

Celerity Fiber Privacy Policy Notice ("Notice" and/or "Policy")

Effective Date: January 1, 2025

Thank You for Choosing Celerity Fiber!

This Celerity Fiber, LLC ("Celerity Fiber", "we", "our" or "us") Privacy Policy describes the types of information Celerity Fiber collects when you subscribe to, use, and/or access Celerity Fiber Services ("Services") or websites that post a link to this Policy. By using our Services or accessing and using a Celerity Fiber website, you agree to the terms and conditions of this Privacy Policy and any updates we make to it. This Privacy Policy is part of the Terms of Service governing use of our Services.

Celerity Fiber is responsible for processing your personal data, as outlined in this Privacy Policy, unless stated otherwise.

This Privacy Policy (hereinafter referred to as the "Policy") explains, in detail, how we collect, use, and process your personal information and that of your customers when you browse our website or use Celerity Fiber's services (the "Services").

Personal Information and Data

The personal information you provide to Celerity Fiber through the Services is governed by this Policy. You are responsible for maintaining the confidentiality of your username, password, and other account-related information.

For purposes of this Policy, "**Personal Data**" refers to any information related to an identified or identifiable person.

This Policy outlines our practices (and your options) regarding the collection, use, and disclosure of certain Personal Data, as well as any information related to the Services.

IMPORTANT:

Before browsing our website or using our Services, please read this Policy carefully. If you do not agree with this Policy, you must refrain from using the website and Services.

At Celerity Fiber, safeguarding your privacy and personal data is a top priority. We aim to offer full transparency about the information we collect and how you can manage your data preferences. By accepting Celerity Fiber's Terms, you agree to the collection and processing of your personal information as described in this Policy.

We may update this Policy from time to time to reflect changes in our practices. When we do, we will revise the “Effective Date” at the top. You will be notified of any material changes through reasonable means, such as prominent notice on our website or direct communication when required by applicable law.

We encourage you to review this Policy periodically to stay informed about how we collect, process, and share your information. Past versions of this Policy will also be archived for your reference.

For any questions regarding this Policy or how we process your data, you can contact us at **legal@celerityfiber.com**.

Scope

This Notice also applies when you use or access our website, located at www.celerityfiber.com and its subdomains or portals (the “Site”) or otherwise provide Personal Information or interact with us electronically, over the internet or email. For the purpose of this Notice, “Personal Information” means any personal information relating to an identified or identifiable individual that is protected by applicable privacy laws and rules of professional conduct. We refer to all of the above and all services we provide to our clients as Services. Our Services are used by our clients (“Clients”), individuals who visit our Site (“Site Visitors”) and individuals applying for employment with us (“Employment Applicants”). By using the Services offered through the Site, you agree that your Personal Information shall be subject to this Notice. Where applicable, we indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide Personal Information when requested, you may not be able to benefit from our Services if that Personal Information is necessary to provide you with the Services or if we are legally required to collect it. If you have any questions about this Privacy Notice, please contact us at **legal@celerityfiber.com**.

Exclusions – Third-Party Websites

Celerity Fiber’s website may contain links to third-party websites. The privacy practices and content of these websites are governed by their own privacy policies. We encourage you to review the privacy policies of any third-party website you visit to understand their data handling practices.

Information We Collect

When you interact with Celerity Fiber (whether through our website, events, or Services), when you subscribe to, use or access our Services, we may collect Personal Data, as described below:

- **Direct Information:** Information you actively provide when registering for an account, attending events, subscribing to newsletters, requesting customer support, or purchasing Services. This may include your name, social security number, state-issued driver's license number or other government issued identifiers, email address, phone number, billing address, service address, and payment details.
- **Website Interaction:** We automatically log information such as how you arrived at our website, the pages you visit, and which features you use.
- **Account Information:** Data collected when you create, use or update your Celerity Fiber account, including information provided to authenticate your access to the Services, including login credentials, password, images, voice-recordings or other personal identifiers, contact details, custom settings, preferences, additional information about the Services options you have chosen, and billing information. Collected Data will also include maintenance records, service records, customer correspondence and other communications records, including records of calls, chats and texts with our customer service department.
- **Payment Data:** If you purchase our Services, we collect billing and payment details, which may include credit card information or bank account details. Payments are processed securely via third-party payment processors.
- **Mobile App Data:** If you use our mobile applications, we automatically collect device type, operating system, carrier, and location data (where applicable).
- **Usage Information:** Actions you take within our Services (like sharing, editing, or creating files) and network traffic data are recorded to enhance our user experience and improve service quality.
- **Device and Equipment Information:** We collect device-specific data such as IP address, browser type, operating system, and device/equipment identifiers to detect fraud, improve performance, and troubleshoot issues.
- **Cookies and Tracking:** We use cookies and similar technologies to remember your preferences, enhance website performance, and deliver relevant content and ads. You can control cookie settings through your browser, but disabling cookies may impact certain features.

