



Viasat Subscriber Privacy Notice

VIASAT BRASIL SERVIÇOS DE COMUNICAÇÕES LTDA, a Brazilian limited company ("Viasat"), with an office located R. Gomes de Carvalho, 911 - Vila Olímpia, 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 Privacy Notice ("Notice"), we describe the information that we obtain about users of Viasat internet services (the "Services"). For the purposes of compliance with the applicable data protection legislation, we are the Data Controller of the personal information that we collect or receive from you (the "Personal Data"). Within this Notice, users of the Services may be referred to as "Data Subjects." A Data Subject is the individual to whom the personal data relates.

This Notice does not apply to users of our websites such as <https://viasatdobrasil.com.br/>, which are governed by a separate website Privacy Notice, or any third-party websites that you access when using our Services. By using our Services, you agree that any information you provide to Viasat will be handled as described in this Notice, which is incorporated by reference into the applicable Customer Agreement or terms of service.

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INFORMATION COLLECTION

- **Information You Provide to Us**

Viasat collects Personal Data from you when you use our Services, create an account with us, request information from us, or otherwise contact us. Depending on the activity, the Personal Data we collect may include your name, mailing address/zip code, email address, phone number, location (latitude/longitude) information, payment or banking information, your ID and taxpayer numbers, and your filiation. We may combine the Personal Data you provide to us with information from and about you that we receive from third parties, including business partners and vendors, and credit bureaus (for purposes of credit reviews), or information that we automatically collect as described in this Notice. Viasat does not proactively process Personal Data that is considered sensitive under applicable legislation.

- **Information Automatically Collected**

We may collect information regarding 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 or media access control (MAC) address, cookies, domain and subdomain names. We also may collect information about the websites you visit when using the Services, as necessary to provide the Services. If you connect devices (via a wired and/or wireless connection) to our modem, we may also collect information specific to each device you connect, including, but not limited to, the device's unique MAC address, the hostname of the device, connection properties specific to each device, the times the device connects to or accesses the modem and the amount of data each device consumes. We may use the information described in this paragraph to troubleshoot your home network and to optimize, troubleshoot, measure, and monitor the performance of our network and Services, including performing de-bugging and measuring service levels taking steps to ensure efficient service delivery. Whenever data cannot be related, by any means, to an identified or identifiable Data Subject, information is not considered Personal Data under applicable legislation.

HOW WE USE YOUR INFORMATION

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

- To provide you with the Services that you have agreed to, including within the Customer Agreement;
- Our compliance with a legal or regulatory obligation;
- For the regular exercise of Viasat's rights, if necessary; and



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- 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 customers, preventing frauds and managing and operating our business.

Viasat may use the Personal Data we collect from and about you for any of the following purposes:

- To comply with the applicable legislation, including regulation applicable to the telecommunication sector;
- To fulfill orders, provide the Services and communicate with customers;
- To develop new products or services;
- To respond to your inquiries;
- To market our Services to you and engage third parties to help us market our Services;
- To contact you with information, newsletters and promotional materials from Viasat or on behalf of our partners and affiliates;
- To contact you when necessary;
- To troubleshoot your home network and to optimize, troubleshoot, measure and monitor the performance of our network and Services;
- To address problems with the Services or our business;
- To protect the security or integrity of the Services and our business;
- As described to you at the point of data collection;
- To use and disclose your financial or banking information to process payments and prevent fraud; and/or
- To assess credit risks when you subscribe the Services.

