

# PRIVACY POLICY

## COMMITMENT TO PROTECTING CUSTOMER PRIVACY

Suttle-Straus, Inc. (“Suttle-Straus”), is dedicated to providing superior customer satisfaction and is committed to protecting customer privacy. Suttle-Straus takes this responsibility seriously as a key component to earning and maintaining its customers’ trust.

## SCOPE

This Privacy Statement applies to Suttle-Straus and any Third Party with whom we share or collect Confidential Personal Information. Third Party refers to agents, vendors, suppliers, subcontractors, and independent contractors. By subscribing to our services or accessing our Web sites, you agree to our collection and use of your information as described in this Privacy Statement as may be amended from time to time. It does not apply to services, products, or Web sites that do not display or link to this Privacy Statement or that have their own privacy statements.

## COLLECTION OF YOUR CONFIDENTIAL PERSONAL INFORMATION

Confidential Personal Information is information that relates to you and identifies or can be used to identify you. This information includes your name, billing address, social security number, driver’s license number, credit card number, bank account number, email address, and credit information. Suttle-Straus may collect Confidential Personal Information for those purposes specified in this Privacy Statement, and as otherwise permitted by law.

We may collect Confidential Personal Information through a business office, over the phone, or online. You may choose to provide this information to us through a number of interactions such as by:

- Ordering a product or service from us
- Sending us an email
- Registering to receive information about our products or services
- Applying for a job or a grant; or
- Entering a contest.

We may also collect this information about you from trusted agents who are authorized to sell our products and services, or from employees of our Affiliates. Affiliates refers to any of the Telephone and Data Systems, Inc. owned companies.

We may ask you questions to better serve your special needs and interests. For example, we may ask whether you work at home, whether any members of your household have special needs or whether teenagers reside in your household in order to determine whether you may be interested in certain services. For training or quality assurance, we may also monitor or record our calls with you.

As part of network operations and when you visit a Suttle-Straus Web site, we automatically collect certain information such as your domain type, your IP address, and click stream information to gauge the effectiveness of our Web sites, improve our online operations, enhance your online experience with customized content, and focus our marketing efforts to better meet the needs of our customers. We also may collect Confidential Personal Information if you order a product or service through one of our Web sites the same as we would if you called us on the phone to place an order.

We may store small data files known as cookies, or other similar technologies, on your computer or mobile browser when you visit one of our Web sites. Cookies allow Suttle-Straus to personalize your service by collecting and storing information that will identify you when you visit a Web site. Cookies also allow us to collect ‘Web site usage’ information when you visit our Web sites, including IP address, Web browser and operating system types, Web pages visited on our Web sites, time spent on our Web pages, and return visits to our Web sites.

We do not use cookies to identify or track any personal information other than personal information linked to your browser and IP address, which may be considered personal information in some countries. If you do not wish to have a cookie sent to your browser, you can change the settings on your internet browser to stop it from automatically accepting cookies, or you can exercise choices to opt-out of advertising cookies at [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices) or [www.optout.aboutads.info](http://www.optout.aboutads.info). You may be able to disable cookies on your computer; however if you do so, you may limit your experience on that Web site, including finding pricing and availability of products and services in your area from our Web site. You can set your browser to delete cookies or to tell you before you accept one. Look in your browser's Options or Preferences menu.

"Do Not Track" signals are options available on your browser to tell operators of websites that you do not wish to have your online activity tracked. Our Site operates no differently if these "Do Not Track" signals are enabled or disabled.

Suttle-Straus is not responsible for the practices, including the use of cookies, employed by Web sites linked to or from our Web site or for the content contained therein. The Web sites and services you are able to access on the Internet are outside the control and limits of this privacy policy.

## USE OF YOUR CONFIDENTIAL PERSONAL INFORMATION

Suttle-Straus may collect personal data with your consent or for purposes that are necessary for Suttle-Straus's legitimate interest in the operation of our business. For example, we may use your Confidential Personal Information to provide you with and manage the services you request, communicate with you to maintain good customer relations or to suggest new products and services that may be of interest to you, personalize the content we deliver, conduct industry or consumer surveys, manage, improve and troubleshoot our network and services, enforce our Terms of Service, or for any purpose otherwise permitted or required by law.

