

Privacy Policy: Viasat Community Broadband Services

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Viasat, Inc., and its subsidiaries and affiliates (collectively, “**Viasat**,” “**we**,” “**us**,” or “**our**”) is a leading communications company delivering satellite broadband solutions to consumers. This Privacy Policy (“**Policy**”) explains our data practices for the Community Internet, WiFi, and other value-added services (collectively, the “**Services**”) that we offer to consumers in locations around the world.

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WHO WE ARE AND SCOPE OF THIS POLICY

Viasat, Inc. is headquartered in the United States with affiliates in locations around the world. Except where we state otherwise in this Policy, Viasat, Inc. is a data controller under applicable data protection law for the personal information collected under this Policy, which means that we are responsible for deciding how we hold and use, or process, your personal information.

- Viasat Brasil Servicos de Comunicações LTDA located in São Paulo, Brazil is also a data controller for Services offered by Viasat in Brazil.
- Viasat Tecnología, S.A. de C.V. with an office located at Montes Urales 754, piso 3, colonia Lomas de Chapultepec, alcaldía Miguel Hidalgo, C.P. 11000, in Mexico City, Mexico, is also a data controller for Services offered by Viasat in Mexico.

The Services covered by this Policy include our Community Internet, WiFi, and other broadband connectivity services (the Services branding may vary based on your location). Your use of the Services may be subject to other terms and disclosures provided by us and our partners, including within any terms of service made available to you by us or third parties. This Policy covers personal information that we collect from end users of the Services.

This Policy also applies to the individuals and businesses that host a Community Internet, WiFi, or other broadband service at their location to enable the Services (the “**Hosts**”), as described in the *Information About Hosts* section of this Policy.

INFORMATION WE COLLECT

You provide us with information directly, such as when you sign up to use the Services. We also collect information about you and your activity when you use our Services, to the extent authorized by and in accordance with applicable legislation, including through the device(s) that you use to access the Services. We also may collect information about you from third parties, such as our external business partners.

The types of information that we collect depend on how you use the Services and interact with us. You have certain rights over how we use your personal information, which we describe in the *Manage Your Communications and Data* section below, though we require certain information to enable the requested activity, or to deliver the Services you purchase.

- **Information You Provide**

Viasat collects personal information from you when you use our Services, request information from us, or otherwise contact us. The personal information we collect may include your name, email, phone number, WhatsApp number and tax identification number. We may combine the information you provide to us with information from and about you that we receive from third parties, including business partners and vendors, or information that we automatically collect when you use the Services, such as your Services purchase history.

- **Information Collected Automatically**

When you use our Services, we may collect information about your use of our Services and how our Services perform, including the amount of time it takes to load a page, the order in which the content on a page loads, your browser type, Internet Protocol (“IP”) address, cookies, domain and subdomain names and the URLs of the websites you visit, in accordance with applicable law. If you connect devices to our system, we may also collect information specific to each device you connect, including, but not limited to, the device’s unique MAC address and device type, the hostname of the device, connection properties specific to each device, the times and duration the device connects to or accesses the Host modem and the amount of data each device consumes.

We use the information described in this section to provide the Services, including to optimize, troubleshoot, measure, and monitor the performance of our network and Services, including performing de-bugging, measuring service levels and identifying loading trends and websites that are statistically significant to our user population in order to deliver internet traffic more efficiently. Where permitted by law, we also may combine this information with information that you provide to us so that we may contact you with special incentives or offers relating to the Services.

- **Information You Post**

Any comments or personal information that you post on public pages (such as social media sites) is publicly available and may be viewed, collected, and used by others, including Viasat. Viasat is not responsible for the accuracy of any information contained in those postings.

OUR LAWFUL BASES FOR PROCESSING

We’re required in certain locations to disclose our lawful basis for processing the personal information we collect. The lawful basis will depend on the specific information and the context in which we collect it. We normally will collect personal information from you only (i) where we need the information to perform a contract with you, or in anticipation of entering into a contract with you, including our Terms and Conditions for the Services or a Host agreement; (ii) where the processing is in our or a third party’s legitimate interests and not overridden by your rights, freedoms or interests; or (iii) where we have your consent. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the information to protect your vital interests or those of another person, for example, if there is evidence of fraud or criminal activity.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is required or not, as well as of the possible consequences if you do not provide such information.

