

## POWERNET INTERNET PRIVACY POLICY

This is the Internet Privacy Policy for the PNG Telecommunications, Inc. ("Powernet") web site.

Powernet values individual privacy, and we want to give our web site visitors the opportunity to know what information we collect about them and how Powernet collects, protects, uses, discloses and otherwise manages the information gathered, in conformance with applicable law. At certain points on the Powernet web site, you may be asked or given the opportunity to submit information that may personally identify you ("Personal Information"). All Personal Information that we gather is collected in a fair and non-intrusive manner, with your consent, in order to better serve you. Personal Information that you submit via this web site is only accessible to Powernet employees, contractors and service providers who need the information for the purposes for which it is collected or as you consent.

This Privacy Policy applies to the collection of Personal Information at the Powernet web site. Different privacy policies and procedures may apply to the collection of Personal Information by Powernet offline, other web sites, and to information that Powernet obtains offline.

### Collection and Use of Personal Information

For the areas of the Powernet web site where the collection of Personal Information is necessary, you will be aware that such information is required because you will have to complete an online form. We may collect limited Personal Information, including, but not limited to name, any "nickname," date of birth, email and postal addresses and any other information that would allow someone to identify or contact you, as well as information about your personal/product preferences, survey responses and online activities, if any, that is known to Powernet. We may also collect limited Personal Information about others from you including, but not limited to, name and e-mail address.

We may collect Personal Information for one of several purposes, for example;

- to allow us to send you specific information or materials that you have requested, such as a coupon, newsletter or other materials;
- to enable you to communicate with friends, for example, to send an electronic greeting card or a notice about a promotion;
- to help improve our web site and our services, or to customize your experience at our web site.

We may combine this information with other generally or publicly available information to help us identify our visitors' preferences or interests.

You can choose not to allow us to use your Personal Information for direct marketing purposes by indicating your preference at the time of collection or by responding to the promotional email in the manner provided. If you have not opted-out of receiving marketing materials, we may also use, but will not disclose, your Personal Information to promote and market additional goods, services and special offers from us and our affiliates. Otherwise, we do not provide your information to third parties for their own direct marketing purposes. At any time you may "opt out" of future contacts by un-subscribing from our contact list.

We sometimes use the non-Personal Information that we collect to improve the design and content of our site and to enable us to personalize your Internet experience. We may use this information in the aggregate (grouped with information from other users) to analyze site usage, as well as to offer you products, programs or services.

Typically, we will seek consent for the use of your Personal Information at the time of collection. In certain circumstances, consent may be sought after the information has been collected but before use (for example when we want to use information for a use not previously identified). The form of consent we seek, including whether it is express or implied, will largely depend on the sensitivity of the information and the reasonable expectations of the individual in the circumstances. You may withdraw consent at any time, subject to legal and contractual restrictions and reasonable notice. If you wish to withdraw consent, please contact us in the manner described below. We will inform you of the implications of withdrawing consent at or before the time of withdrawal.

We will not, as a condition of the supply of a product or service, require you to consent to the collection, use or disclosure of information beyond that required to fulfill the explicitly specified and required purposes for which the information is being required.

### Online Shopping

Some web sites allow users to purchase products and services or to register to receive catalogs, product or service updates, or other materials. In such cases, you may be asked to provide contact information such as name, address, telephone number, email address and credit/debit card information if you are making a purchase. Powernet has no control over third party web sites or their use of any personal information you provide to them. If you order products or services directly from Powernet, we use any personal information collected to process and fill your order. We do not share such information with outside parties except as described above.

### Sharing of Personal Information

Except as described in this Privacy Policy, Powernet will not disclose your Personal Information to a third party, unless you request or otherwise consent to such disclosure or disclosure is required or authorized by law.

