



# PRIVACY POLICY

**EFFECTIVE DATE:** November 4, 2013

As you purchase and use products or services offered through ProtectCELL, or use the [www.protectcell.com](http://www.protectcell.com) website, we want you to be clear how we're using information you share with us and the ways in which you can protect your privacy. This Privacy Policy describes the types of personal information we collect, how we use the information, with whom we share it, and the choices you can make about our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices.

By using the [protectcell.com](http://protectcell.com) website and/or purchasing products or services from ProtectCELL, you agree to be bound by the terms of this Privacy Policy. The Privacy Policy may be amended, modified, or otherwise changed from time to time and any such amendments, modifications, or changes are effective upon posting of the Privacy Policy on [www.protectcell.com](http://www.protectcell.com) as amended, modified, or changed. Your use and access to the [www.protectcell.com](http://www.protectcell.com) website following such posting will constitute your acceptance of the new Privacy Policy. It is your responsibility to be aware of the current Privacy Policy.

If you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these [key terms](#) first.

Your privacy matters to ProtectCELL, so whether you are new to ProtectCELL or a long-time customer, please take the time to get to know our practices – and if you have any questions, [contact us](#).

Our Privacy Policy explains:

- [What information we collect](#)
- [How we collect information about you](#)
- [How we use the information we collect](#)
- [How we protect your personal information](#)
- [What information we share](#)
- [Your rights and choices about the collection of your personal information](#)
- [Links to other websites](#)

## What Information We Collect

We may collect different types of personal and other information based on your use of our products and services and our business relationship with you. Some examples include:

- Contact information that allows us to communicate with you – including your name, address, telephone number, and e-mail address;
- Billing information related to your financial relationship with us – including your payment data, credit card number, and service history;
- Equipment, service plans and membership information, ProtectCELL website usage, and other technical information about your use of ProtectCELL services, products or websites;
- Other information, such as shopping behavior and preferences, IP address, and referring URLs, collected automatically through cookies and pixel tags that track your use of our website.

### **How We Collect Information about You**

We collect personal information about you in three ways:

#### **You provide it to us directly**

You give us your information when you purchase or interact with us about a product or service we offer or provide, or in connection with an actual or potential business or employment relationship with us.

#### **Automatically**

We automatically collect information, such as IP address, browser type, operating system, referring URLs, information on actions taken on a website, and dates and times of website visits, when you visit our website or use our products and services, through the use of cookies and pixel tags.

#### **Other sources**

We obtain it from other sources, such as vendor partners.

### **How We Use the Information We Collect**

We may use the information we collect about you in several ways:

- Create and manage your online account, provide the products and services you purchase, and respond to your questions;
- Provide, administer, and communicate with you about products, services, updates, and promotions (including contests, sweepstakes, programs and other offers);
- Monitor the use and improve the quality of our interactive assets;
- Address network integrity and security issues;
- Comply with applicable legal requirements, industry standards, and investigate, prevent or take action regarding illegal activities;
- Perform data analyses (including anonymization of personal information);
- Evaluate your interest in employment and contact you regarding possible employment with ProtectCELL.

We also may use the information in other ways for which we provide specific notice at the time of collection, and give you the option to decline to participate at the time of collection.

### **How We Protect Your Personal Information**

ProtectCELL maintains appropriate administrative, technical, and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.

We restrict access to personal information to ProtectCELL employees, contractors, agents, and third-party business partners who need to know that information in order to process it for us to achieve any of the goals listed in the section entitled, "How We Use the Information We Collect." Any employee, contractor, agent, or third-party business partner in contact with personal customer information is subject to strict contractual data confidentiality obligations.

### **What Information We Share**

We do not share personal information with companies, organizations, or individuals outside of ProtectCELL unless one of the following circumstances applies.

#### **With your consent**

We will share personal information with companies, organizations, or individuals outside of ProtectCELL when we have your consent to do so. We require opt-in consent for the sharing of any sensitive personal information.

#### **For external processing**

We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

#### **For legal reasons**

We will share personal information with companies, organizations, or individuals outside of ProtectCELL if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request.
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of ProtectCELL, our users, or the public as required or permitted by law.

### **Non-personally identifiable information**

We may share aggregated, non-personally identifiable information publicly and with our partners – like publishers, advertisers, or connected sites. For example, we may share information publicly to show trends about the general use of our services.

### **Merger, acquisition, or asset sale**

If ProtectCELL is involved in a merger, acquisition, or asset sale, we reserve the right to transfer personal information we have about you as part of a sale or transfer of all or a portion of our business or assets. In such an event, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## **Your Rights and Choices about the Collection of Your Personal Information**

ProtectCELL offers you certain choices about what personal information we collect from you, how we use that information, and how we communicate with you.

