

## FROG Privacy Notice

**Last Revised:** {08.20.2018}

Frog Holdings, LLC and its affiliates, including Quail Valley Telecom, LLC D/B/A Frog ("Frog," "we," or "us") respects your privacy. This Privacy Notice describes: (i) the types of information we may collect from you when you visit our website at [www.frognow.com](http://www.frognow.com), and the websites and domains of our affiliates ("Frog Websites"), or use our products and services that include an authorized link to this Privacy Notice, including our Internet Services and Security Alarm Monitoring Services (collectively with the Frog Websites, the "Services"), (ii) how we use the information we collect, (iii) with whom we share it, (iv) how we protect it, and (v) the choices we offer you regarding our collection and use of such information.

### 1. INFORMATION WE COLLECT

*General.* In connection with our Services, we may collect personal information about you, meaning information that can uniquely identify you, from various sources, such as:

- Directly from you when you use the Services, such as when you register for an account, access certain features or content, or place an order.
- Our parent, subsidiary, or other affiliated entities, service providers, business partners, and other third parties.

The personal information we may collect about you may include, without limitation:

- Name and contact information, such as mailing address, service address, email address, and phone number;
- Account information, such as account number, types of services ordered, billing and payment history, and information relating to a credit application for services, including [social security number], driver's license number or other government issued identification;
- Location information, such as street address, to determine if Frog service is available at your location;
- Login information, such as username, password, and security questions and answers;
- Payment and information, such as payment card or bank account information.

In addition, if you access and use the Services on a mobile device or use public wi-fi and your mobile device's settings allow it, we may collect information about your real-time location. Please see the "Your Choices" section below for information regarding how to limit the location information that we may collect when you access and use the Services on a mobile device.

*Frog Internet Services.* In connection with our Internet Services, we may automatically collect and store information and statistics relating to your use of the Services, including Internet Protocol (IP) addresses, the devices you use the access and use the Services, the volume of bandwidth used through your service, Internet connection performance, and connection dates and times.

*Security Monitoring Services.* In connection with our Security Alarm Monitoring Services, we may collect and/or you may provide us with certain additional information, including unit description, home or business size, home or business system configuration, sensor names, appliances or other devices account information, schedule, mode, automation settings, and device settings) in order for us to personalize your Services. We may also process information regarding your use of the Security Alarm Monitoring Services, including but not limited to: performance of any security or

other device monitored by Frog, electrical usage or consumption, light or other fixture settings, and usage and alert logs. We receive this type of information from your devices that are monitored by Frog and your computer or other electronic device through which you may access, browse, download, receive, or otherwise use the Services.

*Frog Websites.* When you access and use the Frog Websites, we may also collect certain information by automated means, such as:

- Cookies - A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser.
- Web Beacons - A “web beacon,” also known as an Internet tag, pixel tag, or clear GIF, is used to transmit information about actions of the user opening the page or email containing the beacon back to a web server.
- Locally Stored Objects. Certain features of the Services may use local shared objects (or Flash cookies) to collect and store information about your preferences and how you interact with the Services.
- Third-party analytics tools (such as Google Analytics) that collect information about use of the Services and user traffic.

The information we may collect from the Frog Websites by automated means may include, without limitation:

- Information about the devices you use to access the Services (such as the IP address and the type of the device, operating system, and web browser).
- Dates, times, and duration of use of the Services (including whether you are a repeat or first time visitor).
- Information on actions taken when using the Services (such as page views and website navigation patterns).

The information we collect automatically is statistical data and does not include personal information, but and may include personal information or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve and personalize our Services, including by enabling us to identify and authenticate users.

Your web browser may let you choose your preference as to whether you want to allow the collection of information about your online activities over time and across different websites or online services. At this time, the Services do not respond to the preferences you may have set in your web browser regarding such collection of your information, and the Services may continue to collect information in the manner described in this Privacy Notice.

## **2. HOW WE USE THE INFORMATION WE COLLECT**

We may use information we obtain about you to:

- Process orders you place and complete other transactions you have requested using the Services, and provide you with the Services you request.
- Maintain a record of your purchases and other transactions using the Services.
- Respond to your questions and comments and provide customer support.
- Send you information or materials you request.
- Operate, evaluate, and improve our business and the Services we offer.

- Communicate with you about our Services, offers, and promotions and third party products and services that may be of interest to you.
- Analyze and enhance our marketing communications and strategies, including by identifying when emails sent to you have been received and read.
- Analyze trends and statistics regarding use of the Services and transactions conducted using the Services.
- Protect against and prevent fraud, unauthorized transactions, claims, and other liabilities, and manage risk exposure, including by identifying potential hackers and other unauthorized users.
- Enforce our terms of use and other agreements with you.
- Comply with applicable legal requirements and industry standards.

