



Premier Wireless Solutions Privacy Policy

Date: November 15, 2021

I. Personal Information We Collect

Premier Wireless Solutions, Inc. (PWS), located in San Jose, California, is a value-added distributor and solutions provider. PWS (also referred to as “we,” “us,” or “our” in this policy) offers Private Network Services, allowing us to provide our customers cellular connectivity, device management capabilities, API access, and secure data delivery and storage. With Private Network Services, PWS integrates carrier service, hardware, and software solutions to help customers communicate with and control mobile devices via cellular and Internet communications networks. We also provide wireless communication products ranging from embedded modules, for instance for Internet of Things applications and deployments. Finally, PWS also works with design services companies and certification labs to provide appropriate certifications for our solutions.

Much of the information that our services process is not personal information. Our services facilitate Internet of Things and other machine-to-machine communications. Accordingly, most of the data that our systems process is about machines rather than individuals. For instance, our customers use our solutions to collect machine data from sensors. In other instances, the information passing through our services may contain some personal information, but we have no access to it, because it is traveling from the endpoint to the customer’s data center via encrypted tunnels. For example, our customers’ video camera data may capture images or audio of individuals. In such cases, we act as a mere conduit through which data passes on the way from the sensors collecting it to the customer’s data center. This policy applies only to personal information that we access and process in providing our services and products.

II. Personal Information We Collect

A. Personal Information Collected By Our Website

PWS collects personal information that you provide us by using features of the website. The web forms on our website collect name, email address, and any subject lines and notes you choose to send to us. Notes could include any personal information you provide us using our web forms. If you make a purchase using our webstore, we will collect your name, company name, shipping address, billing address, phone number, and email address.

Our electronic commerce site collects payment card information to complete product purchases. Nonetheless, our electronic commerce site is hosted by Network Solutions LLC. In addition, payments are processed by a gateway service. Accordingly, we do not have access to your payment card information.

If you have an account on our website, we use your email address as a username and use the password that you select when you establish your account on our website. You may change your password by logging into your account and using the account features to make the change.

B. Account-Related and Other Personal Information You Provide Us

We may collect, and you may provide us, personal information from past, present, and prospective customers, vendors, and business partners. This personal information includes "business card data" – name, title, company name, postal address, and email address. We may also collect biographical information from these persons. Finally, we may also collect payment information for customers to pay for services and products. Personal information of this kind helps us to create and maintain customer accounts.

C. Customer Data You Provide to Us

As mentioned above in Section I, most of the data we process in providing our services is machine data, rather than personal information. Moreover, when we are providing network services, we do not collect, access, view, store, or disclose any data that customers transmit using our networks.

Nonetheless, users may be able to store comments and other arbitrary text in some of the systems established by our services. Accordingly, users can store whatever information they want using those features, including personal information they decide to store in our systems.

D. Our Users

Our wireless solution services and products are intended for use by adults 18 years and older. We do not market or sell services or products to minors or knowingly collect personal information from children. If you believe that we have inadvertently gathered personal information about a minor, please write to us using one of the methods in Section IX (Contact Information) below in order for us to delete it.

III. Uses of Personal Information

In general, we use personal information for the business purpose of performing services and providing products to our customers. The subsections in this Section III provide additional details about how we use personal information.

A. Personal Information Collected By Our Website

We use personal information you submit on web forms to communicate with you and respond to your comments or questions. We use contact information and payment card information you provide on our webstore to provide you the products you order, obtain payment for our products, and provide customer support. For website account usage, we use your email address and password to provide and control access to your online account. Our support team may assist you by resetting your password or updating your email address in our records.

B. Account-Related and Other Personal Information You Provide Us

We use business card data that we collect from past, present, and prospective customers, vendors, and business partners to create and manage business relationships in connection with providing, managing, and ending the services and products that we provide our customers; and obtaining products and services from vendors.

We may also use this business card data for the commercial purposes of marketing and selling our services and products, as well as promoting marketing initiatives we enter into with other companies.

With respect to customer account-related information of this kind, we use personal information for marketing, opening new accounts to purchase or use our services,

obtain payments for services or products, and to maintain or terminate existing accounts.

C. Customer Data You Provide to Us

We use whatever customer data we collect using our systems (if any) for the purpose of providing, maintaining, and supporting our services. We access customer data you store in our services only on a “need to know” basis.

