application may collect your requests and other information from your phone in order to work.

**Device Performance.** We may collect and report performance and diagnostic data from your device, including information about your use of applications on your device, such as the fact that an application has been added, when an application is launched or fails to launch, length of time an application has been running, and battery strength.

### **Web Browsing Activity**

**Our Websites.** When accessing our websites, mobile websites, applications and widgets designed for your device or web-based experience, we automatically collect certain information about your device and your visit, such as your IP address, browser type, date and time, the web page you visited before visiting our website, your activities and purchases on our websites, and other analytical information associated with the sites.

**Other Websites.** When your device's Web browser utilizes our data services to access websites other than our own, we automatically capture information associated with your browsing activities, and measure and monitor network and Internet connection performance, throughput, latency, and similar network data.

**Do Not Track Statement.** Some browsers have incorporated "Do Not Track" features. Because there is not yet a common understanding of how to interpret the DNT signal, we do not currently respond to the browser DNT signals when you use our services and products or interact with our websites or online services. We do not collect information for interest based advertising purposes nor do we share or sell such information to third parties. However, web browsers and other third party web sites and apps that you use may collect and use such information. To opt out of information collected by third parties about your online activities over time and across third-party websites or online services for online interest based advertising purposes you must go to that particular site and view any "Do Not Track" features that third party may employ.

### **HOW WE COLLECT INFORMATION**

We collect information in three basic ways:

- **You Give It to Us** when you make a purchase or set up an account with us.
- **We Automatically Collect Information** when you use our networks, products and services. For example, we use network tools to collect your call records; we collect wireless device location from our network and from your device; and we also use cookies, web server logs and other technologies.
- **We Obtain Information from Outside Sources** like credit reports, marketing mailing lists, commercially available geographic and demographic information along with other publicly available information, such as public posts to social networking sites.

### **USE OF PERSONAL INFORMATION**

We use your personal information for a variety of purposes, including providing you with services. We use your personal information to do things like:

- Process your orders.
- Protect our rights and property and those of our customers.
- Respond to legal process and emergencies.
- Develop or inform you of new products and services.
- Anonymize or aggregate personal information for various purposes like market analysis or traffic flow analysis and reporting.
- Monitor, evaluate or improve our products, services, systems, or networks.
- Customize or personalize your experience with our services.
- Customize or personalize online advertising to bring you information about products and services of Naked Mobile that may interest you, including co-branded offers.

### **CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

Customer Proprietary Network Information, or "CPNI", is a subset of Personal Information that is generated in connection with the telecommunications services we provide to you. CPNI includes, for example, call details, call location information, and certain information about your rate plans and features. CPNI does not include your name, address, and phone number.

Under federal law, you have a right, and we have a duty, to protect the confidentiality of CPNI and we have adopted policies and procedures designed to ensure compliance with those rules. We will not intentionally disclose your CPNI to third-parties without your permission, except as allowed under FCC rules, applicable law, or explained in this Policy. However, if you are the primary account holder, you may designate other “authorized users” (for example, a spouse) to access and manage your account information, including CPNI.

### **INFORMATION WE SHARE**

We do not share information that identifies you personally with third parties other than as follows:

**Affiliates.** We may share personal and non-personal information with affiliated entities for approved business purposes.

**Service Providers.** We may share personal information with third parties who perform services on our behalf.

**Group Account Holders.** We offer group accounts to business and government customers, family customers and other group account holders ("Group Accounts"). The account holder for Group Accounts is the entity or person that buys the service or product for its employees, family members or other authorized users. You (as the user of a device) may receive service, certain pricing, terms or other benefits through a Group Account with us. If so, we may share with that Group Account holder customer registration and other information related to your use of our services.

**Third Party Verification Services.** We may share limited personal information (e.g., address, phone number) with non-Naked Mobile entities to assist with identity verification, and to prevent fraud and identity theft.

**Other Third Parties with Your Consent.** We may share information with other third parties with your consent. For example, you may agree to our sharing your information with other third parties to hear about their products and services. Use of the information you agree to share will be subject to those third parties' separate privacy policies.

**Disclosures to Third Party Application and Service Providers.** You may choose to use services and products offered by third parties through our services or devices such as third party applications. When you leave our network you may also use mobile roaming services provided by third parties. Your use of such services and applications may result in these third parties collecting your personal information and obtaining information from Naked Mobile, including location information (when applicable). You may also choose to give personal information directly to third parties when using our services. In each case, personal information you give a third party will be subject to its terms, conditions, and policies - not this policy. You should review a third party's privacy policy and terms of service before providing your information or using the service.

**Business Transfers.** Personal information about you may be disclosed as part of any merger, acquisition, sale of company assets or transition of service to another provider. In the unlikely event of an insolvency, bankruptcy or receivership, personal information may also be transferred as a business asset.