We may combine the information we collect with publicly available information and information we receive from our parent, affiliate, or subsidiary companies, business partners, and other third parties. We may use that combined information to enhance and personalize your experience with us, to communicate with you about products, services, and events that may be of interest to you, for promotional purposes, and for other purposes described in this Privacy Notice.

We also may use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

### **3. DISCLOSURE OF INFORMATION**

We may disclose aggregated information about our users (information that does not identify any individual user) without restriction. We may disclose personal information about you:

- To contractors, service providers, and other third parties we use to support our business and who are obligated to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Frog, users of the Services, or others.
- With your consent.
- To enforce or apply our terms of use and other agreements with you.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

We also reserve the right to transfer your personal information to a buyer or other transferee in the event of a merger, divestiture, restructuring, reorganization, dissolution, sale, or other transfer of some or all of our assets. Should such a sale, merger, or transfer occur, we will use reasonable efforts to direct the transferee to use your personal information in a manner that is consistent with our Privacy Notice.

### **4. DATA SECURITY**

We have implemented measures intended to protect your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on secure servers behind firewalls. Any payment transactions, and other transactions requiring such protection, will be encrypted using SSL technology. Please note that the electronic transmission of information is not completely secure. We cannot guarantee that the security measures we have in place to safeguard personal information will never be defeated or fail, or

that such measures will always be sufficient or effective. Any transmission of personal information is at your own risk.

## **5. YOUR CHOICES**

We offer you the following choices about the information we collect from you and how we communicate with you:

### **Cookies**

Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Flash cookies operate differently than browser cookies and cookie management tools available in a web browser may not remove Flash cookies. To learn how you can manage your Flash cookie settings, visit [http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html). Please note, however, that without cookies you may not be able to take full advantage of all of the features of the Services.

### **Promotional Communications**

If you do not want us to use your contact information to promote our own or third parties' products or services, you can opt out by sending us an email stating your request to. If you have received a promotional email from us, you can also opt out of receiving future promotional emails from us by following the unsubscribe instructions contained in such email. If you have received materials via the postal service from us and you send us an email to opt out of future mailings, please be sure to include in the email your name and mailing address exactly as they appear on such mailing. We will remove your name from our mailing list as soon as possible.

### **Location Information**

If you access our Services using a mobile device, you may adjust the settings on your mobile device to allow or prevent the sharing of location information. For example, you can disable "Location" (or "Location Services" on iOS-based devices) on your mobile device to prevent sharing your location information with us. Please refer to instructions provided by your mobile service provider or the manufacturer of your mobile device to learn how to adjust your mobile device settings. Please note that if you disable the sharing of location information, you may be unable to access some features of our Services that are designed for mobile devices.

## **6. ACCESSING AND CHANGING YOUR INFORMATION**

You can review and change the personal information associated with your account by logging into your account and visiting your account profile page. You may send us an email at [info@frognow.com](mailto:info@frognow.com) to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

## **7. YOUR CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section § 1798.83 permits users of our Services who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [info@frognow.com](mailto:info@frognow.com).

## **8. CHILDREN UNDER THE AGE OF 13**

The Services are not directed to, and Frog does not knowingly collect or solicit personal information from, children under the age of 13. If we learn we have collected or received personal information from a child under the age of 13, we will delete that information. If you believe we might have any information from or about a child under the age of 13, please contact us at [info@frognow.com](mailto:info@frognow.com)

## **9. CHANGES TO OUR PRIVACY NOTICE**

Frog reserves the right to update or change this Privacy Notice at any time. If we make a material change to our Privacy Notice, we will provide notice to you (by email or posting on our website) that our privacy practices have changed and will provide a link to the new policy. In the event we make a material change to how we use your personal information, we will provide you with an opportunity to opt out of such new or different use. The date this Privacy Notice was last revised is at the top of this page. We encourage you to review this Privacy Notice periodically to check for any updates or changes.

## **10. DATA TRANSFERS**

Frog is based in the United States. When we obtain information about you, we may transfer, process, and store such information outside of the country in which you reside, including in the United States. By using the Services, you consent to the transfer to and processing and storage of your information in countries outside of your country of residence, which may have different data protection laws than those in the country where you reside.

## **11. CONTACT US**

If you have any questions about this Privacy Notice or our information practices, please contact us at [info@frognow.com](mailto:info@frognow.com)