- **Third-Party Sources:** We may gather publicly available data from sources like social media platforms, review sites, and event organizers to improve our outreach efforts and personalize communications. However, no mobile information will be shared with third parties/affiliates for marketing/promotional purposes. Information sharing 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.
 - **Identifiers:** Your IP address, IDFA, Android/Google Advertising ID, IMEI, or another unique identifier.
 - **Statistical information:** About how both unregistered and registered users, collectively, use the Site and Services. This aggregate information is derived from Personal Information but cannot be tied back to you or your web browser.
-

How We Use Your Information

Celerity Fiber uses your data to:

- Provide and maintain the Services.
- Customize and improve user experience.
- Process transactions and manage billing.
- Communicate service updates, marketing offers (with consent), and support alerts.
- Conduct research, analytics, and reporting.
- Comply with legal obligations and protect against fraud or misuse.

Most data processing activities are based on:

- Contractual necessity to provide the Services.
 - Legitimate interests (e.g., improving product offerings).
-

Information Sharing

Celerity Fiber may share Personal Data with:

- **Service Providers:** Hosting, payment processing, analytics, and customer service providers who process data on our behalf under strict confidentiality agreements.

- **Celerity Fiber Group Companies:** To streamline internal operations and reporting.
- **Legal Authorities:** To comply with lawful requests or legal processes.
- **Corporate Transactions:** In case of mergers, acquisitions, or asset sales, your data may be transferred to the new entity.

The sharing of such data may occur in a variety of ways, including without limitation:

To Provide Our Services

We process certain Personal Information when you access or use our Services, including to:

- process your payments for products and Services;
- create and verify user accounts;
- facilitate the functionality of our Site, including payment-related functionality; and
- customize experiences and personalization when you are on our Site.

To Communicate with You

We process certain information in order to communicate with you in relation to your accounts, our Services, our marketing, and your requests, including to:

- communicate with you about our Services;
- send you personalized promotions, content, and special offers; and
- communicate with you about our brands, products, events, or other promotional purposes.

For Improvement of Our Site or Services

We want to ensure that our Site and Services are continually improving and expanding so that we meet and exceed your needs and expectations. To do so, we may process certain Personal Information, including to:

- maintain, improve, and analyze our Site or Services; and
- detect, prevent, or investigate suspicious activity or fraud.

To Comply with Applicable Laws

We may be required to process certain Personal Information under certain laws and regulations, such as tax laws, as well as to:

- maintain appropriate records for internal administrative purposes; and

- comply with applicable legal and regulatory obligations, and respond to lawful governmental requests, as needed.

To Enforce our Terms, Agreements, or Policies

To maintain a safe, secure, and trusted environment for you when you use our Site and Services, we use your Personal Information to ensure our terms, policies, and agreements with you and any third parties are enforced.

To Evaluate Your Application for Employment

We may use your information to evaluate your application for employment or administer employment benefits.

Data Security

Celerity Fiber follows reasonable practices to secure the information we collect, in accordance with applicable law. We implement strong administrative, technical, and physical measures to protect Personal Data against unauthorized access, loss, or misuse. This includes:

- Access controls and encryption.
- Regular security audits and risk assessments.
- Employee training on data protection.

While we take the responsibility of safeguarding your information seriously, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use or disclose your information

Data Retention

We maintain information that personally identifies you in our regular business records while you subscribe to one or more Services. We also maintain this information for a period of time after you no longer subscribe to a Service if the information is necessary for the purposes for which it was collected or to satisfy legal requirements. These purposes typically include business, legal, or tax purposes. If these purposes no longer apply, we will destroy, de-identify, or anonymize the information according to our internal policies and procedures.

All information you provide to us is stored on our secure servers or those of our third-party data storage providers.

