

CLARO ENTERPRISE SOLUTIONS, LLC PRIVACY POLICY

GENERAL

Claro Enterprise Solutions, LLC (“CES”) respects the privacy of every individual or company who visits our website at www.usclaro.com (our “Website”), responds to our interactive advertisements or sends us e-mail. This Privacy Policy (“Policy”) outlines the information CES may collect from you and how we may use that information.

We realize that the exciting growth of the Internet and online services raises questions concerning the nature, use and confidentiality of information collected about consumers. We want you to know that we apply our long-standing commitment to safeguarding privacy.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This Policy may be updated from time to time (see [Changes to This Policy](#)). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

NETWORK AND INFORMATION SECURITY

We maintain a variety of physical, electronic, and procedural safeguards to guard your personal information. For example, we take a variety of steps to protect against unauthorized access to our systems that store personal information such as policies limiting access to those systems to authorized personnel.

All orders on the CES website utilize a Secure Socket Layer (SSL) or Secure Electronic Transaction (“SET”) protocol to provide "secure sessions" for our visitors. Order forms will be sent and will arrive privately and unaltered.

Also, we use encryption technologies to protect your account information when you are viewing your bill on our website or via email. You should be aware that CES has no control over the security of other sites on the Internet you might visit, interact with, or from which you buy products or services.

You should keep your user name, password or other access information safe and confidential to protect against unauthorized access to your account information and services. And you must adopt passwords that others may not guess easily.

CHILDREN’S ONLINE PRIVACY

CES recognizes that children may not be able to make informed choices about giving out personally identifiable information.

CES is committed to protecting the privacy needs of children and we encourage parents and guardians to take an active role in their children's online activities and interests. CES does not knowingly collect information from children under the age of 13 and does not target its website to children under 13. If

you are under 13, do not use or provide any information on this Website or through any of its features, or provide any information about yourself to us, including your name, address, telephone number, or email address. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information.

If you believe we might have any information from or about a child under 13, please contact us at usaregulatory@usclaro.com or by mail to: Claro Enterprise Solutions, LLC, Office of Privacy: Legal Department, Claro Enterprise Solutions, 3350 SW 148 Avenue, Suite 400, Miramar, Florida 33027.

CES encourages parents to take an active role to protect the privacy and security of their children and to prevent the inappropriate use of information about their children.

California residents may have additional rights regarding the collection and use of their personal information. Please see the [California Consumer Privacy Act Disclosure](#) for more information.

INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGY

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). For information on how you can opt out of behavioral tracking on this website and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking, please contact us at usaregulatory@usclaro.com.

The information we collect helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our

Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see [Choices About How We Use and Disclose Your Information](#).
- **Web Beacons.** Pages of our the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

Choices About How We Use Your Information

We strive to provide you with choices regarding the information you provide to us.

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

California residents may have additional personal information rights and choices. Please see the [California Consumer Privacy Act Disclosure](#) for more information.

PERSONALLY-IDENTIFIABLE INFORMATION YOU PROVIDE TO CES

CES will not collect any personally identifiable information about you (that is, your name, address, telephone number, or e-mail address) unless you provide it to us voluntarily. CES does not share, disclose or sell any personally-identifiable information (such as your name, address, telephone number or e-mail address) with other unaffiliated companies or organizations for non-CES marketing purposes, but we restrict their use and limit disclosure of CPNI for purposes or providing service to you or to market products and services as previously described. We will also prohibit the third party from further disclosing the CPNI except as required by law and require the third party to implement safeguards to protect the confidentiality of the CPNI.

Because this information is a critical part of our business, it would be treated like our other assets in the context of a merger, sale or other corporate reorganization or legal proceeding

How We Use Your Information

CES uses the personally-identifiable information we collect online principally to provide you with the service(s) you have ordered and to let you know about other offerings which may be of interest to you. Postal and e-mail address information, for example, enables communication about services offered and ordered, as well as the proper provisioning and billing of those services.

