

Owner

Data Privacy Officer

Approved/Published

December 2022

Version

1.0

INTRODUCTION

Liberty Latin America and all its [subsidiaries and affiliates](#), including Liberty Communications of Puerto Rico LLC, Liberty Mobile Puerto Rico Inc., Liberty Mobile USVI Inc. and Broadband VI, LLC (“LLA”), are committed to protecting our customers’ privacy. We want you to be confident in knowing that we treat your information with care and in accordance with our obligations under applicable data protection and privacy laws.

This Privacy Policy (the “Policy”) describes how we collect, store, use, protect, and disclose your information when we provide you with our products, services, networks, and platforms, including our cable television, internet, mobile and fixed telephone services, business to business services, websites, and mobile apps (individually and collectively, the “Services”). Please be aware that because this Policy describes the privacy practices of all our Services, some parts of the Policy may not apply to you. For example, if you do not subscribe to LLA’s telephone services, we will not collect call detail information. Also, if you have a separate contract for any Service, that contract may describe how we process information about you. If a portion or section of this Policy conflicts with local laws or regulation, those laws or regulation will supersede said section.

This Policy does not apply to products, services, websites, and mobile applications not provided by LLA. We recommend that you read the privacy policies of such third parties. We are not responsible for the privacy practices or content of any such third parties’ websites, products, or services.

If required by law, we will notify you of our Privacy Policy annually. However, we may update this Policy from time to time. Any updates will be posted on LLA’s website at www.lla.com/privacy and on subsidiaries’ websites (in conjunction, the “Websites”) and are effective as of the date first published. If at any time you find this Policy unacceptable, you should cease using the Services.

INFORMATION WE COLLECT

We collect information about you that directly identifies you, such as name, address, and telephone number, to assist us in providing and invoicing our Services. We also collect information that does not directly identify you but can be associated with you and your use of devices and our Services, such as IP address, device numbers, and account numbers.

We may obtain this information from you directly, automatically through the devices you use to access our Services, or from third parties. If you permit others to use the Services, we may collect information about them too.

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Among others, we may collect information about you in the following ways:

- Information you give us directly, such as when you purchase products or services, fill out a form for any of our Services, send us an e-mail, or respond to a survey
- Automatically from your device, such as when you use an interactive or transactional service, television viewing controls, or use our Services
- From third parties, such as service providers who provide us operational support

Additionally, with respect to our customers in the United States, we collect Customer Proprietary Network Information (CPNI) from you when you use certain telecommunications Services. Please see the section on CPNI below for more information, which includes instructions if you wish to opt-out of our use of your CPNI for marketing.

You may provide information to us directly, including:

- **Registration information:** When you sign up for our Services, we require you to provide information about yourself and supporting documentation, including all or some of the following: your name, service and billing address, email

address, telephone number, Social Security or other government-issued identifiers, driver's license number, billing and credit records, and bank account and credit card numbers used to pay for our Services.

- **Account Information:** Information we use to identify you and to maintain your account and the Services, which may include date of birth, government-issued identifiers, next of kin, employment, and credit history.
- **Payment and Billing Information:** Information about your payments to us and the information on your billing statements and receipts.
- **Contact Information:** Information that we maintain to be able to get in touch with you.
- **Social Media Information:** When you interact with us on social media, we may collect your username, real name, profile picture, and any information you choose to share with us on the social media platform.
- **Photographs:** We may collect photos of your property for troubleshooting purposes.
- **Communications:** We may collect records of calls, emails, and chats with our customer service representatives.

We or partners working on our behalf may collect information automatically from the devices or software you use to access our Services. If you are using our Websites, applications ("apps"), or other digital channels, we may collect some of this information using web "cookies" and similar information-gathering technologies and maintain server logs. The types of information we may collect include:

- **Online Analytical Information:** We may collect information from your browser and activity on our Websites or apps, including details about your interaction with our Websites, apps, and electronic newsletters.
- **Online Advertising Information:** We and partners working on our behalf may collect information from your browser and activity on our Websites or apps that we use for advertising our Services to you on third-party websites or apps, including special advertising and other unique identifiers that enable us or our partners to target advertisements to you. Please be aware that our advertising partners may collect information about you when you visit third-party websites or use third-party apps. They may use that information to better target advertisements to you on our behalf.
- **Service Usage:** We may collect information about your use of our Services. This includes, for example, your video selections when you use our cable television Services, your use of company-provided and third-party set-top boxes, remote controls, electronic program guides, video players, applications, tablets, and other devices and software that are connected to our cable system or other Services. This information includes which channels, programs, and advertisements are viewed and for how long. When you use our digital video recording service, our DVR partner collects information about you, including personal and viewership information, to provide that Service. When you use our internet and telephone services, we may transmit, collect, and store information about you for a period of time related to your use of our Services and features. This information may include your email, instant messaging activity, file transfers and sharing, web browsing, telephone activity including voicemails, use of our voice center, custom settings or preferences, and communications with us for support, or other uses of our Services and features.
- **Voice Commands:** We may collect information from voice-activated or voice-controlled devices.
- **Geolocation:** We may collect precise geolocation if you have it enabled on your mobile device when you use our apps. Also, we may collect address-level information, for example, when you use Wi-Fi enabled devices that connect to your router. If you do not want us to collect your device's location, you can disable location services on your device using the device settings.
- **Device and Network Activity Information:** We may collect technical information about your use of devices on our network, for example, IP address, Domain Name Server, and statistics about your network activity.
- **Video and Audio Recordings:** If you use our home security services and activate recording features, we may collect video and audio recordings.

