



California Consumer Privacy Policy

Effective: April, 10, 2022

Your privacy is important to Synergy. We value the trust you place in us when you use our products and services, interact with us through our online and mobile platforms and tools, such as our websites and mobile applications, or interact with us through person-to-person customer service and sales channels or other electronic means, such as our call centers and/or Synergy Internet store locations. We take seriously the responsibility of protecting your privacy and the information we collect about you.

This privacy policy is applicable only to California residents and supplements the [Synergy Internet Privacy Policy](#). As required in the California Consumer Privacy Act of 2018 (the "CCPA"), this policy describes the rights available to California consumers (defined as California residents) regarding their personal information, and our practices regarding the collection, use, disclosure, and sale of personal information as defined in the CCPA.

Under the CCPA, California resident rights include:

- **Right to Know:** This is your right to know what categories of personal information we collect about you, how we use your personal information, whether we share, disclose and/or sell your personal information to third parties, and what other rights you may have under the CCPA with respect to your personal information;
- **Right to Delete:** This is your right to request that we delete the personal information we have collected from you and maintain in our systems, subject to certain exceptions that permit us to keep your personal information for specific purposes;

- **Right to Access:** This is your right to request access to the personal information we have collected about you;
- **Right to Opt-Out of Sale:** This right allows you to opt-out of the sale of your personal information to third parties; and
- **Right to Non-Discrimination/Equal Service:** This right means that Synergy Internet will not discriminate against you in any manner because you elect to exercise any of your rights under the CCPA.

In reviewing this privacy policy, we encourage California consumers to also review the [Synergy Internet Privacy Policy](#) for more information about our overall privacy practices, as well as details about other rights you may have under certain federal and state laws when you use, subscribe to, or interact with certain Synergy Internet products or services.

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THE CATEGORIES OF PERSONAL INFORMATION ABOUT YOU THAT WE COLLECT, USE, DISCLOSE AND/OR SELL UNDER THE CCPA

In addition to the disclosures in the [Synergy Internet Privacy Policy](#), the CCPA requires that we provide you with certain, additional disclosures.

The Categories of Personal Information We Collect under the CCPA

In the last twelve (12) months, Synergy Internet has collected the following categories of personal information, as defined in the CCPA, about California consumers:

- Personal identifiers (e.g., real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers);
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) (e.g., name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information);
- Protected classification characteristics under California or federal law (e.g., age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical

or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information);

- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Biometric information (e.g., genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data);
- Internet or other similar network activity (e.g., browsing history, search history, information on a consumer's interaction with a website, application, or advertisement);
- Geolocation data (e.g., physical location or movements); and
- Inferences drawn from other personal information (e.g., profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes).

For more information about our collection practices, including specific examples, please visit the [Synergy Internet Privacy Policy](#).

The Sources from Whom We Collect Personal Information under the CCPA

Synergy Internet collects personal information about you from a variety of sources to provide you with our products and services, communicate with you, and when you interact with us through person-to-person customer service and sales channels or other electronic means, such as our call centers and/or Synergy Internet store locations, or use our products, services, websites and applications. These sources include:

- Information you provide to us directly, such as when you contact or communicate with us, or when you establish a customer or user account;
- Information we collect automatically and through your use of Synergy Internet products, services, websites and applications;
- Information obtained from third parties; and
- Publicly available information about you.

How We Use the Categories of Personal Information We Collect under the CCPA

At Synergy, we use the personal information we collect about you to provide you with reliable, high quality products and services, communicate with you, make improvements to our products and services, investigate theft, fraud and other illegal activities, and to personalize your experience. The [Synergy Internet Privacy Policy](#) describes how we use the information we collect about consumers, and the circumstances under which we may share or disclose that information, including to:

- provide, deliver, maintain and improve the products and services you request, interact with, and to which you subscribe;
- fulfill requests for new service or changes to your account or the products and services you already receive;
- provide you with technical support and high-quality customer service;
- create and administer a Synergy Internet account, including activating your service, billing, invoicing, and debt collection activities;
- authenticate or otherwise provide you access to your Synergy Internet products and services;
- provide updates, upgrades, repairs or replacements for any of our service-related devices or software used in providing or receiving services;
- manage and configure our device(s), system(s) and network(s);
- understand how the service is being used, including through the creation of operational and marketing reports based on deidentified and/or aggregated service usage information;
- inform you of additional products and services that may be of interest to you;
- protect the security of the system, prevent fraud, detect unauthorized reception, use, and abuse of any Synergy Internet product, service, website or application, and to enforce any Synergy Internet policy or applicable terms of service;
- protect our rights, our personnel, our property, and the safety of others;
- maintain our accounting, tax and other records;
- comply with applicable federal and state laws and regulations, as well as for the general administration of our business;
- deliver and personalize communications with you;
- create internal business and marketing reports; and
- provide advertising and marketing subject to the applicable consent.

