

Principle 1 Accountability

The eTVnet.com is responsible for personal information under their possession and shall designate one or more persons who are accountable for compliance with the following principles.

- 1.1 eTVnet.com will implement policies and practices to give effect to the principles, including:
 - 1.1.a Implementing procedures to protect personal information;
 - 1.1.b Establishing procedures to receive and respond to complaints and inquiries;
 - 1.1.c Training employees and communicating to them information about ETVnet.com policies and practices;
 - 1.1.d Developing methods to explain ETVnet.com policies and procedures.
- 1.2 Accountability for ETVnet.com compliance with the principles rests with the senior management of ETVnet.com and the person or persons designated by senior management.

Principle 2 Identifying Purposes for Collection of Personal Information

ETVnet.com shall identify the purposes for which personal information is collected at the time of the collection or before the information is collected.

- 2.1 Personal information is any information that is used to identify the customer, or by which customer's identity can be deduced. Personal information that ETVnet.com collects from customers includes:
 - 2.1.a Customer's name and address and other contact information;
 - 2.1.b Credit and reference information, such as date of birth, telephone numbers, email address and bank information requested for pre-authorized payments;
 - 2.1.c Information about current Internet usage;
- 2.2 ETVnet.com collects personal information only for the following purposes:
 - 2.2.a For provision of service(s) and/or products to its customers;
 - 2.2.b For maintenance of commercial relations and to communicate with its customers (which will include, but not be limited to: billing, collection, advertising, promotion, account verification);
 - 2.2.c identification customer needs and/or preferences;
 - 2.2.d For administration and management of its business operations
 - 2.2.e To meet legal and regulatory requirements;
- 2.3 Individuals collecting personal information will be able to explain to customers the purposes for which the information is being collected, or will refer the person to a designated individual at ETVnet.com who will explain the purposes.

Principle 3 Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of a customer or employee are required for the collection, use or disclosure of personal information, except where inappropriate.

- 3.1 In certain circumstances, personal information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical or security reasons may make it impossible or impractical to seek consent. Moreover, ETVnet.com may provide personal information to its lawyer or agent to collect a debt, comply with a subpoena, warrant or other court order, government institution requesting the information upon lawful authority, or as may be otherwise required by law.
- 3.2 ETVnet.com will generally seek consent for the use or disclosure of personal information at the time of collection. In certain circumstances, consent of use or disclosure of personal information may be sought after the information has been collected but before use (for example, when ETVnet.com wants to use information for a purpose not previously identified).
- 3.3 An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. ETVnet.com will inform the individual of withdrawal implications. In order to withdraw consent, an individual must provide notice to ETVnet.com in writing or other.
- 3.4 ETVnet.com will make ensure that the individual is informed of the purposes for which the information would be used. The purposes will be stated in a comprehensible manner that the individual can reasonably understand how the information will be used or disclosed.

- 3.5 Under the condition of supply of the product or service, ETVnet.com will not require an individual to consent to the collection, use, or disclosure of information beyond that requirement to fulfill the specified and legitimate purposes.

Principle 4 Limiting Collection of Personal Information

ETVnet.com shall limit the collection of personal information, necessary for the purposes identified. ETVnet.com shall collect personal information by fair and lawful means.

- 4.1 ETVnet.com shall collect personal information from its customers for the purposes described in Principle #2
- 4.2 Due to connection with Internet provider business, ETVnet.com may use a 'Cookie' to collect certain information to track user patterns on its web site. A Cookie is a text file containing a unique identification number that identifies a user's browser, but not a particular individual. A Cookie does not identify an individual. ETVnet.com does not use Cookies in combination with other information to obtain any personal information. If an individual does not wish to use Cookies, he or she can re-set their browser to either provide notification or refuse to accept Cookies.

Principle 5 Limiting Use, Disclosure and Retention of Personal Information

ETVnet.com shall not use or disclose personal information for purposes other than those for which it was collected except with the consent of the individual or as required by law. ETVnet.com shall retain personal information only as long as necessary for the fulfillment of those purposes.

