

Web Services Privacy Policy

Revised and Effective: April 14, 2017

What the Privacy Policy does

The Web Services Privacy Policy describes the information Spartan Net collects about you when you use any of the Spartan Net Web Services (as defined below), how Spartan Net uses that information, and how Spartan Net protects your privacy when you use certain websites, mobile applications, and other interactive features that link to this Privacy Policy, including, but not limited to:

1. Spartan Net-branded mobile applications that link to this Web Services Privacy Policy, on iOS and Android apps;
2. Spartan Net-branded websites and web services that link to this Web Services Privacy Policy, such as: Spartan-Net.com, fiberapartment.com, and grandrapidsfiberinternet.com;
3. any versions of these sites and services that are optimized for mobile browsing;
4. Spartan Net Wi-Fi, if you are not an Spartan Net Internet subscriber; and

This summary gives you some key points from the Privacy Policy, but you should read the whole Privacy Policy to get a full understanding of our privacy practices. This Privacy Policy applies to all Spartan Net Web Services, but those services have different features and functions. Some services do not collect or use all of the information described in this Privacy Policy. Therefore, some provisions of this Privacy Policy may be inapplicable to those Spartan Net Web Services.

What the Privacy Policy does not do

Please note: the Privacy Policy does not tell you what information we collect and how we use it when you use other Spartan Net services (such as spartan-net.com, FiberApartment.com, satellite TV services, grandrapidsifiberinternet.com and Internet services and subscription).

The Information Spartan Net Collects and How it is Used and Shared

We want you to understand what kinds of information may be collected about your use of any of the Spartan Net Web Services, and what we might do with that information.

Spartan Net collects two types of information from people who use Spartan Net Web Services: (i) information that identifies a particular person using a website or app, and (ii) activity information about a person's use of one of the Spartan Net Web Services without identifying him or her.

Information that Identifies Someone

Information that identifies a particular person is "Personally-Identifiable Information" or "PII." PII can include the person's name, address, social security number, financial account number, or phone number. We will not share this information with an advertiser, and we will not share it with another website or company, unless you tell us to (for example, if you want to post information from your Spartan Net on your Facebook page). We also use PII to provide services to you. For example, we may use it to bill you for services, to check your credit, to confirm your identity when you login, or to communicate with you. Sometimes we use other companies to help us provide our services. We may share your information with these companies, but they are required to protect it and to use it only to provide services to you.

Information that Does Not Identify a Specific Person

Information that *does not* identify a particular person is "Non-Personally-Identifiable Information" or "non-PII." It could be an anonymous personal record of online activity, or information you put in a profile - like your zip code, or your gender (when it's used without your name). We routinely collect this kind of information and use it to improve your experience, for example, by showing you content and advertising that may be more relevant and interesting to someone like you. Sometimes we share this non-PII with other companies that help us deliver and improve our services.

Your Information May be Shared Among Spartan Net Companies

The Spartan Net Web Services are provided by various companies that Spartan Net contracts with including AT&T DIRECTV. We may share your information among these companies so we can make it easier for you to use several Spartan Net Web Services seamlessly. Also, if you use any of the Spartan Net Web Services in connection with other Spartan Net or DIRECTV services (for example, to set your DVR online to record a show on your television or manage your home Wi-Fi network), we may need to share your information with the Spartan Net companies that offer those services, too.

Disclosure of your Information

We respect and protect your privacy, but it is possible that we may be required to provide information about you to a court or law enforcement agency. In these cases, we will only disclose your information if we are legally required to do so—if we receive a valid subpoena, court order, or search warrant, for example. We may also disclose information about you in order to defend claims you may bring against the company.

Your Choices

We want you to know how you can control the PII that we may collect. When you use any of the Spartan Net Web Services that link to the Privacy Policy, you are agreeing that the policy applies to you.

Registering

You may choose not to register for any one of the Spartan Net Web Services (or for all of them) if you do not want to share information that identifies you when you use that service.

If you register for certain Spartan Net Web Services we will give you a chance to create a profile. We may use some of the information in that profile to choose the content and advertising we think you would like to see.

When you register, we may also send you email about other products and services. You may choose not to receive these messages. However, we will still send you email with information about the specific services you use.