The Categories of Personal Information We Disclose or Sell to Third Parties under the CCPA

Synergy Internet does not sell your personal information to third parties for monetary consideration for any purpose, including advertising. In some limited situations, Synergy Internet discloses or makes available to third parties certain personal identifiers, as defined by the CCPA, such as online or device identifiers that do not directly identify you but could be associated with you, your household, or your devices. These third-party disclosures are generally limited to analytics or other purposes and are based on your interaction with our products, services, websites, and applications.

In other instances, Synergy Internet discloses the personal information identified earlier in this policy to service providers who perform services on our behalf for specific business purposes. In those instances, Synergy Internet provides such service providers with only that personal information necessary to perform the services they are providing to Synergy. Synergy Internet engages service providers for the following business purposes:

- Auditing;
- Protecting the security of Synergy's networks, preventing fraud, detecting unauthorized reception, use, and abuse of any Synergy Internet product, service, website or application, enforcing any Synergy Internet policy or applicable terms of service, and detecting security incidents;
- Providing updates, upgrades, repairs or replacements for any of our service-related devices or software used in providing or receiving services, and managing and configuring our device(s), system(s) and network(s);
- Short-term, transient uses that does not involve or contribute to profiling a consumer or household;
- Performing business activities and functions on our behalf to support our interactions with you, such as billing and collections, payment processing, analytics and research, marketing, service delivery and customization, maintenance and operations, and fraud prevention;
- Internal purposes, such as improving our products and services; and/or
- Testing or improving our products, service, and devices.

The CCPA does not restrict Synergy Internet's ability to disclose the personal information identified earlier in this policy to third parties for the following purposes, including to:

- Comply with federal, state, or local laws;
- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- Cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law;
- Exercise or defend legal claims;
- Collect, use, retain, sell, or disclose consumer information that is deidentified or in the aggregate consumer information; and/or
- Collect or sell a consumer's personal information if every aspect of that commercial conduct takes place wholly outside of California.

For more information about our collection, use and disclosure practices, and the sources from which we collect information, including specific examples, please visit the [Synergy Internet Privacy Policy](#).

YOUR RIGHTS TO KNOW, REQUEST ACCESS TO AND/OR DELETION OF PERSONAL INFORMATION AND HOW TO EXERCISE THOSE RIGHTS

With certain limitations, the CCPA establishes your right to request access to the personal information we collect about you, and the right to request the deletion of the personal information we collect from you. In order to submit a verifiable consumer request, please visit the "How You Can Submit A Verifiable Consumer Request for Access to and/or Deletion of Your Personal Information" section below.

Right to Know What Personal Information We Have Collected About You under the CCPA and Other California Law

In addition to existing California law governing online privacy policies, CCPA requires that, upon request, we provide you with the following information:

- the categories of personal information we have collected about you;
- the categories of sources from which the personal information is collected;
- the business or commercial purpose for collecting, disclosing or selling, if applicable, the personal information;
- the categories of third parties with whom we have shared or sold, if applicable, your personal information; and
- the specific pieces of personal information we have collected about you.

This is known as your "right to know" under the CCPA.

Right to Request Access to the Personal Information We Have Collected About You

The CCPA also provides that we provide you with access to the actual personal information we have collected about you in the preceding twelve (12) months; this is known as your "right to access." The CCPA requires us to comply with up to two (2) access requests in a twelve (12)-month period, which are subject to limitations for manifestly unfounded or excessive requests. In addition, there are some types of personal information that we will not return to you in response to your access request because of the inherently sensitive nature of such information which could create a substantial, articulable, and unreasonable risk to the security of that personal information. This includes your Social Security number, driver's license number or other government-issued identification number, financial account number, health insurance or medical identification number, account password, or security questions and answers.

Right to Request Deletion of the Personal Information We Have Collected from You

If you want us to delete the personal information, we have collected from you, subject to a verifiable consumer request, we will delete your personal information from our systems, subject to certain exceptions for which it is necessary for us to continue to retain such information. We will also notify any service providers and third parties with whom we have shared your personal information of your request. As noted above, your deletion request is subject to certain exceptions which we may rely on where it is necessary for us to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Identify and repair errors that impair existing intended functionality of our services;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;

- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;
- To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with us;
- Comply with a legal obligation; or
- Otherwise use the personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

If any of these exceptions apply, Synergy Internet is not required to delete your personal information. In the event that we deny your request to delete based on any of these exceptions, we will inform you, in writing, of the reason.

