

Privacy Policy

Effective and Updated Date: September, 2024

Fourway Computer Products, Inc (“Fourway” “we,” “our,” “us”) realizes that Customers care about how their personal information (“Personal Information”) is used and shared. Fourway takes Customers’ privacy seriously and this document contains the policies that we use. This privacy policy applies to visitors to Fourway’s website, current and former customers that have used our services (individually a “Service” and collectively “Services”) located in the United States. Visitors and current/former customers are referred to collectively as (“Customers,” “you,” and “your”).

By using our Service(s) as defined in the Customer Service Agreement or accessing Fourway’s website in any way, Customer understands, acknowledges, and agrees to the policies and practices described in this Privacy Policy. Customer’s use of the Service is always subject to the Customer Service Agreement (and the Terms of Service & Acceptable Use Policy contained within) which includes this privacy policy by reference. Any capitalized terms not defined in this Privacy Policy will have the same meaning as defined in Customer’s Service Agreement.

Fourway Services are designed and targeted to U.S. audiences and are governed by and operated in accordance with the laws of the U.S. If Customer is not a U.S. citizen or does not reside in the U.S., Customer voluntarily consents to the collection, transfer, use, disclosure, and retention of Customer Personal Information in the U.S. Customer also agrees to waive any claims that may happen under Customer’s national laws.

When a Customer uses the Service, the Personal Information (as defined below) Customer sends and receives is transmitted over a wireless network & fiber network that may be subject to interception by unauthorized third parties who seek to do you harm. While Fourway takes reasonable measures to reduce the risk that unauthorized third parties will be able to intercept Personal Information Customer sends and receives through the Service, Fourway cannot and does not make any guarantee that transmissions over the Internet are 100% secure or error-free.

Fourway does not knowingly collect, solicit or use Personal Information from anyone under the age of 13. If Customer is under 13, please do not attempt to register for the Services or send any Personal Information about yourself to Fourway. If we learn that we have inadvertently collected Personal Information from a child under the age of 13, Fourway will delete that information as quickly as possible to the extent technically feasible. If Customers believes that its child under 13 may have provided Fourway Personal Information, please contact Fourway at legal@fourway.net

California Privacy Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask Fourway for a notice identifying the categories of Personal Information which Fourway shares with its Affiliates and/or other third parties for their marketing purposes, and providing contact information for such Affiliates and/or third parties unless Fourway meets certain exceptions in the law. This Privacy Policy qualifies for the exception to those requirements. If Customer resides in California and Customer has an established business relationship with Fourway, Customer may request information about Fourway’s opt-

out and opt-in policies of sharing Customer Personal Information with other companies (including Our Affiliates) for their marketing purposes.

Fourway will not accept requests via telephone or messaging program(s). Fourway will not respond to requests that are not properly labeled or sent, or are missing information.

- For all requests, include the Customer's full name, street address, city, state, and zip code
- In an email request, Customer must state "RE: Your California Privacy Rights" in the subject line and send Customer email to legal@fourway.net
- In a postal request, Customer must send a letter or postcard to:

Fourway.net
12700 4A Road
Plymouth, IN 46563
Attention: Your California Privacy Rights

What types of Customer information does Fourway collect and why?

Fourway collects various types of information about Customers and Customers' use of the Service via Fourway's website, Help Desk and call centers, postal mail, remote kiosks, the Fourway Facebook Page and other social network platforms or by other means.

Personal Information Definition

Personal Information is the information Customer provides to Fourway voluntarily or passively through Customer's use of the Service and/or website, and which is directly associated with or reasonably linked to a specific person, computer, or device. Examples include: initial registration process, when equipment to provide Service is installed/maintained/modified, when Customer contacts Fourway regarding Service. Fourway collects Personal Information such as Customer name, email address, physical address, billing address, & phone number(s). Customer may be required to provide certain Personal Information to Fourway in order to register with Fourway, to assist Fourway in improving Customer's Service or troubleshooting problems Customer is experiencing with the Service, Customer computer, or device; or otherwise, to improve the quality of the Service.

Fourway will communicate with Customer if Customer has provided Fourway the means to do so. If a preferred contact method is in place we will use that avenue first (otherwise it is at the discretion of Fourway to choose the appropriate contact method).

Fourway may also combine Customer Personal Information with additional Personal Information obtained from Fourway Facebook Pages or other social network platforms, its Affiliates, its Operational Service Providers (third-party owned companies that provide or perform services on Fourway's behalf) to help serve.