Third-Party Advertising

We use advertising networks to help us display ads to you. In addition, our content providers may have the right to sell ads in the content they distribute through certain Spartan Net Web Services. All of these parties may use cookies and other technology to help them understand how you interact with their services so they can deliver you ads that are more useful to you. In the Privacy Policy, we give you more information about these parties' privacy practices and the functionality these parties make available to you to control certain of those practices. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out using the links provided in section 7 below. Please note this does not opt you out of being served advertising. You will continue to receive generic advertisements.

Blogs, Forums, and Surveys

If you choose to post information on blogs or forums on any of the Spartan Net Web Services, it will not be private. Once the information is posted, other users may copy or store it. Spartan Net may provide you the opportunity to participate in surveys on some of the Spartan Net Web Services.

Information Sharing with Social Networking Sites

You may choose to exchange information between the Spartan Net Web Services and a social network, such as information from your Spartan Net profile, information about what you do on Spartan Net Web Services, or information about the people, places, and things that you follow on your social network. If we get instructions to send your information to, or collect your information from, one of these networks, we will follow those instructions. On pages of a Spartan Net Site (as defined below) that contain social network functionality, the social network providing the functionality may be able to collect information about you regardless of whether you use that functionality. For example, if a page within a Spartan Net Site contains a Facebook "Like" button, Facebook may be able to collect data about your visit to that page, even if you don't click on the "Like" button. Please review the privacy policy of the relevant social network and/or log out of it before you use any of the Spartan Net Web Services. As with other websites, you may be able delete any cookies placed on your device by the social network using your browser.

Changes to Spartan Net's Business or the Privacy Policy

If Spartan Net's business changes—for example, if our company merges with another company or we sell one or more of the Spartan Net companies that provide the Spartan Net Web Services—we may provide the new owners of the Spartan Net Web Services with your information. If there is a change of ownership, we will tell you using any permissible means, including via email and/or a prominent notice on the Spartan Net Sites, as well as let you know of any choices you may have regarding your PII. We will also let you know if the Privacy Policy changes for any other reason, so you can decide whether you want to continue using the Spartan Net Web Services.

Full Privacy Policy

1. About the Privacy Policy and the Spartan Net Web Services

Spartan Net respects your privacy. Within this Web Services Privacy Policy ("Privacy Policy") the term "Spartan Net" or "we" (and related pronouns) will refer to Spartan Net Spartan Net, Co, and its respective subsidiaries and affiliates (i.e., other companies owned or controlled by Spartan Net Corporation) that own and operate websites, Internet services, and apps on Spartan Net's behalf. The term "you" (and related pronouns) refers to you as a user of any or all of the Spartan Net Web Services described below. As described above, the term "Personally Identifiable Information" or "PII" refers to information that identifies a specific person, such as the person's name, address, social security number, financial account number, or phone number. The term "Non-Personally Identifiable Information" or "non-PII" refers to information that is demographic, de-identified, aggregated, or does not otherwise identify a specific person, such as a person's gender, ZIP code, device and network identifiers and settings, connection and usage information, or other information when that information is not used with Personally Identifiable Information.

What does this Privacy Policy cover?

This Privacy Policy explains how Spartan Net will use the information that you provide when you use certain websites, mobile applications, and other interactive features that link to this Privacy Policy, including, but not limited to:

1. Spartan Net-branded mobile applications that link to this Web Services Privacy Policy, on iOS and Android apps;
2. Spartan Net-branded websites and web services that link to this Web Services Privacy Policy, such as: Spartan-Net.com, fiberapartment.com, and grandrapidsfiberinternet.com;
3. any versions of these sites and services that are optimized for mobile browsing;
4. Spartan Net Wi-Fi, if you are not an Spartan Net Internet subscriber; and

This Privacy Policy applies to all Spartan Net Web Services, but those services have different features and functions. Some services do not collect or use all of the information described in this Privacy Policy. Therefore, some provisions of this Privacy Policy may be inapplicable to those Spartan Net Web Services.

What is outside the scope of this Privacy Policy?

Some of the Spartan Net Web Services contain links to other websites, including websites of third parties who are acting on our behalf as our agents, suppliers, or providers. These other websites are not operated by Spartan Net and have their own privacy policies that you should read before you use them. Other sites that we link to may contain Spartan Net branding, but these non-Spartan Net websites and resources are provided by companies or persons other than Spartan Net. Examples of these non-Spartan Net websites include websites where you are required to log-in using a username and password other than your username and password for the Spartan Net Web Services, such as the DIRECT or AT&T mobility or TV service websites. This Privacy Policy *does not apply* to those non-Spartan Net sites. Those sites have their own policies that you should read before you use them.

