



## Website Terms of Use

welo ("welo", "we", "us" or "our") is committed to respecting your privacy. This Website Terms of Use (the "Terms of Use") explains our practices regarding the collection, use, and disclosure of information that you ("you" or "your") may provide to us through your visit to [www.joinwelo.com](http://www.joinwelo.com), the subdomains thereof (or its predecessor or successor URLs) (collectively, the "Website"), and the social media pages.

**An Important Note:** The Terms of Use do not apply to any of the personal information that we process from subscribers of welo's products and services. Please review welo's [Customer Privacy Notice](#) and [Website and Mobile Application User Agreement](#), available at [joinwelo.com/legal](http://joinwelo.com/legal) which apply to welo Internet subscribers and their use of [www.joinwelo.com](http://www.joinwelo.com) and welo-branded mobile applications.

By visiting, accessing and/or using our Website you agree to be bound by these Terms of Use. IF YOU DO NOT AGREE TO THE TERMS OF USE, PLEASE DO NOT VISIT, SIGN UP FOR, ACCESS, AND/OR USE THE WEBSITE. EACH TIME YOU USE THE WEBSITE, THE CURRENT VERSION OF THE TERMS OF USE WILL APPLY.

Questions regarding these Terms of Use should be directed to welo by sending a notice by U.S. Mail to welo, Attention: Privacy Officer, P.O. Box 690066, Quincy, Massachusetts 02269.

### INFORMATION YOU VOLUNTARILY PROVIDE TO WELO

In order to purchase and/or use our products and services, you must first sign up for and provide certain information as part of the serviceability check and registration process. We may ask, for example, for your name, service and billing address, e-mail address or telephone number, and we might request additional personal information, including but not limited to, your household's internet usage, the number of internet devices in your home, and your home square footage. As a welo customer, you may provide additional information as set forth in more detail in our [Customer Privacy Notice](#). Certain other information collected, such as security questions, may be used by welo to verify your identity in the event that you lose or forget your Website login credentials.

The information you supply will help us to sign you up for our products and services, offer you more personalized features, to tailor our Website to your interests, to allow you to accept any promotions or product or service offerings, to respond to your inquiries or send administrative notices, to prevent fraud (including unauthorized use of this Website or violations of applicable policies), or to ensure our own compliance with the law.

We collect information when you communicate with us. The specific types of information we collect will depend on the forum in which you communicate with us. For example, if you send us an e-mail, we will collect your e-mail address and the content of your e-mail.

Supplying such information discussed above is entirely voluntary. If you choose not to supply the information, we may be unable to provide you with the products, services, or features we make available to other visitors to the Website. You will not be able to order selected products or services using the Website unless you provide certain personally identifying information about yourself. When you submit any personally identifying information on or through the Website, welo (i) will use the information for the purposes described at the time you submit it (for example, your name, address, telephone number, e-mail address, and payment information provided while ordering one of our products or services will be used in connection with the processing and fulfillment of your order); (ii) if you become a customer, it will become a part of our account records and will be subject to our Customer Privacy Notice referenced above; and (iii)



may use the information to contact you regarding your service, to make you aware of other products and services of interest, or for other permitted purposes. If you would prefer not to supply your personally identifying information, you are still free to take advantage of the publicly available content on our Website without registration.

If you interact with us on social media, we may collect your social media profile information, your communications with us, and your communications and posts on our social media pages.

**Information about Children:** The Website and our products and services are not directed to children under 13. We do not knowingly collect personally identifiable information about children under 13.

#### **INFORMATION WELO AUTOMATICALLY COLLECTS**

We may de-identify or aggregate information about visitors to the Website. We do not re-identify this information and have no ability to know who the user is.