IV. Sharing and Disclosure of Personal Information

We may share your personal information with vendors or outsource service providers, and may have shared your personal information with them, in the last 12 months for business purposes. These vendors or providers include cloud service providers. The business purposes for such sharing are to help us provide products and services to our customers, help us manage our operations, or assist with customer service and support functions such as marketing, billing, or payment card processing. We require any such vendors or service providers to manage your personal information with privacy and security safeguards consistent with this privacy policy.

From time to time, we may be required to respond to a subpoena, court order, search warrant, administrative or judicial process, requests by law enforcement agencies, or other requests that we must respond to under applicable law. We may disclose your personal information in response to any of these requirements. Also, we may disclose your personal information to preserve the security of our website, resolve disputes, or assess any possible wrongdoing.

We may share or transfer personal information about you in connection with a merger, acquisition, reorganization, or sale of assets of our business, in the event of bankruptcy, or during the negotiations leading to such an event. We will seek assurances from any buyer that your personal information will be used, shared, maintained, and disclosed consistent with the terms of this policy.

Except as noted above, we will not sell, distribute, transfer, or lease your personal information to third parties.

V. Notices to California Residents

A. California Consumer Privacy Act (CCPA) Disclosures

1. Categories of Personal Information and Uses

The table below summarizes the categories of personal information we collect from California residents, and the purposes for which the categories of personal information will be used. We may have collected any or all of these categories of personal information in the last 12 months. As noted above in Section IV, we do not sell personal information in the ordinary course of business. In addition, we have not made any such sales in the past 12 months.

Categories of Personal Information Collected		Purposes of Use
"Identifiers" such as a real name, alias, postal address, telephone number, email address, and account name. See Sections II.A and II.B above.		See all purposes in Sections III.A and III.B above.
Information (other than Identifiers already described above) that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to:	Signature	We collect signatures from customers on paper credit and debit card receipts, purchase orders, and similar ordering instructions.
	Employment information (job title and business contact information). See Sections II.A and II.B above for more details.	See Sections III.A and III.B above.
	Bank account number, credit card number, debit card number, or any other financial information. See Section II.A and II.B above for more details.	See Sections III.A and III.B above.

Categories of Personal Information Collected	Purposes of Use
Commercial information, including records of products and services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. See Section II.A and II.B above for more details.	See the purposes in Sections III.A and III.B above.
Electronic information. See Sections II.A above for more details.	See the purposes in Section III.A above.
Professional or employment-related information (job title and business contact information). See Section Sections II.A and II.B above for more details.	See Sections III.A and III.B above.
Inferences drawn from other personal information described in this section reflecting customers' preferences collected in the form of notes in our customer database.	Our sales team may collect notes about customer preferences to assist in understanding our customers' needs and wishes in connection with marketing and selling our products and services.
Context-specific personal information not specifically covered within the categories above. See Sections II.A and II.C above for more details. As mentioned in Sections II.A and II.C, any kinds of personal information could be placed in a web form or in some of our services by a user.	See Sections III.A and III.C above.

2. Individual Rights Under CCPA

a) *Right of Access and Data Portability*

Upon request, we will tell a California resident the categories and specific pieces of personal information we have collected about that resident in the previous 12 months. In addition, upon request, we will disclose to a California resident:

- The categories of personal information we have collected about that California resident.
- The categories of sources from which the personal information is collected.

- The business or commercial purpose for collecting that California resident's personal information.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we have collected about that California resident.

The identity of any person making such a request must be verified as a condition of providing the requested information.

b) Right of Deletion

You have the right to request that we delete any of your personal information that we collected from you and retained by us, subject to certain conditions and exceptions under the law. For instance, we have the right to retain personal information needed to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by the California resident, or reasonably anticipated within the context of our ongoing business relationship with the California resident, or otherwise perform a contract between our business and the California resident.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Conduct solely internal uses that are reasonably aligned with the expectations of the California resident based on the California resident's relationship with us.
- Comply with a legal obligation.
- Use the personal information internally, in a lawful manner that is compatible with the context in which the California resident provided it.

The identity of any person making such a request must be verified as a condition of deleting the personal information as requested.

c) How to Exercise Individual Rights

If you wish to contact us about any of your rights as set out in this Section V.A, all such requests should be submitted to us via the contact information in Section IX. Please contact us using one of these methods if you wish to have an authorized agent make a request for individual rights on your behalf.

d) Verification of Identity

For California residents with a password-protected account on our website, we can verify your identity by having you access your account and complete a web form to submit a request for your rights or confirm that you made a request.