We also provide personally-identifiable online information in response to subpoenas and other legal demands, and where we believe that disclosing this information is necessary to identify, contact or bring legal action against individuals who may be endangering public safety or interfering with CES property or services, or with our customers' or others' use of them.

- Internal Business Use. Your personal information is used in many aspects of our business operations. We use personal information to provide you the services you request, to properly identify you when you contact us, to bill and collect for services, to ensure your creditworthiness for continued service, to determine appropriate state and local payment of taxes, to protect our rights or property, or to enforce the terms of any agreements or terms of service. We use personal information to communicate with you about your account or other matters, our services or products you use, or to respond to your requests.
 - o To complete an online order for a product or service (if you do not wish to complete an online order form, we will always provide an option for you to complete an order by calling a toll free phone number)
 - o To enter an online contest or sweepstakes (if you do not wish to complete an online contest or sweepstakes form, we will always provide an option for you to enter by mailing a 3 x 5 card to specific address)
- Marketing Communications. We use personal information to inform you about new products and services. We may contact you at your wireless, residential or business phone numbers, by email or text message, fax or by automated voice messaging and by direct mail. If you are a CES subscriber and want to change your preferences for receiving marketing communications, you may call us at the customer service number shown on your bill or send an email to: usaregulatory@usclaro.com. While you may choose not to receive email or telephone marketing information from us, you will continue to receive invoices, customer service-related notifications, technical or network-related notifications and similar information from us electronically or otherwise.
 - o Facsimile. CES does not send commercial information by fax, unless you request such information to be sent by fax. You may email our Office of Privacy at: usaregulatory@usclaro.com or call our Customer Care representatives at the number shown on your bill if you believe you have received an unwanted fax from CES. Our business customers should contact their account representative

- Customer Proprietary Network Information ("CPNI"). There are special rules related to the access, use and disclosure of CPNI. This Policy incorporates those rules throughout. You have a right, and CES has a duty, under the law, to ensure the confidentiality of CPNI. In other circumstances, we may also disclose your CPNI as permitted by law.

Your name, address and phone number are not CPNI, but otherwise are covered by this Policy.

We may use your CPNI to market additional communications and data products and services similar to the types you currently purchase from us. We may also use CPNI to contact former customers when permitted by law. And, to provide your service, we may use and disclose CPNI to our agents, affiliates, joint venture partners and independent contractors, but we restrict their use and limit disclosure of CPNI for purposes of providing service to you or to market products and services as previously described. We will also prohibit the third party from further disclosing the CPNI except as required by law and require the third party to implement safeguards to protect the confidentiality of the CPNI. If you are a new customer of CES, you will receive a notice of your CPNI rights and further information on this topic from CES.

If you do not want your personally-identifiable information collected, please do not submit it to us. If you have already submitted this information and would like for us to remove it from our records, please contact us at the e-mail address listed at the bottom of this Policy. We will use reasonable efforts to delete your information from our existing files.

California residents may have additional rights regarding the collection and use of their personal information. Please see the California Consumer Privacy Act Disclosure for more information.

DECLINING E-MAIL OFFERS

CES will only send e-mail promotions or announcements to you if you have previously provided your permission for us to do so.

Although many customers tell us they appreciate receiving notice of these carefully designed promotions and announcements we recognize the importance of providing you with choices.

At any time, you may unsubscribe from our e-mail list by filling out our sample online unsubscribe form. All e-mail offers that you receive from CES, will inform you how to decline receiving further e-mail offers.

DO NOT CALL POLICY

This notice is the CES Do Not Call Policy under the Telephone Consumer Protection Act. We do not solicit via telephone numbers listed on the state or federal Do Not Call lists, unless the law allows. Applicable CES employees receive training on how to document and process telephone marketing choices. Consumers who ask not to receive telephone solicitations from CES will be placed on the CES Do Not Call list and will not be called in any future campaigns, including those of affiliates of CES.