Suttle-Straus uses the information collected on its Web sites to provide you with the information you requested. When you use our Web sites to order products or services, or to request information about them, we may use the information we have about you as we would use the same information obtained offline – for example, to evaluate your service needs and contact you regarding additional services you may find useful. You may also submit applications for employment online, and we will use the information you provide to consider you for employment.

There may be instances when Suttle-Straus may access or disclose Confidential Personal Information without notice or your consent in order to: (i) investigate, establish, protect or defend the legal rights or property of Suttle-Straus, our Affiliated Companies or their employees, agents and contractors (including enforcement of our agreements); (ii) protect the safety and security of customers or members of the public including acting in urgent circumstances; (iii) protect against fraud or for risk management purposes; or (iv) comply with the law or legal process such as a subpoena. In addition, if Suttle-Straus sells all or part of its business or makes a sale or transfer of all or a material part of its assets or is otherwise involved in a merger or transfer of all or a material part of its business, Suttle-Straus may transfer your Confidential Personal Information to the party or parties involved in the transaction as part of that transaction.

If we obtain Confidential Personal Information from a Third Party, our use of that information is also governed by this Privacy Statement.

Suttle-Straus does not make decisions that have legal effects on people due solely to automated processing of personal data.

## COLLECTION AND USE OF CHILDREN'S CONFIDENTIAL PERSONAL INFORMATION

Suttle-Straus's Web sites and services are intended for general audiences. In order to respect the privacy of children online, Suttle-Straus does not knowingly collect, maintain or process Confidential Personal Information submitted by children under the age of 13.

## SHARING OF YOUR CONFIDENTIAL PERSONAL INFORMATION

We will not disclose your Confidential Personal Information without your express or implied consent outside of Suttle-Straus, its Affiliates, or its authorized agents other than as described in this Privacy Statement.

Suttle-Straus may share Confidential Personal Information for purposes permitted by law without your consent such as to help initiate, render, bill, and collect for its products and services.

Your Confidential Personal Information may be shared with Affiliates and Third Parties with your consent for the purposes of marketing our products and services. Depending on the circumstance, notice and opt-out may be a permissible means of obtaining your consent.

Affiliates and Third Parties are permitted to obtain only the Confidential Personal Information they need and are prohibited from using it for any purpose other than those permitted by law or with your consent. When we use service providers to assist us in processing your Confidential Personal Information, we require that they comply with this Privacy Statement and maintain appropriate privacy and security measures.

Suttle-Straus does not sell your Confidential Personal Information to Third Parties for any purpose other than to enforce our rights under the Terms of Service or as expressly stated in this Privacy Statement. For example, we may sell past-due accounts receivable in an effort to collect for unpaid services. In addition, if Suttle-Straus sells all or part of its business or makes a sale or transfer of all or a material part of its assets or is otherwise involved in a merger or transfer of all or a material part of its business, Suttle-Straus may transfer your Confidential Personal Information to the party or parties involved in the transaction as part of that transaction.

## CALIFORNIA PRIVACY RIGHTS

A business subject to California Civil Code section 1798.83 is required to disclose to its customers, upon request, the identity of any Third Parties to whom the business has disclosed “personal information” regarding that customer within the immediately preceding calendar year.

If you are a California resident and would like to make such a request, please submit your request in writing to:

Suttle-Straus  
Attention: Legal Dept.  
PO Box 370  
Waunakee, WI 53597

Please note that California businesses are only required to respond to a customer request once during the course of any calendar year.

## ACCESSING YOUR CONFIDENTIAL PERSONAL INFORMATION

Suttle-Straus takes reasonable measures to assure that the Confidential Personal Information we use about you is accurate, complete, and up-to-date. We make good faith efforts to provide you with access to your Confidential Personal Information either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes.

Customers who wish to review and/or edit their Confidential Personal Information may do so by contacting us at the number provided on their billing statement or at the number posted on the Suttle-Straus website under Contact Us.

We may decline to process requests for information that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. If you believe that Suttle-Straus may be

processing data about you and wish to have access to that information, we can provide you with that data or at least an explanation of why we cannot do so in the particular context, such as when only our client or vendor, the data controllers, have the right to provide such access, or if responding to the request would be unreasonably expensive.

For United States residents, we undertake marketing only in compliance with the CAN-SPAM Act, the Telephone Consumer Protection Act, and other applicable law. For European Union residents, we undertake marketing only with your expressive affirmative consent and in compliance with applicable data privacy laws. EU residents will not be added to the marketing lists unless they have already provided express affirmative consent consistent with applicable data protection laws.