2. Resolving Customer Privacy Questions

If you have reported a privacy or data concern to us that we have not addressed to your satisfaction, you may escalate the matter here <https://www.spartan-net.com/contact-us.html>

3. Collection of Information

All Users

Spartan Net, or third parties acting on Spartan Net's behalf, routinely log Non-PII that is automatically generated when all users visit or use the Spartan Net Web Services (including both the Spartan Net Sites and Spartan Net Apps), as a by-product of the user's activities ("Web Services Log Data"). This information includes, but is not limited to HTTP header information that is automatically passed between a user's device and the Spartan Net Web Services, such as the browser being used at the time, the operating system being used at the time, the UDID of the device (if the device being used to access the Spartan Net Web Services is a mobile device) and the URL of the webpage or other asset within the Spartan Net Web Services that is being requested. This information may also include details relating to the activities users perform within the Spartan Net Web Services, such as what links they click on, in what order they access specific web pages within the Spartan Net Web Services, the search queries they perform on the Spartan Net Web Services, and the devices and Wi-Fi networks that users set up and manage.

Some of the Spartan Net Web Services allow you to store certain details and preferences that help you personalize that Spartan Net Web Service ("Preference Data"). This Non-PII may include ZIP code, gender, favorite genre to watch on television, preferred type of news, and device names and associations. We do this so that you do not have to enter this data every time you return to the Spartan Net Web Services. We may also use the Preference Data to deliver other personalized services and features of the Spartan Net Web Services.

Registered Users

Spartan Net asks you to provide certain information when you initially register to use any of the Spartan Net Web Services and then afterwards may ask you to provide additional information when you use certain Spartan Net Web Services for the first time. In addition, Spartan Net also collects information about your use of any of the Spartan Net Web Services as a registered user. This table summarizes the different types of information that we may collect from you when you register for any of the Spartan Net Web Services and use one of the Spartan Net Web Services as a registered user.

Type/Name	When Collected	Representative Examples
Registration Data	When you create an account for any of the Spartan Net Web Services or subsequently modify your Registration Data	First and last name, username, password, email address, mailing address, location, phone number, and gender
Profile Data	The first time you access certain Spartan Net Web Services after you have created an account or subsequently modify your Profile Data	Additional email addresses, lists of people to connect with through certain Spartan Net Web Services, school affiliations, movie genre preferences, notification preferences for products and services made available by Spartan Net and device names, policies, and associations
Activity Data	When you log-in to your account and use any of the Spartan Net Web Services	Flagging or rating news articles, movies, television shows or other content, posting blog entries or comments, sharing URLs, and content and data feeds from non-Spartan Net social networks or services that you choose, and device and network connection and usage information

Collectively, your Registration Data, Profile Data, Activity Data, and any other generally available demographic or other data about you that Spartan Net gathers from other sources is referred to as "Your Data." Your Data does not include information that third parties may independently gather from other websites about you using their own cookies, as further described in this Privacy Policy.

Most Spartan Net Web Services have their own pages where you can manage certain portions of your Registration Data and Profile Data relevant to that specific service.

Referral Service

If you choose to use our referral service to tell a friend about a Spartan Net Site, we will ask you for your friend's name and email address. We will automatically send your friend a one-time email inviting him or her to visit the Spartan Net Site. We do not store this information and use it for the sole purpose of sending this one-time email and tracking the success of our referral program.

User Access and Choice

You have the right and ability to access certain information that Spartan Net collects under this Privacy Policy. For example, if your PII changes, you may update it (or correct it if it is incorrect) by contacting us. If you'd like us to help you remove any of your PII that we have previously collected through a Spartan Net Site or that is currently posted on a Spartan Net Site in a public forum, directory, or testimonial, please contact us. <https://www.spartan-net.com/contact-us.html>

We will respond to your request within 30 days. In some cases, we may not be able to remove your PII, in which case we will let you know if we are unable to do so and why.

