



Privacy Policy

Polar Communications (hereinafter “Polar,” “Company,” “our,” “us,” or “we”) is committed to respecting and protecting the privacy of our customers and business partners. Protecting your private information or Personally Identifiable Information is our priority. Accordingly, we deploy a standard of least privilege and least access through role-based access to minimize risk. We utilize policies, controls, and evidence review to ensure our standards are understood and effective. We train our workforce and partners about their obligation to safeguard customer information and communications, and we hold them accountable for their actions.

This Privacy Policy applies to Polar-managed assets, systems, and data, including <https://polarcomm.com/> (the “Website”), but it is not exclusive to it. By using any managed asset or system or by using the Website, you consent to the data practices described in this Privacy Policy.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information. By accessing or using this Website, you agree to this Privacy Policy.

Definitions

- Personal Identifiable Information or “personal information” refers to any information that can be used to identify a specific individual. This includes information that is directly linked to a person, such as their

name, date of birth, social security number, or email address, as well as information that can be used to identify them indirectly, such as their physical characteristics, biometric data, or online identifiers like IP addresses or device identifiers.

- Allowable Tracked Information refers to the specific types of data that a website or application is permitted to collect, use, and share with third parties. Examples of allowable tracked information that a website or application may collect and use could include: User behavior data, such as website usage patterns, search history, or clickstream data; location data, such as GPS data or IP address; demographic information, such as age, gender, or occupation; contact information, such as email address or phone number; or financial information, such as credit card numbers or payment information.
- Third Party refers to any entity that is not directly affiliated with Polar or Polar's Website that is collecting or processing user data. This can include companies that provide services or products to the Company, analytics providers, or other third-party service providers. Examples of third parties that may be involved in the collection and processing of user data include: Analytics providers that collect data on user behavior and provide insights to the organization, or payment processors or financial institutions that process transactions and collect payment information, etc.
- Cookies refer to text files placed on a computer, mobile phone, or other device used to navigate the internet. Cookies transmit information back to the website's server about the browsing activities of the user and may also be used to collect and store information about your preferences after you visit a website.

Collection of Your Personal Information

Polar limits the collection, use, retention, and disclosure of personal information to what is reasonably necessary and proportionate to achieve the purposes for which the personal information was collected or processed. Polar also limits secondary use to that which is compatible with the original purpose of the personal information collection.

When you visit our Website, you may provide us with two types of information: personal information that you knowingly choose to disclose that is collected on an individualized basis, and website use information collected on an aggregate basis as you and others browse our Website.

You may also be required to provide certain personal information to us when you elect to use certain products or services by (a) registering for an account, (b) entering a sweepstake or contest sponsored by us or one of our partners, (c) signing up for special offers from selected third parties, (d) sending us an email message, and (e) submitting your credit card or other payment information when ordering and purchasing products and services.

We will use your information for, but not limited to, communicating with you in relation to services and/or products you have requested from us. Polar uses information about customers in defined and responsible ways in order to manage, provide, and improve its products, services, and operations for its customers. This information will be used for internal purposes only and will not be shared with any third party. It shall not be used for any improper or unlawful purpose.

Polar retains customer information for such periods of time as required by law or regulation or as reasonably necessary to provide services.

Sharing Information with Third Parties

Polar does not share customer information with third parties, except at the customer's request, with the customer's consent, or as described below. Polar does not sell, rent, or lease its customer lists to third parties.

Polar may share allowable tracked information with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. This information will not include personal information. All such third parties are prohibited from using your personal information except to provide these services to the Company, and they are required to maintain the confidentiality of your information.

Representative third parties include:

Vendors: Polar may provide information to our vendors who help us do things like provide services features, monitor Website activity, maintain databases, and assist us in hosting; and where they may observe information about you in the same way as described herein. We also use third-party vendors to provide services related to hosting the Website, providing technical support, updating records in our database, and sending or coordinating marketing communications on our behalf.

Marketing: The information you provide on the Website may also be used by Polar for marketing purposes, such as when you subscribe to receive marketing communications or newsletters. Your information will not be provided to third parties for any third-party marketing purposes. You may choose to stop receiving our marketing communications at any time by opting out by following the unsubscribed instructions

included in those communications, or you can contact us at customerservice@polartel.com.

Third-Party Support: While not routine, Polar may provide your information to persons or entities in connection with our own business operations, such as to our auditors or counsel, or in connection with a major change in our business (such as an acquisition). In these instances, the Company will ensure that such persons or entities are subject to obligations to keep the information confidential and use the information only for the purpose we provided it to them.

Polar may disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on the Company or the site; (b) protect and defend the rights or property of the Company; and/or (c) act under exigent circumstances to protect the personal safety of users or the public.

Tracking User Behavior

Polar may keep track of the websites and pages our users visit within Polar to identify trends among Polar services. Polar may use this data to deliver customized content and advertising to customers whose behavior indicates that they are interested in a particular subject area.

Automatically Collected Information

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect allowable tracked information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data, and the resources that you access and use on the Website.
- Information about your device and internet connection, including your IP address, operating system, domain names, access times, and browser type.

Polar uses this allowable tracked information to operate the Website, maintain the quality of the Website, and assess Website usage.

Use of Cookies

The Website may use “cookies” to personalize your online experience. Cookies are small pieces of data that are stored by a user’s web browser on the user’s hard drive. One of the primary purposes of cookies is to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you personalize website pages or register with our Website or services, a cookie helps Polar to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, etc. When you return to the same website, you can easily retrieve the information you previously provided.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Polar services or our Website.

Links

This Website contains links to other sites. Please be aware that Polar is not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects Personally Identifiable Information.

