

## **Trifecta Privacy Policy**

Last Modified: August 19, 2019

### **1. Introduction**

Trifecta Solutions, LLC (“Trifecta”) is dedicated to protecting your personal information. This Privacy Policy applies to your use of [www.trifectawireless.com](http://www.trifectawireless.com), the components and other software, and the Trifecta Services (collectively the “Platform”). Our Privacy Policy discloses our privacy practices and explains to you how we use, collect, store, transfer, and share your personal information. Please review this Privacy Policy periodically as we may revise it from time to time without notice. If you do not agree with or accept our Privacy Policy in its entirety, you must not access or use the Platform. Where any term is not defined in our Privacy Policy such term shall be defined in our Terms of Use.

### **2. Information Collected**

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed or otherwise anonymized.

#### **Personal Information Collected from Users**

You will not be required to provide us with any personal information when you visit our Platform. However, portions of our Platform may require us to collect personal information about you. During your use of the Platform we may collect your name, email, date of birth, address, telephone number, username, password, identifier, age, User Content, and other identifying details. Any personal information you submit via the Platform shall be used and disclosed in accordance with this Privacy Policy. We may also collect payment information that you make available to us for your use of the Platform.

#### **Personal Information Automatically Collected**

Whenever you use our Platform, we may collect non-identifying information from you, such as your IP address, date/time-zone, gender, zip code, interactions with the Platform, query information, location information, referring URL, browser, application interaction, mobile provider information, computer operating system, data usage, data transferred, and Internet Service Provider.

### 3. **Anonymized Data**

Please be aware that we may collect information about how you use or interact with the Platform. Such information is not considered personal information and we use such information solely for internal research and business purposes.

### 4. **Sharing and Use of Your Information**

This section explains how Trifecta may share or use your personal information. You consent to our use of your personal information for the following purposes:

- **CONTRACT ADMINISTRATION** - We may use your personal information to negotiate, execute, renew and/or manage our agreements with you.
- **ACCESS AND COMMUNICATIONS TO OUR PLATFORM AND SERVICES** - We may use your personal information to (1) set-up and manage your Trifecta account; (2) interact with you through our Platform (e.g. legal updates, Platform announcements, etc.); and/or (3) manage and respond to your questions (e.g. technical, commercial, or administrative).
- **USE OF THE PLATFORM** - We may use your personal information (1) to enable you to enjoy the use of, and easily navigate the Platform; (2) to train our employees and to improve our Platform; and/or (3) to better understand your needs and interests.
- **SHARING WITH THIRD PARTIES** - We may use your personal information to share with any Third Party Telecom Providers or other businesses for marketing and informational purposes. We may also share your personal information with our service providers with whom we contract with, such as contractors, web hosts, software providers and others so that you may access to the Platform.
- **DIRECT MARKETING AND INQUIRIES** - We may use your personal information to contact you about our additional products and services that you may be interested in or to respond to an inquiry.
- **LEGAL PROCESS** - We may share your personal information: if we believe that disclosure is reasonably necessary to comply with a law, regulation, legal or governmental request; to respond to a subpoena, court order, warrant, or other legal process; to enforce applicable Terms of Use or this Privacy Policy, including investigation of potential violations thereof; to protect the safety, rights, or

property of the public, any person, or Trifecta; to detect, prevent, or otherwise address security, technical issues, or illegal or suspected illegal activities (including fraud); or as evidence in litigation in which we are involved, as part of a judicial or regulatory proceeding.

## **5. Retention of Personal Information**

We will keep your personal information:

- For any legally required duration.
- Until we no longer have a valid reason to keep or use your personal information. We retain the personal information we collect for so long as reasonably necessary to fulfill the purposes for which the information was collected, to perform our contractual and legal obligations, in accordance with our internal policies, and for any applicable statute of limitations periods for the purposes of bringing and defending claims.
- Until we receive a request to eliminate, delete, or modify any of your personal information stored with us, subject to our legal obligations.