For California residents that do not have an account on our website:

- We will verify your identity in response to a request to exercise your individual rights by requiring that you to provide two pieces of information that we already have on file with you, which may include:
 - Items of business card data,
 - Recent invoice amounts, or
 - Recent payment amounts.
- In addition, in the case of a request for specific pieces of personal information, we will ask for an additional piece of information that we may have in addition to the two pieces requested above, together with a signed declaration under penalty of perjury that the requestor is the consumer whose personal information is the subject of the request or an authorized agent acting on behalf of that consumer.

We will not provide or delete information as requested if we are unable to verify the identity of the requestor as required above or have reason to believe that the request is fraudulent. We may ask for additional verification if we suspect fraud, such as a copy of an identification credential from the requestor. We will use any such additional information strictly for identity verification purposes, and it will be deleted following the completion of the verification process.

e) Policy Against Discrimination

PWS will not discriminate against individual California residents for exercising any of their rights under the CCPA, including by:

- Denying goods or services to the California resident
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- Providing a different level or quality of goods or services
- Suggesting that the California resident will receive a different price or rate for goods or services or a different level or quality of goods or services

B. Notice to California Residents Regarding “Do Not Track” Settings Under California law, online service providers must disclose in their privacy policies how they respond to “do not track” settings. These are settings users can set in their browser software. Currently, there is no standard governing what, if anything, a website operator should do when receiving a “do not track” signal. Accordingly, PWS does not currently take action in response to a “do not track” browser setting. As industry standards regarding do not track settings emerge, PWS will revisit and amend this policy to account for these standards.

VI. Data Security Practices Regarding Personal Information

PWS has an information security program to implement reasonable and appropriate industry-standard security controls to protect personal information. PWS also requires its service providers to implement controls that are at least as stringent as the ones PWS itself uses, consistent with this policy. PWS's administrative, physical, and technical safeguards:

- Provide assurances of the integrity and confidentiality of personal information covered by this policy,
- Protect against reasonably anticipated threats or hazards to the security or integrity of personal information, and unauthorized uses or disclosures of such personal information, and
- Facilitate compliance with legal frameworks of requirements under applicable data protection laws.

One example of a security safeguard we use is encryption. Specifically, our webstore uses encrypted communications when it obtains your personal information and payment card information to complete orders and obtain payment for products you purchase using our website.

VII. Accessing Your Personal Information

If you would like to access the personal information we have collected about you to correct or update it, and you are a PWS customer, you have the ability to log into our website and make the corrections to the personal information in your account. Alternatively, or if you need assistance, please contact us by one of the means described in Section IX, and someone on our support team will assist you correct or update your personal information.

Please keep in mind that we may have a legal right or obligation to preserve personal information as it currently exists. If we do not amend personal information about you upon your request, we will communicate with you concerning the reason.

If you wish to opt out of or stop receiving any marketing communications from us, please contact us at one of the mechanisms listed in Section IX. Any email communications from us contain instructions on opting out of further email communications. Nonetheless, even if you opt out of marketing communications, we will still contact you regarding support, administration, and security of our services and products.

VIII. Links to Other Websites

Our website may contain links to other websites of interest, such as those of our partner networks. However, once you have used these links to leave our site, you should note that we do not have any control over those other websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide while visiting such sites, and such sites are not governed by this policy. When going to another website, you should exercise caution and look at the privacy statement applicable to that website to understand its privacy practices.

IX. Contact Information; Questions, Concerns, or Complaints

If you have any questions, comments or concerns about this policy or about our privacy practices, seek to exercise any of your privacy rights under applicable law, or wish to access, change, or update personal information we have about you, please call our support team at 888-594-2430, or send an email message to privacy@pws.bz, or submit a support ticket using our support portal on this page: <https://www.pws.bz/support/>

You may also direct your privacy-related comments, questions, or complaints to the following postal address:

Premier Wireless Solutions Inc.
Attention: Gregg Peterson
88 Bonaventura Dr
San Jose, CA 95134

Our privacy team will investigate any complaints that you make concerning our privacy practices and provide you with a written response. You will need to provide enough information for us to evaluate your complaint, and we may need to ask for additional information in order to assess any complaint. Also, you have a right to submit any complaint to your local data protection authority or government regulator.

X. Amendments to this Policy

PWS may change this policy from time to time. We will modify the policy by placing an amended copy of it on our website or, if PWS considers it necessary, by sending you an email notice regarding the amended policy. Your continued use of our website, products, or services after a copy of the amended policy is provided to you by the website or email will constitute your approval of the amended policy.