- 5.1 ETVnet.com may collect, use or disclose personal information without the individual's knowledge or consent in certain circumstances as described in Principle #3.1.
- 5.2 ETVnet.com may disclose a customer's personal information to:
- 5.2.a Another telecommunication company for the provision of telecommunications services to that customer;
 - 5.2.b A company involved in providing communications directory services;
 - 5.2.c A person involved in the development, promotion, marketing or enhancement of ETVnet.com services;
 - 5.2.d A credit collections agency;
 - 5.2.e Emergency services in an emergency situation;
 - 5.2.f A person, who, in the reasonable estimation of eTVnet.com, is an agent of the customer;
 - 5.2.g Any other third party, upon receiving the consent of the customer or as required by law.
- 5.3 Certain ETVnet.com employees may be given access to customer personal information solely for business purposes.
- 5.4 ETVnet.com makes their employees aware of the importance of maintaining the confidentiality of personal information. ETVnet.com employees are governed by a non-disclosure agreement prohibiting disclosure or use of any confidential or personal information for any purposes other than the stated business purposes.
- 5.5 Personal information that is no longer required to fulfill the identified purposes will be destroyed, erased or made anonymous according to the procedures established by eTVnet.com

Principle 6 Accuracy of Personal Information

Personal information shall be as accurate, complete, and up-to-date as it is necessary for the purposes for which it would be used.

- 6.1 6.1 The extent to which personal information will be accurate, complete, and up-to-date will depend upon the use of the information, taking into account the interests of the individual. Information will be sufficiently accurate, complete, and up-to-date to minimize the possibility of inappropriate information use to make a decision about the individual.
- 6.2 Personal information that is used on an ongoing basis, including information that is disclosed to third parties, should be generally accurate and up-to-date, otherwise specified.

Principle 7 Security Safeguard

ETVnet.com shall protect personal information by security safeguards appropriate to the sensitivity of the information.

- 7.1 7.1 ETVnet.com will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. The nature of the security

will differ depending on the sensitivity of the information collected, the amount, distribution and format of the information, and the method of storage.

- 7.2 eTVnet.com methods of protection include:
 - 7.2.a Physical measures, such as locking cabinets and restricted access to offices;
 - 7.2.b Organizational measures, such as security clearances and limiting access;
 - 7.2.c Technological measures, such as the use of passwords and encryption.
- 7.3 ETVnet.com will use safety measures in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information.

Principle 8 Openness Concerning Policies and Practices

ETVnet.com shall make readily available to customers specific information about its policies and practices concerning management of personal information.

- 8.1 ETVnet.com will make its policies and practices concerning management of personal information easily comprehensible and accessible, by providing the following information upon request:
 - 8.1.a The name, title, and address of the Senior Manager responsible for eTVnet.com policies and practices and to whom complaints or inquiries may be addressed;
 - 8.1.b A description of the type of information held by eTVnet.com s, including a general account of its use.
- 8.2 ETVnet.com will make this Privacy Policy available online, by mail, or in a brochure format at its place of business. eTVnet.com Customer Services Representatives will be trained to answer any requests or complaints at ETVnet.com customer service telephone number.

Principle 9 Customer and Employee Access to Personal Information

ETVnet.com shall inform a customer of the existence, use and disclosure of his or her personal information upon request. A customer shall be able to challenge the accuracy and completeness of its disclosure and to have it amended as appropriate.

- 9.1 When an individual successfully demonstrates the inaccuracy or incompleteness of disclosure of personal information, ETVnet.com will amend the information as required. Depending upon the nature of the information challenged, amendment involves the correction, deletion or addition of information. Where appropriate, the amended information will be transmitted to third parties.
- 9.2 When a conflict is not resolved to the satisfaction of the individual, ETVnet.com will record the substance of the unresolved conflict. When appropriate, the existence of the unresolved conflict will be transmitted to third parties.
- 9.3 All personal information ETVnet.com collects about its customers is available through the customer portal <http://www.etvnet.com>. Customers can log in to the site, review and edit personal information. If there are problems accessing the site customers contact our support center.

Principle 10 Challenging Compliance

A customer shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for the eTVnet.com compliance with the Code.

- 10.1 ETVnet.com will respond accordingly to received complaints or inquiries about its policies and practices relating to the use and disclosure of personal information. ETVnet.com will make ensure that its procedures are easily accessible and simple to use.
- 10.2 ETVnet.com will inform individuals who make inquiries or complaints of the existence of relevant complaint procedures.
- 10.3 The person(s) accountable for compliance with this Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.
- 10.4 ETVnet.com will investigate all complaints and take appropriate measures. If a complaint is justified, ETVnet.com will act accordingly, including, if necessary, amending its policies and practices.

Principle 11 Special information for EU users

SUMMARY

Beginning May 25, 2018, the processing of personal data of users in the European Union is subject to the EU General Data Protection Regulation ("GDPR").

This section summarizes ETVnet's grounds for processing personal information under the GDPR, and the rights of EU users as relates to ETVnet's handling of personal information.

Beginning May 25, 2018, the processing of personal data of users in the European Union is subject to the [EU General Data Protection Regulation \("GDPR"\)](#). This section provides information as relates to EU users' rights, and ETVnet's responsibilities, under this regulation.

