

**Moxee Technologies, LLC**  
**Privacy Policy**

**Last Updated:** June 26, 2025

**Introduction and Overview**

This Privacy Policy ("**Privacy Policy**") applies to Moxee Technologies, LLC (including brands it operates under, such as Panda **Mobile**, **Collegiate Mobile**, **Polar Mobile**, and **Moxee Mobile**) ("**we**," "**us**," or "**our**"). It applies to all users ("**you**") of our devices, products, apps, websites, and services (collectively, "**Services**"). It also applies anywhere it is linked, except where we indicate that separate terms and conditions apply. If you do not agree with this Privacy Policy, then you must not access or use our Services. We may change this Privacy Policy from time to time, so check this policy regularly for updates.

This Privacy Policy is part of the Terms of Service and Agreement to Arbitrate Disputes and Judge or Jury Trial Waiver ("**Terms of Service**") governing the use of our Services, posted at [www.pandamobile.com](http://www.pandamobile.com). To the extent that any provision or clause in our Terms of Service conflicts with any provision or clause in this Privacy Policy or a specific service plan offer, the terms of the Privacy Policy will take precedence, followed by the Terms of Service, and then the Rate Plan terms.

Additional information for consumers located in specific regions is below.

**Types of Personal Information We Collect About You**

Depending on how you interact with us or our Services, we may collect the following categories of Personal Information from or about you. "**Personal Information**" is information that identifies you or is reasonably capable of being associated with or linked, directly or indirectly, with you or your household. This includes, for example:

- **Identifiers**, such as your name, address, e-mail address, telephone number, date of birth, Internet protocol ("**IP**") address, social security number, account name, username(s), driver's license number, state identification card number, and passport number.
- **Information in customer records** such as your name, address, social security number, driver's license or state ID card number, passport, phone number, education, employment, bank account number, financial information.
- **Financial information associated with you** such as such as credit card, debit card, checking account information, purchase and order history, and billing information related to your use of our voice and text Services; documentation of participation in an eligible government low-income or financial assistance program, documentation demonstrating proof of income, or your Social Security number, each of which may be used to determine eligibility for particular service offerings or government-supported or mandated discount programs.
- **Characteristics of protected classifications under State or Federal law**, such as Tribal status (*i.e.*, National Origin, Ancestry in California) that may be used to determine eligibility for government-supported or mandated programs.
- **Commercial information**, including records of personal property, products or Services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, such as your purchase and order history, frequency of use, and quantity of use, your interaction with our communications and advertisement, broadband usage, your activity on your Device, and Customer Proprietary Network Information ("**CPNI**"), as described in the CPNI section below.

- **Biometric information**, such as interactive voice control communications with our customer service system, and recorded audio interactions with our customer service representatives.
- **Internet or other electronic network activity information**, such as information about your use of the Services, including the date and time of your use, frequency of use, and quantity of use, your interaction with our communications and advertisement, broadband usage, and your activity on your Device; cookies; your IP address, browser type, operating system, software version, and Device type, model, and Electronic Device Identifiers such as International Mobile Equipment Identity (“IMEI”), and Integrated Circuit Card Identifier (“ICCID”) numbers.
- **Geolocation Data**, such as the location of your Device when it is connected to our network and our Underlying Carrier’s network.
- **Audio, electronic, visual, thermal, olfactory, or similar information**, such as interactive voice control communications with our customer service system, and recorded audio interactions with our customer service representatives.
- **Professional or employment-related information**, such as employment status.
- **Education record information**, as defined in federal law, such as school enrollment information.
- **Sensitive Personal Information**, such as your social security number, driver’s license number, state Identification card number, and/or passport number; your login, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; and Precise Geolocation.

