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## Scope of This Notice

This Privacy Notice explains how Viasat collects, uses, discloses or otherwise processes your personal data when you use our websites and when we provide many of our services to you. We also explain your data protection rights as well as how to contact us if you have questions or comments.

Viasat collects your personal data when you interact with us. We respect your privacy, and for this reason we work hard to gain and maintain your trust and to be transparent about how we use your information. This Privacy Notice explains who we are, how we collect, use, and share your personal data and your related rights.

This Privacy Notice applies to the personal data that we collect when you visit the Viasat websites including when you sign up to any newsletters, download content, register for events or webinars (“**Websites**”); take part in any competitions; purchase or use our residential, commercial, and community broadband connectivity, communications, content and analytics services; engage

with our mobile applications (“**Apps**”); contact our customer support agents; receive and interact with the communications we send to you; or otherwise engage or communicate with us related to any of these services, or any other Viasat products or services that link to this Privacy Notice (collectively referred to as the “**Services**”).

We may provide these Services to you directly, such as when you sign up for our residential satellite broadband service. You also may access certain Services because Viasat has a relationship with your company and we collect certain information about you as a result, including your user contact information and username and password credentials that enable you to access and use our Services, such as our Intelie by Viasat services.

**IMPORTANT:** Viasat collects personal data for different reasons, not all of which are addressed in this Privacy Notice. For example, the personal data processing for Viasat’s Mobility services, including our **in-flight connectivity, maritime, and related services**, is covered under a separate Privacy Notice. Also, we collect personal data from you if you **apply for employment with Viasat**, and the processing of your information in this context is covered under a different Privacy Notice. Our other privacy notices can be found in the Privacy Center on our Websites or at other locations where you interact with us.

Where we refer to “Viasat” (or “**us**,” “**we**,” or “**our**”) in this Privacy Notice, we mean Viasat, Inc., Inmarsat Global Limited, and all of our group companies. To find information on the group company that is the owner of a particular Website or provider (or data controller) of a particular service, you can find a list of those entities [here](#). If you have any questions or comments about our use of your personal data, please contact us using the contact details provided at the bottom of this Privacy Notice.

We recommend that you read this entire Privacy Notice so that you are fully informed about how we treat your personal data and your rights. This includes information available in the “**Service-Specific Privacy Information**” and “**Additional Region-Specific Information**” sections of this Notice that include details on our personal data processing that apply depending on the specific Viasat service you use, or your location, e.g., state, country, or region.

## Who We Are and What We Do

Viasat, including Inmarsat has been providing consumers, businesses and enterprises in the aviation, maritime, and other sectors, and governments with communications and broadband internet products and services for more than 40 years.

Viasat is a global communications provider headquartered in the United States. Viasat group of companies are located throughout the world. You can find a list of many of our Viasat locations on our Websites [here](#) and [here](#).

## Personal Data We Collect and Sources of Information

The personal data we collect either directly or indirectly from or about you will depend on the Service you are using and how you interact with us, and can include your contact, payment and service details, device information, websites you visit, cookies, and data captured using other tracking technologies.

When you interact with Viasat, we collect personal data about you from the following different sources:

- **Directly from you.** We collect personal data such as your name and contact information directly from you when you voluntarily choose to provide us with this information.
- **Indirectly.** We collect personal data about you indirectly, including through automated means. Data we collect indirectly is captured through your use of the Services, and some information is collected using cookies and other tracking technologies, as explained further in the “**Cookies and Similar Tracking Technology**” section of this Notice.
- **Third parties.** We also collect information about you from third-party sources such as our business partners, as well as service providers that provide marketing, analytics, data (including advertising networks data), and financial and credit related services. Some of this collection may occur even before your initial interaction with us, such as in the U.S., where we may purchase information from a third-party data broker to assist with our marketing efforts.

The table below describes the personal data we collect from and about you depending on the Service, some of which we combine in our systems.

Personal Data Description	Information Source
<b>Identifiers</b> including your name or alias, Viasat account credentials like username and password, online identifiers through our Websites and Apps (e.g., cookies and similar tracking technology), and other similar identifiers	<ul style="list-style-type: none"><li>• Directly from you</li><li>• Third parties</li></ul>
<b>Contact details</b> including your physical address used for contact or service support purposes or billing and deliveries, telephone number, email address, fax, job title, company affiliation, and Viasat Voice telephone number (for Viasat Voice customers)	<ul style="list-style-type: none"><li>• Directly from you</li></ul>
<b>Financial and related information</b> including your credit or debit card number for payments, bank account information that we use to set up direct debit payments, and credit-related information to support credit and solvency decisions	<ul style="list-style-type: none"><li>• Directly from you</li><li>• Third parties (payment processor, credit check)</li></ul>
<b>National identification numbers</b> such as a social security number (including last four digits) and tax identification number that we associate with your account for Services	<ul style="list-style-type: none"><li>• Directly from you</li></ul>

Personal Data Description	Information Source
<b>Customer account information</b> including records of the Services you consider or purchase from Viasat, billing records (including amount, due date, and payment date), invoices, fees processed, payment status (current or delinquent), payment method expiration status, services added or removed, internet account status (active, disconnected, suspended), status of customer service calls (scheduled or unscheduled), and records of our interactions with you, including when and how you contact us and the content of those interactions	<ul style="list-style-type: none"> <li>Indirectly</li> </ul>
<b>Service usage information</b> such as information on interactions with our Services including account log ins (including date and time) and actions taken within your account	<ul style="list-style-type: none"> <li>Indirectly</li> </ul>
<b>Online usage information</b> such as Internet and other network activity information that we capture as an internet service provider (ISP), including, to the extent allowed by local laws, the domains associated with the websites you visit, the date and time of visits, and related network metadata, search history, malicious traffic your device may encounter (including when visiting websites), and crash reports.	<ul style="list-style-type: none"> <li>Indirectly</li> </ul>
<b>Device information</b> such as IP address, device type, unique device identification numbers such as your device MAC Address, modem and router information, operating platform and system, and browser-type, browser plug-in types and versions.	<ul style="list-style-type: none"> <li>Indirectly</li> </ul>
<b>Geolocation information using IP address, WiFi access points and GPS</b> from which we can identify your general geographic location, e.g., country or city-level location, time zone settings, and other technical information that associates your location to your use of the Services	<ul style="list-style-type: none"> <li>Indirectly</li> </ul>
<b>Sensory information</b> such as audio recordings of your customer service calls to Viasat in relation to the Services	<ul style="list-style-type: none"> <li>Indirectly</li> </ul>
<b>Characteristics</b> such as age or age range, date of birth, nationality, occupation, gender and other demographic data that we use to tailor our offers and Services to you	<ul style="list-style-type: none"> <li>Directly from you</li> <li>Third parties</li> </ul>
<b>Inferences derived from personal data</b> such as purchase preferences, interests and characteristics. For example, when providing our Viasat Connect service we make predictions about websites you might visit based on other personal data we collect in connection with that service.	<ul style="list-style-type: none"> <li>Indirectly</li> <li>Third parties</li> </ul>
<b>Marketing and Communications Preferences</b> includes preferences in receiving marketing from us and our third parties and your communication preferences.	<ul style="list-style-type: none"> <li>Indirectly</li> <li>Third parties</li> </ul>

## Service-Specific Privacy Information

You can find more detail on our personal data processing for certain Services by clicking on the applicable Service below:

- Viasat Browser
- Viasat Voice Service (and Customer Proprietary Network Information processing)
- Viasat Community Internet
- Viasat Wholesale Connectivity Services
- Intelie by Viasat

## How We Use Your Personal Data and Our Legal Bases

**We use your personal data for various reasons, including to provide, support, and improve the Services and tailor the Services to you, to keep your information secure, and to communicate with you about the Services. We are a global company, and in certain countries and regions where we operate, we must inform you of our specific legal basis to collect and use your personal data.**

We use the personal data that we collect from and about you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your information.