**Protection of Naked Mobile and Others.** We may disclose Personal Information, and other information about you, or your communications, where we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary. We may access, monitor, use or disclose your personal information or communications to do things such as:

- Respond to lawful requests by public authorities, including to meet national security or law enforcement requirements;
- Protect the rights or property of us, our agents, members, our customers, and others to enforce our agreements, policies and terms of use;
- Notify, respond or provide information (including location information) to a responsible governmental entity in emergency or exigent circumstances or in situations involving immediate danger of death or serious physical injury;
- Initiate, render, bill, and collect for services; or



- Facilitate or verify the appropriate calculation of taxes, fees, or other obligations due to a local, state, or federal government requirement; or determine eligibility for government benefits;
- To protect our rights or interests, property or safety or that of others;
- In connection with claims, disputes, or litigation – in court or elsewhere;
- To protect users of our services and other carriers or providers from fraudulent, abusive, or unlawful use of, or subscription to such services; and
- Notify the National Center for Missing and Exploited Children of information concerning child pornography of which we become aware through provision of our services.

## **NETWORK AND INFORMATION SECURITY**

We maintain a variety of physical, electronic, and procedural safeguards. These safeguards help protect your personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Be sure to use a strong password to access your information on CellularOne.com and not one you use for other services.

## **ADVERTISEMENTS**

**Our Websites.** When accessing our websites and related applications and widgets designed for your device or web-based experience we automatically collect certain information about your interests on our sites and use cookies or similar technologies to identify your computer or device and record your preferences regarding our products so that we can personalize your visit(s) and improve our websites and your experience. Depending on your device or computer, you may be able to set your browser(s) to reject cookies or delete cookies, but that may result in the loss of some functionality on our websites.

We do not sell your personal information or any web browsing activity information aggregate or personal to any third parties for advertising purposes.

You may see advertisements when you visit websites, mobile websites, in applications, or on your device. Some advertisements may request information directly from our customers or take our customers to websites that may request personal information. Naked Mobile has no control over those advertiser's privacy policies, so please examine the privacy policy of any company advertising on our website prior to submitting any personal information.

## **OUR PRIVACY COMMITMENTS**

Although we strive to keep your Personal Information secure, no security measures are perfect, and we cannot guarantee that your Personal Information will never be disclosed in a manner inconsistent with this Policy (for example, as the result of unauthorized act by third parties that violate the law or this Policy). Laws and regulations guide us in how to give you notification when certain types of sensitive information are involved in a security breach. We will provide you with notice in accordance with these laws and regulations.

We are happy to help you review and correct the Personal Information we have associated with your account and billing records within a reasonable time. Please contact Customer Care for more information.

- We don't sell your Personal Information to anyone for any purpose.
- We keep your Personal Information in our business records while you are a customer, or until it is no longer needed for business, tax or legal purposes.
- We will keep your information safe using encryption or other appropriate security controls.

## **INFORMATION CHOICES AND CHANGES**

We offer you choices regarding how we contact you for marketing-related communications and whether we use information regarding your online or mobile web activities for marketing purposes. We **do not** use information to make ads you see on your mobile device more relevant and to produce or facilitate production of business and marketing reports shared with third parties. However, other sites and apps that you use may collect that information.

As described above, we work with advertisers and advertising networks that serve ads on our sites and that may use cookies, web beacons and other technologies to collect information about your use of our sites and other websites. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and deliver better understanding your online activity. To "opt out" of being contacted for marketing purposes contact a Service Representative.

If you disable cookies on your Internet browser, you also may stop some collection and use of data when you visit our web sites.

## **CHILDREN**

Naked Mobile websites are not structured to attract children under the age of 13. Naked Mobile believes there is no information on its website which is inappropriate or objectionable for viewing by children. Naked Mobile does not knowingly collect information from children under the age of 13. If you allow a child to use your device or our services, you should be aware that their personal information could be collected.

Of course, wireless devices and services purchased for family use may be used by minors without the knowledge of Naked Mobile. If that happens, any information collected from the usage will appear to be the personal information of the actual adult subscriber and treated as such under this Policy.

We encourage you to spend time online with your children, and to participate in and monitor their online activity.

## **CONTACTING US**

If you have any questions about or complaints that concern this Policy, please call us at 1 (800) 730-2351. If you have an unresolved privacy or data use concern that we have addressed satisfactorily or if you are not satisfied with our resolution of any dispute, including with respect to privacy or data use concerns please email [cpo@cellularoneaz.com](mailto:cpo@cellularoneaz.com).

## **UPDATING THIS POLICY**

We may change this Policy at any time. When we change the Policy we will give notice by changing the date it was last updated or as required by law.