### **Direct collection of your information**

You may choose not to provide personal information directly to ProtectCELL.

### **Cookies**

You may elect not to have a unique cookie identification number assigned to your computer to avoid aggregation and analysis of data collected on our website. If you would like to opt out, set your browser so it does not accept cookies, and delete cookies after each session.

Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Please note, however, that without cookies you may not be able to take full advantage of all our website features.

### **Marketing communications**

ProtectCELL may contact you by email, text, mail, or phone regarding your current ProtectCELL products in accordance with National Do Not Call Registry standards. We require your express consent to send you promotional emails, and your prior express written consent is required for us to contact you with promotional offers by phone or by text. You may change your opt-out preferences anytime by:

- Logging into your account at [www.protectcell.com](http://www.protectcell.com);
- Emailing your request to [opt-out@protectcell.com](mailto:opt-out@protectcell.com);
- Speaking with a ProtectCELL Customer Service Representative at 877.775.3274; or
- Writing us at Digital Leash, LLC d/b/a ProtectCELL. 39500 High Pointe Blvd., Suite 250, Novi, MI 48375.

You may also tell us not to send you marketing communications by e-mail by clicking on the unsubscribe link within the marketing e-mails you receive from us.

You may receive from other entities promotional postal mail that contains a ProtectCELL logo. Please contact those entities to exercise your choices regarding these communications.

#### **Data analysis**

Contact us to opt out of any data analysis of anonymized personal information.

#### **Withdraw your consent**

You may withdraw any consent you previously provided to ProtectCELL, or object at any time on legitimate grounds, to the processing of your personal information. We will apply your preferences going forward. In some circumstances, withdrawing your consent to ProtectCELL's use or disclosure of your personal information will mean that you cannot take advantage of certain products or services we offer.

Subject to applicable law, you may have the right to request access to and receive information about the personal data we maintain about you, update and correct inaccuracies in your personal data, and have the information blocked or deleted, as appropriate. The right to access personal information may be limited in some circumstances by local law requirements.

To update your preferences, ask us to remove your information from our mailing lists, or submit a request, please contact us.

In accordance with California Civil Code Sec. 1789.3, California residents using this website or purchasing ProtectCELL products or services are entitled to know that they may file grievances and complaints with the California Department of Consumer Affairs, 400 R. Street, Suite 1080, Sacramento, CA 95814; by phone at 916 445-1254 or 800 952-5210; or by email at [dca@dca.ca.gov](mailto:dca@dca.ca.gov). For more information about protecting your privacy, you may visit [www.ftc.gov](http://www.ftc.gov).

#### **Contact us**

To request removal from ProtectCELL marketing communications, email us at [opt-out@protectcell.com](mailto:opt-out@protectcell.com).

Or you may send your request in writing to:

ProtectCELL  
Attn: Opt-Out Request  
39500 High Pointe Blvd.  
Suite 250  
Novi, MI 48375

#### **Links to other websites**

ProtectCELL's website may provide links to other websites for your convenience and information. These websites may operate independently from ProtectCELL, and may have their

own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not owned or controlled by ProtectCELL, we are not responsible for the sites' content, any use of the sites, or the privacy practices of the sites.

## Key terms

1. Personal information
2. Cookie
3. Anonymous identifier
4. IP address
5. Server logs
6. Sensitive personal information
7. Non-personally identifiable information
8. Pixel tag

### **Personal information**

This is information that you provide to us that personally identifies you, such as your name, email address or billing information, or other data that can be reasonably linked to such information by ProtectCELL.

### **Cookie**

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies.

### **Anonymous identifier**

An anonymous identifier is a random string of characters that is used for the same purposes as a cookie on platforms, including certain mobile devices, where cookie technology is not available.

### **IP address**

Every computer connected to the Internet is assigned a unique number known as an Internet protocol (IP) address. Since these numbers are usually assigned in country-based blocks, an IP address can often be used to identify the country from which a computer is connecting to the Internet.

### **Server logs**

Like most websites, our servers automatically record the page requests made when you visit our sites. These “server logs” typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.

**Sensitive personal information**

This is a particular category of personal information relating to confidential medical facts, racial or ethnic origins, political or religious beliefs or sexuality.

**Non-personally identifiable information**

This is information that is recorded about users so that it no longer reflects or references an individually identifiable user.

**Pixel tag**

A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking activity on websites, or when emails are opened or accessed, and is often used in combination with cookies.