Some forms of Non-Personal Information as described below will be classified as Personal Information if required by applicable law or when such information is directly associated with or reasonably linked to a specific person, computer, or device, or is combined with other forms of Personal Information.

Non-Personal Information

When you visit Fourway's website, Fourway will collect various types of Non-Personal Information which may include Customer IP address, unique device identifier, "cookie" information, the type of browser and/or device you're using to access the Service, and the page or feature Customer requested. IP Address and device identifiers are classified as Non-Personal Information, unless Fourway is required to do so otherwise under applicable law. "Cookies" and "web beacons" are text file identifiers Fourway transfers to Customer's browser or device that allow Fourway to recognize Customer's browser or device and tell Fourway how and when pages and features on the Fourway website are visited, by how many people, and other activity on the website.

Customer can change the preferences on Customer's browser or device to prevent or limit Customer's device(s) acceptance of cookies, web beacons or other similar technology, but this may prevent Customer from taking advantage of some of the features on the Fourway website, or accessing certain functions and conveniences. If Customer clicks on a link to a third-party website or service, such third party may also transmit cookies to Customer. This Privacy Policy does not cover the use of cookies or other such tracking technology by any third parties, and Fourway is not responsible for their privacy policies and practices.

Fourway also uses Personal Information and Non-Personal Information to enhance the Fourway website and Fourway Service offerings. Fourway will continue to conduct analytics on Fourway website performance, and Customer may not opt-out of this use of cookies or other Personal Information or Non-Personal Information. Technology is improving every day and to improve Fourway Services' operation and function Fourway may introduce new technologies and monitoring techniques without advance notice or consent from Customer. Fourway may also use third party providers to conduct such internal analyses.

Network Information

Fourway also collects Network Information, information about Customer access to, and use of, the Fourway network, which may or may not be directly associated with or reasonably linked to a specific person, computer, or device. We use Network Information to monitor, enhance, and optimize the performance of the Fourway Internet Network. For example, Fourway may collect information about the performance of the Provider Equipment installed on Customer property or at Customer premises, when Customer is using the Service, the various devices Customer is using to access the Service, the amount of data Customer is transmitting and receiving, the content of the data Customer is transmitting and receiving, the websites Customer is visiting, and any other information that is transmitted over the Fourway network. Fourway may also aggregate Network Information from multiple subscribers and Fourway will share such aggregated Non-Personal Information about the overall performance of the Fourway Service and network with Our Affiliates and other third parties. Aggregated information does not identify a specific individual, computer, or device.

We use Network Information to monitor and enhance the performance of the Fourway network. Fourway will not monitor the content of the websites viewed or email communications as part of Fourway's standard network management. Generally, Fourway will only monitor and preserve the following Network Information:

- When Customer is using the Service;
- How Customer is using the Service, such as monitoring traffic patterns regarding websites visited, amount of data being sent or received, or other activity;
- The amount of data Customer is transmitting and receiving through the Service; and
- General information regarding the performance of the Provider Equipment installed on Customer's property or at Customer's premises, and its interaction with the rest of Fourway's network.

However, Fourway reserves the right to, and may, monitor, access, review, and preserve any Network Information and/or content in the following situations:

- In response to an inquiry from Customer or another Authorized User on Customer's account regarding Customer or their use of the Service or problems Customer or they are experiencing using the Service;
- If Fourway has reason to believe Customer is using the Service in violation of Customer's Service Agreement or any applicable statutes, rules, ordinances, or regulations;
- If Fourway has reason to believe Customer use of the Service is negatively affecting other Customers; or
- When Fourway is required by law or legal process to do so, or when Fourway acts in a good faith belief that Fourway is required by law or legal process to do so.

How is Personal Information used for marketing and advertising purposes?

Fourway will use Personal Information to send Customer marketing and advertising messages related to Fourway's Service and website using Customer's email address, postal address, or telephone number (for voice, texts, and pre-recorded calls). Fourway may deliver a marketing or advertising message based on Customer visits to Fourway website, which will be general advertising or "Contextual Advertising," which is advertising based on the subject matter or the content of the specific website page or subject matter. Fourway may also send Customer "First Party Advertising," which is advertising that is customized or personalized based on a history of Customer's use of our Services (possibly combined with information from our Facebook fan page or other social network platforms). First Party Advertising is based solely on a combination of information Fourway collects from Customer – not from Customer's visits to other websites across the Internet.