#### **Sources of Personal Information We Collect About You**

We may obtain Personal Information about you in the following ways:

- **Information You Provide Directly to Us.** You may give us Personal Information directly, including when you apply for, subscribe to, or purchase our Services; communicate with us using our contact information; or provide us with your Device when you relinquish, exchange, return, or recycle your Device or provide it to us, our contractors, or our vendors for maintenance.
- **Information We Collect Automatically from You.** We, our service providers, or contractors may automatically or passively collect Personal Information, such as Internet or other electronic network activity information, Geolocation Data, Precise Geolocation, and Sensitive Personal Information when you use or interact with our Services, including through the use of network management technology and third-party analytics and advertising tools, which may use cookies, web beacons, pixel tags, log files, local shared objects (Flash cookies), HTML5 cookies, or other technologies to automatically or passively collect information about your use of and interaction with the Services.
- **Information We Collect from Other Sources.** We may collect Personal Information from affiliates, business partners, federal and state regulators, subsidy program administrators, compliance and service support entities, or third parties (such as social media platforms, data aggregators, public databases, and other commercially available sources), which may include the Personal Information you provide those entities or that they automatically collect from you.
- **Location-Based Services.** We use location information, including Geolocation Data, to route Services and to provide 911 service, which allows emergency services to locate your general location. Depending on your device, you may also choose Services based on your device’s location, including Precise Geolocation.

These location-based services are made available by us and by third parties through applications. It is important for you to understand the location settings on your device and how those settings can be used. Please read carefully the terms of service for any location-based Services you use – those we may provide, and those provided to you by third parties. Where we provide a location-based Service, you will receive notice of the location features of the Service, and our collection of location data will be with your consent.

We may combine the various types of Personal Information we receive from or about you, including information you provide to us, information we automatically collect, and information from other sources, and use it as described in this Privacy Policy.

### **How We Use Personal Information We Collect About You**

We may use your Personal Information for a variety of business and commercial purposes, including for:

- **Verifying Eligibility for, and Subscribing You to, Our Services.** To verify your identity and eligibility for a service offer, and subscribe you to our Services, including to execute requests to port your phone number.
- **Providing, Improving, and Maintaining Our Services.** To initiate and render our Services; maintain the accuracy of the information we collect; track, measure, and analyze the usage and operations of our Services; maintain, manage, optimize, and resolve problems with our wireless networks, information technology, and our Services; develop and improve our business, content, products, and Services; and interact with third-party services.
- **Customer Service.** To respond to questions and comments about your account and Services, to communicate with you about your account status and technical issues, and for training or quality assurance purposes.
- **Billing and Payments.** To complete your purchases, including billing and payment processing, which may involve the use of cookies.
- **Prevention and Detection of Unlawful and Unauthorized Use.** To prevent and detect fraud, abuse, and other unlawful and unauthorized use of our Services, including to investigate possible violations of and enforce our Terms of Service and any other contracts, and to otherwise protect the security or integrity of the Services, our business and property, and our rights and interests, and those of you, our other customers, our service providers or contractors, and other businesses.
- **Complying with Legal and Regulatory Obligations.** To comply with our legal and regulatory obligations, including responding to legal process, such as subpoenas, court orders, and search warrants.
- **Emergency Situations.** To allow responses to law enforcement and public safety requests and for other emergencies or exigencies in cases involving danger of death or serious physical injury to you or any other person.
- **Marketing and Advertising.** To serve you promotional offers, content, advertisements, and other marketing about our Services, or those of our affiliates, partners, and third parties, through our website, applications, social media, direct mail, email, or manual, autodialed, or prerecorded calls and texts, each with your consent, where necessary, including by: personalizing marketing and advertising to your interests (“interest-based advertising”); measuring, analyzing, and optimizing the effectiveness of our marketing and advertising; and using your comments and communications with us about our Services as customer testimonials (with only your first name and your last name initial) or for other purposes that benefit us.

- **Contests, Surveys, and Message Boards.** To administer and enable you to participate in contests, surveys, polls, and message boards.

We may also use your Personal Information as otherwise disclosed and explained to you at the point of collection and with your consent, where necessary.

