

*Effective Date: May 8th, 2018*

## **ALLO Privacy Policy**

### **1. Privacy Policy Overview**

ALLO Communications, LLC (“we,” “us,” or “our”) operates the website <https://www.allocommunications.com/> (the “Website”), which is governed by this Website Privacy Policy (the “Policy”). This Policy applies to any individual or entity (“you”, “your”, or “User”) who accepts this Policy. This Policy is designed to inform you of the types of information we collect from users, how we use that information, and the circumstances under which we will share it with third parties when users utilize the products and services (collectively, the “Services”).

This Policy pertains to information collected only directly through the Website and does not apply to personal information collected from offline resources and communications (for instance, if you send us a postal letter or call us). Our Services, and our collection, use, and disclosure of your information through this Website is governed by U.S. law. Accordingly, our Policy applies to Users who are located in the U.S. when visiting the Website.

We reserve the right at any time, and in our sole discretion, to change or modify this Policy. If any such changes or modifications are made, we will update the “Effective Date” heading at the top of this web page. Such changes or modifications shall be effective immediately upon posting to the Website, and supersede any prior versions of this Policy. Upon material modification of this policy notice will also be provided through electronic or physical mail. Your use of the Website or the Services provided through the Website following such changes or modifications shall constitute your acceptance of the Policy as last revised.

### **2. Types of Information Collected**

#### ***NON-IDENTIFYING INFORMATION***

We, and/or our third-party advertising or technology vendors, may collect Non-Personally Identifiable Information using various tracking technologies described in this Policy. Non-Personally Identifiable Information is anonymous and includes information such as IP address, web pages which have been viewed, date and time, search queries that have been submitted, domain type, and responses by a visitor to an advertisement and content delivered by us or a third party advertising or technology vendor. We may use different types of technologies to collect this type of information, including cookies and web beacons (1x1 pixels). Additionally, when requesting further information on the Website, we may collect additional Non-Personally Identifiable Information about the individual. Examples of Non-Personally Identifiable Information that may be requested include geographic location. None of this Non-Personally Identifiable Information, by

itself, or together with other Non-Personally Identifiable Information, can by its nature be matched with a specific individual.

### ***PERSONALLY IDENTIFIABLE INFORMATION***

Personally Identifiable Information, as used in this Policy, means any information or set of information that identifies a specific individual, and may be collected, for example, when users request more information, subscribe to Services online, register for an account, or contribute to a chat, or in any other way submit personal information to us via the Website. Examples of Personally Identifiable Information that may be requested include your first and last name, email address, ALLO account number, CPNI customer code, user ID and/or password information, credit card or other payment information, postal address, and phone number(s). We collect this information on the Website to provide you with notices in the form of e-mails, mailings, and the like, to allow you to request information from us, and otherwise correspond with you about our Services. You can choose not to provide your Personally Identifiable Information by electing not to complete a form. By providing your personal information, you acknowledge and consent to our use of your Personally Identifiable Information in accordance with this Policy.

### **3. How We Collect Information**

We automatically collect certain Non-Personally Identifiable Information on the Website through cookies, web beacons, log files, and other common website data collection techniques. Additionally, we receive information from third parties.

When you enter the Website, we will identify the Internet Protocol (IP) address of your computer or handheld device. The IP address does not identify you personally, but it lets us identify the device you are using. We store IP addresses in case we need to track a connection for security purposes. We may also collect information about the device you are using to access administrator services, including what type of device it is, what operating system you are using, device settings, unique device identifiers, geo-location data, and crash data. Whether we collect some or all of this information often depends on what type of device you are using and its settings. Check the policies of your device manufacturer or software provider to learn more about what information your device makes available to us.

### ***DO NOT TRACK SIGNALS***

Do Not Track is a feature in your web browser, which enables you to opt-out of the third party tracking of your online activities over time and across third party websites. We do not process or comply with any web browser's "do not track" signal or other similar mechanism that indicates a request to disable online tracking of individual users who visit this Website or use our Services. Third parties cannot collect any Personally Identifiable Information from this Website unless you provide it to them directly.

## ***WEBSITE COOKIES***

The website may place “cookies” on a visitor’s computer. Cookies are small text files. Our cookies save anonymized (e.g. Non-Personally Identifiable) data about individual visitors, allowing the website to recognize information about a visitor and help deliver personalized content and other services and functions. The Website may use both session cookies, which terminate when a User closes his or her browser, and persistent cookies, which remain on the User’s computer until they expire or are manually deleted. A cookie does not retrieve any other data from your hard drive.

The Website may also contain coding from our third party business and technology partners, which generate third-party cookies. Third-party cookies allow these third party business and technology partners to store Non-Personally Identifiable Information, which is accessible when you visit the Website or other third party websites. We do not control use of these cookies.

Most browsers allow you to control cookies, including whether or not to accept them, and provide the ability to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser. Blocking cookies may result in a lower quality experience for you while you are using the Website, or otherwise stop certain features on the Website from functioning. Blocking cookies does stop all tracking activities described in this Policy.