This information may include the location of your network; the other websites you visit and how you interact with them; clickstream, heatmap, and other in-page analytics such as the clicks you make and the pages you visit on this Website; network traffic and usage statistics; information regarding your interaction with e-mail messages, for example, whether you opened, clicked on, or forwarded the e-mail message; advertising campaign analytics such as the ads you see and/or click on; and other information about the type of web browser, device or cookie identifiers, computer, platform, related software and settings you are using. We use this information for internal system administration, to help diagnose problems with our server, to display advertisements on our Website and on third-party websites, and to administer our Website and services. We may also use this information to, measure the use of our Website, determine which products and services are the most popular with Website visitors, and may disclose this information to third parties.

#### **COOKIES, TRACKING TECHNOLOGY, AND ADVERTISING**

welo may use "tags," "pixels," or similar technologies on the Website, for example, to gather information about your visit, such as your IP address, device or cookie identifiers, and information or statistics about your visit, including your behavior while visiting the Website. A tag or pixel is a piece of third-party code that is inserted on the Website to track users' behavior and send it to a third-party analytics platform, such as Google Analytics.

To help make our Website more responsive to the needs of our visitors, we invoke a standard feature of browser software, called a "cookie," to assign each visitor a unique, randomly generated number that temporarily resides on your computer. The cookie itself doesn't identify the individual, just the particular device that a visitor uses to access the Website. Unless you voluntarily identify yourself, welo will not know who you are, even if we generate a cookie for your particular Website session. The Website may store information in a cookie about your computer configuration so that it can more efficiently provide information to you the next time you visit the Website. welo uses cookies on the Website to remember your username and may remember other information you voluntarily provide to welo, including but not limited to, your e-mail address or account number. This helps us tailor our Website to your needs, to deliver a better, more personalized service, and to remember certain choices you have made so you do not have to re-enter them. You can set your browser not to accept cookies, but if you do, you may not be able to take advantage of the personalized features enjoyed by other visitors to our Website. welo does not store your name or other personal information in cookies.



We work with third-party marketing tools who also use these tracking tools to provide advertisements on our Website or mobile applications. These third parties may use these technologies to collect information about you when you use the Website. They may collect information about your IP address, serviceability address and online activities over time and across different websites, mobile applications, and other online services. They may also use persistent identifiers to track your Internet usage across other websites in their networks beyond the Website. They may use this information to provide you with interest-based advertising or other targeted content, to track conversion rates, and to design targeted re-advertising campaigns. While we do not knowingly provide these entities with information that personally identifies you, such third parties may with sufficient data from other sources be able to personally identify you, unknown to us.

Some content, including advertisements and applications which may include our chat widget and listening post may be served by unaffiliated third parties. We do not control these third parties' tracking technologies or how they may be used. We are not responsible for the content or privacy practices on any website not operated by us to which our Website links or that link to our Website.

We use third-party analytics services on our Website. These third parties use cookies or other tracking technologies to help us analyze how users interact with and use the Website, compile reports on the Website's activity, and provide other services related to the Website activity and usage. The technologies used by these third parties may collect information such as your IP address, time of visit, whether you are a return visitor, and any referring website. The Website does not use these third-party web analytics services to gather information that personally identifies you. The information generated will be transmitted to and stored by the respective third-party analytics service providers and will be subject to their privacy policies.

Although we do our best to honor the privacy preferences of our visitors and customers, we are not able to respond to Do Not Track signals from your browser.

## EMPLOYMENT

Job openings at welo are posted on a website operated by our parent company, Cogeco Communications Inc. ("Cogeco"). If you provide your personally identifying information in response to a job opening, we will handle that information in accordance with these Terms of Use, and you are giving us permission to use and retain your personally identifying information for the purpose of evaluating your application for employment for the specific position that you applied to, as well as other roles at welo. This personally identifying information may also be processed and stored by Cogeco in accordance with its [Privacy Policy](#) and [Corporate Privacy Commitment](#), and by our other affiliates and subsidiaries and/or third party talent solution providers as well as with vendors, consultants, and other service providers who need access to such information to carry out work relating to the recruitment process on our behalf.