#### **How We Share or Allow Access to Your Personal Information**

We may share or allow access to your Personal Information for a variety of business and commercial purposes, including, for example:

- **Sharing Across Affiliates.** With our parent, subsidiary, and affiliate companies for business, operational, and legal purposes.
- **Provide, Improve, and Maintain Our Services.** With service providers or contractors that provide business, professional, or technical support functions for us and help us provide, improve, and maintain our Services, such as by administering activities on our behalf, including network operations, website hosting, database management, information technology, billing and payment processing, customer service, analysis of our Services, and the sale and delivery of our Services. Billing and Processing may include the use or sharing of Call Detail Information for the provision of services to you. Call Detail Information may include Geolocation Data (and Precise Geolocation), such as your location when using our network.
- **Protect Our Services and Users.** With governmental authorities or other entities if we believe disclosure is necessary or appropriate to protect against fraudulent, malicious, abusive, unauthorized, or unlawful use of our Services; protect our network, databases, Services, Devices, users, and employees from physical or financial harm; and investigate violations of our Terms of Service or other contracts.
- **Legal Rights and Obligations.** With governmental authorities, auditors and third-party identity verification services, credit bureaus or collection agencies, and other entities to the extent necessary to: respond to subpoenas, court orders, search warrants, or other legal process; respond to requests for cooperation from law enforcement or other government entities, including pursuant to the Communications Assistance for Law Enforcement Act ("CALEA"), Electronic Communications Privacy Act, Wiretap Act, and Stored Communications Act, which may require that we monitor or facilitate monitoring and otherwise disclose the nature and content of communications transmitted through the Services or Devices without any further notice or liability; comply with legal and regulatory obligations, including identity verification, fraud and identify theft protection, and protection, advancement, or defense of our rights or the rights of others; recover payment for previously-billed Services; and facilitate or verify the appropriate calculation of taxes, fees, or other obligations due to local, state, or federal governments and governmental agencies.
- **Sale or Transfer of Business or Assets.** In connection with a corporate transaction, such as a sale, assignment, divestiture, merger, bankruptcy, consolidation, reorganization, liquidation, or other transfer of the business or its assets. If another entity acquires us or any of our assets, your Personal Information may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties.
- **Emergencies.** With governmental authorities or other entities or individuals in emergency situations involving danger of death or serious physical injury to you or any other person, to respond to law enforcement and public safety requests, and for other emergencies or exigencies.

- **Commercial Marketing Purposes.** With our affiliates, service providers, contractors, or marketing partners for our marketing and advertising purposes, including when we use our marketing partner's analytic and advertising tools, such as cookies, web beacons, pixel tags, log files, local shared objects (Flash cookies), HTML5 cookies, or other technologies that automatically or passively collect Personal Information from your use of our Services.

We do not and will not sell your Personal Information to third parties for monetary consideration without your consent.

### **How You Might Share Your Personal Information with Third Parties**

When using our Services, you may choose to install, access, or use services offered by third parties, such as websites, applications, and the networks of other carriers (such as when you are roaming). In some cases, our Services may have links to websites operated by third parties, plugins for social media services, or third-party advertisements. When you interact with third-party services, you may be consenting to those third parties accessing, collecting, using, or disclosing your Personal Information through our Services or directing us to share or allow access to your Personal Information by those third parties. This Privacy Policy does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked from the Services. Please review the privacy policies on those websites and applications to understand their privacy practices.

**Google Analytics and Google AdWords.** We may use Google Analytics on our Sites to help us analyze traffic and improve services. For more information on Google Analytics' processing of Personal Information, please see <http://www.google.com/policies/privacy/partners/>. You may opt-out of the use of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

Our Sites also use the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site. This could be in the form of an advertisement on the Google search results page or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to our Sites. Any data we collect will be used in accordance with this Privacy Policy, and Google is responsible to abide by its own privacy policy. You can set your preferences for how Google advertises to you using the Google Ad Preferences page: <https://adssettings.google.com>.

You have certain choices and consent options related to the use and disclosure of your Personal Information for advertising purposes. Exercising these choices and options will not affect our provision of Services to you. Please note that these choices and options may not prevent you from receiving all advertising; you may continue to receive generic advertising from us or interest-based advertising from third parties, depending on how they operate.

