

## **Thinix is Committed to Protecting Your Privacy**

At Thinix, we know how important your privacy is, and we are committed to providing strong customer privacy protections. This Privacy Policy (the "Policy") describes how Thinix collects, uses, and protects your personal information, and details your options with regard to our collection and use. The Policy applies to customers of all Thinix products and services and to visitors of Thinix websites.

### **The Types of Information We Collect**

Thinix collects information about you and your device(s) in order to provide our products and services. The information we collect may include:

- **Account Information:** We collect information related with your particular account, such as your name, address, telephone number, email address, and call records.
- **Financial and Credit Information:** When applicable, we collect information about your credit card, credit history, or other banking information for account opening, billing, and collection purposes.
- **Service-Related Network and Device Information:** We collect information on your Thinix service history, as well as information on how you use Thinix's network, products, and services, and how well the network, products, and services are operating. We also collect information related to your specific device or equipment type, status, settings, software, and configuration.
- **Location Information:** We may collect information on your ZIP-code and street address, as well as where your wireless device is located. This information is generated when your device communicates with cell towers, wi-fi routers, and/or other technologies. We monitor, collect and use wireless location information, together with other information we obtain from our network and your wireless device, to maintain and improve our network.
- **Location Based Services (LBS):** Your device may be used to access a series of services based on your location, including for advertising purposes. We offer these services via applications that have been pre-loaded or downloaded by you on your device. To the extent any applications on your device are owned or controlled by us, we will provide you with prior notice and ask for your consent when your location is used or shared. The applications on your device may be third party applications that we do not control and that have the third party application owner's own privacy policy. Our Policy does not cover any use of information that is collected by the third party application or that you provide to the third party application.
- **Internet Browsing & Application Information:** We may collect information on the websites you visit and the mobile apps you use on the Thinix network, including the amount of time spent using the app or website and how often the app or website is used.

### **External Marketing and Analytics Reports-**

While we currently do not engage in external marketing and analytics reports for marketing purposes, we may, and reserve the right to, use aggregate information that does not personally identify you to create External Marketing & Analytics Reports that we may sell to or share with third parties for their own marketing, advertising or other similar uses. These reports may be a combination of information

from wireless and Wi-Fi locations, website browsing and mobile application usage and other information we have about you and other customers. Upon implementation of any such program by Thinix, we will provide an opt-out option if you do not want us to share your anonymous information to be included in these reports. To the extent implemented at a later date, if we provide individual anonymous information to businesses or any retail store, we will require that they only use it to provide aggregate reports, and for no other purpose. We will also require businesses to agree they will not attempt to identify any person using this information, and that they will handle it in a secure manner, without compromising the secured identity of the customer, consistent with this Policy.

### **How We Collect Information**

Thinix collects information by virtue of your use of our products, services, and network. This includes collecting information in the following ways:

#### **Information You Provide**

We collect information that you supply when you purchase or use our services or products, or otherwise communicate with Thinix representatives. Some of the ways that you provide information to Thinix include:

- When you purchase or add Thinix's products and services
- When you contact Thinix customer service representatives online, by phone, or in person
- When you create, modify, or interact with our website or your online account

#### **Information Collected When You Use Thinix Products and Services**

When you use your Thinix device, products, or services, Thinix automatically collects certain information as we monitor the performance of our services and/or equipment. For example, Thinix automatically collects information about:

- Your device, such as what type of device is used, device location, when the device is on or off, what services are being used, what calls and text messages are sent and received, and general device performance issues.
- Our network performance by measuring things such as signal strength, application performance, data transmission, dropped calls and data failures, and other network performance issues.
- Your computer or device web preferences and other online data collected through the use of cookies, web tags, or similar technologies, which may be used to identify your computer or device, personalize your web experience, and provide customized support and performance.
- When you interact with Thinix's websites, Thinix collects information about your visit. This may include data about your searching, browsing, and purchasing activities on our website, as well as your IP address, account information, mobile device telephone number, web addresses of the websites that you come from and go to next, and information about your internet connection.
- We use this information in order to deliver more relevant and accurate marketing messages, as offerings may vary depending on where you live. We also use this information to manage the

frequency with which you see certain advertisements. In addition, we use this information to review and maintain the effectiveness of our websites.