## DATA RETENTION

We store personal data for different periods of time consistent with the purposes for which they were originally collected, as subsequently further authorized, or when required or allowed under applicable law.

## COMMUNICATION PREFERENCES

If you do not want Suttle-Straus to use your Confidential Personal Information to contact you for marketing or solicitation purposes (excluding notices about your existing account), you may make this request to [info@suttle-straus.com](mailto:info@suttle-straus.com). Customers may also make this request to Suttle-Straus, Attn: Legal Dept, PO Box 370, Waunakee, Wisconsin 53597.

When writing to us, please specify which contact methods (phone calls, mail, bill inserts, or email messages) you would prefer that we do not use to communicate to you for the purposes outlined above. Keep in mind that restricting contact methods may make it more difficult for us to keep you informed about new products and services that can be of benefit to you. You can revoke these options at any time by contacting us using one of the methods provided.

These choices do not apply to the display of online advertising or the receipt of mandatory service communications that are considered part of certain Suttle-Straus services, which you may receive periodically unless you cancel the service.

If you request to not be contacted by phone for marketing or sales purposes, please note that the Suttle-Straus Do Not Call List restricts these types of phone contacts from Suttle-Straus only, so you may continue to receive calls from other companies. If you would like to add your number to the National Do Not Call List, you may do so by calling 1-888-382-1222 or going online at [www.donotcall.gov](http://www.donotcall.gov).

## SECURITY OF YOUR CONFIDENTIAL PERSONAL INFORMATION

Suttle-Straus takes reasonable security safeguards to protect against such risks as loss or unauthorized access, destruction, use, modification, or disclosure of Confidential Personal Information.

We restrict access to Confidential Personal Information to Suttle-Straus employees, employees of our Affiliates, and authorized Third Parties who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Customers should not provide their account information or pin to anyone other than Authorized Users on their account. Customers are encouraged to protect their computer and passwords against unauthorized access. When accessing information online, customers should sign off when finished using a shared computer and always log out of any Web site after viewing Confidential Personal Information.

We will not store Confidential Personal Information beyond what is necessary for business purposes, including for internal service evaluation and quality assurance purposes, except as otherwise required by law.

## **DATA ACCESS, THE RIGHT TO BE FORGOTTEN, AND DISPUTE RESOLUTION**

Individuals in Europe have certain data subject rights that may be subject to limitations and/or restrictions. These rights may include the right to: (i) request access to and rectification or erasure of their personal data; (ii) restrict processing or object to processing of their personal data; and (iii) the right to data portability. If you wish to exercise one of the above-mentioned rights, please send us your request via email at the end of this policy. In Europe, individuals may also have the right to lodge a complaint about the processing of their personal data with their local data protection authority.

Please also let us know if you have any questions, concerns, disputes, or issues. We are always open to dialogue to resolve issues. If your concerns cannot be resolved, we can enter into appropriate third-party neutral dispute resolution. If you need to reach us about a privacy or data protection issue, please contact us at the address below.

## **ENFORCEMENT OF THIS PRIVACY STATEMENT**

Our employees, agents, and Affiliates are trained regarding their responsibilities to safeguard your privacy. They are required to adhere to a Code of Business Conduct, this Privacy Statement, and Suttle-Straus's policies which support our commitment to protecting customer privacy. Failure to comply with the Code, this Privacy Statement, or Suttle-Straus's policies may result in disciplinary action up to and including termination of employment.

If employees or Third Parties become aware of practices that raise privacy concerns, they are required to report them to their supervisors or to contact Suttle-Straus's Incident Response Team.

## **CHANGES TO THIS PRIVACY STATEMENT**

We reserve the right to modify this Privacy Policy Statement at any time without notice. The Privacy Policy Statement posted at any time or from time to time via the Site shall be deemed to be the Privacy Policy Statement then in effect. By continuing to use the Site following the posting of changes, you expressly accept and agree to abide by the terms set forth in the amended Privacy Policy Statement.

## **CONTACTING US**

Suttle-Straus welcomes your comments regarding this Privacy Statement. If you have questions about this Privacy Statement or believe that we have not adhered to it, please contact us by writing to us at the following address:

Suttle-Straus  
Attn: Legal Dept.  
PO Box 370  
Waunakee, WI 53597

This Privacy Policy Statement was last updated on and effective as of May 24, 2018.