**Interest-Based Advertising.** You have choices and options concerning interest-based advertising on our Services or across other websites and online services as follows:

- To opt-out of collection and use of your Personal Information for interest-based advertising by companies participating in the Digital Advertising Alliance ("DAA"), please visit [optout.aboutads.info](http://optout.aboutads.info) or click on the DAA icon when you see it on an online ad.
- To opt-out from the use of Personal Information about your online activities for interest-based advertising by Network Advertising Initiative ("NAI") member companies, please visit [optout.networkadvertising.org](http://optout.networkadvertising.org).
- To opt-out of the use of your mobile device ID for targeted advertising, please visit [www.aboutads.info/appchoices](http://www.aboutads.info/appchoices).

- To prevent your Personal Information from being used by Google Analytics to measure and improve marketing and advertising and understand the use of our Services, including through Google AdWords, Google Display Network Impression Reporting, DoubleClick Platform Integrations, and Google Analytics Demographics and Interest Reporting, add the Google Analytics opt-out plugin to your browser, available at [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).
- To manage flash cookies, visit Adobe's Global Privacy Settings Panel.
- You may be able to adjust your browser, computer, or device settings to disable cookies, remove or prevent the storage of HTML5, or control other advertising and analytics technology to stop or reduce the amount of interest-based advertising you receive, but doing so may prevent you from using certain features of our Services.

**Consent to Receive Text Messages.** In accordance with our Terms of Service, you provide consent for us to contact you via email, voice call or text, including manual, autodialed, and prerecorded calls and texts to the extent permitted by applicable law, including for Service-related messages. We will ask for your separate consent before sending you marketing messages via text. Terms of Service you may limit or revoke these authorizations as follows:

- Call us at the number in the Our Contact Information section below.
- Unsubscribe from our email communications following the unsubscribe instructions contained within our emails.
- Reply "STOP" to our text messages.

Your instructions to opt-out from these communications will be processed as soon as reasonably practicable. Please note that exercising a marketing opt-out will not affect the Services you receive and will not affect our right to contact you about the Services to which you subscribe, including notifications regarding compliance obligations related to those services (e.g., non-usage, de-enrollment, and collection notices).

#### **Do Not Track**

Because Do Not Track ("DNT") and similar signals do not yet operate according to common, industry-accepted standards, our Services do not respond to DNT signals.

#### **Additional Provisions for Telephone Customers**

If you subscribe to our telephone service, federal law provides additional protections with respect to information known as "customer proprietary network information" or "CPNI." CPNI refers to the quantity, technical configuration, type, destination, location, and amount of your use of a telecommunications service that is made available to us solely by virtue of our relationship with you as a telephone customer. CPNI also includes information in your bills pertaining to your telephone service. CPNI does not include subscriber list information, such as your name, address, and telephone number.

Your CPNI is protected under federal law. For your protection, we will not disclose your call detail records over the phone to an inbound caller, and we require a password to log into accounts where you can view your CPNI online. We may use, disclose, or permit access to CPNI to provide you with the Services to which you subscribe; to bill and collect for communications Services; to protect our rights or property, or to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services; to provide inside wiring installation, maintenance, or repair services; as required by law; as expressly authorized by the customer; to market equipment used to originate, route, or terminate telecommunications; and to market Service offerings within a category of Service to which you already subscribe, and, in the case of CPNI we receive from the provision

of wireless services, to market information services such as Internet services. We do not provide or sell your CPNI to any third party for marketing activities.

### **How We Store, Retain, Protect Personal Information We Collect About You, and How Long We Keep Your Personal Information**

We maintain reasonable physical, technical, and procedural safeguards to help protect against loss, misuse, or unauthorized access, disclosure, alteration, or destruction of your Personal Information. While we take reasonable steps to help ensure the integrity and security of our network and servers, we cannot guarantee their security, nor can we guarantee that your communications and information will not be intercepted while being transmitted over our Underlying Carrier's network or the Internet.