## ***WEB BEACONS (1×1 PIXELS OR GIFS)***

Our website contains coding known as Web Beacons that use 1×1 pixel images to capture and transmit the online activity of users on the Website. These Web Beacons typically transmit information about the completion of forms on the Website and other Website activities in order to measure advertising effectiveness and/or store analytics information. In addition, we may use Web Beacons in HTML-based emails. This use allows us to evaluate the effectiveness of our email communications and our marketing campaigns by showing how many emails recipients open.

## ***LOG FILES***

Like most websites, our servers utilize log files. Log files store information including internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks. Log files are used to analyze trends, administer the Website, track Users’ movement in the aggregate, and gather broad demographic information for aggregate use. We use log file information at times to help identify you as you browse and to gather broad technical and demographic information on who uses our website.

## ***GOOGLE ANALYTICS ADVERTISING FEATURES***

We use Google Analytics to collect information about the use of the Website. Google Analytics collects information such as how often users visit the Website, what pages they visit when they do so, and what other sites they used prior to coming to the Website. We use the information we get from Google Analytics only to improve the Website. Google Analytics collects only the IP address assigned to you on the date you visit the Website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with Personally Identifiable Information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to this Website by disabling the Google Analytics cookie on your browser. You can also view and change the currently available opt-outs for Google Ads.

We also use the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to of our website. This could be in the form of an advertisement on other websites or on the Google search results page. Third party vendors, including Google, use cookies to serve ads based on someone's past visits to the Website. Any data collection will be used in accordance with our own privacy policy and Google's privacy policy. You can set preferences for how Google advertises to you using Google's Ads Settings. Alternatively, you can opt-out of a third party vendor's use of cookies by visiting the Network Advertising Initiative opt-out page.

## **4. How We Use and Share Information**

### ***USES OF INFORMATION***

In addition to the uses listed in other sections of this Policy, the information you provide to us and automatically-collected information (both Personally and Non-Personally Identifiable Information) is used to provide a number of different functions and services on the Website and to provide an enhanced online experience for users. We collect information so we can identify you as our customer, to establish, manage and protect your accounts, to verify your identity in the event that you lose or forget your Website login credentials, to complete your transactions, to offer you Services you might be interested in, to personalize and improve upon your experience with us, and to comply with various legal and regulatory requirements.

Third-party advertising companies may also be utilized by us to target display advertising to you once you leave the Website. These companies may use Non-Personally Identifiable Information about your visits to the Website in order to provide advertisements about goods and services that may be of interest to you. It is solely your obligation to review and understand the privacy practices and policies of these advertisers and their associated third parties. These advertisers and their associated third parties are independent entities over which ALLO exercises no control. ALLO is

not responsible for, and will not be liable for, their conduct, actions, omissions, or information handling or dissemination practices. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by clicking [here](#). Please note, this does not opt you out of being served advertising. You will continue to receive generic ads.

## **SHARING OF INFORMATION**

ALLO does not sell or disclose information about you to any other party except under the circumstances described below, or as otherwise provided in this Policy, or required or permitted by law. Sharing of your Personally Identifiable and Non-Personally Identifiable Information includes, but is not limited to, the following:

- If you give us your consent, we may share your Personally Identifiable Information with third parties pursuant to the terms of your consent.
- We may share your contact information, such as your name, email address, and phone number collected on the website, among our trusted third parties so that they may contact you with marketing offers that are different from services you currently have with us. You may, however, limit this sharing. If you do not want this information shared for marketing purposes, please click **here** to opt-out.
- We aggregate information into statistics about Users, including their usage of the Website, traffic patterns, and demographics. We may provide third parties with such statistics, but such information does not constitute Personally Identifiable Information.
- We may occasionally share your information with our affiliates, service providers, and other third parties that help to operate our business and this Website and deliver the Services available on or through the Website to: facilitate, improve, or outsource elements of our service or operation of the Website, including processing transactions, sending emails, and providing marketing assistance or analysis.
- We may provide your information to, or exchange your information with, these service providers for use in their provision of services to us, such as fraud protection, compliance monitoring, or marketing analysis. These external service providers may have access to Personally Identifiable Information needed to perform their functions or services to us, but may not use it for other purposes including their own marketing.
- We may sell, transfer or otherwise share some or all of our assets, including your Personally Identifiable Information, in connection with a merger, acquisitions, reorganization or sale of assets including in the event of bankruptcy.

In addition to the uses described above, sometimes the law or other circumstances require that we disclose Personally Identifiable Information about you to nonaffiliated third parties. Some examples are the following:

- To assist law enforcement or other governmental agencies investigating cases of possible illegal activities by third parties.

- To respond to subpoenas, court orders, legal process, and to establish or exercise ALLO's legal rights to defend against legal claims.
- To enforce or apply our agreements, and to protect the rights, property, or safety of our users or others.
- To prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical, or legally actionable activity.