Laws in certain locations where we operate require that we disclose our legal basis for processing your personal data, which includes the following bases depending on which service you use:

- **Contract** – we require certain personal data to provide and support the Services you purchase or request from us
- **Consent** – in certain circumstances, we may ask for your consent before we will collect, use, or disclose your personal data, in which case you can voluntarily choose to give or deny your consent without negative consequences to you
- **Legitimate Interests** – we may use or disclose your personal data for the legitimate business interests of either Viasat or a third party, but only when we're confident that your privacy rights will remain appropriately protected
- **Legal Obligation** – there may be instances where we must process and retain your information to comply with laws or to fulfill certain legal obligations
- **Vital Interests** – there may be circumstances where we will process your information to protect your vital interests or those of another person

If we rely on our (or a third party's) legitimate interests to collect and use your personal data, these interests will normally be to operate and provide our Services, communicate with you and respond to your questions, improve our Services or use the insights to improve or develop new services, market or promote either our Services or the services of a third-party that are closely partnered with our Services, or to detect or prevent illegal activities.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

The following table provides more details on our purposes for processing your personal data and the related legal bases.

<b>Purpose</b>	<b>Personal Data</b>	<b>Legal basis</b>
Register you as a customer and provide the requested Services to you.	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Contact details</li> <li>○ Financial and related information</li> <li>○ National Identification number</li> <li>○ Device information</li> <li>○ Customer account information</li> <li>○ Service usage information</li> <li>○ Online usage information</li> <li>○ Geolocation information</li> </ul>	Contract
Communicate with you about the Services, including installation scheduling and updates, product and service updates and availability, and updates to our terms of service	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Contact details</li> <li>○ Customer account information</li> <li>○ Geolocation information</li> </ul>	Contract
Respond to inquiries and requests from current and prospective customers, and Website users, including for customer support quality assurance and training purposes, and related recordkeeping.	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Contact details</li> <li>○ Financial and related information</li> <li>○ Customer account information</li> <li>○ Service usage information</li> <li>○ Sensory information</li> </ul>	Legitimate Interests of Viasat

Purpose	Personal Data	Legal basis
	<ul style="list-style-type: none"> <li>○ Device information</li> <li>○ Geolocation information</li> </ul>	
Keep the personal data of Website users and customers secure, prevent fraud, and address threats to your safety or the safety of others. For example, we may use malware and spyware monitoring tools to detect suspicious activity and algorithms to detect unauthorised access to our Websites and Services.	<ul style="list-style-type: none"> <li>○ Service usage information</li> <li>○ Online usage information</li> <li>○ Device information</li> <li>○ Geolocation information</li> </ul>	Legitimate Interests of Viasat Vital interests
Manage compliance with our service terms, and to bring and defend legal claims, including recovery of debts.	<ul style="list-style-type: none"> <li>○ Customer account information</li> <li>○ Service usage information</li> <li>○ Online usage information</li> <li>○ Device information</li> <li>○ Geolocation information</li> </ul>	Legitimate interests of Viasat
Maintain, support, and improve our IT systems, including to repair and debug our systems.	<ul style="list-style-type: none"> <li>○ Customer account information</li> <li>○ Service usage information</li> <li>○ Online usage information</li> <li>○ Device information</li> <li>○ Geolocation information</li> </ul>	Legitimate interests of Viasat
Learn about our current and prospective customers and Website users to improve our Services, to develop new products and services, and improve our marketing, customer relationships and experiences. This includes identifying usage trends and patterns and evaluating this information on an aggregated, specific group(s), and individual basis	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Customer account information</li> <li>○ Service usage information</li> <li>○ Online usage information</li> <li>○ Device information</li> <li>○ Geolocation information</li> <li>○ Characteristics</li> <li>○ Inferences derived from personal data</li> </ul>	Legitimate interests of Viasat
Contact current and prospective customers about products, services, and events we think may be of interest to you, including	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Contact details</li> </ul>	Consent (where required); otherwise,

<b>Purpose</b>	<b>Personal Data</b>	<b>Legal basis</b>
with promotional mailers and electronic communications	<ul style="list-style-type: none"> <li>○ Characteristics</li> <li>○ Inferences derived from personal data</li> </ul>	legitimate interests of Viasat
Personalize and customize your experience with our Websites and Services, including to provide local or otherwise targeted content and information, e.g., using browser and device-related location data to customize Viasat dealer information presented on the Websites	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Contact details</li> <li>○ Characteristics</li> <li>○ Inferences derived from personal data</li> </ul>	Consent (where required); otherwise, legitimate interests of Viasat
Personalize, target, and deliver advertising for our Services on third party websites, apps, and other online services, and measure the effectiveness of our campaigns and adjust our methods	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Contact details</li> <li>○ Inferences derived from personal data</li> </ul>	Consent (where required); otherwise, legitimate interests of Viasat
Administer surveys to collect customer perceptions and measure satisfaction	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Contact details</li> <li>○ Customer account information</li> <li>○ Sensory information</li> </ul>	Legitimate interests of Viasat
Administer competitions and prize draws	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Contact details</li> <li>○ Customer account information</li> <li>○ Service usage information</li> <li>○ Inferences derived from personal data</li> </ul>	Legitimate interests of Viasat
Manage our use of tracking technologies such as cookies used with our Websites and Apps, and enable you to manage your cookie preferences	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Device information</li> </ul>	Consent (where required); otherwise, legitimate interests of Viasat
Identify audiences and Individuals like you to better tailor our marketing campaigns and communications	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Contact details</li> <li>○ Inferences</li> </ul>	Consent (where required); otherwise, legitimate



Purpose	Personal Data	Legal basis
		interests of Viasat
Comply with the legal obligations to which we are subject and to support our general business operations	<ul style="list-style-type: none"> <li>○ Identifiers</li> <li>○ Contact details</li> <li>○ Device information</li> <li>○ Customer account info</li> <li>○ Service usage</li> <li>○ Online usage</li> </ul>	Legal obligation

## When We Share Your Personal Data

Your information may be shared with third parties, such as service providers (within and outside the Viasat group) and business partners. On certain occasions where necessary or required, we may share your information with law enforcement, government agencies, or the purchasers of some or all of a Viasat group business.

We may disclose your personal data to the following categories of recipients to the extent permitted by applicable law:

- Viasat group companies.** We share information across the Viasat group companies to help us operate our business and Services or for their own purposes, such as to provide their services directly to you. These entities are located in various countries around the world. A list of countries in which Viasat entities are located can be found [here](#) and [here](#). If a group company uses your information for its own purposes, those entities are ‘controllers’ (or a similar-meaning term) of your personal data. We sometimes may share information with group companies in an aggregated and anonymized format and in those cases, you will not be identified through the information that is disclosed. Generally, all categories of the personal data that we process will be accessible to Viasat, Inc.
- Third-party service providers.** We use third-party vendors to perform services on our behalf. These vendors provide business, professional, payment processing, marketing and advertising, analytics and measurement, and technical and hosting support to us, help us operate our business, Services, and Websites, and administer activities in support of our business and the Services on our behalf. These vendors range from consulting services provided by groups and individuals, large technology platform and cloud hosting providers like Amazon Web Services, Salesforce, SAP, and others, and other third-party technology application providers. These vendors are not permitted by us to use or share your personal data for either their own or another third party’s commercial purposes. Categories of personal data shared: identifiers, contact details, personal records, commercial information, internet or other electronic activity, professional or employment-related information, geolocation data, sensory information, and profile inferences.

