

# NHTC Wi-Fi Manager Mobile Application Privacy Policy

## What is covered by this Privacy Policy

This Privacy Policy (the “**Privacy Policy**”) covers NHTC’s privacy and security policies for personal information collected by NHTC in connection with the NHTC Wi-Fi Manager mobile application (the “**App**”). For this Privacy Policy, personal information refers to information relating to an identified or identifiable natural person with reference to an identifier, such as a name, an email address, an online identifier such as login credentials, or any other identifier by which that natural person may be contacted online or offline.

NHTC understands the importance of privacy and security and is committed to providing a secure environment to protect the personal and private information provided by you in connection with your use of the App. Accordingly, this Privacy Policy sets out:

- The personal information that is collected when you download, install, register for and/or use the App; and
- NHTC’s practices associated with collecting, using, retaining, disclosing and protecting the information associated with your use of the App.

## What is not covered by this Privacy Policy

This Privacy Policy DOES NOT apply to information:

- NHTC collects on its website; or
- NHTC may collect unrelated to NHTC’s provision of the App.

Information collected on NHTC’s websites at [www.nhtc.coop](http://www.nhtc.coop) or [www.nhtcsolutions.com](http://www.nhtcsolutions.com), is subject to NHTC’s privacy policy (accessible at <http://nhtc.coop/your-cooperative/important-documents/privacy-policy>).

Personal information does not include information that has been anonymized or aggregated so that it can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

## Privacy Policy applies for any use of the App

This Privacy Policy applies to NHTC’s policies and practices associated with the provision

of the App described in the NHTC Wi-Fi Manager Mobile Application End User License Agreement (the "Agreement"). Please read this Privacy Policy carefully to understand NHTC's policies and practices regarding your information and how such information will be treated. If you do not agree with NHTC's policies and practices, you should not install, use or access the App. By accepting and agreeing to the Agreement, or by using or accessing the App, you agree to this Privacy Policy.

This Privacy Policy may be updated from time to time. You should review this Privacy Policy periodically for updates and changes. Your continued use of the App after NHTC revises this Privacy Policy means you accept those revisions.

### **Children Under the Age of 16**

The App is not intended for children under 16 years of age, and NHTC does not knowingly collect personal data of children under 16. If NHTC learns that personal data from a child under 16 has been obtained or received without verification of parental consent, NHTC will delete that information. If you believe NHTC might have any information from or about a child under 16, please contact NHTC at [suggestions@nehp.net](mailto:suggestions@nehp.net).

### **How NHTC Collects Your Information**

NHTC collects and processes information provided directly by you when you install the App and register for an account to use the App. Specifically, this information includes:

- Your name, email address and location;
- Browser information and session cookies related to your access and use of the App;
- Data insights NHTC attains based on correlation and analytics of your information collected in providing the App, which may be used in aggregated and disaggregated formats or to obtain trend analytics, to provide the App; and
- Use of the above-described collected information in aggregated and disaggregated formats to enhance our current App or to provide App features.

### **How NHTC Uses the Information**

NHTC uses the information collected as described in this Privacy Policy, including personal information, to:

- Provide you with the App as described in the Agreement;
- Implement, improve and/or enhance the App, including to make future releases available to you;

- Carry out NHTC's obligations as described or authorized in the Agreement and this Privacy Policy;
- Enforce NHTC's rights arising from the Agreement between you and NHTC; and
- Fulfill any other purpose authorized by you and reasonably required for the App.

NHTC may also use the information collected as described in this Privacy Policy, including personal information, to inform you about goods and services that may be of interest to you. NHTC does not contact you unless and only to the extent expressly authorized by you in writing.

### **Disclosure of Information**

NHTC does not sell or otherwise distribute or disclose your information to third parties other than as described or authorized in the Agreement, including this Privacy Policy.

NHTC discloses the information to its subsidiaries, affiliates and certain third-party vendors and contractors that provide development, integration, web hosting and consulting services to NHTC for the purpose of providing you with the App, to maintain, support, develop, improve and/or enhance the App and to fulfill NHTC obligations associated with the App.

NHTC may be required to disclose information under certain circumstances:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- To enforce NHTC's rights arising from the Agreement entered into between you and NHTC;
- If NHTC believes disclosure is necessary or appropriate to protect the rights, property, or safety of NHTC, its customers or other third parties; or
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of NHTC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which you and/or you subscriber held by NHTC are among the assets transferred.

### **Your Choices About Our Collection, Use, and Disclosure of Information**

The provision of the information described in this Privacy Policy is necessary in order for you to use the App.

Your information is retained and used as described in this Privacy Policy. In the event you delete your account for the App in accordance with the terms of the Agreement, your information will be deleted within 30 days of the deletion of such account or within such

other timeline as may be mandated by applicable law. You will no longer be able to access the App when your account is deleted.

You may set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If cookies are disabled or refused or if you block the use of other tracking technologies, some parts of the App may then be inaccessible or not function properly.

### **Accessing and Correcting Information**

You can (a) access and review your information, including personal information, and (b) correct your information, by logging into the App and visiting the settings page.

### **Data Security**

All information you provide to us is stored on our secure servers behind firewalls. NHTC utilizes mechanisms such as intrusion detection systems, intrusion prevention systems, firewalls and encryption to secure information from accidental loss and from unauthorized access, use, alteration, and disclosure.

NHTC deploys Intrusion Detection Systems (IDS) and Intrusion Prevention Systems (IPS) to alert and proactively contain potential threats. Enhanced security visibility and coverage is enabled through added layers of firewall and IDS beyond the network perimeter. Management connections to servers are always authenticated and encrypted via Secure Shell (SSH) when administration access is required for troubleshooting, patch management, and upgrades.

NHTC runs automated vulnerability scanning on all perimeter systems to identify potential security risks. Scanning applications are regularly updated to remain current and up to date on important security vulnerabilities. Patches are applied to all relevant systems, unless a compensating control is implemented.

NHTC uses a variety of industry-standard security technologies and best practices to help protect information from unauthorized access, use, or disclosure. All data stored on the NHTC systems is encrypted following industry standards using the strongest keys and ciphers. All communications with the App are protected with industry standard security protocols.

You control access to your account and, as set forth in the Agreement, you are obligated to keep your login credentials and passwords secure and protected and maintained as confidential. Although NHTC implements measures that are reasonably designed to protect you, information may nevertheless be transmitted outside of NHTC's systems. Any such transmission of information is at your own risk, and NHTC is not responsible for any circumvention of any privacy settings or security measures provided.

## **Changes to this Privacy Policy**

NHTC may update this Privacy Policy from time to time. If NHTC makes material changes to how NHTC treats personal information under this Privacy Policy, NHTC will notify you by email or other communication.

The date the Privacy Policy was last revised is identified at the end of this Privacy Policy. You are responsible for ensuring NHTC has an up-to-date active and deliverable email address for you and for periodically visiting this Privacy Policy to check for any changes.

## **Contact Information**

To ask questions or comment about this Privacy Policy and NHTC's privacy practices for the Cloud Services, contact NHTC via e-mail at [suggestions@nehp.net](mailto:suggestions@nehp.net).

*Last modified: June 24, 2020*

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