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our Services, to communicate with you as necessary to provide the Services to you, and for our legitimate commercial interest, for instance, when responding to your queries, improving the Services, undertaking marketing, or to detect or prevent illegal activities or fraud. We may have other legitimate interests and, if appropriate, we will notify you at the relevant time about such legitimate interests. Our reliance on legitimate interests will not affect your rights, freedoms or interests.

HOW WE USE INFORMATION

We use the information we collect from and about you for the following purposes:

- Provide the Services or to fulfill an agreement with you;
- Enhance your experience with the Services, and develop new products or services;
- Respond to your inquiries and contact you in relation to the Services, including about offers, incentives, and promotions;
- Provide technical and other support, including to optimize, troubleshoot, measure and monitor the performance of our Services, perform de-bugging, measure service levels, and identify loading trends and websites that are statistically significant to our user population to deliver internet traffic more efficiently;
- Address issues with the Services or our business;
- Protect the security or integrity of the Services and our business, protect and defend our legal rights, and meet our legal obligations;
- To prevent fraud;
- Market our Services to you and conduct demographic studies;
- Analyze our users, in combination with other data, to assess our user base and target marketing at other similar groups; and

We also may use your information that we collect as described to you at the point of data collection.

WHEN WE SHARE INFORMATION

As detailed in this Policy, we share your information with our vendors and affiliates that perform support and other services in connection with the Services, and with third parties for collaborative offerings, legal and safety purposes, in connection with the sale or transfer of a business or asset, for use in aggregate or anonymous form, and for other purposes with your permission.

Viasat shares your Information with third parties for the following purposes:

- Vendors

We use vendors to perform services on our behalf. These vendors provide business, professional, marketing, or technical support to us, help us operate our business and Services, or administer activities in connection with our business and the Services on our behalf. These vendors are not permitted to use or share your personal information for their own or a third party's commercial purposes.

- Affiliates

We share your information with our affiliated companies, including our parent company and subsidiaries, to help us operate our business and Services.

- Third Parties

We share your information with third parties as described in this Privacy Policy, including as follows:

Legal & Safety: We may share your information to protect the security of our Services, servers, network systems, databases, and business and in connection with an investigation of fraud, intellectual property infringements, interference with our rights, property or users, or other activity that is illegal or may expose you or us to legal liability, including as required or requested by outside auditors or advisors, and law enforcement or other government officials. We also may share your information with third parties when we have reason to believe that a disclosure is necessary to address potential or actual injury or interference with our rights, property, operations, users, or others who may be harmed or may suffer loss or damage, or when we believe that it is necessary to protect our rights, investigate, or enforce our policies, terms, combat fraud, or comply with a judicial proceeding, court order, or legal process served on Viasat. We also may share your information when we have reason to believe it is necessary to investigate or enforce our policies, terms, or other legal document or contract related to the Services or rights of a third party.

Sale or Transfer of Business or Assets: We may sell or purchase assets during the normal course of our business. We may disclose information about you and transfer that information to another entity as part of a potential or actual acquisition or merger of Viasat or any of our assets. If we bring or are defending a reorganization, bankruptcy, or similar event, such information may be considered our asset and sold or transferred to third parties.

Aggregate or Anonymous Information: We may share aggregate or anonymous information with third parties for their marketing or analytics uses. When we do, we take steps to ensure that this information cannot be used to identify you.

As Disclosed to You: We may share your information as disclosed to you at the time of collection.

MANAGE YOUR COMMUNICATIONS AND DATA

We provide options for you to manage the communications you receive from us, and how we use your information. These include utilizing email (or similar) unsubscribe and deletion tools; and, depending on your location, making a data request or exercising your right to object to our use of your personal information, or other rights.

- **Marketing Opt-outs**

You have the right at any time to opt-out of the marketing communications that we send to you. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing communications you receive, and through other means that we may describe to you. To opt out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the *Contact Us* section below.

Please note that it may take up to ten (10) business days for us to process marketing opt-out requests. If you opt out of receiving marketing communications from us, we still may contact you about any Services you have requested or received from us, or for other customer service purposes. Additionally, you may receive marketing or advertising outreach from Viasat dealers and partners who act independently of Viasat. Dealers are independent contractors authorized to sell Viasat services in addition to other services. Viasat does not control marketing or advertising communications from dealers to Viasat customers that were developed independently from Viasat.

