



Customer Privacy Notice

This Customer Privacy Notice describes our practices with respect to information welo collects, uses, shares, and protects as part of the services we provide to our customers ("customer," "subscriber," "you" or "your"). The terms "welo," "us," "we" or "our" refer to the welo entity that provides service to you. This Customer Privacy Notice applies to welo Internet their use of www.joinwelo.com. Use of welo's website at www.joinwelo.com and its subdomains, mobile applications, and their various related features are also governed by welo's Website and Mobile Application User Agreement.

Some states have enacted laws, which provide their state residents the rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to access, correct, delete, obtain a portable copy, and limit disclosure of personal information.

Those laws further require welo to make certain public statements regarding its data collection and sharing practices:

- welo does not sell the customers' personal information; and
- To the extent welo maintains and uses de-identified data of its customers (referred to as de-identified data in the sections below), it does so without attempting to re-identify the data.

For more information, residents of Connecticut, New Hampshire and Maryland can visit the Additional Privacy Rights for Residents in Connecticut, New Hampshire and Maryland at www.joinwelo.com/legal.

Additionally, Section 631 of the Federal Cable Communications Policy Act of 1984, as amended (the "Cable Act"), provides certain protections to you as a subscriber to cable service or other services provided by welo. In accordance with the Cable Act, this Customer Privacy Notice explains the following:

- the limitations imposed by the Cable Act upon welo in its collection and disclosure of personally identifiable information about you;
- the type of personally identifiable information we collect about you;
- how we use your personally identifiable information;
- under what circumstances we may disclose your personally identifiable information and to whom we may disclose it;
- the duration for which we maintain your personally identifiable information; and
- how you may access your personally identifiable information in our possession.

Information We Collect

welo collects information about our customers that includes personally identifiable information of a specific person. We also collect information about your use of our products, services, and websites. In addition, we collect demographic and other data about customers from third-party data sources. The types of information we collect are set forth below.

- *Registration information.* When you register with us or sign up for our products or services, we require you to provide to us information about yourself, including all or some of the following: your name, service and billing address, e-mail address, username or nickname, telephone number, billing, and credit



records. Bank account and credit card numbers used to pay for our services are provided to a third payment processor that we use to facilitate payments as described in more detail below.

- *Account and technical information.* In order to provide you with services, we collect and maintain some or all of the following: your account number, username, billing, payment and deposit history, services to which you subscribe, maintenance and complaint information, the quantity, device identifiers and network addresses of equipment used with your account (such as modems, routers and other devices) connected to our network and other service-related information.
- *Communications with us.* When you contact us by e-mail, text or chat, we collect information, including your name, address, e-mail address, telephone number, billing or account information, and any other information you choose to share with us; we also retain customer correspondence and communication records.
- *Customer damage claims.* If you submit a damage claim concerning any of our products or services, we require you to provide to us information about the damage, the circumstances concerning damage, and certain information about yourself for purposes of processing the claim and any payments to you related thereto, including: your name, billing address, and your social security number in connection with receiving a payment.
- *Authentication.* If there is any reported fraud on your account, we may require a copy of residency documents (such as your lease agreement) to authenticate your name, phone number, and service address.
- *Data from third-party data sources.* We may collect data about you from third-party data sources, including demographic information and billing or credit history.
- *Other sources.* We also use customer surveys, questionnaires, and interviews to gather information about your interests and use of our products and services.

How We Collect Data

We may collect data from you during a range of interactions and using a number of different technologies. Some of this data you provide, such as when you sign up for our service, send us an e-mail, complete a web-based form, or use our websites or welo mobile applications to pay your bill. Some of this information may be submitted by you at a

welo marketing event, or it may be provided by you to a welo representative over the phone or during a visit to your home. Some of this information we collect when you access our services, including from the equipment welo provides to you as well as from equipment you may own that you use to access those services.

How We Use Data

We use the information we collect primarily to conduct business activities related to providing you with our cable service and other services and to help us detect theft of service. Below are specific ways in which we use customer information:

- to install, configure, operate, upgrade, support, and maintain our internet service and other services;
- to provide billing, account maintenance, product and service repair, and to provide customer service to you;
- to administer and manage our business and operations, including the protection of the security and integrity of our services and our website;
- to provide you with accurate and high-quality customer service and support, authenticate access to your account, and enable technical support, including product recall;
- to properly deliver your services, and protect the security of the system;