- **Credit agencies or bureaus.** We engage with credit agencies or bureaus to carry out credit checks so that we can make credit and solvency decisions when you request the Services. These credit agencies/bureaus are in various countries around the world .
- **Authorized retailers and distributors and delivery partners.** We engage with select retailers that can help you select the best Service plan for you and support installation. Categories of personal data shared: identifiers and contact details. You can search for our authorized retailers [here](#)
- **Third-party ad platforms or networks.** We may also share personal data with advertising platforms or networks or permit these partners to collect information from you directly on the Websites to facilitate online advertising for Viasat services, such as search engines and social network advertising providers to serve ads for our Services to you or to groups of other users similar to you based on commercial interests and demographics, on third-party platforms or other websites you visit. For more information, including how to opt out of targeted online advertising, please visit the “**Cookies and Similar Tracking Technologies**” section of this Privacy Notice.
- **Entities involved in corporate transaction.** We may sell or purchase assets during the normal course of our business. In connection with these transactions, we may disclose your personal data or transfer this information to another entity as part of a potential or actual acquisition or merger of Viasat or any portion of our assets. If we bring or are defending a reorganization, bankruptcy, or similar event, your personal data may be considered our asset and sold or transferred to third parties. These third parties are located in various countries around the world.
- **Law enforcement, governmental, judicial and related entities.** We may share your information to protect the security of our Services, network, and IT systems and applications, 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, 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. We may share your information when we believe that it is necessary to protect our rights, investigate, or enforce our policies, terms, or other legal document or contract, or to comply with a judicial proceeding, court order, or legal process served on Viasat. Categories of personal data shared: identifiers, commercial information, or Geolocation data. We may share your data with public authorities, such as tax authorities, to comply with our legal obligations.
- **Other persons with your consent** to the disclosure.
- **Third parties who receive aggregate or anonymous information.** We may share aggregate or anonymous information with third parties, including our business partners, for their business, marketing, or analytics uses. When we do, we take steps to ensure that this information cannot be used to identify you.

## Cookies and Similar Tracking Technology

Cookies are small data files that are placed on your computer or mobile device when you visit a website or online platform. We use cookies and similar tracking technology (collectively, “**Cookies**”) to operate and enhance our Websites and certain Services and understand how you navigate our Websites and Services, to maintain user preferences or settings, combat fraud, help to ensure compliance with our policies and Terms of Use, and support our online advertising (including retargeting efforts) for Viasat services. Where required by applicable law, we ask you to provide your consent to or give you choices on the use of these tracking technologies.

For more information about the types of Cookies we use, why, and how you can control Cookies, please see either our Cookie Notice or the Do Not Sell or Share My Personal Information page available on the Website or Service you are using.

## How We Secure Your Personal Data

**Viasat takes the security of your personal data seriously. The measures we use to protect your information may vary between Websites and the Services.**

We take our responsibility to protect your information seriously and use appropriate technical, physical, and organizational measures to safeguard the information that we process through our Websites and Services. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal data. No security system is 100% secure, however, and we cannot guarantee our security measures will not be compromised.

## International Data Transfers

**We operate as a global organization with service providers and partners around the world. Your personal data may be transferred to countries with data protection standards that are not equal to the standards in the country where you are located. We put in place appropriate measures to safeguard your personal data when transferring it around the world.**

Your personal data may be transferred to, and processed in, countries other than the country in which you reside. These countries may have data protection laws that are different than the laws of your country (and, in some cases, may not be as protective).

The servers that operate or process personal data related to our Services are primarily located in the United States and the UK, though personal data also may be transferred to India, Israel, Ireland, and the countries in which our business is established or our Services are available, and potentially other countries. Our group companies and third-party service providers and partners operate

around the world. This means that when we collect your personal data, we or our service providers may process it in any of these countries depending on the Service.

We take appropriate safeguards to help ensure that your personal data remains protected in accordance with this Privacy Notice. These include, for example, implementing the UK and European Commission's Standard Contractual Clauses for transfers of personal data between our group companies, which require all group companies to protect personal data that they process from the European Economic Area, Switzerland, and the UK in accordance with data protection laws in those areas. Where appropriate, we also put in place additional safeguards to protect your personal data when it is transferred to countries considered to be less protective.

Information on the Standard Contractual Clauses we have in place between our Viasat group companies can be provided on request. We have implemented similar appropriate safeguards with our third-party service providers and partners.

## **Additional Region-Specific Information**

Data protection laws and requirements can differ by location, including region, country, or state. Where appropriate, we describe additional country specific information about our collection and use of your personal data in connection with our Websites and Services.

If you are in one of the locations listed below, please click on the relevant link for country specific information about our collection and use of your personal data.

- United States (including state-specific information, e.g., CA, CO, CT, ME, NV, UT, VA)
- UK, Switzerland and European Economic Area
- Brazil
- Mexico

## **How Long We Keep Your Information**

We retain the personal data we collect from you where we have an ongoing legitimate purpose to do so described in the “**How We Use Your Personal Data and Our Legal Bases**” section above. For example, where we process your information based on a contract with you, we generally will retain the information for the length of the contract 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 data, we will either delete or anonymize it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

## Automated Decision-Making

We do not use your personal data to engage in automated decision-making that will have a significant effect on you (legally or otherwise). In the U.S., we use automated tools that process information such as your location and credit history to assess whether our Services are an available or most appropriate service option for you and to inform the appropriate initial upfront fee for our Services.

## Your Choices and Data Protection Rights

**Depending on your location, you may have certain rights that you can exercise over our collection and use of your personal data.**

Depending on your location, the privacy laws that apply to Viasat and our Services give you certain rights over the personal data we process about you. These rights are in addition to your right to know or be informed about how we process your data, which we honor through our descriptions in this Privacy Notice. Your data protection rights may include:

- You can **access, correct, update or request deletion** of your personal data. You also can **object to processing** of your personal data, ask us to **restrict processing** of your personal data or **request portability** of your personal data. You can exercise these rights at any time by submitting a request through our online [Privacy Rights Request Form](#). You also have the right to **avoid discrimination** by us in response to exercising your rights.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails you receive from us. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided under the “**How to contact us**” heading below.
- If we have collected and process your personal data with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of our processing activity prior to your withdrawal, nor will it affect our processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal data. For more information, please contact your local data protection authority.

## Privacy Controls

**Requests to exercise your data protection rights**

Please submit a request using our [Privacy Rights Request Form](#) to exercise your data protection rights. While your location

	determines what rights are available to you, we respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.
<b>Requests to stop sending directed marketing</b>	You can unsubscribe from marketing emails by clicking the unsubscribe link at the bottom of the email you receive from Viasat or its marketing partner. You also can use our <a href="#">Privacy Rights Request Form</a> to instruct us to remove you from our marketing campaigns.
<b>Account management</b>	If you have set up an online account for Services that is accessible through one of our Websites or Apps you can manage your account settings by logging into your account.
<b>Accepting or rejecting Cookies</b>	You can change your cookie settings (including to decline non-essential cookies) by visiting our Cookie Settings tool or clicking the Do Not Sell or Share My Personal Information link available on the Website or Service you are using (where applicable based on local laws). You also can adjust your browser settings more generally and modify local device settings to accept or reject cookies, as explained in our Cookie Notice available on the applicable Website or Service.

## Personal Data About Children

The Viasat Websites and Services are not directed to children under 13 years old (or older, if applicable law provides for different protections), and we do not intentionally collect personal data from children. If you become aware that we have inadvertently collected personal data from a child, please notify us as soon as possible by contacting us using the contact details provided under the “**How to Contact Us**” section below.

## Updates to This Privacy Notice

We keep this Privacy Notice up to date and will update it from time to time based on changing business, technical or legal developments. When we make changes, we’ll let you know by updating the Privacy Notice and the date at the top of this page. Depending on the type of changes we make, we’ll also take appropriate measures to inform you and provide you with appropriate choice in compliance with applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “Effective” date displayed at the top of this Privacy Notice.