Customer may opt-out of First Party Advertising but not Contextual Advertising. No Personal Information is used to deliver Contextual Advertising; it automatically will appear based on the content or webpage Customer is viewing. Customer may continue to receive general advertising if Customer opts-out of First Party Advertising, it will not be customized or personalized for Customers.

Fourway also allows third-party advertising companies to display ads using cookies or other tracking mechanisms when you visit our websites. Multiple third-party websites and online services are involved in this tailored or personalized advertising process, in essence a "network" of advertising providers. As described herein, you have choices available to you regarding the use of your Personal Information for such Network Advertising. In addition, some browsers have incorporated "Do Not Track" mechanisms. Most of these mechanisms, when turned on, send a signal to the website or online service indicating that the user does not wish to be tracked online. However, because the providers of "Do Not Track" and similar signals do not yet operate according to common, industry-accepted standards, we currently do

not respond to those signals. More information on Do Not Track mechanisms is located at <https://allaboutdnt.com>. For information about how to opt out of Networking Advertising go to <https://optout.networkadvertising.org/?c=1>

Links to other websites or online services

The Fourway website and/or Facebook Pages (or other social networking platforms) may contain a variety of content and functionality and may provide links to other third-party websites or online services. Despite such links, this Privacy Policy applies only to Fourway and our Affiliates. The presence of a link does not constitute or imply Fourway's endorsement, recommendation, or sponsorship of the content, goods, services, business, or privacy practices on such websites or online services. Fourway encourages Customers to be aware and informed when Customers leave Fourway's website and Fourway's Facebook Pages, or any other social networking platforms.

Will Fourway share Customer Personal Information?

Customer's Personal Information will only be disclosed to third parties (including Fourway's Affiliates) as listed in this Privacy Policy. Fourway reserves the right to fully use, disclose, and process any Non-Personal Information collected from Customer in any manner as well as any information Customer makes public via Fourway Services or the Fourway Internet Site.

Fourway will not rent, sell, or disclose Personal Information to anyone not related to Fourway for marketing or promotional purposes, unless in connection with a potential or actual sale, merger, or a corporate restructuring by or of Fourway. ("For Business Transfers/Restructuring" has more details below.) Fourway will share Customer Personal Information with its Affiliates and with other third parties as described in this section for the following reasons:

- **To Our Affiliates.** Fourway relies on various Affiliates in order to provide the Service to Customers. These are companies that are related to Fourway by common ownership or control. Fourway may share Personal Information and Non-Personal Information with any of its Affiliates for business, operational, promotional and/or marketing and advertising purposes.
- **To Operational Service Providers:** Fourway and its Affiliates contract with other companies and people to perform tasks or services on Fourway's behalf and need to share Customer Personal Information to provide products or services to Customers. For example, Fourway may use a payment processing company to receive and process Customer's ACH or credit card transactions for Fourway, or Fourway may contract with third parties to assist Fourway in optimizing Fourway's network. Unless Fourway tells Customer differently, Fourway does not grant its Operational Service Providers any right to use the Personal Information Fourway shares with them beyond what is necessary to assist Fourway.
- **For Business Transfers/Restructuring:** Fourway may choose to buy or sell assets, or Fourway may sell assets or be sold. In these types of transactions, Customer Personal Information is typically one of the business assets that would be disclosed and transferred. Also, if Fourway (or Fourway's assets) are acquired, or Fourway goes out of business, enter bankruptcy, or go through some other change of control, including restructuring, re-organization or financing arrangements, Personal Information could be one of the assets disclosed, transferred to or acquired by a third party.

- **For Protection of Fourway, and Our Affiliates, Employees, Operational Service Providers, Users and Subscribers and Public Safety:** Fourway reserves the right to access, read, preserve, and disclose any Personal Information Fourway has access to if Fourway believes doing so will implement and/or enforce the Service Agreement, Terms of Service, Acceptable Use Policy, Privacy Policy, or any legal document; protect our Network(s), website(s), and company assets; protect the interests, rights, property, and/or safety of Fourway or Our Affiliates, employees and officers/directors, Operational Service Providers, Users and Subscribers, agents, third-party licensors or suppliers, or the general public.
- **When Required by Law or in Response to Legal Process:** Fourway reserves the right to access, read, preserve, and disclose any Personal Information to which Fourway has access if Fourway is required by law or legal process to do so, or if Fourway has a good faith belief that Fourway is required by law or legal process to do so.

Is Customer Personal Information secure?