How You Can Submit A Verifiable Consumer Request for Access to and/or Deletion of Your Personal Information

Synergy Internet takes the responsibility of protecting your privacy and the information it collects about you seriously. Given the sensitive nature of the information under the CCPA and as proscribed by the law itself, it is essential that we verify your identity in order to process your request. Synergy Internet has engaged an independent third-party identity service provider to conduct the identity verification process on our behalf. While the identity verification process involves the processing of personal information relevant to you as the requestor, Synergy Internet does not collect, retain, or store the information that you provide on the request form as part of the verifiable consumer request process, provided that we will retain the email address you provide for the sole purpose of fulfilling your request or otherwise communicating with you in connection with your request. If we cannot verify your identity, we cannot fulfill your request.

It may take up to forty-five (45) days to fulfill your request, or up to a total of ninety (90) days if additional time is needed. In the event that we cannot complete your request within the initial forty-five (45) day period, we will notify you in writing within the initial forty-five (45) day period.

To exercise one or more of your CCPA rights, please submit a verifiable consumer request:

- Be emailing us at customer.service@synergyinternet.us; or
- By calling our toll-free number at (855) 779-6374

The CCPA allows you to authorize another person to make a verifiable consumer request on your behalf. If an authorized agent will be submitting a request for access to or deletion of personal information on your behalf, the authorized agent should submit the request by email at customer.service@synergyinternet.us. As part of the authorized agent request process, Synergy Internet will use reasonable efforts to verify your identity, as well as the identity of your authorized agent to ensure that your agent has been properly authorized by you to request information on your behalf.

YOUR RIGHT TO OPT-OUT OF THE SALE OF PERSONAL INFORMATION TO THIRD PARTIES AND HOW TO EXERCISE THAT RIGHT

Synergy Internet offers many choices to help you manage your privacy and ensure that you have meaningful choice and control over how we use your data. You can visit the [Synergy Internet Privacy Policy](#) for more information about the various choices you have as a consumer, some which only apply when you have a subscriber relationship with us with respect to certain products and services.

The CCPA adds a new right for California consumers to opt-out of the sale of their personal information to third parties. As stated above, Synergy Internet does not sell your personal information to third parties for monetary consideration for any purpose, including advertising, but Synergy Internet may disclose or make available the personal information identified earlier in this policy for limited reasons. To opt-out of the sale of your personal information, click on the [California Consumer Do Not Sell My Personal Information link](#), which is available on our websites and applications. If you exercise your right to opt-out of the sale of your personal information to third parties, we will not ask you to change that decision for at least 12 months, and you will experience no effect, now or in the future, in how we provide any services to you or charge you for services as a result of your decision to restrict our ability to sell your personal information.

YOUR RIGHT TO EQUAL SERVICE AND NON-DISCRIMINATION (back to [top](#))

The CCPA prohibits businesses from discriminating against California consumers for exercising any of their rights under the CCPA. This means that if you exercise any of your rights under the CCPA, Synergy Internet commits not to:

- Deny you goods or services;
- Charge you different prices or rates for goods or services; or
- Provide different levels or quality of goods or services to you

HOW WE PROTECT YOUR PERSONAL INFORMATION

We take our responsibility to secure the information we collect and maintain seriously. We use reasonable security, including technical, physical, and administrative controls, to secure the information we collect and maintain. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose Synergy Internet information.

You can help protect the privacy of your own information by using encryption and other techniques to prevent unauthorized interception of your personal information. You are responsible for the security of your information that you transmit to us or view, download, or otherwise access when using unencrypted, public or otherwise unsecured networks.

HOW WE PROTECT CHILDREN'S PRIVACY

At Synergy, we do not knowingly collect personal information from anyone under the age of 16.

ADDITIONAL RIGHTS YOU HAVE UNDER OTHER CALIFORNIA PRIVACY LAWS

As noted above, other California law also entitles California residents with the right to request additional information from a business which shares personally identifiable information, as defined by those laws, with third parties for such third parties' direct marketing purposes. We do not share personally identifiable information with unaffiliated third parties, for their own direct marketing purposes. We may share personally identifiable information with some same-branded affiliates, however, for those affiliates' direct marketing purposes. If you contact us using the contact information provided below, we will provide you with information about these affiliates and a list of personally identifiable information that we may have shared with them. However, requests for access to and/or deletion of your personal information or to opt-out of the sale of personal information under the CCPA should be made via the applicable links on our [California Consumer Privacy Rights](#) page.

WHAT HAPPENS IF WE CHANGE THIS PRIVACY POLICY

We reserve the right to change this policy from time to time. If we make any changes that materially affect your rights or the ways in which we collect, use

or disclose your personal information, we will notify you in advance through written, electronic or other means, as permitted by law.

HOW TO CONTACT US WITH QUESTIONS ABOUT THIS CALIFORNIA CONSUMER PRIVACY POLICY AND SYNERGY INTERNET'S OVERALL PRIVACY PRACTICES

Questions about this California Consumer Privacy Policy or Synergy Internet's overall privacy practices should be sent to:

Synergy Communications, LLC
Attn: PPR-Legal, Privacy and Cybersecurity Counsel
30 N Gould Street
Sheridan, Wyoming 82801