## How to Contact Us

If you have any questions or concerns about our use of your personal data, please contact us using the following details:

Viasat, Inc.

Attn: Viasat Privacy Office (Legal Dept.)

901 K Street, NW, Suite 400

Washington, DC 20001

Email: [privacy@viasat.com](mailto:privacy@viasat.com)

## Viasat Controller Entities

Viasat, Inc. and/or its affiliated entities act as the controllers of your personal data and are responsible for its processing, unless expressly stated otherwise in our Privacy Notice. While Viasat, Inc. generally will operate as the main decision maker as to the processing of personal data subject to this Privacy Notice, the following table provides additional details on Viasat entities that operate as a controller of your personal data for certain Services, including Mobility Services. For clarity, this Privacy Notice does not apply to instances where Viasat processes personal data in the role of a data processor (as this and similar terms are defined in various privacy laws) on behalf of our customers.

You can contact us at [privacy@viasat.com](mailto:privacy@viasat.com) with questions on any of the entities listed below.

Viasat Entity	Data Controller Status / Services
<b>Viasat, Inc. (U.S.)</b> 6155 El Camino Real Carlsbad, CA 92009-1699	<ul style="list-style-type: none"><li>• Data controller for Mobility Services offered in the U.S., the European Economic Area, and other geographies where the Mobility Services are available, except as otherwise stated in this Addendum.</li><li>• Fixed and residential broadband (Viasat and WildBlue) (U.S.)</li><li>• Alternative broadband ventures / Community WiFi (U.S.)</li><li>• Viasat Shield</li><li>• Viasat Browser</li><li>• <a href="http://www.viasat.com">www.viasat.com</a></li></ul>
<b>Inmarsat Global Ltd.</b> 99 City Road London, EC1Y 1AX	<ul style="list-style-type: none"><li>• Data controller for Mobility Services provided to end users under the Inmarsat Global Ltd Terms of Service.</li></ul>
<b>Viasat Brasil Serviços de Comunicações Ltda. (Brazil)</b> Av. Engenheiro Luís Carlos Berrini 105 Unit 301 - 30th Flr, Tower 04 - Cidade Monções São Paulo - SP 04571-010	<ul style="list-style-type: none"><li>• Data controller for the Mobility Services offered by Viasat in Brazil.</li><li>• Fixed and residential broadband (Brazil)</li><li>• Alternative broadband ventures / Community WiFi (Brazil)</li></ul>
<b>Viasat Europe Sàrl (Switzerland)</b> EPFL Innovation Park, Building J, 3rd Floor, 1015 Lausanne, Switzerland	<ul style="list-style-type: none"><li>• Fixed and residential broadband (Spain)</li></ul>
<b>Viasat Tecnología, S.A. de C.V (Mexico)</b> Montes Urales 754, piso 3, colonia Lomas de Chapultepec, alcaldía Miguel Hidalgo, C.P. 11000 Mexico City, Mexico	<ul style="list-style-type: none"><li>• Data controller for the Mobility Services offered by Viasat in Mexico.</li><li>• Fixed and residential broadband (Mexico)</li></ul>



<b>Viasat Malaysia Sdn. Bhd. (Malaysia)</b> Suite 3158 SPACES Menara Prestige No. 1 Jalan Pinang 50450 Kuala Lumpur Phone: +60122929067	<ul style="list-style-type: none"> <li>• Data user, or the nominated representative of Viasat, Inc. for Mobility Services offered by Viasat in Malaysia.</li> </ul>
<b>Intelie Soluções em Informática Ltda. (Brazil)</b> 64, Dom Gerardo street 9 <sup>th</sup> floor - Center, CEP 20090-906 Rio de Janeiro, State of Rio de Janeiro	<ul style="list-style-type: none"> <li>• IntelieLIVE software and services</li> </ul>

## Service-Specific Information

This section provides additional details about the personal data that we process when you use the following Services:

- Viasat Browser
- Viasat Voice Service (and Customer Proprietary Network Information Processing)
- Viasat Community Internet
- Viasat Wholesale Connectivity Services
- Intelie by Viasat

### Viasat Browser

When you use the Viasat Browser, we automatically collect certain online usage information so that over time the Viasat Internet Hinting Service feature included within the browser provides more accurate hints about URLs of interest for the purpose of enabling faster page loads. We collect and process through the Viasat Internet Hinting Service data including your IP address, network access global unique identifier, app usage and click-stream data (including the app features you engage and the webpages you visit), the webpage URL, the list of objects (e.g., images, text boxes) on the web page, the time for each object to load, whether any failures occurred loading the objects, object meta-data, and whether the object was in the browser cache and whether the domain was in the DNS cache. The click-stream data that we process is relayed from the Viasat Hinting Service and aggregated with clicks to that particular site made by other users of the Service for purposes of optimizing and improving the Service.

Additionally, we process information on the browsing environment such as whether ad blocking is enabled, and information regarding the device CPU, disk, and operating system so that these elements are considered when analyzing web page load performance. We also collect additional information and perform analytics related to your experience with the Service and the performance of your Internet connection to aid in troubleshooting and optimizing the Service.

When providing you with the Service, we also store hashes of the cookie values along with the cookie names for each request and response associated with rendering a specific webpage. To minimize tracking and data collection from cookies, we cryptographically hash cookies with a SHA2 algorithm before they are processed by the Viasat Hinting Service.

Other than as described in this Section, the Viasat Internet Hinting Service data does not process data that you enter into the browser when visiting or interacting with a website, such as usernames and passwords, cardholder data, search engine queries, contact information, or any other user-entered data.

You have the option to temporarily limit the Viasat Hinting Service's access to your information by operating Viasat Connect in incognito mode (ctrl-shift-N). When in incognito mode, Viasat Connect does not communicate with the Viasat Hinting Service, though please note that page load speeds may decrease as a result.

We receive Service crash reports that include data related to the associated incident, which may include personal data that we only use to evaluate the malfunction, make efforts to correct the problem, and improve our products and services to reduce the chance of the malfunction occurring again. In addition, you have the option to send us feedback reports that include data related to your Service usage.

## **Viasat Voice Service (and Customer Proprietary Network Information)**

Viasat Voice is a home phone service available to certain Viasat Internet subscribers. Viasat collects and maintains information known as customer proprietary network information (“**CPNI**”) as part of Viasat Voice. CPNI includes, among other things, how you use Viasat Voice, for example, calling records and your billing information. Your Viasat Voice telephone number, name, and address do not constitute CPNI.

U.S. federal law generally permits Viasat to use CPNI in its provision of Viasat Voice, including billing and collections for such service. Viasat also is permitted by law to use, disclose or permit access to CPNI (i) to provide or market service offerings among the categories of services to which you already subscribe; or (ii) for legal or regulatory reasons, such as to respond to a court order, to investigate fraud, to protect Viasat's rights or property or to protect other users of Viasat's services against unlawful, fraudulent or abusive use of Viasat's services.

Viasat does not sell or trade your CPNI with anyone outside of Viasat and those third parties authorized to perform functions on Viasat's behalf related to the performance of Viasat Voice, except as the law may require or permit or you may otherwise authorize. Neither Viasat, nor any third party to whom Viasat has provided CPNI, use CPNI for marketing purposes, except as may be permitted by law.

## **Viasat Community Internet**

This Privacy Notice also applies to the individuals and businesses that host a Community Internet, WiFi, or other broadband service at their location to enable the Services to others (the “**Hosts**”).

We collect information about individuals and businesses who are or may become Hosts, including identifiers, contact details, personal records, and national ID number. This information may include name, physical address, tax identification number, contact information including phone number, WhatsApp number, and email address, and the Hosts 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.