We will retain Your Data for as long as your account is active or as needed to provide you with the Spartan Net Web Services, or as otherwise necessary to help us improve our products and services, comply with our legal and contractual obligations, resolve disputes, and enforce our agreements with you.

Tracking Technologies and Spartan Net's Data Collection

Spartan Net, and its marketing partners and service providers, may use technologies such as cookies, beacons, tags, and scripts to collect information as further described in this Privacy Policy. A cookie is a small file that is stored on a user's computer. Among other things, cookies enable certain Spartan Net Web Services to store Preferences Data, as further described in this Privacy Policy. For example, cookies enable the website to remember your preferred ZIP code for weather forecasts. Cookies can also hold information like an anonymous but unique

string of numbers and letters, that Spartan Net may use to help it collect Activity Data, as further described in this Privacy Policy.

Certain Spartan Net Web Services may use different types of cookies, like HTTP cookies (sometimes referred to as "browser cookies"), Flash cookies (sometimes referred to as "Flash LSOs"), and HTML5 local storage (sometimes referred to as "LS" or "LS cookies"). For more information on controlling HTTP cookies and these cookies, please see Section 8, below.

We may also use a software technology called clear gifs (sometimes referred to as "Web beacons" or "Web bugs") to help us collect Activity Data, as further described in this Privacy Policy. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to HTTP cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on web pages and are about the size of the period at the end of this sentence. If you are a registered user of any of the Spartan Net Web Services, we may associate the data we collect using cookies and/or clear gifs with your information and use it as further described in this Privacy Policy. If your web browser is configured not to accept cookies, you may still use the Spartan Net Web Services, but your ability to use some areas or functionality may be limited.

4. Use of Information

Spartan Net uses Web Services Log Data, Preferences Data, and Your Data, including both PII and Non-PII, in aggregated, de-identified, and individual forms, to provide the Spartan Net Web Services and support them. We may process and use this data for purposes consistent with the law and this Privacy Policy, including, but not limited to:

- Customize, measure, and improve the Spartan Net Web Services, and the content, features, and advertising provided through them;
- Enforce our Web Services Terms of Service and detect fraud and other illegal activities;
- Bill and collect for any applicable fees or charges;
- Provide customer service and technical support for the Spartan Net Web Services for performance, configuration, usage, and management and troubleshooting of the services and any devices or networks you use with them;

- Let you know about new products or services from Spartan Net or other companies we work with as well as promotional offers from Spartan Net or others we work with.
- Let you know about changes to the Spartan Net Web Services, the Web Services Terms of Service, this Privacy Policy, and other terms that apply to our services; and
- Update any hardware, software, or other tools that we provide in conjunction with the Spartan Net Web Services.

Spartan Net may use Web Services Log Data, Preferences Data, and Your Data in these forms for internal business purposes, such as delivering the Spartan Net Web Services, determining how much traffic certain portions of the Spartan Net Web Services receive, for license reporting and assessment of service levels, to better understand how the Spartan Net Web Services are used, to gauge traffic patterns and determine what types of content, devices, and services are most popular with users of the Spartan Net Web Services, and determining which search queries on certain Spartan Net Web Service are the most popular.

Spartan Net may also use Web Services Log Data, Preferences Data, and Your Data to customize the Spartan Net Web Services and make them more relevant to you. For example, Spartan Net may use this data to determine which news articles, movies, or television shows to recommend to you.

Spartan Net may use your Registration Data to verify that you are the person authorized to use the Spartan Net Web Services or to manage your account. Spartan Net may also use your Registration Data to determine whether your subscription allows you to access premium content or services offered through some of the Spartan Net Web Services. For example, Spartan Net may use this subscription information to permit you to access, via one or more of the Spartan Net Web Services, certain programming included in your TV package or to recommend additional Spartan Net products and services that it thinks may be of interest to you.

5. Sharing of Information

Spartan Net uses third parties to assist us in delivering parts of the Spartan Net Web Services to you. We may share portions of Your Data with these third parties to the extent necessary for them to provide these services. These companies are acting on Spartan Net's behalf and are required, by contract with Spartan Net, to keep this

information confidential and are only authorized to use it for specific purposes. As described in more detail below, Spartan Net may also provide Non-PII elements of Your Data to third parties who deliver ads to you on Spartan Net's behalf. Spartan Net will not provide your PII to these advertisers unless you expressly authorize us to do so.

