#### **Privacy Policy**

This Statement of Privacy ("Privacy Policy") applies to the services provided by SWIFTCCL.CA Internet Services LP (hereinafter Swift-Net) and describes the policies and procedures for the collection, use, and disclosure of information. By using Swift-Net Services, you agree to the collection and use of information in accordance with this Privacy Policy.

#### **Definitions**

For the purpose of this Privacy Policy:

Account – A unique account created for you to access our Service.

Company – Also referred to as "the Company", "We", "Us", or "Our". This term represents Swift-Net.

**Cookies** – These are small files that are placed on your computer, mobile device, or any other device that can access a website. The files contain details of your browsing history on a particular website among its many uses.

**Device** – Any electronic used to access the Service, such as a computer, tablet, or smartphone.

Personal Data – Any information that relates to an identified or identifiable individual.

**Service** – Also known as "Services". This refers to the use of the Swift-Net website or the Internet service provided by Swift-Net.

**Service Provider** – Any person associated with Swift-Net, including employees, agents, contractors, and representatives, who processes data on behalf of the Company. It also includes third-party companies or individuals who facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service, or to assist the Company in analyzing how the Service is used.

**Usage Data** – The data is collected automatically, either generated by the use of the Service or from the Service infrastructure itself.

Website - www.swift-net.ca

**You** – Also referred to as "the Customer", "your" and "the user". This term represents the individual or company accessing or using the Service, or other legal entity on behalf of such individual or company, if applicable.

### What information do we collect?

Swift-Net collects and retains three (3) types of information – personal, non-personal, and network.

**Personal Information** is information provided by the Customer to Swift-Net voluntarily or passively through use of the Services. It is directly associated with or reasonably linked to a specific person or electronic device. We will collect Personal Information when you sign up for Service, have equipment installed to provide Service, have the Service maintained or upgraded, and when you contact us regarding the service. This information includes the Customer name, email address, phone number, billing address, billing information, service address, and the nature of any Customer devices or other property making use

of the Service. You may also be asked to provide additional Personal Information to allow Swift-Net to provide additional Services or assist in providing customer service to troubleshoot the Service, a Customer device, or improve the quality of the Service.

**Non-Personal Information** is collected using Website information, cookies, and other similar tracking technology. When you visit Swift-Net's Website, we will collect various types of Non-Personal Information, such as server logs from your browser or device. These server logs may include your IP address, a unique device identifier, cookie information, the type of browser and/or device you're using to access the Service, and the page or feature being interacted with. You have the ability to change the preferences on your browser or device to prevent or limit acceptance of cookies or similar tracking technology. Opting out of tracking may prevent you from tracking advantage of some features on the Website or accessing certain functions and conveniences. Clicking on a link to a third-party website or service may also transmit cookies to your browser or device. Swift-Net is not responsible for the privacy policies or practices of third parties.

**Network Information** is information about how you access and make use of the Swift-Net network. This information will be associated with the performance of the Swift-Net Equipment installed on your premises. We monitor and preserve the following:

- When you're using the service
- How you're using the service traffic patterns regarding websites visited, amount of data being sent/received, or other activity
- Amount of data you're transmitting/receiving through the Service
- General information about the performance of our equipment and its interaction with the rest of the network

We do reserve the right to and may monitor, access, review and preserve any network info and/or content in the following situations:

- Response to an injury from customer or another authorized user on your account regarding customer or their use of the Service or problems you or they are experiencing with the Service
- If we have reason to believe you are using the Service in violation of the Terms of Service or any applicable statutes, rules, ordinances, or regulations
- If we have reason to believe your use of the Service is negatively affecting other customers
- When we're required by law or legal process to do so, or when we have a good faith belief that we will be required by law or legal process to do so

The network information does not contain information that specifically identified individuals. Monitoring the network does not include the content of websites viewed or the email communications sent out.