- **Your Data Protection Rights**

You have certain rights under applicable data protection law that relate to our processing of your personal information.

If you wish to access, rectify, update or request deletion or cancellation of your personal information, you can do so at any time by contacting us using the contact details provided in the *Contact Us* section below. You can also object to, or ask us to restrict, the processing of your personal information, or request portability of your personal information. We may require certain information to confirm your identity before we act on your request.

Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, and it will not affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You can exercise all of the rights described above by contacting us using the contact details provided under the *Contact Us* section below. We will respond to your request in the manner and time period that complies with applicable law.

Depending on your location, you have the right to complain to a data protection authority about our collection and use of your personal information. Please contact your local data protection authority for more information. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

DATA RETENTION

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). When we no longer have an ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

DATA SECURITY

We follow generally accepted industry standards and maintain appropriate safeguards to help protect the security, integrity, and privacy of the information we collect about you. These security measures are designed to protect against the accidental or unlawful destruction, loss, misuse, alteration, and unauthorized disclosure of, or access to, the information under our control. No system is 100% secure, however, and we cannot guarantee our security measures.

You are responsible for any access to or use of the Services by you or any person or entity using your PIN or other access credentials, whether or not such access or use has been authorized by or on behalf of you. If you choose to provide third parties with access to the Services you have purchased, Viasat cannot be held responsible for any release of personal data that occurs as a result of this access.

CHILDREN'S PRIVACY

We do not knowingly collect personal information from children under 13 years old (or older, if applicable law provides for different protections). If you believe we may have inadvertently processed personal information of a child, please contact us using the contact details provided in the *Contact Us* section below.

INTERNATIONAL DATA TRANSFERS

We and our vendors may process, transfer, and store information about you in connection with the Services in the United States and other countries that may not have data protection laws equivalent to the country where you reside. We take steps to apply appropriate safeguards when we transfer that information. We are committed to adopt all the necessary measures and safeguards as to the cross-border data flow, as set

forth by the applicable legislation. These transfers are made to our affiliates and vendors in these countries to the extent that they are necessary to provide you with the Services, or where the transfer is necessary by virtue of a contract executed in your interest between Viasat and our service providers. When required by applicable laws, we will request appropriate consent from you for international data transfers.

OTHER VIASAT TERMS, THIRD-PARTY TERMS, AND LINKS TO OTHER SITES

Use of the Services may be subject to other policies, terms, and disclosures provided by us and our partners, including: (i) our terms of service; and (ii) other terms and disclosures made available to you by us or third parties. Also, at times, our Services may contain links to third-party websites or applications, including third-party products or services. Any access to and use of such linked products or services is governed by the privacy policies or terms of use of those third parties, even though some of these other products or services may be co-branded with us. We are not responsible for the information practices of such third parties.

INFORMATION ABOUT HOSTS

We collect information about individuals and businesses who are or may become Hosts. This information may include name, physical address, tax identification number, contact information including phone number, WhatsApp number, and email address, and your image as part of the site surveys we or our partners perform when selecting Hosts. We may collect this information either directly from you, or from our third-party business partners.

We process this information to assess whether to extend you an offer to host a broadband service solution at your location, either now or in the future. If you agree to the installation of a broadband service solution, we will process your information to provide account and technical support, to help improve the solution, and to contact you with offers and promotions relating to the service. We may share your information with our affiliates, including Viasat, Inc., to perform the functions described in this paragraph.

You can exercise your rights over your personal data at any time by following the instructions in the *Manage Your Communications and Data* section of this Policy.

CONTACT US

If you have any questions about this Policy or our processing of your information, to reach our Data Protection Officer, or to exercise your rights described in this Policy, please contact us at privacy@viasat.com. We do not respond to support requests or other non-privacy related correspondence at this point of contact.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to make changes to this Privacy Policy. Please check back from time to time to ensure that you are aware of these changes. If we change this Privacy Policy in a material way, we will provide appropriate notice to you and, as appropriate, provide additional choices regarding such change. As permitted by applicable law, your continued use of the Services means that you accept these changes.

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