We only retain your Personal Information for as long as reasonably necessary to fulfill the purposes for which we collected it, including: to provide the Services; to use for any legal, accounting, or reporting purposes; to resolve disputes; to comply with applicable law; and to enforce our agreements.

### **Governing Law and Notice to Non-U.S. Residents**

Our Services are solely intended for individuals located within the United States and its territories and are subject to U.S. law. If you are located outside of the United States and its territories, please do not use the Services except as expressly permitted by us, such as may be the case with current customers under international roaming agreements.

We may transfer the Personal Information we collect about you to countries other than the country in which the information was originally collected, for the purposes outlined in the How We Share or Allow Access to Your Personal Information section above. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Privacy Policy.

### **Information from Children**

Our Services are not directed toward children, and we do not knowingly collect Personal Information from children under the age of 13 (or under the age of 16 in California) ("Children" or "Child").

While you may have supplied information about Children to us, such as school enrollment or school breakfast/lunch program documentation to qualify for the Affordable Connectivity Program, we do not control or possess that information; that information is held and controlled by the Universal Service Administrative Company.

If you are a Child, please do not provide us any Personal Information or use or access the Services without receiving your parent's or guardian's permission. If we learn that we have collected any Personal Information from a Child without their parent's or guardian's permission, we will take steps to delete the information as soon as possible except as required by applicable law. If you believe that we might have any Personal Information from a Child or if you are a parent or guardian of a Child who provided us with Personal Information without your consent, please contact us via one of the methods in the Our Contact Information section below to request deletion of the Personal Information.

### **Your California Privacy Rights**

#### **California Consumer Privacy Act**

The California Consumer Privacy Act ("CCPA") provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to know/access, correct,

delete, and limit disclosure of Personal Information. You have the right to be free from discrimination based on your exercise of your CCPA rights. If we collect Personal Information subject to the CCPA, that information, our practices, and your rights are described below.

*Notice at Collection Regarding the Categories of Personal Information Collected*

You have the right to receive notice of certain information about our Personal Information collection, use, and disclosure. The following table summarizes the categories of Personal Information we collect; the categories of sources of that Personal Information; whether we disclose, sell, or share that Personal Information to service providers or third parties, respectively; and the criteria we use to determine the retention period for such Personal Information. The table also summarizes the categories of “sensitive” Personal Information that we collect, the purposes for which such Personal Information is used, and whether we sell or share such Personal Information. The categories we use to describe Personal Information are those enumerated in the CCPA. We collect this Personal Information for the purposes described above in “How We Use Personal Information We Collect About You.”

Category	Information Type	Source	We disclose to:	We sell to/share with:
Identifiers	Your name, address, e-mail address, telephone number, date of birth, internet protocol (“IP”) address, social security number, account name, username(s), driver’s license number, state identification card number, passport number; and Electronic Device Identifiers such as “IMEI” (International Mobile Equipment Identity (“IMEI”), and “ICCID” (Integrated Circuit Card Identifier (“ICCID”)). Information in customer records such as your name, address, social security number, driver’s license or state ID card number, passport, phone number, insurance policy number, education, employment, bank account number, financial information.	You; our social media pages; third party subscription service providers	Service Providers	Business partners
Health Information	Protected health information.  Physical or mental status or ailments.	You	Service Providers	Not sold/shared
Financial Information	Credit card, debit card, checking account information, purchase and order history, and billing information related to your use of our Services; documentation of participation in an eligible government low-income or financial assistance program, documentation demonstrating proof of income, or your social security number.	You	Service Providers	Not sold/shared