E-mail Communications

From time to time, Polar may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. To improve our services, we may receive a notification when you open an email from Polar or click on a link therein.

If you would like to stop receiving marketing or promotional communications via email from Polar, you may opt out of such communications by clicking the "Unsubscribe" button at the bottom of the email.

If you choose to correspond with us through email, we may retain the content of your email messages along with your email address and our responses. We also may send automated messages to you pertaining to your account, such as billing invoices and other notices. We provide the same protections for these electronic communications that we employ in the maintenance of information received by mail or telephone. We ask that you not provide us with confidential information such as social security or account numbers through unsecured email. You may also contact us by phone, U.S. mail or by visiting our location.

Mobile Applications

POLAR WIFI APP AND POLAR E-BILL APP

Polar collects and processes information provided directly by you when you install the App and register for an account to use the App. Specifically, this information includes:

- Your name, email address, location, user's phone or contact book data, user's inventory of installed apps, and user's screen recording;
- Browser information and session cookies related to your access and use of the App;
- Data insights Polar attains based on correlation and analytics of your information collected in providing the App, which may be used in aggregated and dis-aggregated formats or to obtain trend analytics, to provide the App; and
- Use of the above-described collected information in aggregated and dis-aggregated formats to enhance our current App or to provide App features.

Polar uses the information collected as described in this Privacy Policy, including personal information, to:

- Provide you with the App as described in the Agreement;
- Implement, improve, and/or enhance the App, including to make future releases available to you;
- Carry out Polar's obligations as described or authorized in the Agreement and this Privacy Policy;
- Enforce Polar's rights arising from the Agreement between you and Polar; and
- Fulfill any other purpose authorized by you and reasonably required for the App.

Data Safety

You may have a right to correct, update, delete, or request access to the Personal Information that you have provided to us. You may submit your request to customerservice@polartel.com or call 701.284.7221. These rights are limited and may not be available to you depending on where you are located.

For your protection, we will only implement requests with respect to Personal Information about you (not anyone else), and we may need to verify your identity before implementing your request. We may need to retain certain information for recordkeeping purposes, as required under applicable legal obligations. And even if you have a right to deletion, some of your information may remain within our systems and other records or archives, in compliance with applicable law.

Children Under Thirteen

Polar does not provide services to children. Our website is not targeted or marketed to children under the age of thirteen. We respect the privacy of your children, and we comply with the practices established under the Children's Online Privacy Protection Act. We do not knowingly collect or retain personally identifiable information from consumers under the age of thirteen.

Security of Your Personal Information

All Polar employees are responsible for safeguarding individual customer communications and information.

- Polar takes reasonable precautions to protect personal information against unauthorized access. Polar requires all personnel to protect the

privacy of all forms of customer communications as well as individual customer records.

- Polar secures all customer personal information from unauthorized access, use, or disclosure with Secure Sockets Layers protocol (SSL). This technology encrypts, or scrambles, your information so it's virtually impossible to read by anyone other than employees at our company. SSL technology secretly encodes information that is being sent over the Internet between your computer and our website, helping to ensure that the information remains confidential.
- Polar uses SSL protocol to protect your personal information when you interact with a third-party website (such as when making a payment). Once the data is transmitted, the third party's policies will govern the protection of your personal information.

The use of SSL requires that you have an SSL compatible browser. While older browser versions may support SSL sessions, we strongly recommend the following browsers:

- Windows and Unix operating systems: Microsoft Internet Explorer 7 or later, Mozilla Firefox, or Google Chrome
- Macintosh: Safari, Firefox, or Google Chrome

We strive to take appropriate, commercially acceptable security measures to protect against unauthorized access to or alteration of your personal information. While we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet that are beyond Polar's control; and (b) security, integrity, and privacy of information and data exchanged between you and us through this Website cannot be guaranteed; and (c) no method of transmission over the internet, or method of electronic storage is one hundred percent secure. Any

transmission of information over the internet is at your own risk. Polar is not responsible for the circumvention of any privacy settings or security measures contained on the Website by any person or entity.

CPNI Notice

From time to time, Polar changes its service offerings and makes available additional features and services, which may enhance and augment the services to which you are already subscribed. In order for us to determine which customers may benefit from the new services and enhancements, we will use information about your account that is within our database, legally referred to as Customer Proprietary Network Information (CPNI), unless you restrict that use in the manner described below. CPNI includes information such as which long-distance carrier and plan to which you are subscribed, calling features and plans to which you are subscribed and the associated charges for those plans. Use of this data will allow Polar to tailor its service offerings to your individual needs.

For this purpose, CPNI data will be used by Polar, its subsidiaries and its affiliates only. This data will not be shared by Polar with any other outside source except as necessary and required to provide the service(s) to which you are already subscribed, and unless we are legally compelled to.

You have a right under federal law to protect the confidentiality of your account information and restrict the use of CPNI data, and we have a responsibility to protect your data. To restrict the use of your CPNI data, please call our business office at 701-284-7221 or e-mail us at customerservice@polartel.com to request that we not utilize your CPNI data. Your denial of approval for Polar to use this data will not affect the provision of any services to which you subscribe. Your approval or denial of approval for

the use of CPNI outside of the service to which you already subscribe will remain valid until you revoke or limit the approval or denial.

Changes to Our Privacy Policy

Polar reserves the right to change, modify, or update this Privacy Policy at any time without notice. In the event of any modification, we will post the changes in this Privacy Policy so that you will always know what information we are gathering and how we might use that information. Accordingly, you should periodically visit this page to determine the current Privacy Policy to which you are bound.

Contact Information

If you have a question or comment about this Privacy Policy, please call 701-284-7221 or email us at customerservice@polartel.com.