1. EU User Rights

If you are an ETVnet user in the EU, you have the following rights with respect to ETVnet's handling of your personal information. To exercise these rights, please see below or submit your request [here](#).

- a. Explanation and copies of your data
 - You have the right to request an explanation of the information that ETVnet has about you and how ETVnet uses that information.
 - You also have the right to receive a copy of the information that ETVnet collects about you if collected on the basis of consent or because ETVnet requires the information to provide the services that you request.
- b. Correction
 - If ETVnet has information about you that you believe is inaccurate, you have the right to request correction of your information. Please see the section titled "Explanation, Copies and Correction" below for more information on correcting, or requesting correction of, your information.

c. Deletion

- Users may request deletion of their accounts at any time. Users may request deletion via email support@etvnet.com, via Live Chat or by calling any of our customer support numbers. We may retain certain information about you as required by law and for legitimate business purposes permitted by law.
- d. Objections and complaints
 - Users in the EU have the right to object to ETVnet's processing of personal data, including for marketing purposes based on profiling and/or automated decision making. ETVnet may continue to process your information notwithstanding the objection to the extent permitted under GDPR.
 - Users in the EU also have the right to file a complaint relating to ETVnet's handling of your personal information with the Autoriteit Persoonsgegevens, the Dutch Data Protection Authority. Their contact information is as follows:
 - Autoriteit Persoonsgegevens
 - Postbus 93374
 - 2509 AJ DEN HAAG
 - (+31) - (0)70 - 888 85 00
 - You may also submit questions, comments or complaints to ETVnet's Data Protection Officer.

2. Grounds for Processing

The GDPR requires that companies processing the personal data of EU users do so on the basis of specific legal grounds. As described below, ETVnet processes the information of EU users based on one or more of the grounds specified under the GDPR:

- a. The processing is necessary to provide the services and features you request
 - ETVnet must collect and use certain information in order to provide its services. This includes:
 - User profile information that is necessary to establish and maintain your account, including to verify your identity; enable communications with you about your services, orders and accounts; and to enable you to make payments for the services provided.
 - Transaction information, which is necessary to generate and maintain in connection with your use of ETVnet's services.
 - Usage information, which is necessary to maintain, optimize and enhance ETVnet's services.
 - Collection and use of this information is a requirement for using ETVnet.
- b. The processing is necessary to protect the vital interests of our users or of others
 - ETVnet may process personal information, including disclosing data with law enforcement authorities in case of threats to the safety of users or of others.
- c. The processing is necessary for ETVnet's legitimate interests
 - ETVnet collects and uses personal information to the extent necessary for its legitimate interests. This includes collecting and using information:
 - To maintain and enhance our users' usability of the service. For example, we collect and analyze personal information to prevent use of our services by users who have engaged in inappropriate or dangerous behavior to prevent fraudulent transactions through our apps or website.
 - To prevent, detect and combat fraud in connection with the use of our services. For example, ETVnet uses user profile, location, device and usage information, to identify and prevent circumstances when users attempt to defraud ETVnet or other users.
 - To provide customer support.
 - To optimize our service and develop new services. This includes, for example, identifying viewing habits and preferences and offering personal recommendations.
 - For research and analytical purposes. This includes, for example, analyzing usage trends to improve the user experience and enhance usability of our service.

- For direct marketing purposes. This includes, for example, analyzing data to identify trends and tailor marketing messages to user needs.
 - To enforce ETVnet's Terms of Service.
- d. The processing is necessary for the legitimate interests of other persons or parties
 - ETVnet collects and uses personal information to the extent necessary for merchant processor to process payment transactions for the services.
- e. Consent
 - ETVnet may collect and use your information on the basis of your consent. You may revoke your consent at any time. If you revoke your consent, you will not be able to use any service or feature that requires collection or use of the information we collected or used on the basis of consent.
 - ETVnet relies on consent in connection with data collections or uses that are necessary to enhance the user experience, to enable optional services or features, or to communicate with you. If you are an EU user, the following types of data collections or uses are done on the basis of your consent.
 - Personal information – name, surname, address and phone number. Needed for account verification purposes
 - Payment information – name, surname, address, credit card number, expiry date. Needed for payment processing by third Party (merchant acquirer).
 - Email and message notifications: Account and Service Updates, marketing purposes, discounts and news
 - Email – needed to create an account and log in to service
 - ETVnet may also collect personal information about you through voluntary surveys. Your responses to such surveys are collected on the basis of consent, and will be deleted once no longer necessary for the purposes collected.
- f. Marketing Opt-outs
- You may opt out of receiving promotional emails from eTVnet by following the instructions in those messages. Please note that if you opt out, we may still send you non-promotional messages, such as receipts for your rides or information about your account.