Spartan Net may also share non-PII elements from Your Data with third parties. For example, Spartan Net may share traffic data for one of the Spartan Net Sites with a third party that analyzes and publishes website traffic surveys. Or Spartan Net may share Web Services Log Data and Preference Data with one of the providers, so that Spartan Net and the provider can determine what additional content that provider should show on that site. Or Spartan Net may share non-PII elements of Your Data with its affiliates, so that they can let you know about their products and services that may be of interest to you. Section 7 tells you more about the choices you have relating to this type of sharing.

Spartan Net may also share Web Services Log Data, Preference Data, and Your Data with its affiliates that help it operate the Spartan Net Web Services, solely to provide you with the Spartan Net Web Services, other cross-platform products and services, advertising, and promotional offers it thinks may be of interest to you. For example, Spartan Net will share your Registration Data with an affiliate, so that affiliate can provide you with online access to content from premium networks that are part of your TV subscription if you have signed up for that service, and to make you aware of other Spartan Net products and services it thinks may be of interest to you. This sharing occurs when you sign up for and use these other services, and may be necessary for us to provide them. If you do not want Your Data shared with a specific service, then you may choose not to sign up for that service or stop using it at any time if you have already signed up for it.

You may authorize other websites such as Facebook to access and publish on their websites some of Your Data, including your Activity Data. In addition, certain Spartan Net Web Services allow you to import information from websites such as Facebook to use within the Spartan Net Web Services. If you provide Spartan Net with your credentials for this kind of Internet service and use the features of the

Spartan Net Web Service that share information across these Internet services, or, if one of these Internet service contacts Spartan Net using your Spartan Net Web Services credentials and asks to have access to certain portions of Your Data, Spartan Net will treat this as your authorization to share these portions of Your Data with that Internet service.

On pages of the Spartan Net Web Services that contain social network functionality, the social network providing the functionality may be able to collect information about you, even if you don't use that functionality. For example, if a page within one of the Spartan Net Web Services contains a Facebook "Like" button, Facebook may be able to collect data about your visit to that page, even if you don't click on the "Like" button. Please review the privacy policy of the relevant social network and/or log out of it before you use the Spartan Net Web Services. As with other websites, you may be able delete any cookies placed on your device by the social network using your browser.

6. Online Tracking Policy

Some of the third-party service providers that Spartan Net uses to deliver services, content, and advertising on the Spartan Net Web Services may collect information from those services, as disclosed in this Privacy Policy. This information may include PII or may be used to contact you online.

As stated in this Privacy Policy, in Sections 7 and 8, we and our service providers may also use cookies to deliver relevant advertising to you when you visit other websites, including advertising based on the products and services you viewed on the Spartan Net Web Services. We may collect data when you use certain Spartan Net Web Services on a particular browser or device. We then may connect this data to another computer or device that you are using to access those services in order to provide you with a consistent experience.

Spartan Net participated in the World Wide Web Consortium's (W3C) process to develop a "Do Not Track" standard. Given that the definitions and rules for such a

standard have not yet been defined, Spartan Net does not yet respond to "Do Not Track" signals sent from browsers.

7. Advertisements and Promotional Offers

Spartan Net, or third parties acting at Spartan Net's request, may deliver advertisements to you through certain Spartan Net Web Services and other websites, depending on whether you are a registered user or not, as described in more detail below.

All Users

We, or our advertising providers, automatically deliver ads to all users on certain Spartan Net Web Services, whether the users are registered or not, based on non-PII including, but not limited to: (i) the HTTP header and other information that is customarily passed between a user's device and the Spartan Net Web Services; (ii) the type of web page that is being displayed, such as a news or sports page; or (iii) the content on the page that is shown, such as a sports article about a certain team or a movie review for a particular movie. Because this advertising activity automatically applies to all users and it is purely contextual, this type of advertising delivery cannot be customized or controlled by individual users.

