**ISP Management, Inc.**

**Technology Network Communication Access, LLC,**

**Privacy Policy**

**Version 1.2, Effective July 1st, 2020**

**Disclosure**

ISP Management, Inc., a Michigan Corporation is One Hundred Percent (100%) owner of the Membership Interest of Technology Network Communication Access, LLC, sometimes referred to as “TNC Access” or “TNC Access LLC” and ISP Wireless Group, Inc. Hereafter, the term “ISP” shall fully encompass all of these legal entities in regards to the policies set forth herein.

**Your Privacy Matters**

This Privacy Policy (“Privacy Policy” or “Policy”) sets forth how the ISP collects and uses personal information of the ISP’s customers when they use the ISP’s products, services, networks, or platforms (collectively “Services”). It also applies to the information that the ISP collects about customers from third parties using Services, you agree to be bound by the terms and conditions of this Privacy Policy, as they may be amended from time to time in the future (see "Changes to This Privacy Policy," below). Any capitalized terms not otherwise defined herein shall have the meanings assigned to them in the ISP’s Terms of Service.

**Introduction**

The ISP is committed to maintaining the confidentiality, integrity, and security of any Personal Information (defined below) about the ISP’s Customers. This Privacy Policy explains how we protect Personal Information provided through our Site and Platform and how we use that information in connection with the Site and Platform, subject to the state and federal laws of the United States.

In this Policy we use the term “Personal Information” to describe information that can be associated with an individual and can be used to identify that individual. We do not consider Personal Information to include information that has been anonymized or aggregated so that it does not identify an individual. You represent that if you give us Personal Information on behalf of someone else, the person providing the Personal Information to you gave you consent to provide their individual information to the ISP. If someone else gives us Personal Information on your behalf, you represent that you gave that person consent to provide your Personal Information to the ISP.

The Privacy Policy applies when you:

* Agree to the ISP’s Terms of Service;
* Visit or utilize a website on which this Policy is posted;
* Utilize one of the ISP’s Services; or
* Interact with the ISP off-line or online.

This Policy does not apply to the non-ISP products, services, or websites that you may use through the ISP’s platforms. For example, if you subscribe to the ISP’s internet service and visit a news or shopping website, the privacy policy for that website will apply. If you use our platform to use a streaming service, the privacy policy for that streaming service will apply to information it collects. Likewise, if you connect your smart thermostat to your internet service, the privacy policy of the smart thermostat company will apply to the information it collects.

The ISP stresses its privacy and security standards to guard against identity theft and provide security for your Personal Information. We regularly re-evaluate our privacy and security policies and adapt them as necessary to deal with new challenges.

**Terms and Conditions**

By accepting this Privacy Policy, you represent that you have read, understood, and accepted the ISP’s Terms of Service, which are available at [www.ispmgt.com/legal](http://www.ispmgt.com/legal) and/or [www.tncaccess.com/legal](file:///C:\Users\jeff\Dropbox\Executive%20Documents\www.tncaccess.com\legal) . **If you do not agree with this Privacy Policy, do not access or use our services or interact with any other aspect of our business.**

**Personal Information We Collect**

We collect information from you, including Personal Information, when you voluntarily provide information to us. Examples of instances when we collect Personal Information from you include when you register to open an account, answer questions on our Site, complete a survey or otherwise provide feedback regarding our Services, and contact us with questions.

If you allow others to use your ISP accounts or Services, we will also collect personal information about those individuals. If you are not an ISP customer, but use our Services through someone else’s account, we will collect information about you, but it may not identify who you are to us. We may also collect information about you from third parties.

We may collect this information to provide our Services, respond to your requests, and to tailor our Services to best meet your needs and interests.

We may collect the following Personal Information from you:

* Contact information such as first name, last name, and email address;
* Phone number;
* Billing/Payment information; and
* Physical address.
* Date of Birth
* Social Security Number
* Drivers License Number
* Security PIN

We also may collect the following information from you:

* Your user preferences, product and service interests, communication choices, and other user profile information, including feedback and user-generated data; and
* Interest in and use of advertising, marketing, and offers in conjunction with use of the Services.

When you use our Services, we may automatically record information such as browsing activity and data displayed or clicked on (such as UI elements, ads, and links) and collect other information such as the type of device you use, browser type, operating system version, IP address, data and time of access, and device identifier (or "UDID"). We do not otherwise collect your location-based information.

**How We Use Your Information**

The ISP stores, processes, and maintains data related to you in order to provide support, offer new products and services, and provide our Services to you in accordance with the rules of regulatory bodies. You may choose not to provide such information to us, but if you choose not to provide such information, you will not be able to participate in the Services, register as a Customer, or open an Account.

The ISP uses and discloses your Personal Information only as follows:

* To Provide the Services
  + Setting up your account and account management
  + Measure credit and payment risk
  + Service delivery
  + Billing and invoicing
  + Authenticating access to your account
  + Maintenance and operations, including management of the network and devices supporting our service and our systems
  + Provide technical support
  + Help with hardware and software upgrades for devices and systems
* To Communicate with You
  + Respond to your questions
  + Personalize communications
  + Send you service-related announcements
* To Understand Your Use of and Make Improvements to Our Services
  + Understand the use of our existing Services
  + Identify and develop new products and services
  + Create measurement and analytics reports for us and others
* To Provide Recommendations and Deliver Relevant Advertising
  + Market the Services
  + Let you know which products and services we think may be of interest to you
  + Help third-party advertisers and programmers deliver more relevant advertising on our Services and other services and platforms
* To Investigate Theft or Other Illegal Activities and to Ensure a Secure Online Environment\
  + Detect the unauthorized use, or abuse of the Services
  + Protect our customers from fraudulent, abusive, or unlawful use of the Services
  + Protect our rights, our personnel, and our property
  + Comply with applicable law
* To enforce the ISP’s Terms of Service; and
* As otherwise set forth in this Privacy Policy.