- to communicate with you, in response to your inquiries and customer service requests, to notify you about your account and subscription information, to inform you of software and security updates, and to create offers and contact you about other products or services that may be of interest to you;
- to serve you more efficiently, we retain certain business and service records, as well as customer correspondence and communication records;
- to market and advertise, including the use of targeted advertising to facilitate personalized marketing concerning equipment refresh programs and other marketing campaigns that may fit your interests or preferences;
- to manage the network supporting our services;
- to measure credit and payment risks;
- to verify you are meeting eligibility criteria for participation in the Lifeline Program, if these criteria are applicable to you;
- to enhance, improve, and repair our offerings and their functionality, to provide you with personalized offers and features, and tailor our services to make them more useful and enjoyable for you;
- to personalize your settings on our products and services so that you don't have to change these settings each time you use them;
- to measure Internet service performance, including network and connection performance, device configuration, and other service-related data; and
- to protect our rights, personnel, and property, and to comply with applicable law.

We also combine third party data with the data we have collected about customers in order to provide and improve our products and services, to customize products and services to a particular geographic area, to better tailor them to meet our customers' needs, to maintain the security and integrity of our products, services, and websites, and to develop and offer new products and services. We maintain customer records to enable us to serve our customers and for our regulatory, audit and compliance purposes. The types of information we collect are set forth herein.

How and with Whom We Share Data

Except as described in this Customer Privacy Notice, we do not share your personal data without your consent. We may share or disclose your information to the following categories of third parties:

- with third-party service providers, vendors, and partners that help us with various business purposes: to provide our products and services, marketing and advertising campaigns, to provide customer service support and communicate with you, and to conduct analytics, billing, and maintaining or repairing our network, products and services;
- within the welo family of companies, including with our parent company Cogeco Communications Inc. ("Cogeco") and with subsidiaries and other affiliates; we may also disclose information about you to outside auditors, professional advisors, regulators, or as part of a corporate transaction, such as a merger or sale of business assets: to comply with internal and external reporting requirements, confirm accuracy of financial statements and transactions, and for operational and policy audits;
- with law enforcement agencies and other parties as required by law or to respond to lawful requests; these disclosures may be made with or without the subscriber's consent, and with or without notice, in compliance with the terms of legal process, such as subpoenas, court orders or search warrants;
- with government authorities or payment processors: to protect against fraud, abuse, or harm, or to protect our interests; and
- with outside counsel or collections agencies: to protect our customers, employees, or property, in emergency situations, to enforce our rights under our customer agreements or other policies in court or elsewhere, and as otherwise permitted by law.



When we allow third-party service providers to transmit, collect and store information on our behalf to provide features of our services or to perform services on our behalf (such as audience measurement or market research), these third parties are not permitted to use your information except for the purpose of providing these features or services. Third-party service providers collect and/or receive personally identifiable information about you in connection with providing services to us.

Customers have the choice to sign up for SMS texts or email for appointments, technical information, and marketing. If you opt-in to receive these messages, text messaging originator opt-in data and consent will not be shared with any third parties.

In addition, we may share subscriber lists, activity data associated with particular devices, or certain de-identified or aggregate information with third-party service providers. This information may be combined with aggregated or non-aggregated demographic information (such as census data) and other audience attributes, such as purchasing data, demonstrated interests, loyalty programs, organizational affiliations, advertiser customer lists, and similar data to provide us with audience analysis data. Our third-party service providers may provide such de-identified or aggregate audience measurement data to others, including advertisers, so that they may better focus their advertising resources. We may also work with academic or research interest groups to analyze de-identified information we provide to them for specific purposes or projects. We, or third parties working on our behalf, may combine demographic and other generally available information or advertiser information with our subscriber lists. Aggregate reports are then generated to reflect how groups of customers with common characteristics, such as age and gender or a demonstrated interest in a particular product, use our services and respond to the programming and advertising that we distribute. We may use this information to improve and communicate with you about our own products and services and to help us deliver relevant information and advertising on behalf of other companies and advertisers to certain subscriber groups who may be most interested in this information and advertising. When we do this, we do not share your personally identifiable information with these advertisers unless you provide your express consent. We may also combine information about you from our business records with information obtained from third parties to create a database, which we use in marketing and other activities related to our cable service and other services.

The Cable Act authorizes welo to disclose limited personally identifiable information to others for cable or non-cable "mailing list" or other purposes. Although we do not generally provide mailing lists to third parties, we may disclose your name and address for these purposes. However, you have the right to prohibit or limit this kind of disclosure by sending us a written request as described below. Any "mailing list" and related disclosures that we may make are limited by the Cable Act to disclosures of subscriber names and addresses where the disclosures do not reveal, directly or indirectly, (i) the extent of any viewing or other use by the subscriber of a cable service or other service provided by us; or (ii) the nature of any transaction made by the subscriber over the cable system.