## **6. Accessing and Editing Your Information**

When using our Platform you may be able to access and edit some of your personal information via your account on the Platform. If at any time, you have any questions or wish to review, change, or edit any additional personal information please access your account within the Platform.

## **7. Removal of Information**

If you wish to have any of your personal information stored within the Trifecta Platform removed, please contact us via the Platform. Please be aware that removal requests are not processed instantaneously. There may be a reasonable delay in removing any personal information requested.

If you require additional details regarding the deletion or retention of your personal information, please contact us. All removal or deletion requests are subject to Section 5 and/or any applicable laws. Additionally, we will retain and use your personal information (even after a removal or deletion request), where required, so that we may fulfill our legal obligations, resolve disputes, comply with our internal policies, and enforce our agreements.

## 8. **Cookies**

We currently use cookies to remember your logins and payment information. We share your cookie information with third parties that we contract with to provide our services to you. We may also use third party cookies for the purposes of ad tracking and to understand your usage of our Platform. If you do not wish to have cookies loaded on your browser, please adjust your browser settings to reject cookies. Please be aware that disabling cookies may cause some issues with the functionality of our Platform.

## 9. **Opting Out and Do Not Track**

If you decide to provide us with your contact information, you agree that we may send you communications via text and email where you have consented. You may opt out certain communications and personal information collection, where applicable.

We currently do not offer website functionality for you to opt out of any “do not track” signals or listings.

## 10. **Third Parties**

Trifecta or its users may post links to third party websites on our Platform, which may include information that we have no control over. When accessing a third party site through our Platform, you acknowledge that you are aware that these third party websites are not screened for privacy or security issues by us. Trifecta bears no responsibility for the information collected or used by any advertiser or third party website that you have visited through a link on our Platform. You must review that third party’s Terms of Use and Privacy Policy to understand how their information collection practices work.

## 11. **Security Measures**

We make reasonable attempts to protect your information by using physical and electronic safeguards in order to assist you in protecting your personal information. However, as our Platform is hosted electronically we can make no guarantees as to the security or privacy of your information. For this reason, we recommend that you use anti-virus software, robust passwords, firewalls, and other precautions to protect yourself from security and privacy threats.

## 12. **Your California Privacy Rights**

Trifecta permits residents of the State of California to use its Platform, and complies with the California Business and Professions Code §§ 22575-22579. If you are a

California resident you may request certain information regarding our disclosure of personal information to any third parties for their direct marketing purposes. Please be aware that we do not currently share your personal information with any third parties for marketing purposes. Various provisions throughout this Privacy Policy address requirements of the Californian privacy statutes. Although we do not disseminate your information to third parties without permission, you must presume that we collect electronic information from all visitors. You may contact us via the Platform with any questions regarding your California Privacy Rights.

### **13. Age Compliance**

We intend to fully comply with American and international laws respecting children's privacy. Therefore, we do not collect or process any information for any persons under the age of 18. If you are under 18 you may not access the Platform.

### **14. Transfer of Your Information Internationally**

If you are not a citizen of the United States please be aware that your personal information shall be transferred and processed in the United States. These data transfers are necessary to provide the Platform to you.

### **15. Merger and Acquisition**

In the event that Trifecta is involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your personal information may be sold or transferred as part of that transaction. Please be aware that once the information is transferred your privacy rights may change.

### **16. Amendments**

Like our Terms of Use, we may amend this Privacy Policy at any time without notice. When we amend this Privacy Policy, we will modify the date listed on this Agreement or we may contact you via email. You must agree to the amendments as a condition of your continued use of our Platform. If you do not agree, you must immediately cease using our Platform and notify us of your refusal to agree by contacting us via the Platform.

### **17. Contacting Us**

If you have any additional questions regarding this Privacy Policy, please contact us at [support@trifectawireless.com](mailto:support@trifectawireless.com).