We may also use one or more advertising networks and/or other audience segmenting technology providers to help select and deliver content on certain Spartan Net Web Services, and advertisements sold by and promotional offers from Spartan Net on the Spartan Net Web Services and other digital properties. These providers use non-PII elements of Your Data shared with them by Spartan Net and its affiliates (such as the type of Spartan Net products and services that you purchase), and other information that they independently collect from your interaction with the Spartan Net Web Services and other digital properties that contain their technology. If we share non-PII elements of Your Data with these providers, they will keep this information confidential and only use it for specific purposes determined by Spartan Net. But the information that these providers independently collect through their pixels, cookies, and other technologies described in Section 8, is subject to their own privacy policies, not Spartan Net's Web Services Privacy Policy. If you do not want the benefits of the customization offered by

these providers, you may opt-out by selecting the Ad Choices icon to make your opt out selections.

Registered Users

If you are a registered user, Spartan Net, or service providers acting at Spartan Net's request, may use Your Data, regardless of where we gathered this information, to determine what type of service or ad to display to you on certain Spartan Net Web Services and other digital properties. In addition, some of the graphical display, text, and other ads sold by Spartan Net and promotional offers from Spartan Net on certain Spartan Net Web Services and other digital properties are customized for you based on the ZIP code of your Internet service address, information about your current subscription, or use of Spartan Net products and services. If you do not want this information to be used to serve you targeted ads or promotional offers, you may opt-out by contacting us <https://www.spartan-net.com/contact-us.html>. Please note this does not opt you out of being served advertising or promotional offers. You will continue to receive generic advertisements and promotional offers.

8. Advertising Networks and Advertising Sold By Content Providers

The advertising networks and/or content providers that deliver ads on the Spartan Net Web Services may use technologies such as HTTP cookies, Flash cookies, and HTML5 local storage to uniquely distinguish your web browser and keep track of information relating to serving ads on your web browser, such as the type of ads shown and the web pages on which the ads appeared. In addition, the third parties that provide Web Services Log Data services for Spartan Net may use cookies to uniquely distinguish your web browser and to keep track of the websites that your web browser visits across the service provider's network of websites. For more information on controlling HTTP cookies and these cookies, please visit our "Customer Control" FAQ [here](#). Cookie management tools provided by your browser may not affect Flash cookies. To learn how to manage privacy and storage settings for Flash cookies click [here](#). To learn how to manage privacy and storage settings for HTML5 local storage, please refer to the help for your browser.

Some of these companies may combine information they collect in connection with the Spartan Net Web Services with other information they have independently collected relating to your web browser's activities across their network of websites. These companies collect and use this information (which may include PII or information that can be used to contact you online) under their own privacy policies.

9. Communicating with You

Spartan Net may use your Registration Data to send you a confirmation email verifying the ownership of the email addresses provided in your Registration Data and to send you service-related communications about the Spartan Net Web Services. In addition, Spartan Net may send you promotional or commercial email relating to each of the Spartan Net Web Services for which you have activated your account. You can opt-out from receiving this promotional or commercial email by following the instructions contained in the emails or by going to your customer My Account.

Spartan Net may send you an opt-out confirmation email to the address you enter. If you are sent an opt-out confirmation email, you must respond to that email to complete the opt-out process.

10. Signing in Using Non-Spartan Net Credentials

Spartan Net may allow you to access portions of the Spartan Net Web Services by signing in using your username or other identifier from another Internet service, such as Google or Facebook ("Non-Spartan Net Username"). This other Internet services will authenticate your identity and provide you the option to share certain information with us, such as your name or email address. Spartan Net will treat your Non-Spartan Net Username and any additional information that the relevant Internet service provides to Spartan Net about you as Your Data.

11. Participating in Blogs, Forums, and Surveys

If you post comments to any of the blogs, forums, or other editorial sections of the Spartan Net Web Services, any information you submit there can be read, collected,

or used by other users of the Spartan Net Web Services and any PII you post could be used to contact you. We are not responsible for PII you choose to submit through these features.

Children under the age of 13 should not post in any of the blogs, forums, or other editorial sections of the Spartan Net Web Services.

We may provide you the opportunity to participate in surveys on the Spartan Net Web Services. If you participate, we may request certain PII from you. Participation in these surveys is completely voluntary and you therefore have a choice whether or not to disclose this information. The requested information typically includes contact information (such as name), and demographic information (such as zip code). We use this information to improve the Spartan Net Web Services and other Spartan Net products and services.

We use may use a third-party service provider to conduct these surveys; and unless stated otherwise within the survey, that service provider is prohibited from using the PII it collects while providing services on our behalf for any other purpose. We will treat the PII that you provide us through these surveys in accordance with this Privacy Policy.

