

## 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](http://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.

### Information Collected

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 taking 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 identifies individuals. Monitoring the network does not include the content of websites viewed or the email communications sent out.

## **Use of your Information**

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

Your 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 and/or phone number 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 or SMS messages, reply with the word "unsubscribe" or "STOP".*

## **Protecting Your Information**

Swift-Net strives to protect the privacy of our Customer accounts and other Personal Information we hold in our records using reasonable administrative, technical, and physical security measures. We offer the use of a secure server. All supplied sensitive or financial information is transmitted via industry-standard Transport Layer Security (TLS) technology. Stored data is encrypted within our proprietary software and Payment gateway providers' databases. 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.

## **Internet Cookies**

Cookies are small files that a site or its service provider transfers to your device through your web browser 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.

## **Information Disclosure**

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. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. Information sharing with subcontractors in support services, such as customer service is permitted. All other use case categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

**OPERATIONAL SERVICE PROVIDERS** – Companies and people Swift-Net may contract with to perform tasks or provide services on our behalf. Relevant Personal Information will be shared only 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 do not 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** – Swift-Net may choose to buy or sell assets, or may itself be sold.. Your information is considered a business asset 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 understands 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>

### **Text Message Consent (A2P Messaging)**

By providing your phone number, you consent to receive automated text messages (A2P) about:

- Account updates and service-related notifications.
- Marketing messages (only if explicitly opted-in).

### **OPT-OUT:**

Reply "STOP" to marketing texts at any time. Service-related texts are necessary and cannot be opted out of. Message and data rates may apply.

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### **DATA SHARING:**

Data may be shared with affiliates or service providers to deliver our services, in compliance with applicable laws.

### **Your Consent**

We collect personal information only when you provide explicit consent. By using our services or submitting information, you agree to the collection, use, and disclosure of your personal data as outlined in this policy. You may withdraw your consent at any time by contacting us at [support@swift-net.ca](mailto:support@swift-net.ca). Withdrawal of consent may affect the services we can provide.

### **Access To Your Data**

You have the right to access the personal information we hold about you. If you find any inaccuracies or wish to request deletion of your data, please contact us at [support@swift-net.ca](mailto:support@swift-net.ca). We will respond within 30 days and fulfill your request where applicable under law.

### **Data Retention**

We retain your personal information only as long as necessary to fulfill the purposes for which it was collected or as required by law. Once no longer needed, your data will be securely destroyed or anonymized.

### **Children's Data Protection**

Our services are not directed at individuals under the age of 13. We do not knowingly collect personal information from children without parental consent. If we become aware of such collection, we will take steps to delete the data promptly.

### **Data Sovereignty**

All personal information stored by Swift-Net is stored within our data centres, or cloud providers located within Canada. This includes, but is not limited to Amazon AWS, Google Cloud Platform, or Microsoft

Azure. The security of data stored with these providers is governed by their security and privacy policies. Other operational service providers' data storage locations are located within Canada where possible.

### **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**

If you have concerns about how we manage your personal information, please contact our Privacy Officer at [support@swift-net.ca](mailto:support@swift-net.ca). If unresolved, you have the right to file a complaint with the Office of the Privacy Commissioner of Canada.

**Phone:** 1-866-867-2375

**Email:** [support@swift-net.ca](mailto:support@swift-net.ca)

**Website/Chat:** [www.swift-net.ca](http://www.swift-net.ca)