INFORMATION SHARING AND DISCLOSURE

Viasat may send your Personal Data to third parties, including under any of the following circumstances:

- We may disclose your Information to third party vendors, service providers, contractors or agents who perform functions on our behalf related to the Services. For example, these providers may help us deliver our current Services to new customers or new Services to existing customers. In addition, Viasat uses Twilio as a service provider to support our customer care function that you can register for and access through WhatsApp. When you engage with us for care support, Twilio collects certain information that it calls Customer Usage Data that Twilio uses to provide services on our behalf, and for its own limited purposes to support its obligations as a communications service provider. Twilio provides additional information about its data practices, including with respect to Customer Usage Data, in its [privacy notice](#).
- We may disclose your Information to outside auditors, professional advisors, potential business transition partners, and regulators.
- If we are acquired by or merged with another company, or in the event of a consolidation or reorganization involving Viasat, or if all or a portion of our assets are transferred to another company, or as part of a bankruptcy proceeding or as part of a similar transaction, we may transfer your Personal Data to the acquiring company or other involved third party.
- We may disclose your Personal Data to respond to legal process, such as a subpoena or court order, to comply with the law or to protect our rights in litigation or arbitration.
- We may disclose your Personal Data where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or property of any person or entity (including Viasat), or violations of our Customer Agreement or policies.



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ADVERTISEMENTS AND THIRD-PARTY ADVERTISING

We may offer promotions through our Services. Some of these promotions may be based on your Personal Data or your use of the Services and others may be based on your Personal Data or your use of the Services combined with other customer information. We also 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. 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 technologies to measure the effectiveness of the ads they place for us and to personalize advertising content. These third-party cookies and other technologies are governed by each third party's specific privacy notice, not this Notice. Certain network advertisers participate in opt-out programs of the Digital Advertising Alliance and the Network Advertising Initiative. If you want any of the companies that participate in these programs to eliminate the cookies that you have placed on your computer, you can click [here](#) and [here](#).

YOUR CHOICES

If, at any time, you would like to stop receiving marketing emails from us, you may follow the opt-out instructions contained in any such email or as otherwise communicated to you. Please note that it may take up to 10 business days for us to process marketing email opt-out requests. If you opt-out of receiving marketing emails from us, we still may send you emails about your account or any Services you have requested or received from us, or for other customer service purposes. Additionally, you may receive marketing or advertising emails from Viasat dealers 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 emails from dealers to Viasat customers that were developed independently from Viasat.

INTERNATIONAL DATA TRANSFERS

Please also note that in accordance with applicable laws, your Information may be transferred, stored and used in the United States or in any other country in which Viasat or its parent, subsidiaries, affiliates or service providers conduct operations, including for the purposes described above and in the "Information Sharing and Disclosure" section above. In this condition as a Data Exporter, 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. You agree that your information will be transferred as described in this Notice. These transfers are made to our data processors in these countries to the extent that they are necessary for the maintenance or fulfillment of the legal relationship between you and Viasat, 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.

LEGAL RIGHTS

Under the applicable data protection legislation, you have certain rights with respect to your Personal Data, including the following:

- The right to confirm whether we process your Personal Data, and request information on the third parties with whom we share your data
- The right to access your Personal Data
- The right of correction with respect to inaccurate or incomplete Personal Data
- The right to object to the processing of your Personal Data
- The right to limit the use or disclosure of your Personal Data
- The right to delete, anonymize, or block your Personal Data
- The right to portability with respect to your Personal Data
- Where consent applies, the right to revoke consent granted for the processing of your Personal Data, and to understand the impact of denying consent for us to process your data.

As referred above, at any time, you may object to the processing of your Personal Data by us. Please note that objecting to the processing of certain information about you (1) may limit our ability to deliver services to you and (2) does not



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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.

SECURITY

Viasat has taken certain physical, administrative, and technical steps to safeguard the Information we collect from and about you from damage, loss, alteration, destruction or unauthorized use, access or processing. The security measures we have in place are the same measures used to protect Viasat's information. While we seek to ensure the integrity and security of our network and systems, we cannot guarantee the security of the Information, and we encourage you to take precautions to protect your Personal Data when you are on the Internet.

CHANGES TO THIS PRIVACY NOTICE

Viasat may amend this Notice from time to time. When we do, we will make the updated Notice available to you. If we make any material changes in the way we use or disclose your Personal Data, we will provide you with appropriate notice.

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