## HOW WE USE YOUR INFORMATION

We may use any of the information we collect for the following purposes.

- **Serviceability checks and registration:** To determine if you are eligible to receive our products and services and to sign you up as a subscriber of our products and services.
- **Service functionality:** To operate the Website and provide you with certain functionality related to our products and services (such as processing payments, fulfilling orders, send service communications (including renewal reminders)), and to conduct general business operations, such as accounting, recordkeeping, and audits.



- **Service improvement:** To improve and grow our products and services, including to develop new products and services and understand how they are being used, our customer base and purchasing trends, and the effectiveness of our marketing. We may conduct research and analyze and monitor trends and usage.
- **Personalization:** To offer you recommendations and tailor the products and services to your preferences.
- **Advertising and marketing:** To send you marketing communications, personalize the advertisements you see on our products and services and third-party online properties, and measure the effectiveness of our advertising. We may share your information with business partners, online advertising partners, and social media platforms for this purpose.
- **Security:** To protect and secure our products and services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- **Targeted Advertising and Cross-Device Linking:** To facilitate targeted advertising to you on third-party platforms and websites and cross-context and cross-device linking. We may share your personally identifiable information with third service providers for the purposes of targeted advertising as defined by some data privacy laws.

## HOW WE SHARE YOUR INFORMATION

Like most companies, we share information, including personally identifying information, in certain circumstances with third parties through the operation of our Website and our business. Below we explain when that happens.

### SERVICE PROVIDERS

We may transfer your personally identifying information to third party vendors and service providers for the purpose of providing the Website or operating our business as described above.

### PAYMENT PROCESSOR

We use a third-party payment processor to process credit and debit card transactions you initiate with us through our website to pay 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.

### REQUIRED TRANSFERS

We may also transfer your personally identifying information to third parties without prior notice to you under the following circumstances: (i) to our affiliates and subsidiaries, (ii) to governmental authorities in response to governmental requests, (iii) to comply with a legal requirement, law, subpoena, warrant, judicial proceeding, court order, or legal process, (iv) to investigate a possible crime, such as fraud or identity theft, (v) in connection with the sale, purchase, merger, asset sale, financing, reorganization, liquidation or dissolution of welo or an affiliate, including the evaluation thereof, (vi) when we believe it is necessary to protect the rights, property, or safety of welo or other persons, or (vii) as otherwise required or permitted by law, including any contractual obligations of welo.

### OPT OUT

If you no longer wish to receive our marketing and promotional communications, you may opt out by following the instructions included in each communication.

### OTHER THIRD-PARTY WEBSITES

To make our Website more valuable to our visitors, we may offer some features or advertisements in conjunction with other organizations. Our Website may also include links to other third-party websites whose privacy policies we do not control. Once you leave our Website, use of any information you provide is



governed by the privacy policy of the operator of the website you are visiting, which may differ from these Terms of Use. You should contact these third-party websites directly if you have any questions about their use of the information that they collect.

#### **SECURITY OF INFORMATION**

We take reasonable security measures to help protect the personally identifiable information collected through our Website. However, as effective as any security measure implemented by welo may be, no security system is impenetrable. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. If you do not want us to know any particular information about you, do not include it in anything that you submit or post to this Website.

**Important Notice to Website Visitors from Outside the U.S.** If you visit the Website from outside the United States, please be aware that your information, including your personal information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state or the United States, where the privacy laws may not be as protective as those in your jurisdiction. Your use of the Website constitutes consent to your data transfer, processing, and use in the United States and elsewhere.

#### **CHANGES TO THE TERMS OF USE**

We may change these Terms of Use from time to time at our sole discretion. If we change the Terms of Use, we will post the changes on our Website. Such changes and/or modifications shall become effective immediately upon posting thereof. By continuing to use the Website after we post any changes, you accept and agree to the Terms of Use, as modified.