Fourway endeavors to protect the privacy of Customer's account and other Personal Information Fourway holds in its record using reasonable administrative, technical, and physical security measures. However, Fourway cannot and does not guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of Personal Information at any time.

Customer's account is protected by a password for Customer privacy and security. It is Customer's responsibility to prevent unauthorized access to Customer's account and Personal Information by selecting and protecting Customer password and/or other sign-on mechanism appropriately and limiting access to Customer computer, tablet, or device and browser by signing off after Customer has finished accessing Customer's account. Customer is required to notify us immediately if Customer's password or account has been disclosed to a person whose name does not appear on Customer's account, even if you have allowed such disclosure. Customer understands, acknowledges, and agrees that Customer is solely responsible for any use of Fourway Services via Customer's username and password.

Additionally, if Customer contacts Fourway, Fourway will ask Customer for verification of Customer's identification and account. Fourway will not send an email or text, nor should Customer respond to any email or text communications asking for any sensitive or confidential Personal Information, such as social security number, bank account or credit card account number, or a driver's license number. If Customer receives an email or text requesting any such information from Fourway or someone that claims they are with Fourway or Our Affiliates please contact our Privacy Administrator immediately: legal@fourway.net

What Personal Information can Customers access, modify, and/or delete?

Generally, Customer may access the following Personal Information in Customer's account:

- Full name
- Username and password
- Email address
- Telephone number(s)
- Billing and Service (Physical) address

- Account and billing information

By contacting Fourway at support@fourway.net, or through any online access portal Fourway may create to enable Customers to view and modify Customer account settings, Customer may access, and, in some cases, edit or delete the Personal Information listed above. For example, Fourway may retain historic email, billing, and/or Service addresses for security and verification purposes. Customer may not delete such information.

When Customer updates Personal Information, Fourway may maintain a copy of the unrevised information in Fourway's records for internal security reasons and record keeping. Some information may remain in Fourway's records after it is modified, amended, or deleted by Customer or Fourway. Fourway may use aggregated data derived from or incorporating Customer's Personal Information after Customer updates or deletes it, but not in a manner that would identify Customer personally. Fourway may also maintain Personal Information regarding Customer and Customer's use of the Service after Customer is no longer a Fourway customer as required by Fourway's business practices, by law, and/or tax reporting purposes.

The information customer can view, update, and delete may also change. If Customer has any questions about viewing or updating information Fourway has on file about Customer, please contact Fourway at support@fourway.net

What third party disclosure choices do Customers have?

Customer can always choose not to disclose Personal Information to Fourway; however, certain Personal Information is necessary for Fourway to provide the Service to Customer. Customer may opt out of sharing Personal Information with Our Affiliates only for marketing or advertising purposes, but not for business or operational purposes.

Customer may not opt out of Fourway's use of cookies or other similar technology, or use of Customer's Personal Information and Non-Personal Information for Fourway's internal analytics used to monitor activity on Fourway's website, measure Fourway Service performance, or to operate and protect the Fourway network.

Will this Privacy Policy ever change?

Yes, Fourway is constantly working to improve the Service, so Fourway will need to update this Privacy Policy from time to time as Fourway's business practices change and service offerings increase, and/or there are changes in local, state, or federal laws. Additionally, Fourway will also make stylistic, organizational and/or grammatical changes to present Fourway privacy practices in a user friendly easy to read manner. Fourway will alert Customers to any such changes by placing a notice on the Fourway Site with the effective date of the revised Privacy Policy, and/or by sending Customers an email, or by some other means to the extent required by law. Please note that if Customers have not provided Fourway with Customer's email address or Customer has not updated Customer contact information, those legal notices will still govern Customer use of the Service, and Customer is still responsible for reading and understanding all notices posted on Fourway's website. Customer's continued use of the Service or website after notice of any changes have been provided will indicate Customer's acceptance of such changes, except where further steps are required by applicable law.

Use of Customer's Personal Information is primarily governed by the Privacy Policy in effect at the time Customer subscribed to the Service or visited the Fourway website. If Fourway elects to use or to disclose Personal Information that identifies Fourway as an individual in a manner that is materially different than that stated in the Privacy Policy in effect at the time you subscribed to the Service or visited the Fourway website, Fourway will provide Customer with an opportunity to consent to such use or disclosure. Depending on the circumstances, that consent may include an opt-out.

What if you have questions or comments about this Privacy Policy?

If you have any questions or concerns regarding Fourway's privacy practices and policies, please contact Fourway at legal@fourway.net