### ***THIRD PARTY SITES***

This Policy applies only to this Website. It does not apply to your use of any other websites (whether or not operated by us), including any websites to which we provide links or websites of our business partners. We are not responsible for the collection and use of information by companies or individuals unaffiliated with us whose websites may contain links to ours. Your browsing and interaction on any third party website or service are subject to that third party's own rules and policies. We are not responsible for, and will not be liable for such third parties' conduct, actions, omissions, or information handling or dissemination practices.

### ***TESTIMONIALS***

We may use customer testimonials, comments, or reviews of our Services from our Website or from social media for marketing purposes, which may contain personally identifiable information, such as your name. We obtain the user's consent to use his/her personal information, along with the testimonial, prior to using the testimonial.

## **5. Accessing and Changing Your Personal Information**

To request information which was previously voluntarily provided be removed from our database, send a request to ALLO using the information in the "Contact Us" section below. We will attempt to delete such information, where feasible, after we receive a request from you. We will respond to a request for access within 30 days.

In accordance with this Policy, we may have forwarded Personally Identifiable Information to law enforcement agencies or other third parties as required by law. In the event we have shared your information with such third parties we no longer have control over the removal of such information, and we will not be able to remove your information from their systems.

Notwithstanding any request from you, we may retain a record of your information, including Personally Identifiable Information that is necessary to comply with applicable law or as necessary to manage your account.

Please be advised that the information removal request does not carry forward and any subsequent return to the website will result in additional information capture and sharing in accordance with this Policy.

## **6. Email Opt-Out Policy**

By providing your email address through the Website, you consent that the Website may send email to you regarding our Services. You can choose to opt out of receiving email communications from us by selecting to opt out by following the unsubscribe instructions in the email communication you receive from us or by contacting us directly using the information in the “Contact Us” section below.

In accordance with this Policy, we may have shared your email address with third parties. When that occurs, we no longer have direct control over the use of such information, and your rights regarding such use will be governed by such third party’s policies. You will have to contact them directly with any email opt-out request.

## **7. Security Measures to Protect Your Information**

ALLO has implemented reasonable and appropriate physical, procedural, and electronic safeguards to protect your information from unauthorized access and improper use. We review our security procedures on a regular basis to consider new or updated and appropriate technology and methods. Please be aware, however, that no method of transmission of information over the Internet, or method of electronic storage of information, is 100% secure. Therefore, while we strive to use reasonable and appropriate means to protect your information, we cannot guarantee its absolute security. If you have any questions about security on our Website, you can contact us using the information provided in the “Contact Us” section below.

## **8. Children’s Privacy**

The website is not directed to children under 13. We do not knowingly collect, maintain, or use information from children under age 13. If a parent or guardian becomes aware that his or her child has provided us with Personally Identifiable Information without their consent, he or she should contact us using the information in the “Contact Us” section below. If we confirm we have collected such information, we will take all reasonable measures to delete that information from our system as soon as possible.

## **9. Privacy Notice for European Union Residents**

Striving to provide superior customer service, ALLO places great emphasis on its customers and their privacy rights. In doing so, ALLO will comply with European Union Privacy Directives, most notably the EU General Data Protection Regulation. By providing our services, we may from time to time collect, store, use or process your personal data for legitimate business purposes, such as improving our products and services. ALLO’s processing of your data is necessary for compliance with its contractual and legal obligations. Personal data means any identifier information, such as your name, social security number, identification number, location data, or other online identifiers and factors.

Although your data is generally stored within the United States, an international data transfer may occur if third party, cloud-based storage companies that ALLO employs

use servers located outside the United States. ALLO uses appropriate technical and organizational security measures including encryption of personal data and follows various industry standards and best practices to protect your personal data. Additionally, ALLO requires its vendors and processors to abide by the European Union General Data Protection Regulation and to apply adequate security and technical safeguards. We will not transfer your data to or store your data in countries that have not been awarded an adequacy decision by the European Commission.

For general processing purposes, ALLO will store your personal data for a period of seven years after full payment of the loan balance. However, ALLO may retain such information for longer periods where legally required to do so based on its contractor or other legal obligations.

You have the right to withdraw consent for processing at any time. Further, you have the right to request access to and rectification, restriction or erasure of your personal data. ALLO will afford you these rights, but it may not be able to do so where the processing is based on its contractual obligations, based on other legitimate interests, or carried out in the public interest. Along with these rights, if you believe that your data has been mishandled in violation of a privacy directive, you have the right to lodge a complaint with the relevant supervisory authority. If you have questions or concerns about our data processing practices, please address such inquiries to our Data Protection Officer.

### ***CONTACT DETAILS FOR PRIVACY AND DATA-RELATED INQUIRIES***

#### **Data Controller:**

U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202  
1-800-872-5327

#### **Data Processor:**

Nelnet  
Shawn Traudt  
Chief Compliance Officer  
shawn.traudt@nelnet.net  
402-323-4979 (x24979)

## **10. Contact Us**

If you have any questions about this Policy, the practices of the website, or your use of the website, please contact us at:

#### **Address:**

ALLO Communications

610 Broadway Street  
Imperial, NE 69033

**Email:**  
info@allophone.net