We do not sell information to third parties. We may share information with agents, affiliates or service providers who act for or on behalf of Powernet in connection with the business of Powernet, or for further processing in accordance with the purpose(s) for which the data was originally collected, e.g. third party maintenance of secure listing databases or prize fulfillment in connection with a contest or sweepstakes. We require our agents, affiliates and service providers to agree in writing to maintain the confidentiality and security of Personal Information they maintain on behalf of Powernet and not to use it for any purpose other than the purpose for which we retained them. We also require any third parties we retain to protect Personal Information disclosed by us [in accordance with applicable state, federal, and foreign privacy requirements and the general privacy principles described in this Privacy Policy]. Your Personal Information may be provided to a courier or freight forwarder in order to fulfill an order you may have requested from us or supply a promotion prize or award. Powernet may also share statistical or demographic information in aggregate form with service providers for marketing or research purposes. This aggregate data will not contain any information that personally identifies you.

Although we make every effort to preserve user privacy, we may need to disclose Personal Information in certain limited circumstances, specifically: (1) to comply with a judicial proceeding, a court order, or subpoena, or as otherwise may be required by law; (2) to enforce our policies or contracts, or to collect amounts owed to us; (3) to protect users of our sites and our sites from fraudulent or abusive use; (4) to protect Powernet's rights or property (including without limitation in the event of a bankruptcy, merger, acquisition, or transfer of control or assets or other business venture involving Powernet, a subsidiary or an affiliate or any of their businesses or assets); (5) during emergencies when safety is at risk, as determined by Powernet; or (6) otherwise where necessary for the establishment, exercise or defense of legal claims. The Personal Information you provide is considered a company asset and may be included among transferred assets if Powernet or any or all of their subsidiaries or affiliates or any of their assets is ever acquired by a third party. In addition, from time to time, server logs may be reviewed for security purposes; for example, to detect unauthorized activity on the web site. In such cases, server log data containing IP addresses would be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.

### Cookies and Other Information Collected using Technology

When you visit the Powernet web site, we may collect some information about you using software or other technology where it may not be readily apparent to you that it is being collected. For instance, when you come to our site your IP address is collected so that we know where to send information you are requesting. An IP address is often associated with the place from which you enter the Internet, like your ISP (Internet Service Provider), your company, or your school. The following information is logged by our web servers during visits to the web site: IP addresses, type of operating system, time and duration of visit, web pages visited and browser type. We do not link server log information to any other information in a way that would enable the identification of visitors to the web site. We may analyze server log information in order to improve the web site and to customize the web site for users.

When you visit our web site, we place a text file called a “cookie” in the browser directory of your computer’s hard drive. Cookies are pieces of information that a web site sends to your computer while you are viewing the web site. These pieces of information allow the web site to remember important information that will make your use of the site more useful. Internet companies use cookies for a variety of purposes.

We use cookies to help improve your future visits. We may also track data such as the total number of visits to our web site and the number of visitors to each page of our web site. We may use this information, in aggregate form, for system maintenance and to better understand how our visitors use our site and services so that we can make them better. You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Netscape Navigator or Internet Explorer) settings. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you won’t have access to many features that make your experience on our web site more efficient and some of our services will not function properly.

Our websites may also use small pieces of software code called “web beacons” or “clear gifs” to collect anonymous and aggregate advertising matrix, such as counting page views, promotion views, or advertising responses. A web beacon is an electronic image called a single-pixel or clear GIF. Web beacons can recognize certain types of information, such as a user’s cookie number, time and date of a page view and description of the pages where the web beacon is placed. You may render some web beacons unusable if you choose to reject their associated cookies. These web beacons may be used to deliver cookies that conform with our cookie policy above.

#### Banner Advertisements and Links to Other Sites

This Privacy Policy applies only to Powernet and the Powernet web site and does not include third-party web sites. Our site may include banner advertisements or contain links to other sites operated by third parties whose information practices may be different than those at this site. Other Internet sites you visit may have their own privacy policies or no policy at all. Other web sites might use Personal Information differently than our policy permits. Powernet does not guarantee the standards of any web site not related to this site. Powernet is not responsible for the content, practices, or password information practices of the web sites operated by these third parties. In addition, these banner advertisements and links do not constitute sponsorship, endorsements, or approval by Powernet of the content, policies, or practices of these web sites.

