

Viasat General Privacy Notice

VIASAT BRASIL SERVIÇOS DE COMUNICAÇÕES LTDA, a Brazilian limited company (“Viasat”), with an office located R. Gomes de Carvalho, 911 - Vila Olimpia, São Paulo - SP, 04547-003, Brazil, and its parent, subsidiaries and affiliates (collectively, “Viasat,” “we,” “us,” or “our”) respect and value your privacy. In this General Privacy Notice (“Notice”), we describe our information practices with respect to the general Viasat websites that post this Notice, including <https://viasatdobrasil.com.br/> (the “Sites”), and information that we obtain from individuals who otherwise interact with Viasat, but who are not customers (“Subscribers”) of our internet services and related products and services (the “Services”). This Notice also excludes Subscriber-only access areas or portals thereof that post a different privacy policy or notice. The privacy policies or notices applicable to Subscribers can be found on our Subscriber websites and Customer Portals (“Subscriber Privacy Policies”). By accessing the Sites, or for non-Subscribers by interacting with Viasat in any way, including but not limited to through phone, email, or mail, you consent to our data collection, use and disclosure practices as described in this Notice.

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INFORMATION WE COLLECT AND HOW WE USE THE INFORMATION

- **Information You Provide to Us**

Information we, our service providers and/or third-party services may collect may include: (1) personally identifiable information, which is information that identifies you personally, such as your first and last name, e-mail address, phone number, and address, as well as information regarding your access to the Sites, such as IP address, date and time of connection to our Sites (“Personal Information”); and (2) demographic information, such as your gender, age, zip code, interests, and inquiries (“Demographic Information”). Except to the extent required by applicable law, Demographic Information is “non-Personal Information” (i.e., data that is not Personal Information under this Notice). In addition, Personal Information, once permanently “de-identified” (i.e., the removal or modification of the personally identifiable elements, or the extraction of non-personally identifiable elements) is also non-Personal Information and may be used and shared without obligation to you, except as prohibited by applicable law. To the extent any non-Personal Information is combined by or on behalf of us with Personal Information we collect directly from you we will treat the combined data as Personal Information under this Privacy Notice.

Generally, you may interact with us, including browsing through the Sites, without giving us any Personal Information about yourself. When you request information about our products, services, or events, you may voluntarily provide us with Personal Information, including your name, address, phone number and/or email address. We use the Personal Information that you provide to respond to your information requests regarding our Services, and may also use it for any other purposes not prohibited by applicable law or inconsistent with this Notice or representations made by us in writing at the time of collection; provided, however, that Subscriber information may be subject to additional terms set forth in the applicable Subscriber Privacy Policies.

We reserve the right to collect, use, share and transfer non-Personal Information to the fullest extent not prohibited by applicable law or inconsistent with this Notice or representations made by us in writing at the time of collection; provided, however, that Subscriber information may be subject to additional terms set forth in the applicable Subscriber Privacy Policies. We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Notice, and as needed to comply with our legal obligations.

- **Information You Post and Other User Posts**

Any comments or information that you post on public websites, including the Sites, is publicly available and may be viewed, collected and used by others, including Viasat, except as may be prohibited by applicable law. Viasat is not responsible for the privacy of any information that you choose to post on the Sites or for the accuracy of any information contained in those postings.

- **Information Automatically Collected**

We, our service providers, and/or third-party services may also automatically collect certain information about you when you access or use the Sites or otherwise contact us (“Usage Information”). Usage Information may include IP address, device identifier, browser type, operating system, information about your use of the Sites, and data regarding network connected hardware (e.g., computer or mobile device).

For instance, when you interact with Viasat, we may automatically collect information on you regarding how you contacted us. This information may include your method of contacting us (email address or phone number), the date and time you contacted us, and the frequency to which you have contacted us. In addition, Viasat may collect and store the contents of those interactions that you’ve had with us.

The cookies, tracking pixels, or similar now and hereafter known technologies or services (“Tracking Technologies”) on our Sites may collect Usage Information about your activities and interactions with us and the Sites. For instance, we may use third-party services, such as Google Analytics, that use Tracking Technologies to conduct analytics of our Sites, and we, our service providers and third-party services may automatically collect Usage Information about your use of the Sites, including the areas or pages of the Sites that you visit, the amount of time you spend using the Sites, the number of times you return, and other Site usage data. This information helps us to track and understand how visitors use our Sites, and improve the performance and user experience of our Sites.

Some information about your use of the Sites and certain third-party services may be collected using Tracking Technologies across time and services, and used by us and third parties for purposes such as to associate different devices you use, and deliver relevant ads and/or other content to you. See below regarding certain choices you may have regarding these activities.