The ISP may use your Personal Information to communicate with you regarding the Platform or to email you about services that we believe may be of interest to you. If you decide at any time that you no longer wish to receive marketing emails from us, please follow the “unsubscribe” instructions provided in the emails. Please note that you cannot opt out of administrative emails such as regulatory, billing, or service notifications.

You also authorize ISP to use information about you that is publicly available or available directly or indirectly from credit reporting agencies in verifying your identity, performing background checks, investigating suspicious activity, or for any other purpose for so long as your Account is open or any amount is owed to the IP. You authorize the ISP to obtain consumer credit and other reports from any consumer reporting agency or provider of publicly available background information to gather information necessary in the sole discretion of the ISP.

**How We Share Your Information**

We will not sell, rent, or trade your Personal Information to any unaffiliated third parties. This includes your Internet usage information, video usage information, or call detail information. We will not otherwise disclose your Personal Information to unaffiliated third parties except as provided for in this Privacy Policy or as required by law, such as to comply with a subpoena or similar legal process, or when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

There are certain circumstances, outlined below, in which we may share your Personal Information without further disclosure to you. From time to time, we hire other companies to perform certain business and technology related functions (e.g., database maintenance, technical support, installation / repair services and payment processing). In the case we hire another company to perform a function of this kind, we will provide that company only with the minimum information they need to perform their specific function(s). The ISP maintains physical, electronic, and procedural safeguards that comply with applicable federal and state laws, rules, and regulations to safeguard Personal Information.

We may share information about a Customer’s account and use of a Service to the primary account owner following appropriate authentication. The primary account owner may also allow others to see information on the account.

If the ISP is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

**Security**

The security of your Personal Information is important to us. You acknowledge that, to the extent described in this Privacy Policy, the ISP uses authentication and encryption to protect the Service, website, and your information. When you enter sensitive information, such as a credit card number or financial information, on our forms, we encrypt the transmission of that information using transport layer security (TLS).

We follow industry-standard practices to secure the information we collect to prevent the unauthorized access, use, or disclosure of any personal information we collect and maintain. These security practices include technical, administrative, and physical safeguards, which may vary, depending on the type and sensitivity of the information. Although we take the responsibility of safeguarding your personal information seriously, no security measures are 100% effective and we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose your information. We do not warrant or guarantee secure access of the ISP’s Services or website.

**The Communications Act and CPNI**

Section 222 of the Communications Act of 1934, as amended (the “Communications Act”), provides additional privacy protections for information about the quantity, technical configuration, type, destination, location, and amount of your use of telecommunications services, and the information about those services contained on your bills for those Services. This information is known as customer proprietary network information or “CPNI.” CPNI does not include your name, address, or telephone number, which is defined by the Communications Act as “subscriber list information.” However, that information is otherwise considered personally identifiable information.

If you are a customer of one of the ISP’s Services that is subject to these requirements, you have the right, and the ISP has a duty, under the Communications Act and other applicable laws, to protect the confidentiality of your CPNI. In addition, the FCC’s rules provide additional privacy protections and choices regarding use and sharing that are specific to our VoIP service that we describe in this Policy.

**User Access and Choice**

If the Personal Information on file for you changes, or if you no longer desire to use our Services, you may correct, update, amend, delete/remove, or deactivate that information by emailing [staff@ispmgt.com](mailto:staff@ispmgt.com) or calling (989) 466-6104.

We will retain your Personal Information for as long as your account is active or as needed to provide you the Services. We will continue to retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

You may decline to provide Personal Information to the ISP. Declining to provide Personal Information may, however, disqualify you for an account and Services features that require certain Personal Information.

**Other Important Information**

Social Media and Links to Other Websites and Apps: Third Parties

This Privacy Policy applies only to the ISP and the ISP’s Services and website. Customers may use the ISP’s Services to access websites and applications that are not operated or controlled by the ISP. The ISP policies described herein do not apply to such third-party websites or apps. We encourage you to carefully read and understand any and all policies of such third-party websites or apps.

Minors

The Services are not intended to be used by anyone under the age of 13 and, as such, does not knowingly collect Personal Information from anyone under the age of 13. If you are under the age of 13, please do not use the Services and do not submit any Personal Information to the ISP. If a parent or guardian becomes aware that his or her child under the age of 13 has provided us with Personal Information without his or her consent, he or she should contact us at billing and we will delete such information from our files.

**Changes to this Privacy Policy**

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes we will notify you by email or by means of a notice on our website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

**Contact Us**

If you have any questions about our Privacy Policy, please contact us at the information below.

ISP Management, Inc.

TNC Access, LLC,

302 W. Center Street

Alma, MI 48801

staff@ispmgt.com