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PRIVACY POLICY

Version 1.2

Effective Date: January 1st, 2021

New York | New Jersey | Pennsylvania | Maine | California | Florida



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PRIVACY STATEMENT

Unlimited Technology recognizes that privacy is a fundamental human right and further recognizes the importance of privacy, security and data protection to our customers and partners worldwide. As a global organization, with legal entities, business processes, management structures, and technical systems that cross international borders, we strive to provide protections across all our operations that exceed legal minimums and to deploy consistent, rigorous policies and procedures.

This Privacy Statement informs you of our privacy practices and of the choices you can make and rights you can exercise in relation to your personal data, including information that may be collected from your online activity, use of devices, and interactions you have with Unlimited Technology offline, such as when you engage with our customer support representatives. This Privacy Statement applies to all Unlimited Technology companies as well as Unlimited Technology-owned websites, domains, services (including device management), applications, subscriptions, and products, and those of our subsidiaries (collectively "Unlimited Technology Services"). In most cases, Unlimited Technology will be the data controller.

This Privacy Statement does not apply to third-party applications, products, services, websites, or social media features that may be accessed through links we provide on our Unlimited Technology Services for your convenience and information. Accessing those links will cause you to leave the Unlimited Technology Services and may result in the collection or sharing of information about you by a third-party. We do not control, endorse, or make any representations about those third-party websites or their privacy practices, which may differ from ours. We encourage you to review the privacy policy of any site you interact with before allowing the collection and use of your personal data. We have an



Accountability-based program and are committed to the following principles, which are based on internationally recognized frameworks and principles of privacy and data protection:

LAWFULNESS, FAIRNESS & TRANSPARENCY

We process personal data in accordance with law and with transparency and fairness to you. Our data processing activities are conducted: 1) with your consent; 2) in order to fulfill our obligations to you; 3) for the legitimate purposes of operating our business, advancing innovation and providing a seamless customer experience; or 4) otherwise in accordance with law.

NOTICE & CHOICE OF DATA USE

We are transparent and provide clear notice and choice to you about the types of personal data collected and the purposes for which it is collected and processed. We will not use personal data for purposes that are incompatible with these Principles, our Privacy Statement or specific notices associated with Unlimited Technology.

DATA ACCESS

We provide you with reasonable access along with the ability to review, correct, amend the personal data you have shared with us.

DATA INTEGRITY & PURPOSE LIMITATION

We only use personal data for the purposes described at the time of collection or for additional compatible purposes in accordance with law. We take reasonable steps to ensure that personal data is accurate, complete, and current and we only collect personal data which is relevant and limited to what is necessary for the purposes for which it is collected. We will keep personal data for no longer than is necessary for the purposes for which it was collected and then we will securely delete or destroy it.

DATA SECURITY

To protect personal data against unauthorized use or disclosure we implement strong information security controls in our own operations and offer market-leading products and solutions with high levels of data security protection.



ACCOUNTABILITY FOR ONWARD TRANSFER

We acknowledge our potential liability for transfers of personal data among Unlimited Technology entities or to third parties. Personal data will only be shared when third parties are obligated by contract to provide equivalent levels of protection.

RECOURSE, OVERSIGHT & ENFORCEMENT

We are committed to resolving any concerns regarding your personal data. We voluntarily participate in several international privacy programs that provide recourse to individuals if they feel Unlimited Technology has not adequately respected their rights.

HOW WE USE DATA

We collect and use personal data to manage your relationship with Unlimited Technology and better serve you when you are using Unlimited Technology Services by personalizing and improving your experience.

Examples of how we use data include:

CUSTOMER EXPERIENCE

Providing you with a seamless customer experience by maintaining accurate contact and registration data, delivering comprehensive customer support, offering products, services, subscriptions and features that may interest you and enabling you to participate in contests and surveys. We also use your data to deliver a tailored experience, personalize the Unlimited Technology Services and communications you receive and create recommendations based your use of Unlimited Technology Services.

TRANSACTION SUPPORT

Assisting you in completing transactions and orders of our products or services, administering your account, processing payments, arranging shipments and deliveries, and facilitating repairs and returns.



PRODUCT SUPPORT & IMPROVEMENT

Improving the performance and operation of our products, solutions, services, and support, including warranty support and timely firmware and software updates and alerts to ensure the continued operation of the device or service.

ADMINISTRATIVE COMMUNICATIONS

Communicating with you about Unlimited Technology Services. Examples of administrative communications may include responses to your inquiries or requests, service completion or warranty-related communications, safety recall notifications, communications required by law or applicable corporate updates related to mergers, acquisitions, or divestitures.

SECURITY

Maintaining the integrity and security of our websites, products, features and services and preventing and detecting security threats, fraud or other criminal or malicious activity that might compromise your information. When you interact with us, we will also take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your personal data. We may also maintain additional security measures, such as CCTV, to safeguard our physical locations.

BUSINESS OPERATIONS

Conducting ordinary business operations, verifying your identity, making credit decisions if you apply for credit, conducting business research and analytics, corporate reporting and management, staff training and quality assurance purposes (which may include monitoring or recording calls to our customer support) and outreach.

RESEARCH & INNOVATION

Innovating new products, features and services using research and development tools and incorporating data analysis activities.



ADVERTISING

Providing personalized promotional offers on Unlimited Technology products and services and other selected partner websites. These communications include, but are not limited to, price lists, newsletters, other marketing emails, etc.

COMPLIANCE WITH LAW

Compliance with applicable laws, regulations, court orders, government, and law enforcement requests, to operate our services and products properly and to protect ourselves, our users and our customers and to solve any customer disputes.

CHANGES TO OUR PRIVACY STATEMENT

If we modify our Privacy Statement, we will post the revised statement here, with an updated revision date. If we make significant changes to our Privacy Statement that materially alter our privacy practices, we may also notify you by other means, such as sending an email or posting a notice on our corporate website and/or social media pages prior to the changes taking effect.