- **Legal Grounds for the Processing of Personal Information**

The processing of Personal Information as described in this Notice above is carried out based on the following legal grounds:

- Your consent, whenever applicable;
- To provide you with the Services, in case you are a Subscriber, provided, however, that Subscriber information may be subject to additional terms set forth in the applicable Subscriber Privacy Policies;
- Our compliance with a legal or regulatory obligation;
- For the regular exercise of Viasat’s rights, if necessary; and
- Where we have a legitimate interest that is not overridden by your interests and fundamental rights; for example, our legitimate interest in providing Services and marketing to Subscribers.

- **Disabling Cookies and How We Respond to Do Not Track Signals**

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options so you may need to set them separately. Also, tools from commercial browsers may not be effective with regard to Flash cookies (also known as locally shared objects), HTML5 cookies, or other Tracking Technologies. For information on disabling Flash cookies, go to Adobe’s website <http://helpx.adobe.com/flash-player/kb/disable-third-party-local-shared.html>. Please be aware that if you disable or remove these technologies, some parts of the Sites may not work and that when you revisit the Sites your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no consensus among industry participants as to what “Do Not Track” means in this context. Like many online services, we currently do not alter our practices when we receive a “Do Not Track” signal from a visitor’s browser.

One way to potentially identify cookies on our Sites is to add the free Ghostery plug-in to your browser (www.ghostery.com) which according to Ghostery will display for you traditional, browser-based cookies associated with the websites (but not mobile apps) you visit and privacy and opt-out policies and options of the parties operating those cookies. We are not responsible for the completeness or accuracy of this tool or third-party choice notices or mechanisms. For specific information on some of the choice options offered by third-party analytics and advertising providers, see the next section.

ADVERTISEMENTS AND ANALYTICS

We may use third parties such as network advertisers to assist us in displaying our advertisements on third-party websites, and to evaluate the success of our advertising campaigns. Some of these ads may be tailored to your interest based on your browsing of the Sites and elsewhere on the internet, sometimes referred to as “interest-based advertising” and “online behavioral advertising” (“Interest-based Advertising”), which may include sending you an ad on a third party service after you have left the Site (i.e., “retargeting”). This enables us to target our advertisements for our products and services. Third party ad network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other Tracking Technologies to measure the effectiveness of the ads they place for us and to personalize advertising content. The practices related to these third-party cookies and other Tracking Technologies are governed by each applicable third party’s specific privacy policy, not this Notice.

You may choose whether to receive some Interest-based Advertising by submitting opt-outs. Some of the advertisers and service providers that perform advertising-related services for us and third parties may participate in the Digital Advertising Alliance’s (“DAA”) Self-Regulatory Program for Online Behavioral Advertising. To learn more about how you can exercise certain choices regarding Interest-based Advertising, visit <http://www.aboutads.info/choices/> and <http://www.aboutads.info/appchoices> for information on the DAA’s opt-out program for mobile apps. Some of these companies may also be members of the Network Advertising Initiative (“NAI”). To learn more about the NAI and your opt-out options for their members, see <http://www.networkadvertising.org/choices/>. Please be aware that, even if you are able to opt out of certain kinds of Interest-based Advertising, you may continue to receive other types of ads. Opting out only means that those selected members should no longer deliver certain Interest-based Advertising to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). Also, if your browsers are configured to reject cookies when you visit these opt-out webpages, or you subsequently erase your cookies, use a different device or web browser or use a non-browser-based method of access (e.g., mobile app), your NAI / DAA browser-based opt-out may not, or may no longer, be effective. We support the ad industry’s [2009 Self-regulatory Principles for Online Behavioral Advertising](https://www.iab.com/wp-content/uploads/2015/05/ven-principles-07-01-09.pdf) (<https://www.iab.com/wp-content/uploads/2015/05/ven-principles-07-01-09.pdf>) and expect that ad networks we directly engage to serve you Interest-based Advertising will do so as well, though we cannot guarantee their compliance.

You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on. You may exercise choices regarding the use of cookies from Adobe Analytics by going to <http://www.adobe.com/privacy/opt-out.html> under the section labeled “Tell our customers not to measure your use of their web sites or tailor their online ads for you.”

We are not responsible for the completeness or accuracy of these third-party tools or third-party choice notices or mechanisms.

INFORMATION DISCLOSURE

Viasat may disclose the Personal Information we collect from and about you as follows: (1) to our employees or third-party vendors, agents, service providers or contractors, if the disclosure will enable them to perform a business, professional or technical support function for us; (2) with your consent, to third parties who may sell you ancillary or competing services; (3) to respond to legal process or provide information to law enforcement or regulatory agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law; (4) as otherwise not prohibited by law or inconsistent with this Notice; and (5) as otherwise described to you at the point of collection; provided, however, that Subscriber Personal Information may be subject to additional terms set forth in the applicable Subscriber Privacy Policies.