Please note that the privacy policies of third party web sites may differ from those of Powernet. You should carefully review the relevant third party web site’s privacy policy and terms of use in order to understand its policies and practices regarding the collection and use of Personal Information.

#### A Note to Parents/Guardians

Powernet takes special measures to help maintain and protect the personal privacy of children under 13 years of age for the purposes of complying with the Children’s Online Privacy and Protection Act of 1998 (“COPPA”) in the United States.

The Powernet web site is a general audience site that is neither designed nor intended to collect any Personal Information from children under the age of 13. If a parent or legal guardian of a child under the age of 13 believes that the child has provided us with Personal Information, the parent or legal guardian should contact us as described below if they want this information deleted from our files. If Powernet otherwise obtains knowledge that it has Personal Information about a child under 13 in its files, we will delete that information from existing files so that it is not in retrievable form.

#### Data Integrity and Security

We strive to keep any information you provide as secure as possible, and we require our agents, affiliates and service providers to follow the same high standards. We have implemented technical and organization measures designed to help secure your Personal Information from theft, accidental loss, and from unauthorized access, use, alteration, disclosure or destruction. While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party “hackers” from illegally obtaining this information.

Powernet takes reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current.

To provide you with an increased level of security online, access to your Personal Information on certain of our web sites may be protected by a password you select. We strongly recommend that you do not disclose your password to anyone. We will never ask you for your password in any unsolicited communication.

#### International Visitors

While we operate internationally, the servers that will host, store and process information relating to Powernet's web site are currently based in the United States. Unless otherwise specified, data submitted to this web site will be processed by us in the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By providing Personal Information to us you authorize the export of such Personal Information to the United States and its storage and use as specified herein, which includes the use of cookies as described above.

#### Changes

Powernet will maintain Personal Information in accordance with this Privacy Policy. In the future, we may modify this Privacy Policy. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy. We will use information in accordance with the Privacy Policy under which the information was collected. However, if we are going to use Personal Information in a manner different from that stated at the time of collection we will notify users by email. Users will have a choice as to whether or not we use their information in this different manner. If users have opted-out of all communications with the site, or deactivated their account, then they will not be contacted, nor will we use their Personal Information in this new manner.

#### How You Can Access, Control and Update Information About You

We want to be sure that we keep only the most accurate and up-to-date Personal Information in our records. Therefore, whenever you believe that your Personal Information needs to be updated, you can email us at [solutions@powernetco.com](mailto:solutions@powernetco.com) to update your contact information.

You may choose at any time to remove your name, telephone numbers, and postal and email addresses from the lists we use to send notices or updates and elect not to receive correspondence from us by sending us an email at [solutions@powernetco.com](mailto:solutions@powernetco.com).

To protect your privacy, we will take reasonable steps to help verify your identity before granting access or making changes.

#### Contact Us

If you have any questions or complaints, please contact us. We can be reached at [legal@powernetco.com](mailto:legal@powernetco.com) or contact us at the following mailing address:

PNG Telecommunications, Inc.  
Attn: Legal  
8805 Governor's Hill Drive  
Suite 250  
Cincinnati, Ohio 45249

We will address your concern and attempt to resolve any problem. If we do not satisfactorily address a complaint within thirty (30) days, any dispute, controversy or claim shall be settled by an arbitration administered by the American Arbitration Association ("AAA"). All arbitrations will be conducted in English. Judgment rendered by the arbitrator may be entered in any court having jurisdiction. The costs of the arbitration will be borne equally by the parties. Cincinnati, Ohio, USA shall be the site of all hearings, and such hearings shall be before a single arbitrator. You may also submit complaints to the Federal Trade Commission at <http://www.ftc.gov/ftc/complaint.htm> or via phone at (202)382-4357.

This Privacy Policy was last updated on February 17, 2014.