### **Information Provided by Third Parties**

Other sources also provide Thinix with information. For example, Thinix may also receive information from:

- Credit agencies who assist with customer credit-related decisions,
- Marketing companies who provide leads, contact information, and social media information, and
- Companies that collect consumer demographic and interest data.

### **How We Use the Information**

Thinix uses the information it collects in a variety of ways, including:

- To provide you with devices, products, and services
- To bill you for use of the products and services and maintain billing records
- To maintain a record of your interactions with Thinix
- To help you with service, product, and network-related issues
- To manage, improve, and protect the integrity and security of our network
- To improve our services and network
- To inform you about product and service updates, offers, and promotions, including third party offers and promotions, that may be of interest to you
- To comply with laws and regulations
- To prevent and investigate fraud, illegal activities, and violations of our Terms and Conditions
- To provide 911 dialing services and allow emergency services to detect your general location

## **Advertising**

### **Thinix Advertising**

We may use certain information you have provided, such as preferences expressed by use of our websites or through use of our products and services, to provide you with marketing information related to Thinix products and services that may be of interest. We may provide these ads on our websites or mobile applications. This is part of our service relationship, and you may not opt-out of receiving this type of advertising. When you use your Thinix wireless device, you may see ads displayed on websites and applications that you access with your device. Through Thinix's Mobile Advertising Program, we may offer you the opportunity to receive ads that are more relevant to your interests in place of the generic,

random ads you might otherwise receive. This is a specially customized service. You must opt-in to this program in order to participate. We will obtain your consent prior to enrolling you in this program if we decide to offer this opportunity to you.

### **Third Party Advertising**

We will only share your personal information with third party companies for them to use for their own marketing purposes when we have your consent. When you visit Thinix's website or utilize your device, you may see third-party advertisements. Certain advertisements are placed by companies, known as ad servers, which place ads on behalf of other third parties. These companies may place and access cookies on your device to collect information about your visit to the website. Any information they collect from Thinix's website does not identify you personally. The information collected may be used with other data to help advertisers reach target audiences and tailor advertisements to interests they infer from your use of our and other websites. If you chose to interact with advertisers who place ads on Thinix's websites, the information you provide to those third parties is subject to their terms and conditions and privacy policies. Any interactions with ads on Thinix's website may lead to further targeted advertisements on our website or other websites where those ad servers are present. We may permit advertisers on Thinix's websites to place ads based on certain information that we have about you, including your products and services, geographic location, and demographic information. We do not release any personally identifiable information for this purpose. We may also include social network or other third-party plug-ins or widgets on our websites that may provide information to the associated social networks or third parties about your actions with our websites or the services that you use.

### **How We Share Information**

Except as noted in this Policy, Thinix does not sell, license, or share any individually identifiable customer information beyond the Thinix family of companies, for non Thinix-related purposes, without the consent to do so from the individual whose information will be shared.

### **Sharing Within the Thinix Family**

Thinix shares customer information within the Thinix family of companies in order to communicate with you about your account, to provide products and services to you, and to develop the products and services that will serve you best. Thinix also shares information among the Thinix family in order to offer and provide you with additional products and services that may be of interest.

### **Sharing With the Primary Account Holder**

Thinix may disclose information about an account to the primary account holder. If the primary account holder is a business, governmental agency, or another individual, Thinix may provide information about your use of the products or services at their direction.