Protected Classifications and Other Sensitive Data	<p>Characteristics of protected classifications under State or Federal law, such as Tribal status (i.e., National Origin, Ancestry in California).</p> <p>Your social security number, driver's license number, state identification card number, and/or passport number; your login, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; and Precise Geolocation.</p>	You	Service Providers	Not sold/shared
Commercial Information	Records of personal property, products or Services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, such as your purchase and order history, frequency of use, and quantity of use, your interaction with our communications and advertisement, broadband usage, your activity on your Device, and CPNI.	You	Service Providers	Not sold/shared
Biometric Information	Information from interactive voice control communications with our customer service system, and recorded audio interactions with our customer service representatives.	You	Service Providers	Not sold/shared
Geolocation Information	Precise Geolocation. The location of your Device when it is connected to our network and our Underlying Carrier's network. Coarse Geolocation (information that describes location at ZIP code-level or less precision).	You; our analytics and advertising partners	Service Providers	Service providers. Advertising partners (coarse location only)
Internet or Electronic Network Activity Information	Information about your use of the Services, including the date and time of your use, frequency of use, and quantity of use, your interaction with our communications and advertisement, broadband usage, and your activity on your Device; cookies; your internet protocol ("IP") address, browser type, operating system, software version, and IMEI and ICCID.	You; our analytics and advertising partners	Service Providers	Advertising partners

	Advertising identifier (e.g., IDFA, AAID), information provided in URL string (e.g., search keywords), cookies and tracking pixel information, Voice Service usage, information about your interaction with our website, app, email correspondence, or products. Browsing history, search history. Bandwidth usage, diagnostic information (e.g., crash logs, performance data).			
Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information	Call recordings, photographs, video, interactive voice control communications with our customer service system, and recorded audio interactions with our customer service representatives.	You	Service Providers	Not sold/shared
Professional or Employment-Related Information	Current employer, employment status, job title.	You	Service Providers	Not sold/shared
Education Information	Education record information, as defined in federal law, such as school enrollment information.	You	Service Providers	Not sold/shared
Inferences Drawn About You	User profile reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	You; our analytics and advertising partners	Service Providers	Advertising partners
Content of Communications	Contents of voice calls, voicemails, emails, or text messages. Photos.	You	Service Providers	Not sold/shared
Communications Metadata	Call detail, text detail.	You; Service Providers	Service Providers	Not sold/shared
Contacts	List of contacts that you supply to us. List of contacts we collect from your device with your permission.	You	Service Providers	Not sold/shared

We determine the retention period for each of the categories of Personal Information listed above as described in the section on “How We Store, Retain, Protect Personal Information We Collect About You, and How Long We Keep Your Personal Information.”

Entities to which we disclose Personal Information for business purposes are *Service Providers*, which are companies that we engage to conduct activities on our behalf. We restrict Service Providers from using Personal Information for any purpose that is not related to our engagement.

Entities to whom we “sell” or with whom we “share” information are *Third Parties*. Under the CCPA, a business “sells” Personal Information when it discloses Personal Information to a company for monetary or other benefit. A company may be considered a Third Party either because we disclose Personal Information to the company for something other than an enumerated business purpose under California law, or because its contract does not restrict it from using Personal Information for purposes unrelated to the service it provides to us. A business

“shares” Personal Information when it discloses Personal Information to a company for purposes of cross-context behavioral advertising. We may share your Personal Information with a third party to help serve personalized content or ads that may be more relevant to your interests, and to perform other advertising-related services such as enabling our partners to serve such personalized content.

#### *Your rights under the CCPA*

California consumers have the following rights subject to certain exceptions:

- *Opt out of sale or sharing of personal information:* **You have the right to opt** out of our sale or sharing of your Personal Information to third parties. To exercise this right, please visit our Do Not Sell or Share My Personal Information webpage or contact us. Your right to opt out does not apply to our disclosure of Personal Information to Service Providers.
- *Limit the use of your Sensitive Personal Information:* You have the right to limit our use of your Sensitive Personal Information if we use such information to infer characteristics about you. To exercise this right, please visit our Limit the Use of My Sensitive Personal Information webpage or contact us. Your right to limit our use of such information is subject to exceptions.
- *Know and request access to and correction or deletion of Personal Information:* You have the right to request access to Personal Information collected about you and information regarding the source of that Personal Information, the purposes for which we collect it, and the third parties and service providers to whom we sell, share, or disclose it. You also have the right to request in certain circumstances that we correct Personal Information that we have collected about you and to delete Personal Information that we have collected directly from you. Please contact us to exercise these rights.