The Cable Act also requires us to disclose personally identifiable information to a third-party or governmental entity in response to certain subpoenas, search warrants, court orders, or otherwise as authorized by law. In some cases, the government may be required to obtain a court order to obtain certain information about your account and provide you notice and an opportunity to appear and contest the government's claims.

How We Protect Your Data

We endeavor to follow industry-standard practices to prevent unauthorized access to personally identifiable information. However, we cannot guarantee that these practices will prevent unauthorized attempts to access, use, obtain or disclose personally identifiable information about our customers.



Payment Processing

We use third-party payment processors to process credit and debit card transactions you initiate with us through our website to pay for service fees and/or order other products or services. Your credit or debit card information is never shared with us, and at no point in any transaction will we have access to that information.

Protecting Minors' Privacy

Our websites, products, and services are not directed to consumers under the age of 18 years, and we do not sell services to minors. We do not knowingly collect personally identifiable information about consumers under the age of 18 years.

Third-Party Products & Services

Our products and services may enable you to access other websites, services, mobile applications, virtual and voice-activated assistants, home automation, or other third-party products or services. Our websites, products, or services may even contain direct links to or permit you to access other websites and services that are not offered or maintained by welo. The privacy statements and policies of those third parties apply to your access and use of those websites, products, and services and to the information they collect about you. We encourage you to be aware when you leave our service, or browse the Internet, and to read the privacy statements and policies of the websites and services that you visit.

How Long We Retain Personally Identifiable Information

welo maintains personally identifiable information about you in our regular business records while you are a subscriber to our internet service or other services. We also maintain this information for a period of time after you are no longer a subscriber if the information is necessary for the purposes for which it was collected or to satisfy legal requirements. These purposes typically include business, legal, or tax purposes.

Accessing Personal Information

You may see the information that we collect about you. You can access and update some of the information we collect about you through your online account with us (such as your e-mail address and bill-to address) by logging into www.joinwelo.com with your username and password. If your review reveals an error in our records, we will correct it, to the extent within our control.

Communication Preferences

You may opt out of receiving marketing communications from welo at any time. To opt out of marketing communications sent by e-mail, you may use the "unsubscribe" link at the bottom of any such e-mail, or you may navigate to your My Account page on joinwelo.com and make your selections in the Marketing Preferences box. You may also prohibit our permitted disclosure of your mailing list information to third parties under the Cable Act (except as otherwise required by legal process or applicable law) by notifying us in writing. Such requests should be sent to the address provided below.

You may opt out of receiving marketing communications by telephone by notifying the calling party that you wish to opt out or by following the automatic opt-out instructions on such a call. You may also opt out of such calls by sending a request in writing to the address below.

What Other E-Mail Communications Will welo Send Me?

We may send a welcome e-mail and sometimes other information to new subscribers to our services. We may also send service-related announcements to our subscribers from time to time. We may send you an e-mail announcement of pricing changes, changes in operating policies, a service appointment, or new features of one or more of the cable service or other services you receive from us. You may not opt out of these service-related communications. If you fail to check the e-mail address that you have provided to us, you may miss important



information about our services, including legal notices. We reserve the right to send you promotional or commercial e-mail as permitted by applicable law. You can manage the promotional or commercial e-mails we may send to you by following the instructions contained in the e-mails.

Changes to Customer Privacy Notice

We may update this Customer Privacy Notice from time to time. We will notify you of any changes by posting the updated Customer Privacy Notice online. If you object to a change, you may cancel your service. If you continue to use the service following notice of the changes, we will deem that to be your acceptance of and consent to the changes in the revised Customer Privacy Notice. This includes your consent for any personally identifiable information that we may collect and use starting on the effective date of the revised notice, as well as for any personally identifiable information that we have collected prior to the effective date of the revised notice. We will provide you with a copy of the current Customer Privacy Notice at the time you subscribe to our service, and each year that you continue to be a subscriber.

How Do I Contact welo?

If you have any questions regarding this Customer Privacy Notice, or if you believe that your privacy rights have been violated in any way, please contact us directly at privacyoffice@joinwelo.com. If you believe that your rights under the Federal law have been violated, you may bring a private civil action in U.S. District Court to recover damages, costs, and attorneys' fees.

Corporate Privacy Commitment

welo also abides by the principles of the [Corporate Privacy Commitment](#) published by Cogeco, containing the essential principles of the Cogeco Group's commitment to privacy.