### **Sharing With Third Parties**

We will never sell your name, address, or phone number to those outside of the Thinix family to market third parties' products or services without your consent. Thinix does use third party partners for certain business purposes, and shares information with them as necessary for them to perform work on our behalf. We may also provide information that does not identify you personally to third parties for

marketing, advertising, or other purposes. Thinix also shares information with third parties in order to protect your privacy and security and to enforce our own rights. In these situations, we only share your information as needed for those companies or entities to perform specific services. In addition, those companies are required to protect your information with the same level of protection that Thinix provides. As described, we share information beyond Thinix with certain other entities in limited circumstances:

- In order to comply with court orders and other legal and regulatory requirements
- To respond to 911 and other emergencies
- To assist with identity verification and to prevent fraud and theft
- To enforce our agreements and legal rights, or to advance or defend against legal claims
- To process transactions and bills and to collect payments
- As part of a corporate business transaction (i.e., a merger or acquisition)
- With your consent

#### **Consent Required for Individually Identifiable Disclosures**

Thinix will only disclose information that individually identifies customers or their devices to third parties with customer consent, which may be obtained in writing, online through click-through agreements, or when you accept the terms on your device for certain applications or services. Implicit consent will be obtained only in certain situations (i.e., when you purchase a product and request that it be shipped to your home or business, you implicitly consent to disclosure of your name and address to a third-party shipping company in order to complete delivery).

#### **Notice for Thinix Wireless Customers**

Thinix does not provide listing information for wireless numbers to phone book publishers or directory assistance services without your consent.

#### **Third Party Entities, Applications, and Social Networks**

If you choose to interact with third party applications, entities, or social networks via the Thinix website, products, or devices, please be aware that the information you provide to those third parties is subject to the terms and conditions and privacy policies of those third parties, and not Thinix's Policy.

#### **How We Protect Your Information**

Thinix employs a variety of safeguards in order to keep your personal information safe from unauthorized access:

- Thinix employees are trained in various privacy protections and on the proper access to, use, and disclosure of customer information.
- Thinix only permits access to sensitive personal information to those employees who have a business need to access such information.

- Thinix requires password protection to access online account information.
- Thinix retains information only for as long as needed for business or tax purposes, or as applicable laws, regulations, or orders require. Upon disposal of customer information, Thinix utilizes procedures reasonably designed to erase or eliminate access to information (e.g., by shredding documents, wiping media and devices, and various other measures).
- Thinix applies encryption and other security controls to protect your information that Thinix stores or transmits.

Although Thinix strives to provide the security of your personal information, no program is 100% secure and we cannot guarantee that our precautions will prevent every unauthorized attempt to access personal information. Thinix utilizes incident response plans to handle unauthorized attempts to access personal information. If you become aware of a security issue, please contact Thinix's regulatory department at [info@Thinix.com](mailto:info@Thinix.com). In the event that a breach of Thinix's security systems results in an unauthorized disclosure of your personal information, Thinix will provide notice to you of any such breach in accordance with applicable law.

### **Online Privacy Policy for Children**

Thinix does not intentionally or knowingly market to, collect information from, or solicit information online from children under the age of 13 without first obtaining parental consent. Thinix encourages parents to be involved with children's online activities to ensure no information is collected from a child without parental consent. If you authorize a child to use Thinix's products and services by providing them with a device associated with your account, any information acquired as a result of such use will be treated as your information in accordance with this Policy.

### **Customer Choice And Control**

#### **Accessing Your Information**

You can access and modify your account information by contacting Thinix customer service.

#### **Choices Regarding Thinix's Use of Your Information**

Thinix would like to send you certain communications about other products and services that we provide. However, you may choose to limit or opt out of receiving marketing communications at any time. In order to opt out of receiving marketing communications, please call Thinix customer service and speak with a Thinix representative who can process your opt out request. Even if you choose not to receive marketing communications from Thinix, if you purchase Thinix products or services, you will continue to receive certain account and service-related communications, such as invoices, customer service notices, and transactional notices.

#### **Consumer Role in Protecting Privacy**

To ensure that your personal information remains protected, Thinix encourages customers to use passwords to prevent unauthorized access to your account. Use unique, non-obvious passwords and do not share the passwords with others.