### What do we use your information for?

Any of the information we collect from you may be used in one of the following ways:

- To improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you)
- To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs)
- To process transactions
- To send periodic emails
- To monitor and enhance network performance

You information, whether public or private, will not be sold, exchanged, transferred or given to any other company for any reason whatsoever without your consent, other than for the express purpose of delivering the purchased product or service requested.

The email address you provide for order processing may be used to send you information and updates pertaining to your order, in addition to receiving occasional company news, updates, related product or service information, etc.

Note: If at any time you would like to unsubscribe from receiving future emails, reply with the word "unsubscribe".

### How do we protect your information?

Swift-Net strives to protect the privacy of our Customer accounts and other Personal Information we hold in our records using a reasonable administrative, technical, and physical security measures. We offer the use of a secure server. All supplied sensitive or financial information is transmitted via Transport Layer Security technology and encrypted into our proprietary software and Payment gateway providers database. Swift-Net cannot and does not guarantee complete security. The security of Personal Information may be compromised at any time by unauthorized entry or use, hardware or software failure, and other factors.

#### Do we use cookies?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information. We use cookies to help us remember and process the items in your shopping cart, keep track of advertisements and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third parties to assist in better understanding our Website visitors. These third parties will not be permitted to use the information collected on our behalf.

### Do we disclose any information to outside parties?

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you.

Swift-Net will share your Personal Information with affiliates and other third parties for the following reasons:

**Affiliates** are relied on to provide you with our Service. These entities are companies who are related to Swift-Net by common ownership or control. Personal Information and Non-Personal Information may be shared for business, operational, promotional and/or marketing and advertising purposes.

Operational Service Providers are other companies and people Swift-Net may contract with to perform tasks or service on our behalf and need to share Personal Information to provide products or services to you. Payment processing is an example of this. We will contract with a payment processor company to make it possible to process your payments when you use your credit card or other payment related information. Unless we state otherwise, we don't grant Operational Service Providers with any right to use Personal Information we share beyond what is necessary to assist with us with our ability to provide you with Service.

**Business Transfers/Restructuring** may occur if we choose to buy or sell assets, or if Swift-Net is sold. Personal Information and the other information types are considered business assets and will be disclosed and transferred. In the event we or our assets are acquired OR we go out of business, enter into bankruptcy, or go through some other change of control (restructuring, re-organization, or financing arrangements), all Information would be disclosed, transferred to or acquired by a third party.

**Law or Legal Process** – We reserve the right to access, read, preserve, and disclose any Personal Information to which Swift-Net has access if we are required by law or legal process to do so, or if we have a good faith belief that we are required by law or legal process to do so.

#### Third party links

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites. We encourage you to be aware and informed when you leave our website and our pages on social media platforms.

### Calix CommandIQ® Mobile Application Privacy Policy

This section of the Privacy Policy covers Calix's privacy and security policies for personal information collected by Calix in Connect with Calix CommandIQ mobile application (the "App"). For the Calix CommandIQ® Mobile Application Privacy Policy, personal information refers to information relating to an identified or identifiable natural person with reference to an identifier, such as a name, an email address, an online identifier such as login credentials, or any other identifier by which that natural person may be contacted online or offline.

Calix understand the importance of privacy and security and is committed to providing a secure environment to protect the personal and private information provided by you in connection with your use of the App. Accordingly, Calix's Privacy Policy is set out and can be reviewed at: https://www.calix.com/pages/pp/commandiq-privacy-policy.html

#### **Your Consent**

By using our Website or Swift-Net Services, you consent to this Privacy Policy.

## **Changes to the Privacy Policy**

We reserve the right to change the terms of this Privacy Policy. Since any changes will be posted on this page, we encourage you to check this page regularly. Any changes to this policy shall be effective immediately upon posting them here. This privacy policy was last amended [DATE].

# **Contacting Swift-Net**

In the event that you need to contact Swift-Net you may do so using the following methods:

Phone: 1-866-667-2375
Email: <a href="mailto:support@swift-net.ca">support@swift-net.ca</a>
Website/Chat: www.swift-net.ca