Hosts can exercise their rights over their personal data at any time by following the instructions in the “**Your Choices and Data Protection Rights**” section of the Privacy Notice.

## **Viasat Wholesale Connectivity Service**

In some locations, Viasat acts as wholesale provider of connectivity services and processes the personal data of our partners’ customers. In this context, the partner is our customer, and the partner has the direct relationship with the customer (you) receiving the internet service. Personal data we process when we are a wholesale provider includes Usage Information including device identifier, IP address, and URL related information that we process to provide the service to our customers.

We process your personal data for purposes of our legitimate interests, including to fulfil legal obligations, establish and manage the contractual relationship between us and our partner, to provide technical assistance in connection with the wholesale service we provide, defense of legal claims, and to prevent criminal activity.

We share your personal data with others only if we have a legal basis for doing so. If we transfer your personal data to recipients outside the UK, Switzerland, the European Union, or the European Economic Area (EEA), we do so only where there is an adequate level of data protection in relation to that third country, or we have adopted an approved legal mechanism to support the transfer (e.g., using standard contractual clauses or another approved mechanism). Your personal data may be disclosed to public authorities or other entities authorized to have such access under the law.

## **Intelie by Viasat**

When providing the Intelie LIVE on-prem software or software-as-a-service to our business customers, Viasat processes personal data of our customers’ authorized employees, consultants, contractors, and agents (“Authorized Users”).

The personal data of Authorized Users that we process includes credentials, business email address, and log-in information to enable access to the Service along with other technical and related information about Authorized Users use of the Service. We do not use Authorized Users’ personal data in an identifiable way except as necessary to provide the Service or otherwise meet our contractual obligations to the customer to which the Authorized User is associated, or to comply with our legal obligations.

We also may aggregate certain data relating to Authorized Users use of the Service to support and troubleshoot issues, provide updates, automate invoices, analyze trends and improve Viasat’s products or services.

Authorized Users can exercise their rights over their personal data at any time by following the instructions in the “**Your Choices and Data Protection Rights**” section of the Privacy Notice.

## Additional Region-Specific Information

Certain regions, countries and U.S. states have enacted privacy laws that require that we provide residents of those locations with additional information not found in the main Privacy Notice, including information on location-specific choices or rights. You can learn more about your rights and choices for the following locations in this section, including the effective dates of certain rights.

- USA – California
- USA – Colorado
- USA – Connecticut
- USA – Maine
- USA – Nevada
- USA – Utah
- USA – Virginia
- UK, Switzerland, and European Economic Area
- Brazil
- Mexico

### USA – California

*California Notice of Collection of Personal Information:* This notice to California residents is provided under California law, explains your privacy rights as a California resident, provides our “notice at collection,” and provides certain mandatory disclosures about our treatment of California residents’ personal information, both online and offline.

The information in this section applies to the personal information we’ve collected from California residents during the 12 months prior to the effective date of this Privacy Notice.

The following table describes the categories of Personal Information that Viasat collects, the sources from which the Personal Information is collected and the categories of third parties to whom Personal Information is disclosed.

Categories of Personal Information	Personal Information Sources	Categories of Recipients
Identifiers ( <i>name, contact information, unique identifiers, cookies, IP address, and other similar identifiers</i> )	<ul style="list-style-type: none"><li>• You (directly and indirectly)</li><li>• Third-party (data broker)</li></ul>	<ul style="list-style-type: none"><li>• Viasat group companies</li><li>• Third-party service providers</li><li>• Credit agencies or bureaus</li><li>• Payment processors</li><li>• Business partners</li><li>• Third-party ad networks</li><li>• Law enforcement and related entities</li></ul>
Any personal information described in subdivision (e) of Section 1798.80, e.g., personal records such as financial and related information, and bank account information, e.g., to set up direct debit payments	<ul style="list-style-type: none"><li>• You (directly)</li><li>• Payment Processor</li></ul>	<ul style="list-style-type: none"><li>• Viasat group companies</li><li>• Third-party service providers</li><li>• Credit agencies or bureaus</li><li>• Payment processors</li><li>• Business partners</li></ul>

Characteristics of protected classifications under California or federal law ( <i>age, gender, and other demographic data</i> )	<ul style="list-style-type: none"> <li>• You (directly)</li> <li>• Third-party data broker</li> </ul>	<ul style="list-style-type: none"> <li>• Viasat group companies</li> <li>• Third-party service providers</li> </ul>
Commercial information ( <i>your service usage information, history and preferences; purchase history</i> )	<ul style="list-style-type: none"> <li>• You (directly and indirectly)</li> <li>• Third-party data broker</li> </ul>	<ul style="list-style-type: none"> <li>• Viasat group companies</li> <li>• Third-party service providers</li> <li>• Law enforcement and related entities</li> </ul>
Internet or other electronic network activity information ( <i>your online usage information and online interactions with the Services</i> )	<ul style="list-style-type: none"> <li>• You (indirectly, including your device)</li> <li>• Third party (airline or other transportation partner)</li> </ul>	<ul style="list-style-type: none"> <li>• Viasat group companies</li> <li>• Third-party service providers</li> </ul>
Professional or employment-related information (as part of the characteristics information we collect about you)	Third-party data broker	<ul style="list-style-type: none"> <li>• Viasat group companies</li> <li>• Third-party service providers</li> </ul>
Geolocation data such as country and zip code	<ul style="list-style-type: none"> <li>• You (directly and indirectly)</li> <li>• Third-party data broker</li> </ul>	<ul style="list-style-type: none"> <li>• Viasat group companies</li> <li>• Third-party service providers</li> <li>• Law enforcement and related entities</li> </ul>
Audio, electronic, visual, thermal, olfactory, or similar information such as recordings of customer service calls	You (indirectly)	<ul style="list-style-type: none"> <li>• Viasat group companies</li> <li>• Third-party service providers</li> </ul>
Inferences drawn from the above categories ( <i>inferences we draw from your information and activity through the Services to help create a personalized profile so we can better identify services that may be of interest</i> )	You (directly and indirectly) Third-party data broker	<ul style="list-style-type: none"> <li>• Viasat group companies</li> <li>• Third-party service providers</li> </ul>
Sensitive Personal Information	You (directly)	<ul style="list-style-type: none"> <li>• Viasat group companies</li> <li>• Third-party service providers</li> </ul>

Our specific business and commercial purposes for collecting your personal information is described in the “**How We Use Your Personal Information and our Legal Bases**” section of the Privacy Notice.

We may retain each category of personal information we collect as long as necessary to provide our Services to you, after which we delete your data in accordance with our corporate retention policy. For more information, please see the “**How Long We Keep Your Information**” section of the Privacy Notice.

### **Categories of Personal Information Sold or Shared**

In the last 12 months, we “sold” or “shared” (as these words are defined under California law) the following categories of personal information to vendors of services related to advertising (such as ad platforms or networks), marketing, analytics, and measurement for commercial purposes, such as the marketing and advertising of our Services:

- Identifiers
- Internet or other electronic network activity information

We do not sell or share the personal information of known consumers under 16 years of age.

## **Use and Disclosure of Sensitive Personal Information:**

To the extent that we collect, use, or share “sensitive personal information” as that term is defined under California law, we limit our use or disclosure of the sensitive personal information to permitted business purposes.

## **California Privacy Rights**

### *(a) Right to Access*

You have the right to request, up to two times each year, access to categories and specific pieces of personal information about you that we collect, use, disclose, sell, and share, such information to be provided to you in a readily useable format.

### *(b) Right to Delete*

You have the right to request that we delete personal information that we collect from you, subject to applicable legal exceptions.

### *(c) Right to Correct*

You have the right to request that we correct inaccurate personal information that we maintain about you, subject to applicable legal exceptions.

