

# **GDPR Privacy Policy of Orbital Connect**

#### **Definitions**

#### My Company

My Company means Orbital Connect, 14335 Sherman way, Unit 220, Van Nuys, CA 91405

#### GDPR

General Data Protection Regulation Act.

#### Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

#### Data Processor

Data Processor means any natural or legal person who processes the data on behalf of the Data Controller.

#### Data Subject

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

## 1. Principles for processing personal data

Orbital Connect respects the privacy of its clients and guarantees to the maximum extent the protection of their personal data processed during and in connection with the provision of satellite and electronic communications services, and other related activities, as well as the data processed for the provision and support of the requested services. In order to activate the communications services, Orbital Connect shall collect a specific personal information following the principles below.

Orbital Connect's principles for processing personal data are:

- Fairness and lawfulness. When we process personal data, the individual rights of the Data Subjects must be protected. All personal data must be collected and processed in a legal and fair manner.
- Restricted to a specific purpose. The personal data of Data Subject must be processed only for specific purposes.



 Transparency. The Data Subject must be informed of how his/her data is being collected, processed, and used.

### 2. What personal data we collect and process

Orbital Connect collects several different types of personal data for various purposes. Personal Data may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Bank Account and Payment Information
- Credit Card / Debit Card number
- Traffic Data for the specific service
- End User Devices information
- IP Addresses within Orbital Connect network

### 3. How we use the personal data

Orbital Connect process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent. Orbital Connect uses the collected personal data for various purposes:

- To provide you with services
- To notify you about changes to our services and/or products
- To provide customer support
- To gather analysis or valuable information so that we can improve our services
- To detect, prevent and address technical issues

# 4. Legal basis for collecting and processing personal data

Orbital Connect legal basis for collecting and using the personal data described in this Data Protection Policy depends on the personal data we collect and the specific context in which we collect the information:

- Orbital Connect needs to perform a contract with you
- You have given Orbital Connect permission to do so
- Processing your personal data is in Orbital Connect legitimate interests



Orbital Connect needs to comply with the law

### 5. Retention of personal data

Orbital Connect will retain your personal information only for as long as is necessary for the purposes set out in this Data Protection Policy.

Orbital Connect will retain and use your information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our policies.

### 6. Sharing of personal information

Orbital Connect only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.

We only share and disclose your information in the following situations but is not limited to:

- Compliance with Laws. We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- Vital Interests and Legal Rights. We may disclose your information where we believe it is
  necessary to investigate, prevent, or take action regarding potential violations of our policies,
  suspected fraud, situations involving potential threats to the safety of any person and illegal
  activities, or as evidence in litigation in which we are involved.
- Vendors, Consultants and Other Third-Party Service Providers. We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- Third-Party Advertisers. We may use third-party advertising companies to serve ads when you
  visit the Sites. These companies may use information about your visits to our Website(s) and



other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.

- Affiliates. We may share your information with our affiliates, in which case we will require those
  affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries,
  joint venture partners or other companies that we control or that are under common control with
  us.
- Business Partners. We may share your information with our business partners to offer you
  certain products, services or promotions.
- With your Consent. We may disclose your personal information for any other purpose with your consent.

### 7. Data protection rights

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. If you wish to be informed what personal data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you
- The right of rectification
- The right to object
- The right of restriction
- The right to data portability
- The right to withdraw consent

#### 8. Orbital Connect GDPR Contact Details

If you want to contact Orbital Connect, please send an email to: <a href="mailto:contact@orbitalconnect.com">contact@orbitalconnect.com</a> or call +1.888.315.9545