#### *Financial incentives*

We may offer you the opportunity to participate in special promotions and programs from time to time. The specific terms for those promotions and programs vary, and we will make the terms available to you when we present the opportunity to participate.

Your participation is voluntary. If we present these offers to you, we will request your consent to collect your Personal Information in connection with your participation. The categories of Personal Information we collect varies based on the particular promotion, and we will use it to facilitate your participation in the program and to market to you. If we run the program jointly with a business partner, we may disclose the information to that business partner.

You may opt in to the program using the means we present to you, such as an online registration page, at the time we make the offer. You may opt out of the program at any time by contacting us using the instructions in the “Our Contact Information” section below.

The program we offer may qualify as a financial incentive program (FIP) under California law. We are required to explain how the value you receive from FIPs is reasonably related to the value that we receive from the Personal Information you provide to us. We use the Personal Information you provide to administer the program and to market to you, including by sending you direct marketing emails. We disclose the Personal Information you provide to business partners because it gives them an opportunity to find new audiences that may like their products. These activities generate revenue for us that we believe is reasonably related to the benefit you receive from participating in the promotions. We estimate that the value of the Personal Information you provide is consistent with the value you receive by participating in the promotions. We reached this conclusion based on internal data about the value of marketing leads and, if we disclose Personal Information to business partners, our calculation of the value of Personal Information as a fraction of the total value of our contract with those business partners.

#### **Other State-Specific Rights**

California, Colorado, Connecticut, Delaware, Iowa, Montana, New Hampshire, New Jersey, Oregon, Virginia, Utah, Tennessee, Texas, and Nebraska consumers have the following rights, subject to certain exceptions:

- Opt out of “sales” of personal information and use of their personal information for “targeted advertising,” as those terms are defined under applicable law.
- Opt out of “profiling” under certain circumstances, as defined under applicable law.
- Confirm processing of and access to Personal Information under certain circumstances.
- Correct Personal Information under certain circumstances.
- Request the specific third parties (other than natural persons) to which Personal Information has been disclosed. (Oregon only)
- Delete Personal Information under certain circumstances.

Residents of these states can exercise their rights by contacting us by using one of the methods listed below.

### **Nevada**

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their Personal Information to third parties. Currently, we do not engage in such sales as defined under Nevada privacy law. If you are a Nevada resident and would like more information about our data sharing practices, please contact us.

### **Making a request to exercise your rights**

**Submitting requests:** You may request to exercise your rights by submitting the form linked in this Privacy Policy or making a request using the contact information below. When you submit your request, we will provide information about how and when we will respond to it. Some states may allow you to authorize another individual or a business, called an authorized agent, to make requests on your behalf. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

**Verification:** We must verify your identity before responding to certain requests. We verify your identity by asking you to provide personal identifiers that we can match against Personal Information we may have collected from you previously. We may need to follow up with you to request more information to verify your identity.

We will not use Personal Information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

### **Appeals**

Residents of some of the states listed above have the right to appeal a denial of their request by contacting us as described in the notice of denial. The notice will have information about the appeals process, including whether you have the right to appeal.

### **Additional Definitions**

“Device” means any phone, smartphone, tablet, accessory, or other device provided or sold to you by us or that you activate or use with our Services.

“Geolocation Data” means any data that is derived from a device and that is used or intended to be used to locate a consumer within a geographic area.

“Precise Geolocation” means any data that is derived from a device and that is used or intended to be used to locate a consumer within a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet, except as prescribed by law or regulation.

“Services” include voice telephony (“talk”), text messaging (“text”), broadband Internet access services (“data”), and any other services provided to you by us, services and devices subject to Affordable Connectivity Program discounts, and prepaid wireless service.

“Underlying Carrier” means the wireless provider whose facilities we use to provide you wireless Services.

#### **Our Contact Information**

If you have any questions or concerns about this Privacy Policy or how we treat your Personal Information, please contact us using the following information:

Email: [help@pandamobile.com](mailto:help@pandamobile.com)

Phone: (888) 222-6056 during normal business hours: Weekdays from 10:00am to 6:00pm CST.