CHANGES TO THIS POLICY

CES will update this Policy if our practices change or if the law requires changes to it. If at any

Last reviewed: 08/05/2023

Last updated: 01/12/2021

point we decide to use personally identifiable information in a manner that is materially different from what was stated at the time it was collected, we will notify you via posting on this page for 30 days before the material change is made and give you an opportunity to opt out of the proposed use at any time.

CALL MONITORING AND RECORDING

If you communicate with us by telephone, we may monitor and/or record the call.

WHAT ELSE SHOULD YOU KNOW?

Please be careful and responsible whenever you are online. If you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return.

While we strive to protect your personal information, CES cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk.

Third-party Internet sites and services accessible through this Website have separate privacy and data-collection practices, independent of us. CES has no responsibility or liability for these independent policies or actions. Please refer to those sites' own privacy policies to learn how they collect and use information about you.

NOTICE TO EUROPEAN USERS

This Website and the services on this Website are targeted for users in the United States of America. Any information you enter on this Website may be transferred outside of the European Union to the United States of America which does not offer an equivalent level of protection to that required in the European Union. In particular, you are advised that the United States of America uses a sectoral model of privacy protection that relies on a mix of legislation, governmental regulation, and self-regulation. Article 26 of the European Union's Data Protection Directive (Directive 95/46/EC, 1995 O.J. (L 281)

31) allows for transfer of personal data from the European Union to a third country if the individual has unambiguously given his consent to the transfer of personal information, regardless of the third country's level of protection. By using this Website or the services, you consent to the transfer of all such information to the United States of America which may not offer an equivalent level of protection to that required in the European Union and to the processing of that information by the Company on its servers located in the United States of America as described in this Privacy Policy.

WHO TO CONTACT

If you have any questions about or complaints that concern, this Policy, please visit Customer Service Online or email us at: usaregulatory@usclaro.com, or call Customer Service at the number shown on your bill. If you prefer you may also write us at: Office of Privacy: Legal Department, Claro Enterprise Solutions, 3350 SW 148 Avenue, Suite 400, Miramar, Florida 33027. Our representatives will respond to your inquiries or help resolve any dispute concerning this Privacy Policy.

If you have submitted personally-identifiable information through the Website or an interactive advertisement, and would like that information deleted from our records, please contact us at our e-mail address: usaregulatory@usclaro.com. We will use reasonable efforts to delete this information from our existing files.

CALIFORNIA CONSUMER PRIVACY ACT DISCLOSURE

Last modified: 01/14/2020

This CALIFORNIA CONSUMER PRIVACY ACT DISCLOSURE supplements the information contained in the Claro Enterprise Solutions, LLC (“**We**” or the “**Company**”) Privacy Policy (the “**Policy**”) and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this disclosure. Any capitalized terms used, but not defined herein, have the same meaning assigned to them in the Policy.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES

E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as,	NO
	fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our Website (www.usclaro.com). For example, from

Last reviewed: 08/05/2023

Last updated: 01/12/2021

submissions through our Website portal or Website usage details collected automatically.

- From third-parties that interact with us in connection with the services we perform.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to prepare a tax return, we will use that information to prepare the return and submit it to the applicable taxing authorities.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A:	Identifiers.
Category B:	California Customer Records personal information categories.
Category C:	Protected classification characteristics under California or federal law.
Category I:	Professional or employment-related information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with employment, or with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.

4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either email at: usaregulatory@usclaro.com, or call Customer Service at the number shown on your bill. If you prefer you may also write us at: Office of Privacy: Legal Department, Claro Enterprise Solutions, 3350 SW 148 Avenue, Suite 400, Miramar, Florida 33027.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if

Last reviewed: 08/05/2023

Last updated: 01/12/2021

applicable. For data portability requests, we will select a format to provide your personal information

that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us by email at: usaregulatory@usclaro.com, or call Customer Service at the number shown on your bill. If you prefer you may also write us at: Office of Privacy: Legal Department, Claro Enterprise Solutions, 3350 SW 148 Avenue, Suite 400, Miramar, Florida 33027.