We have implemented measures intended to ensure that we will not retain your personal data longer than is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Note, however, that if we have a legitimate interest in retaining the data, or if we are required to do so by applicable law, we will retain the data in accordance with our data retention plans and policies.

In some circumstances we may choose to anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

When deciding how long to keep your information, we consider:

- How long we have had a relationship with you or provided our Services to you;
- Whether we are subject to any legal obligations (e.g., any laws that require us to keep transaction records for a certain period of time before we can delete them)
- Whether we have taken any legal positions (e.g., in connection with any statutes of limitation).

Rather than delete your data, we might de-identify it by removing identifying details.

Your Rights

Depending on your location, you may have rights to:

- Access or obtain a copy of your data.
- Correct inaccuracies.
- Request deletion.
- Restrict processing.
- Object to certain uses (e.g., direct marketing).
- Withdraw consent.
- Port your data to another provider.

To exercise these rights, please contact legal@celerityfiber.com

Children's Privacy

Celerity Fiber Services are not directed towards children, and we do not knowingly collect personal information from children under the age of 18.

If you are a minor, please do not provide us with any personal information or use or access the Services without receiving your parent's or guardian's permission. If we learn that we have collected any personal information from a child under the age of 18, we will take steps to delete the information as soon as possible. If you believe that we might have any personal information provided by a child under 18, or if you are a parent or guardian of a child under 18 that has provided us with personal information without your consent, please contact us at legal@celerityfiber.com to request deletion of the child's information.

Your California Privacy Rights

This section of our Privacy Notice applies to consumers who reside in California. We adopt this section to comply with the California Consumer Privacy Act ("CCPA") and California Privacy Rights Act ("CPRA").

If you are a California resident, you may be able to exercise the following rights. We will honor requests received to the extent required by applicable law and within the time provided by law.

Right to Access and Information Regarding Personal Information

You have the right to request that we disclose to you the categories and specific pieces of Personal Information we have collected about you. Specifically, you have the right to request that we disclose the following to you, in each case in the twelve-month period preceding your request:

- The categories of Personal Information we have collected about you;
- The categories of sources from which the Personal Information is collected;
- Our business or commercial purpose for collecting or selling Personal Information;
- The categories of third parties with whom we share Personal Information;
- The specific pieces of Personal Information we have collected about you;

- The categories of Personal Information about you, if any, that we have disclosed for monetary or other valuable consideration and the categories of third parties to which we have disclosed the information, by category or categories of Personal Information for each third party to which we disclosed the Personal Information; and
- The categories of Personal Information about you that we disclosed for a business purpose.
- The categories of sensitive personal information to be collected and the purposes for which the categories of sensitive personal information are collected or used and whether such information is sold or shared.

Right to Deletion of Personal Information

You have the right to request that we delete Personal Information about you that we have collected from you. There may be certain exceptions to our obligation to delete your information such as if you have an existing account or transaction with us or if we have a legitimate business reason to keep your information.

As permitted by the CCPA/CPRA, if you request deletion of Personal Information that we have collected about you, we, our service providers, and our contractors may be unable to comply with such a request if your Personal Information is necessary to:

- Complete the transaction for which the Personal Information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between us and you;
- Prevent, detect, and investigate security incidents, protect against malicious deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another Consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with section 1546) of Title 12 of Part 2 of the Penal Code;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of that information is likely to render impossible or seriously impair the achievement to such research, if you have provided informed consent;

- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; or
- Comply with a legal obligation

Right to Correct Personal Information

You have the right to request that we correct any inaccurate information that we maintain about you.

Right to Opt-Out

You have the right to opt out of the sale or sharing of Personal Information. We do not sell Personal Information, but we recognize that some privacy laws define “personal information” in such a way that making available identifiers linked to you for a benefit may be considered a “sale.” To opt-out of this, email us at our contact information listed below and request to opt-out.

Right to Non-Discrimination

We may not discriminate against you because you have exercised any of the aforementioned rights, including by:

- Denying you goods or Services.
- Charging different prices or rates for goods or Services, including through the use of discounts or other benefits or imposing penalties;
- Providing you a different level or quality of goods or Services; or
- Suggesting that you will receive different price or rate for goods or service or at a different level or quality of goods or Services.

This includes the right of current and prospective employees not to be retaliated against for the exercise of their CCPA rights.