### *(d) Right to Opt-Out of Sale or Sharing of Personal Information*

You have the right to opt-out of the “sale” or “sharing” of your personal information, as such terms are defined under California law.

### *(e) Right to Non-Discrimination*

You have the right not to be treated in a discriminatory manner for exercising your privacy rights. We do not use the fact that you have exercised or requested to exercise any rights for any purpose other than facilitating a response to your request.

### *(f) Right to Limit Use and Disclosure of Sensitive Personal Information*

You have the right to limit our use and disclosure of sensitive personal information, such as your credit card information with security code, where we use such information to draw inferences or for nonpermitted purposes under California law. We limit our use or disclosure of sensitive personal information to permitted business purposes.

## **Exercising your California Privacy Rights**

To exercise your rights, please visit our [Privacy Rights Request Form](#) or call us at 1-855-463-9333.

**Requests to Opt-Out of the “Sale” or “Sharing” of Personal Information:** To submit a request to opt-out of the sale or sharing of your personal information, you may click on the “**Do Not Sell or Share My Personal Information**” link and visit the Cookie Settings tool or you may choose to



enable online, where available, a universal tool that automatically communicates your opt-out preferences, such as the Global Privacy Control. We will process such a signal as a request to opt-out.

To process certain rights requests described in this section, we may need to verify that you are the person that is the subject of the request. This verification process consists of matching identifying information provided by you with the information we have about you in our records. When making a request, you may be asked to provide your name, email address, contact and request details. A confirmation email will be sent to the email address you provide. If we cannot verify your identity, we may not be able to respond to your request. We use the information that we collect about you during the verification process only for verification purposes.

### **Instructions for Authorized Agents Making Requests**

You may authorize someone to make a privacy rights request on your behalf (an authorized agent). Authorized agents may submit a request using the [Privacy Rights Request Form](#) and will need to demonstrate that you've authorized them to act on your behalf or must demonstrate they have power of attorney pursuant to applicable probate law. We retain the right to request confirmation directly from you confirming that the agent is authorized to make such a request, or to request additional information to confirm the agent's identity. An authorized agent is prohibited from using a consumer's personal information, or any information collected from or about the consumer, for any purpose other than to fulfill the consumer's requests, for verification, or for fraud prevention.

We reserve the right to deny requests in certain circumstances, such as where we have a reasonable belief that the request is fraudulent.

### **California Consumer Privacy Act (CCPA) Metrics**

Under CCPA, businesses that process these requests must publish information about them. That information for California residents for the period of January 1, 2024 through December 31, 2024 is below.

#### **Access Requests**

Total number of Access Requests Received	0
Total number of Access Requests complied with in whole or in part	0
Total number of Access Requests Denied	0

#### **Deletion Requests**

Total number of Deletion Requests Received	13
Total number of Deletion Requests complied with in whole or in part	13
Total number of Deletion Requests Denied	0

#### **Do Not Sell (DNS) Requests**

Total number of DNS Requests Received	0
Total number of DNS Requests complied with in whole or in part	0
Total number of DNS Requests Denied	0

#### **Average Days to Respond**

Average number of days to respond to Access requests	4N/A
Average number of days to respond to Deletion requests	25
Average number of days to respond to DNS requests	N/A

#### **Do Not Track**

California law requires us to let you know how we respond to web browser Do Not Track (DNT) signals. Because there currently isn't an industry standard for recognizing or honoring DNT signals, we do not respond to them at this time.

## **USA – Colorado**

*Effective July 1, 2023*

This section provides supplemental information to residents of the State of Colorado, whose personal data we process in connection with the Services.

Please see the main Privacy Notice for a description of the personal data we collect, the purposes for which we use it, and how and with whom we share it.

#### **Colorado Privacy Rights**

##### *(a) Right to Access*

You have the right to know and access the personal data we process concerning you.

##### *(b) Right to Delete*

You have the right to delete personal data concerning you.

##### *(c) Right to Opt-Out*

You have the right to opt out of targeted advertising and the sale of your data (as defined under Colorado law).

##### *(d) Right to Correct*

You have the right to correct inaccuracies in the personal data, taking into account the nature of the personal data and the purposes of the processing.

##### *(e) Right to Portability*

You have the right to obtain a portable copy of the personal data we process concerning you.

## Exercising Your Colorado Privacy Rights

To exercise your rights, please visit our [Privacy Rights Request Form](#) or email [privacy@viasat.com](mailto:privacy@viasat.com).

To opt-out of targeted advertising and the sale of personal data, you may visit our [Privacy Rights Request Form](#) or you may choose to enable online, where available, a universal tool that automatically communicates your opt-out preferences, such as the Global Privacy Control. We will process such a signal as a request to opt-out.

To process your request, we may need to verify that you are the person that is the subject of the request. This verification process consists of matching identifying information provided by you with the information we have about you in our records. When making a request, you may be asked to provide your name, email address, contact and request details. A confirmation email will be sent to the email address you provide. If we cannot verify your identity, we may not be able to respond to your request. We use the information that we collect about you during the verification process only for verification purposes.

## Instructions for Authorized Agents Making Requests

You may authorize someone to make a privacy rights request on your behalf (an authorized agent). Authorized agents may submit a request using the [Privacy Rights Request Form](#) and will need to demonstrate that you've authorized them to act on your behalf or must demonstrate they have power of attorney pursuant to applicable probate law. We retain the right to request confirmation directly from you confirming that the agent is authorized to make such a request, or to request additional information to confirm the agent's identity. An authorized agent is prohibited from using a consumer's personal information, or any information collected from or about the consumer, for any purpose other than to fulfill the consumer's requests, for verification, or for fraud prevention.

To appeal our decision regarding a request related to these rights, you may email us at [privacy@viasat.com](mailto:privacy@viasat.com)

We do not process the personal data of children under 13 years of age.

## USA – Connecticut

*Effective July 1, 2023*

This section provides supplemental information to residents of the State of Connecticut, whose personal data we process in connection with the Services.

Please see the Privacy Notice for a description of the personal data we collect, the purposes for which we use it, and how and with whom we share it.

## **Connecticut Privacy Rights**

### *(a) Right to Access*

You have the right to know and access the personal data we process about you.

### *(b) Right to Delete*

You have the right to delete the personal data provided by or obtained about you.

### *(c) Right to Opt-Out*

You have the right to opt out of targeted advertising and the sale of your data (as defined under Connecticut law).

### *(d) Right to Correct*

You have the right to correct inaccuracies in the personal data, taking into account the nature of the personal data and the purposes of the processing.

### *(e) Right to Portability*

You have the right to obtain a portable copy of your data processed by us.

## **Exercising Your Connecticut Privacy Rights**

To exercise your rights, please visit our [Privacy Rights Request Form](#) or email [privacy@viasat.com](mailto:privacy@viasat.com).

To opt-out of targeted advertising and the sale of personal data, you may visit [Privacy Rights Request Form](#) or you may choose to enable online, where available, a universal tool that automatically communicates your opt-out preferences, such as the Global Privacy Control. We will process such a signal as a request to opt-out.

To appeal our decision regarding a request related to these rights, you may email us at [privacy@viasat.com](mailto:privacy@viasat.com)

## **USA – Maine**

### **Broadband internet access services**

The Maine Broadband Internet Access Service Customer Privacy Act gives you additional privacy rights when we are your broadband Internet access service provider. The Maine law gives you the right to control certain ways that we use or share information we have about you and requires that we provide you with a notice of your rights and our obligations under this law. We do this in this section.

The Maine law also requires us to take reasonable measures to protect your customer personal information. We describe this in the “**How We Secure Your Personal Data**” section of this Privacy Notice.

We will not use, disclose, sell, or permit access to your broadband customer personal information except for purposes allowed under the Maine law or with your affirmative consent. We may ask you for this consent when we interact with you. For example, we may ask to use your broadband customer personal information to market additional non-communications-related services to you when you contact us.