We reserve the right to share and transfer non-Personal Information to the fullest extent not prohibited by applicable law or inconsistent with this Notice or representations made by us in writing at the time of collection; provided, however, that Subscriber information may be subject to additional terms set forth in the applicable Subscriber Privacy Policies.

Also, Viasat may sell or purchase assets during the normal course of our business. If another entity acquires us or any of our assets, information we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, then such information may be considered an asset of ours and may be sold or transferred to third parties.

INTERNATIONAL DATA TRANSFER TO THE UNITED STATES

Your information is stored on servers in the United States. If you are located outside of the United States, please note that information we collect will be transferred to and processed in the United States, using appropriate safeguards when necessary. To the extent required under applicable legislation, such transfer may be dependent upon your consent.

DATA SECURITY

Viasat has taken certain physical, administrative, and technical steps to safeguard the information we collect from and about visitors to our Sites. While we seek to ensure the integrity and security of our network and systems, we cannot guarantee the security of the information you transmit to us. We encourage you to take precautions to protect your Personal Information when you are on the Internet.

LINKS TO OTHER WEBSITES AND THIRD-PARTY SERVICES

Certain functionalities on the Sites may permit interactions that you initiate between the Sites and certain third-party services, such as third-party social networks (“Social Features”). Examples of Social Features include: enabling you to send content between the Sites and a third-party service; “liking” or “sharing” our content; and to otherwise connect the Sites with a third-party service (e.g., to pull or push information to or from the Sites). If you use Social Features, and potentially other third-party services, information you post or provide access to may be publicly displayed on the Sites or by the third-party service that you use. Similarly, if you post information on a third-party service that references us or the Sites (e.g., by using a hashtag associated with Viasat in a tweet or status update), your post may be used on or in connection with the Sites or otherwise by us. Also, both Viasat and the third party may have access to certain information about you and your use of the Sites and any third-party service.

Except to the extent we combine information we receive from third-party services, or other third parties, with Personal Information governed by this Notice, data obtained by us from a third party, even in association with the Sites is not subject to our limitations regarding data governed under this Notice, however such data remains subject to any restrictions imposed on us by the third party, if any. Otherwise, the information collected, stored, and shared by third parties remains subject to their privacy policies and practices, including whether they continue to share information with us, the types of information shared, and your choices on what is visible to others on third-party services.

We are not responsible for, and make no representations regarding, the policies or business practices of any third parties, including, without limitation, analytics service providers and third-party services associated with the Sites and encourage you to familiarize yourself with and consult their privacy policies and terms of use.

OUR COMMITMENT TO CHILDREN'S PRIVACY

Protecting children's privacy is important to us. We do not direct the Sites to, nor do we knowingly collect any personal information from, children under the age of thirteen.

CHANGES TO THIS PRIVACY NOTICE

Viasat may amend this Notice from time to time. When we do, we will post the change(s) on the Sites. In some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you an email notification). However, we will not treat your previously collected Personal Information that is governed by this Notice, to the extent it is not collected under the new privacy policy, in a manner materially different than represented at the time it was collected without your consent.

CHOICES REGARDING YOUR INFORMATION

To the extent provided by applicable legislation, you have the right to: (a) confirm whether we process Personal Information about you; (b) access Personal Information we maintain about you; (c) exercise your right to data portability; (d) request that we update, correct, amend, erase, or restrict your Personal Information; (e) withdraw your consent previously given; (f) request that we not share your Personal Information with third parties for ancillary or competing services; and/or (g) object at any time to the processing of your Personal Information on legitimate grounds relating to your particular situation.

As referred above, at any time, you may object to the processing of your Personal Information by us and/or revoke the consent previously granted to us. Please note that the exercise of these rights (1) may limit our ability to deliver services to you and (2) does not affect the lawfulness of our processing activities based on the applicable legal bases (for example, the compliance with applicable legislation).

To exercise the above rights, please contact us at privacy@viasat.com. We will notify you within the applicable term of receipt of your request with a determination on your request. If more time is required to fulfill your request, we will notify you with a justification for the extension. Please be aware that the applicable legislation may limit the exercise of these rights under certain circumstances. Also, if you have a complaint about how we handle your Personal Data or respond to your request, you may contact the national authority.

The exercise of rights related to Subscriber Personal Information may be subject to additional terms set forth in the applicable Subscriber Privacy Policies.

HOW TO CONTACT US

If you have any questions that you would like to ask about this Notice or about our handling of your Personal Data, or to contact our Data Protection Officer, please send an email to our Privacy Department at privacy@viasat.com.

Effective Date: January 17, 2020