12. Security

Spartan Net uses industry standard approaches to securely store, control access to, and make appropriate use of Your Data, and we require our contractors and other providers to do so as well. However, no security measure is completely effective and Spartan Net cannot guarantee the complete security of Your Data. If you don't want Spartan Net to know any particular information about you, you should not register to use the Spartan Net Web Services or include it in anything that you submit or post to Spartan Net, including posts on a Spartan Net Site or emails to Spartan Net.

Spartan Net also takes additional steps to increase the security and reliability of customer communications. We do not read your outgoing or incoming email, file attachments, video mail, private chat, or instant messages. However, we (along with our third-party providers) use software and hardware tools to help prevent and block

"spam" emails, viruses, spyware, and other harmful or unwanted communications and programs from being sent and received over Spartan Net.net email and the Spartan Net Web Services. These tools may automatically scan your emails, video mails, instant messages, file attachments, and other files and communications in order to help us protect you and the Web Services against these harmful or unwanted communications and programs.

We follow generally-accepted standards to protect the information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on the Spartan Net Web Services, you can contact us.

As an additional security precaution, neither Spartan Net nor any of our authorized service providers will ask you for your Spartan Net password in an email, over the telephone, or in an online support forum or chat area. Do not give your Spartan Net password to anyone in an email, over the telephone, or in an online support area.

13. Disclosures of Information

Spartan Net holds customer privacy in the highest regard and we make every reasonable effort to protect your privacy as described in this Privacy Policy. Nevertheless, we may be required to disclose PII or other information about you or other users of the Spartan Net Web Services. These disclosures may be made with or without your consent, and with or without notice, in response to lawful requests by public authorities, including to meet government or law enforcement requests (such as pursuant to a subpoena, court order, search warrant, or other valid legal process). We may also disclose information about you or users of the Spartan Net Web Services when we believe in good faith that the disclosure of information is necessary to prevent financial loss, address suspected illegal activity, protect our rights or property, or prevent imminent physical harm. We may also disclose information about you in order to defend claims you may bring against the company. In addition, if you are not a customer, Spartan Net may disclose your PII or other

information if Spartan Net enters into a Business Transition (defined below). Please see Section 16 Change of Ownership or Other Business Transition for more details.

14. Special Note About Children

Spartan Net does not knowingly collect PII from anyone under the age of 13 through any of the Spartan Net Web Services. Children should always get permission from a parent or legal guardian before sending any information about themselves (such as their names, email addresses, and telephone numbers) over the Internet, to Spartan Net or to anyone else.

15. Your California Privacy Rights

California law permits its residents who provide personal information to a business creating an established business relationship as a customer to request and receive information about the business' disclosure of certain categories of personal information to other companies for their use for direct marketing. If you are a California resident and a customer of any of the Spartan Net Web Services, you can request a copy of this information from Spartan Net by sending a letter to Spartan Net, Co, Attn: California Direct Marketing Information, Spartan Net 3032 E Lake Lansing Rd, East Lansing, MI 48823. Please include the name, street address, and email address on the account or registration you created to become a customer of any of the Spartan Net Web Services in all requests.

16. Change of Ownership or Other Business Transition

If Spartan Net enters into a business transition, such as a merger, acquisition, or the sale of all or part of its assets (a "Business Transition"), Your Data (including PII and non-PII associated with the Spartan Net Web Services) will likely be part of the assets transferred. In this event, we will notify you of any Business Transition. We will also notify you of any subsequent material changes to this Privacy Policy as a result of a Business Transition and give you the opportunity to opt-out for information that we have collected before, or may collect after, a new Privacy Policy containing material changes takes effect.

17. Changes to this Privacy Policy

Spartan Net reserves the right to change this Privacy Policy. When we do change it, we will make a copy of the updated Privacy Policy available to you by posting it here, in My Account, or through other methods. If we make material changes to this Privacy Policy, we will also notify you in My Account, by email, direct mail, or other reasonable methods that we select. If we make material changes to this Privacy Policy that will result in a new use, disclosure, or permission of access to Personally Identifiable Information previously collected, we will obtain your opt in consent before implementing the change as required by law.

You understand and agree that if you use any of the Spartan Net Web Services after the effective date of the updated Privacy Policy, Spartan Net will consider your use as acceptance of the updated Privacy Policy.