The Maine law also provides you with a right to opt-out of any use or sharing of data that is not customer personal information under the law that we may collect. If you have questions about your rights, or to exercise your rights under the law, please contact us at [privacy@viasat.com](mailto:privacy@viasat.com). We will not refuse to provide you with broadband service, charge you a penalty, or offer you a discount based on whether you agree that we can use or share your broadband customer personal information.

## **USA – Nevada**

### **The Categories of Personal Information We Collect Through Our Website and Online Services**

For information about the categories of personal information we collect through our website and online, please see the “**Personal Data We Collect and Sources of Information**” section of our Privacy Notice.

### **The Categories of Third Parties with Whom We Share Personal Information**

For information regarding the categories of third parties with whom we may share your personal information, and those that may collect personal information regarding your online activities over time, please see the “**When We Share Your Personal Data**” section of our Privacy Notice.

### **Opt-out Requests**

We do not sell your personal information, as “sale” is defined under Nevada law. Nonetheless, Nevada law allows you to submit a request directing us not to sell any personal information we have collected or will collect from you. If you wish to submit a request, please visit our [Privacy Rights Request Form](#).

### **How We Notify You of Changes to Our Privacy Policy**

Please see the “**Updates to this Privacy Notice**” section of our Privacy Notice.

## **USA – Utah**

*Effective December 31, 2023*

This section provides supplemental information to residents of the State of Utah, whose personal data we process in connection with the Services.

Please see the Privacy Notice for a description of the personal data we collect, the purposes for which we use it, and how and with whom we share it.

### **Utah Privacy Rights**

#### *(a) Right to Access*

You have the right to know and access the personal data we process about you.

#### *(b) Right to Delete*

You have the right to delete the personal data you provided to us.

#### *(c) Right to Opt-Out*

You have the right to opt-out of targeted advertising (as defined under Utah law). We do not sell personal data as “sale” is defined under Utah law.

#### *(d) Right to Portability*

You have the right to obtain a portable copy of the personal data you provided to us.

### **Exercising Your Utah Privacy Rights**

To exercise your rights, please visit our [Privacy Rights Request Form](#) or email [privacy@viasat.com](mailto:privacy@viasat.com).

To opt-out of targeted advertising, you may visit [Privacy Rights Request Form](#).

## **USA – Virginia**

*Effective January 1, 2023*

This section provides supplemental information to residents of the State of Virginia, whose personal data we process in connection with the Services.

Please see the Privacy Notice for a description of the personal data we collect, the purposes for which we use it, and how and with whom we share it.

### **Virginia Privacy Rights**

#### *(a) Right to Access*

You have the right to confirm whether we are processing your personal data and to access such personal data.

*(b) Right to Delete*

You have the right to delete personal data provided by or obtained by you.

*(c) Right to Opt-Out*

You have the right to opt out of targeted advertising (as defined under Virginia law). We do not sell personal data as “sale” is defined under Virginia law.

*(d) Right to Correct*

You have the right to correct inaccuracies in the personal data, taking into account the nature of the personal data and the purposes of the processing.

*(e) Right to Portability*

You have the right to obtain a portable copy of the personal data that you provided to us.

### **Exercising Your Virginia Privacy Rights**

To exercise your rights, please visit our [Privacy Rights Request Form](#) or email [privacy@viasat.com](mailto:privacy@viasat.com).

To appeal our decision regarding a request related to these rights, you may email us at [privacy@viasat.com](mailto:privacy@viasat.com)

## **UK, Switzerland and European Economic Area**

### **1. Joint control of EU data**

For Viasat’s global fixed broadband service available in Spain and Italy, Viasat Europe Sàrl in Switzerland contracts with certain Viasat customers whose personal data is within the scope of GDPR, UK GDPR and Swiss Data Protection Law, all as amended from time to time (“EU Data”). Viasat, Inc. and Viasat Europe Sàrl jointly control EU Data.

As between Viasat, Inc. and Viasat Europe Sàrl, Viasat, Inc. is the main decision maker as to the processing of EU Data and is primarily responsible for fulfilling the controller responsibilities with respect to EU Data, with assistance from Viasat Europe Sàrl where required. For example, Viasat, Inc. is the primary decision maker regarding what and why EU Data is collected, how it is used, how long it is retained and other decisions regarding it and, as between it and Viasat Europe Sàrl, primarily responsible for making sure this is done in accordance with the GDPR, UK GDPR and Swiss Data Protection Law, all as amended from time to time. Viasat, Inc., as between Viasat, Inc. and Viasat Europe Sàrl, is also primarily responsible for informing you how Viasat processes your EU Data (including by providing this notice), deciding how to implement data subject requests and, where necessary, primarily engaging with data protection supervisory authorities and making notifications to them and data subjects. Viasat Europe Sàrl assists Viasat, Inc. in this regard.

Viasat Europe Sàrl implements the decisions of Viasat, Inc. with respect to the processing of EU Data and acts as the main establishment in the EU of Viasat, Inc. and Viasat Europe Sàrl with respect to the processing of jointly controlled EU Data. Viasat Europe Sàrl also engages directly with customers with respect to certain functions such as billing and customer services.

Viasat, Inc. is the main point of contact for data subjects with respect to EU Data so, for example, it is best to contact Viasat, Inc. if you want to exercise your data subject rights under the GDPR, UK GDPR or Swiss Data Protection Law, as amended from time to time, with respect to EU Data. Its contact details are set out in this Notice. Irrespective of this arrangement, you can exercise your rights under the GDPR against either Viasat, Inc., or Viasat Europe Sàrl with respect to EU Data.

## **2. Contacting Viasat**

Viasat commits to resolve complaints about your privacy and our collection or use of your personal data. In addition to contacting us through the “**How to Contact Us**” section of the Privacy Notice, inquiries or concerns regarding this Notice or Viasat’s data handling practices should be directed to our Data Protection Officer, using the following information:

### **European Economic Area**

Fieldfisher LLP

Data Protection Officer

[ViasatDPO@fieldfisher.com](mailto:ViasatDPO@fieldfisher.com)

### **United Kingdom**

Fieldfisher LLP

Data Protection Officer

[ViasatDPO@fieldfisher.com](mailto:ViasatDPO@fieldfisher.com)

You also can contact us through our representatives using the information below if you are in the UK or European Economic Area (EEA):

### **UK Representative**

Lionheart Squared Ltd (FAO Viasat)

Attn: Data Privacy

17 Glasshouse Studios

Fryern Court Road

Fordingbridge

Hampshire, SP6 1QX UK

[Viasat@LionheartSquared.co.uk](mailto:Viasat@LionheartSquared.co.uk)

### **EEA Representative**

Lionheart Squared Ltd (FAO Viasat)

Attn: Data Privacy

2 Pembroke House



Upper Pembroke Street 28-32  
Dublín  
DO2 EK84  
Republic of Ireland  
Email: [viasat@LionheartSquared.eu](mailto:viasat@LionheartSquared.eu)

## Brazil

This privacy notice should be read in conjunction with our main Privacy Notice.

### How We Use Your Personal Data

If you are a subscriber of any Viasat telecommunication service provided by Viasat in Brazil (“**Services**”), your personal data is jointly controlled by Viasat, Inc. and Viasat Brasil Serviços de Comunicações Ltda., the provider of the telecommunications services in this country.

Your personal data is primarily used to provide you with the Viasat products and services you request. It may also be used to comply with legal obligations we are subject to, bring or defend ourselves in legal claims, or to fulfill our legitimate interests, such as to personalize your experience, develop and improve our services, or detect illegal activities, which may also be done to protect your vital interests. Viasat may also process personal data for purposes of complying with applicable Federal and State laws and regulations in Brazil where our products and services are offered. With your prior consent or whenever there is a legitimate interest at stake, it may also be used to send you offers and promotions.