#### **Do Not Call**

Federal "Do Not Call" laws allow customers to place their telephone numbers on the national Do Not Call Registry in order to prevent telemarketing calls. Please visit [www.donotcall.gov](http://www.donotcall.gov) for more information. Please note that even if your number is placed on a federal or state Do Not Call list, most telemarketing laws permit companies to contact their own customers. However, you may be removed from Thinix's telemarketing list by contacting customer service.

### **Other Information You Should Know**

#### **Consumer Code for Wireless Services**

Thinix follows the Consumer Code for Wireless Services ("CCWS") established by the Cellular Telecommunications & Internet Association ("CTIA"). CTIA and the wireless carriers that follow the CCWS have made a voluntary commitment to help consumers make informed choices when selecting their wireless service. For information about the voluntary guidelines included in the CCWS, please visit CTIA's website at [www.ctia.org/policy-initiatives/voluntary-guidelines/consumer-code-for-wireless-service](http://www.ctia.org/policy-initiatives/voluntary-guidelines/consumer-code-for-wireless-service).

#### **California Privacy Rights, Web Site Data Collection, and Do Not Track Notices California Privacy Rights**

California Civil Code Section 1798.83 entitles California customers to request information concerning whether a business has disclosed Personal Information to any third parties for their direct marketing purposes. As stated in this Policy, we will not sell your Personal Information to other companies and we will not share it with other companies for them to use for their own marketing purposes without your consent.

#### **California Web Site Data Collection**

We do not knowingly allow other parties to collect personally identifiable information about your online activities over time and across third-party web sites when you use our websites and services. Thinix provides information about the opt-out choices it makes available online at [www.Thinix.com](http://www.Thinix.com).

#### **"Do Not Track" Notices**

Because the providers of "do not track" and similar signals do not yet operate according to common, industry-accepted standards, Thinix currently does not respond to those signals. For more information on Do Not Track, please visit [www.allaboutdnt.com](http://www.allaboutdnt.com). California customers who wish to request further information about our compliance with these requirements, or have questions or concerns about our privacy practices and policies may contact Thinix customer service.

#### **E-mail Offers and Promotions**

Thinix will only send you e-mail regarding promotional offers or other news if you grant us permission to do so and provide an email address. You have the right to choose not to receive Thinix e-mail marketing communications by opting-out or unsubscribing. You can opt-out or unsubscribe from our e-mail list by clicking on the unsubscribe link found at the bottom of every e-mail message or promotion delivered electronically to you. Upon such election, Thinix will cease contacting you via e-mail with Thinix promotional messages. However, this does not prevent Thinix from continuing to send you service-related e-mails or messages.

#### **E-mail and Text Message Content**

Thinix does not have access to private e-mail communications and text messages that are transmitted using Thinix services.

### **Other websites**

Thinix's websites may contain links to other websites that are not owned or controlled by Thinix. Any personal information collected by such third party websites is not governed by this Policy. We recommend that you examine the privacy policies of such third party websites prior to submitting any personal information at a third party website.

From time to time, our website content may be featured on other third party websites with differing or non-existent privacy policies. These websites may collect personal information from website visitors that may or may not be used in conjunction with our website information. Prior to supplying personal information to any third party company linking to our website, please read and understand the privacy policy of such third party company.

### **Blogs**

Our website may, from time to time, offer you access to publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. You should not provide personally identifiable information in any publicly accessible blog or community forum.

### **Surveys**

Occasionally, we may conduct surveys on our website. Surveys are conducted at random and are completely voluntary to our website visitors. The survey may require a customer to provide customer identifiable information in exchange for the information or services provided by the survey. We may use this information in an aggregate manner to better tailor the types of services, information, and advertising that are provided on our website.

### **Changes to the Policy**

Thinix reserves the right to make changes to its Privacy Policy. Please check back periodically for changes. If any changes are made, Thinix will revise the effective date of the Privacy Policy.

### **How to Contact Thinix**

If you have any questions or concerns about this Policy, you may contact Thinix customer service via phone, send us an email and/or submit questions or concerns to R & D Industries, Inc., 812 10<sup>th</sup> Street, Milford, IA 51351.