18. International Visitors

Our computer systems are currently based in the United States, so your PII will be processed by us in the United States, where data protection and privacy regulations may be different than other parts of the world, such as the European Union. If you create an online account to use a Spartan Net Site as a visitor from outside the United States, you will have agreed to the terms of the Privacy Policy and our Web Services Terms of Service and you will have consented to the transfer to and processing of all of this information in the United States, which many not offer an equivalent level of protection of that in the European Union or certain other countries.

19. Contacting Spartan Net & Customer Support

You can direct questions regarding this Privacy Policy to Spartan Net by contacting us <https://www.spartan-net.com/contact-us.html>. You can also send a letter by mail to Spartan Net Co., Attn: Web Services Privacy Policy Questions, Spartan Net 3032 E Lake Lansing Rd, East Lansing, MI 48823.

You can find customer support and help information at <https://www.spartan-net.com/help/>. Some online support areas and tools may ask you to provide information to Spartan Net to help us address your questions or problems. We may also make software tools available to help configure your device's or network's settings, or collect information from your device or network to help us provide support to you. If you choose to provide this information to Spartan Net or use these tools, we will use the information only for customer support purposes.

20. Special Note about Spartan Net Wi-Fi

In addition to the information collection and use practices described in this Web Services Privacy Policy, the following additional practices apply to the Spartan Net Wi-Fi ("Wi-Fi Service") when used by a non-Spartan Net Wi-Fi Internet subscriber.

Improving and Operating the Wi-Fi Service

Spartan Net may record non-PII about your use of the Wi-Fi Service for purposes of improving the efficiency and effectiveness of the Wi-Fi Service and to automate repeated logins to the Wi-Fi Service from the same device, and may associate that information with PII for account management purposes. Besides the location of the Wi-Fi Service access point to which you log in, and aggregated usage data from that access point, we record the media access control address ("MAC Address") associated with the device you use to access the Wi-Fi Service to enable you to log back in during the time you have signed up for access, and we may track the time(s) and location(s) of the access point(s) you use to access the Wi-Fi Service. The MAC Address is a short series of numbers unique to your phone, laptop, tablet or other Wi-Fi-enabled device.

Promotional Communications

Spartan Net may ask for your email address and home zip code if you sign on to the Wi-Fi Service and you are not an Spartan Net WI-FI subscriber or you are an Spartan Net Wi-Fi subscriber but your subscription does not include access to Spartan Net Wi-Fi Wi-Fi. We will use the email address you provide when you sign in to send you service messages and we may send you promotional messages regarding Spartan Net Wi-Fi products or services you might be interested in based on the zip code you provide. Any promotional email that we send will include

a way to opt out of receiving additional messages. If you sign in to the Wi-Fi Service again, you might receive an additional message, which again will include an opt-out link. If you have otherwise provided your email address to Spartan Net, or Spartan Net has already obtained your email from another source, then Spartan Net may already be sending you promotional emails about our products and services. In addition, you may choose to opt out of promotional emails about Spartan Net's products and services by contacting us <https://www.spartan-net.com/contact-us.html>.

Amenity Wi-Fi

Certain locations ("Venues") may offer you free use of Spartan Net Wi-Fi ("Amenity Wi-Fi"). Your use of amenity Wi-Fi is subject to Spartan Net's Web Services Terms of Service and any other terms and conditions made available by the Venue ("Venue Policies"). As part of a registration process for Amenity Wi-Fi, you may be asked to provide information about yourself, such as your email address and home ZIP code. Spartan Net will use this information to send service-related messages and may also send you promotional messages about Spartan Net's products and services as further described in this Privacy Policy. Spartan Net may also share this information with the Venue operator for the operator to use to send you promotional messages about its products and services as further described in its applicable privacy policy. You should read the Venue Policies before using Amenity Wi-Fi, to learn more about how the Venue uses and shares your information and the choices it provides you with respect to the same.

Changes to Information

You may review and change PII that you provide to us through the Wi-Fi Service by returning to the pages where you entered it, and reviewing or changing the information directly. You may also request changes to your payment information if you are a pay per use customer of the Wi-Fi Service, by calling Spartan Net at 517-203-3096, where you will be required to verify your identity.

Revised and Effective: April 14, 2017