To the fullest extent not prohibited by applicable laws, we may disclose the personal data we collect from and about you for business and commercial purposes to the following categories of recipients: (i) Viasat group companies, (ii) third-party service providers, (iii) credit agencies or bureaus, (iv) authorized retailers and distributors, (v) third-party ad platforms or networks, (vi) entities involved in a corporate transaction, (vii) law enforcement, governmental judicial and related entities, (viii) third parties who receive aggregate or anonymous information, and (ix) other persons with our consent.

We may transfer your personal data outside your local territory. These international data transfers are carried out in accordance with applicable data protection legislation and with the adoption of all the necessary safeguards.

We will retain your personal data for the period necessary to fulfill the purposes outlined hereto and/or in our main Privacy Notice, as needed to provide Services and/or to comply with our legal obligations.

For more information about Viasat's data collection and use practices please read our main Privacy Notice, including the information available in the “**Service-Specific Privacy Information**” section of this document.

### **Know Your Data Protection Rights**

You have several rights outlined in Brazil's data protection legislation including but not limited to the right to confirm the existence of the processing of your personal data, request access to, change, or remove your personal data, change your marketing preferences (including withdrawing your consent at any time), and to petition before the national data protection authority, as set out in Article 18 of Brazil's General Data Protection Law and other applicable laws.

Please see our main Privacy Notice to learn more about managing your marketing preferences or deleting the account you created to access our services.

### **Contact Information for Data Protection Office**

Viasat Brasil Serviços de Comunicações Ltda.

Avenida Presidente Vargas, n.º 309

21º andar, Centro

Rio de Janeiro/RJ, Brasil

CEP 20.040-010

Viasat, Inc.

Attn: Viasat Privacy Office

901 K Street, NW, Suite 400

Washington, DC 20001

Our Data Protection Officer can be contacted by emailing: [privacy@viasat.com](mailto:privacy@viasat.com)

### **How to Make a Request**

To make a request, please visit our [Privacy Rights Request Form](#).

## **Mexico**

Data Owners from Mexico may have the following rights under the FPDL:

- The right to be provided with information about how we process their information
- The right to access their Information
- The right to rectify Information if it is inaccurate or incomplete
- The right to object to the processing of Information
- The right to limit the use or disclosure of their Information

- The right to cancel/delete their Information
- The right to revoke consent granted for the processing of Information

To exercise the above rights, please visit the [Privacy Rights Request Form](#). We will notify you within twenty (20) days 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 under certain circumstances, the FPDL may limit your exercise of these rights.

## **Data Privacy Framework Notice**

This Data Privacy Framework (“**DPF**”) Notice sets out the privacy principles Viasat follows with respect to transfers of personal data from the European Economic Area (**EEA**), the United Kingdom (**UK**) and Switzerland to the United States, including personal data we process as part of our Mobility Services.

Viasat, including those affiliates listed in Annex 1 of this Addendum, complies with the EU-U.S. Data Privacy Framework (**EU-U.S. DPF**), the UK Extension to the EU-U.S. DPF (**UK-U.S. DPF**), and the Swiss-U.S. Data Privacy Framework (**Swiss-U.S. DPF**) as set forth by the U.S. Department of Commerce.\* We have certified to the U.S. Department of Commerce that we adhere to: (i) the EU-U.S. Data Privacy Framework Principles with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF; and (ii) the Swiss-U.S. Data Privacy Framework Principles with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF (collectively, the “**DPF Principles**”). If there is any conflict between the terms in this DPF Notice and the DPF Principles, the DPF Principles shall govern.

*\*We will not rely on the Swiss-US Data Privacy Framework or the UK Extension to the EU-US Data Privacy Framework until each enters into force, but we adhere to their required commitments in anticipation of their doing so.*

To learn more about the DPF, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

### ***Types of personal data we collect and use***

*The types of personal data we may receive in the United States, as well as the purposes for which we collect and use it, will vary depending on the Mobility Services you use. You can find the details applicable to your specific information set out in this Privacy Notice.*

### ***Your choices***

*Where appropriate or required to do so, we will give you an opportunity to opt out where personal data we control about you is to be disclosed to an independent third party or is to be used for a purpose that is materially different from those set out in the Privacy Notice. If you otherwise wish to limit the use or disclosure of your personal data, please contact us using the contact details below.*

### ***Transfers to third parties***

*Information about the types of third parties to which we disclose personal data and the purposes for which we do so is described in the Privacy Notice.*

*If we have received your personal data in the United States and subsequently transfer that information to a third party acting as an agent, and such third-party agent processes your personal data in a manner inconsistent with the DPF Principles, we will remain liable unless we can prove we are not responsible for the event giving rise to the damage.*

### **Your DPF rights**

*If you are from the EEA, UK or Switzerland, you have the right to request access to the personal data that we hold about you and request that we correct, amend, or delete it if it is inaccurate or processed in violation of the DPF.*

*If you would like to exercise these rights, please write to us at the contact details provided below. We may request specific information from you to confirm your identity and we will respond to your request in accordance with the DPF Principles and applicable data protection laws.*

*You may also opt-out of receiving marketing communications from us by writing to us at the contact details provided below or by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.*

### **Disclosures for national security or law enforcement**

Please note that under certain circumstances, we may be required to disclose your personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Viasat publishes annual transparency information reflecting (to the degree permitted by applicable laws) the number and type of data production requests it has received for the corresponding period, the type of data requested and the category of requester.

### **Enforcement**

Viasat's compliance with the with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

### **Questions or complaints**

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, we commit to resolve DPF-related complaints about our collection and use of your personal data. EU, UK and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DP and the Swiss-U.S. DPF should first contact us by email at [privacy@viasat.com](mailto:privacy@viasat.com) or in writing at:

Viasat, Inc.

Attn: Viasat Privacy Office (Legal Dept.)  
901 K Street, NW, Suite 400 Washington,  
DC 20001

We will investigate and attempt to resolve any DPF-related complaints or disputes within forty-five (45) days of receipt. If you have an unresolved DPF complaint that we have not addressed satisfactorily, we commit to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to [JAMS](https://www.jamsadr.com/), an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.jamsadr.com/DPF-Dispute-Resolution> for more information or to file a complaint. These services are provided free of charge to you.

You may also have the option to select binding arbitration for the resolution of your complaint under certain circumstances. For further information, please refer to: <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>

### ***Changes to this Notice***

It may be necessary for Viasat to make changes to this DPF Notice consistent with the DPF's requirements, so please check this page periodically. We will announce any material changes to this DPF Notice via channels appropriate to our relationship with you.

## **Annex 1**

### **List of DPF Self-Certified US Entities**

The following Viasat controlled US affiliates certify compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce:

Automation Communications Engineering Corporation

ComPetro Communications Holdings LLC

ComPetro Communications, LLC

Engreen, Inc.

Frontera LLC

Inmarsat Inc.

Inmarsat Commercial Services Inc.

Inmarsat Government Inc.

Inmarsat Solutions (US) Inc.

Intelie, Inc.

Landtel Communications, L.L.C.

Landtel, Inc.

mmWaveBroadband Co.

RigNet Global Holdings S.a.r.l. (US Branch)

RigNet Holdings, LLC

RigNet Newco, Inc.  
RigNet, Inc.  
Safety Controls, Inc.  
THEU, LLC  
TrellisWare Technologies, Inc.  
Viasat Carrier Services, Inc.  
Viasat China Services, Inc.  
Viasat Global Holdings, LLC  
Viasat Services Holding Co.  
Viasat Technologies Limited (US Branch)  
Viasat Worldwide Limited  
Viasat, Inc.  
VParent, Inc.  
VService, Inc.