However, as permitted by the CCPA, we may offer you certain financial incentives. Any CCPA-permitted financial incentive we offer will reasonably relate to your Personal Information’s value. Participation in a financial incentive program requires your prior opt-in consent, which you may withdraw at any time.

How to Exercise Your California Privacy Rights

You or your authorized agent may make a request to access, correct, delete or opt-out of the disclosure of your Personal Information for business purposes. You may also make a

verifiable consumer request on behalf of your minor child if you believe we have received their information inadvertently. You may request to exercise the aforementioned rights by:

- Submitting a request to the email address below.
- Calling us at:
- Mailing us at:

Please note that we may take steps to verify your identity and residency before granting you access to information or acting on your request to exercise your rights, as required or permitted by law. This might include asking for your email address.

If you use an authorized agent to exercise your rights, we may require proof of written authorization you have given the authorized agent to make the request on your behalf.

We may limit our response to your exercise of the above rights as permitted by law. We will confirm receipt of the request within 10 business days describing our verification process. We will respond to your request within 45 days or let you know if we need additional time.

Data Sharing for Direct Marketing Purposes

California Civil Code § 1798.83 further permits California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. If you are a California resident, you may ask us to refrain from sharing your Personal Information with certain of our affiliates and other third parties for their marketing purposes. Please tell us your preference by contacting us at legal@celerityfiber.com.

Your Privacy Rights Under Other US State Laws

If you are a resident of Colorado, Connecticut or Virginia, you have the right, upon a verified request, to:

- To confirm whether a controller is processing your personal data and to access such personal data;
- To correct inaccuracies in your personal data;
- To delete your personal data;
- To obtain a copy of your personal data that you previously provided to us in a portable, and if technically feasible, readily usable format, if processing is carried out by automated means;

- To opt out of the processing of your personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.

To exercise these rights, you or your authorized agent may make a request to confirm, access, correct, delete, obtain a copy, or opt-out of the processing of your personal data for targeting advertising, sale, or profiling by using this link or contacting us at **legal@celerityfiber.com**.

If you use an authorized agent to submit your request, we may require proof of the written authorization you have given. We also may require you to confirm your identity and your residency in order to obtain the information. For emails, please include “Privacy Rights” as the subject line. You must include your full name, email address, and attest to the fact that you are a resident of Colorado, Connecticut or Virginia. We will process your request within 45 days or let you know if we need additional time or cannot process your request. If you make this request by telephone, we may also ask you to provide the request in writing so that we may verify your identity. If we are unable to honor your request for any reason, we will notify you of the reason within the request time period.

Right To Opt Out Under Applicable State Laws

Residents of Colorado, Connecticut and Virginia have the right to opt out of the sale of their Personal Information and targeted advertising. To exercise your right, please click on this link. California residents may have additional rights, as shown in the “Your California Privacy Rights” section above.

Opt-Out Preference Signals

Some browsers and browser extensions support opt-out preference signals such as the Global Privacy Control (“GPC”) that can send a signal to the websites you visit indicating your choice to opt-out from certain types of data processing, including data sales. GPC is a web browser-level setting, maintained by either a browser or a browser extension, that a user or privacy-focused technology can set. In certain regions, when we detect such a signal, we will make reasonable efforts to respect your choices as required by applicable law.

Appeals Of Our Decisions

In some states, you may appeal to us if we refuse to take action on your exercise of certain choices described above. To appeal such a refusal, please contact us at **legal@celerityfiber.com** with the subject line “Appeal of Refusal to Take Action on Privacy Request” and provide the relevant information in the email. If your appeal is denied, residents of certain states can contact their attorney general as follows:

- Virginia Attorney General
 - Colorado Attorney General
 - Connecticut Attorney General
-

Changes to Privacy Policy

Celerity Fiber may modify this Privacy Policy at any time. You can view the most current version of this Privacy Policy by going to <https://www.celerityfiber.com>. If we make material changes to this Privacy Policy, then we will provide you at least 30 days' notice and will also notify you by e-mail, direct mail, bill messaging, or other reasonable methods that we select. If you continue to use the Service following notice of the changes, we will deem that to be your acceptance of and consent to the changes in the revised Privacy Policy.

Compliance & Complaints

We regularly review compliance with this Policy. For questions or concerns about our privacy practices, please contact us at: legal@celerityfiber.com

Note

Your use of Celerity Fiber's Services is subject to this Policy and our **Terms of Service**, including dispute resolution under Florida law.

End of Privacy Policy