We may collect information about you from third parties, including:

- Information, such as contact information, demographic information, and information about your interests and purchases, that we obtain from other companies to better tailor our programming, marketing, and advertising services to you.
- Information about your billing and credit history from credit reporting agencies.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Information about your interaction with advertisements on our Services or ads that we place on third-party websites from online advertising companies.

If you decide to invite others to the Services, we will collect your and the other person's names, email addresses, and/or phone numbers to send an email or text message and follow up with the other person. You agree that you will obtain the other person's consent before giving us their contact information. You also agree that you will not send us the contact information of a minor. We will inform any other person you invite that you gave us their information in the invitation email.

HOW WE USE YOUR INFORMATION

We use the information we collect from or about you to provide the Services to you, improve those Services, customize the Services to your preferences, market and advertise the Services to you and others, troubleshoot the Services, secure the Services, and respond to requests from governmental entities or law enforcement agencies. We may use information about you for additional purposes, but only if we obtain your consent to do so.

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- **To provide and manage our Services:** We may use information about you to provide the Services you requested, send you bills and invoices, provide technical support, authenticate access to your account, help with upgrades, detect and protect against fraud and the unauthorized use of our Services, provide you with personalized content, process and respond to your inquiries, administer disputes, and enforce our legal rights, including your agreement(s) to receive the Services. Additionally, we may ask you for feedback about our Services' performance, customer care service, and maintenance and operations. As permitted by applicable law, we may monitor and record our communications with you, including emails, chats, and calls, for training purposes, quality assurance, and to record details about the Services you order from us.
- **To enhance our Services:**
 - We may use audience measurement and other demographic data about you to improve our Services and make programming and advertising more relevant to you. We may also use this information to distribute and deliver relevant programming and advertising to you.
 - Viewership information may be used to determine which shows are most popular, how many people watch a program to its conclusion, and whether people are watching commercials. An analysis of this information helps improve our cable television service and other Services and makes programming and advertising more relevant to our subscribers; it also allows us to distribute and deliver relevant programming and advertising to you without disclosing personally identifiable information about you to programmers or advertisers.
 - Activity data may be used to help us learn how popular certain programs are and how our customers as a whole generally prefer to view certain kinds of programming using cable television service, including whether they like to watch certain programs live, on-demand, on mobile devices, or online. This may require us to compare or combine activity data on our cable system with online activity data.
- **To customize our Services:**
 - This enables us to personalize your settings on our products and Services so that you don't have to change these settings each time you use them.
 - We may use location data to identify which of our systems provides services to you to provide relevant information related to our Services in your area.
- **For marketing and advertising:** We may use information about you to deliver our and third parties' advertisements to you on our properties or on third parties' websites and apps, measure the effectiveness of our advertising, provide you with content recommendations, and send you promotions and offers. We may also use activity data to determine whether promoting content and services in certain ways helps attract a larger audience and more customers. We may compare or combine information, such as activity data, we receive when you use cable television services to view content or advertising with information about your use of content and advertising that we deliver on other platforms, such as DVR devices, Websites, and apps. We do this to better understand how our customers access and use our products and services in all of the places that we offer them.
- **For troubleshooting:** We may collect activity data associated with particular devices, such as set-top boxes, portable devices, and other supported devices, so we know where to deliver the Services and how to troubleshoot them.
- **To maintain the security of our systems:** We may use information about you to protect and secure our Services, assets, network, and business operations and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal. We may use automated processes to scan incoming and outgoing email messages to, for

example, identify and filter out likely spam or harmful messages. We do not read or disclose to third parties the content of your email messages or other online communications unless we are compelled by law or legal process to do so.

- **For legal compliance:** We may use information about you to comply with legal processes, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests, and to comply with applicable legal requirements.

HOW WE SHARE YOUR INFORMATION

We may share any of the information we collect from or about you when you direct us to do so, if necessary, to provide the Services to you, to respond to legal process, and to protect our property and the safety of our employees. We may also share information with partners to help market and advertise our Services. Please see *Your Options and Rights Regarding Your Information* (below), which explains how you can opt-out of our uses or disclosures of information for marketing or advertising purposes.

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- **Affiliates:** We may share information with other members of our group of companies.
- **Telephone Services:** We will only use, disclose, or permit access to your information as required by law or as approved by you and as necessary to provide communications services or other services necessary to, or used in, the provision of the communications service. We may disclose your personally identifiable information to third parties in connection with features and services such as Caller ID and directory services.
- **Commerce Partners and Other Third Parties:** When you elect to participate in a special offer or engage in a transaction presented by us but provided by our Commerce Partners, we may disclose information about you to such Commerce Partners when relevant. We may disclose limited information, including your name, address, and level of service, to other non-affiliated entities for “mailing list” or other purposes that may or may not relate to the Services unless you object to such disclosure in advance. Any disclosure that we make under this exception will not reveal, directly or indirectly, the extent of your viewing or other use of the Services or the nature of any transaction you make over our cable system.
- **Service Providers:** We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract to use information that we share only for the purpose of providing these business functions, which include:
 - *Supporting Service functionality*, such as vendors that support customer service and customer relationship management, application development, postal mailings, and communications (email, SMS, fax).
 - *Auditing and accounting firms*, such as firms that assist us in the creation of our financial records.
 - *Professional services consultants*, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
 - *Analytics and marketing services*, including entities that analyse traffic on our online properties, assist with identifying and communicating with potential customers and support distribution of marketing communications.
 - *Security vendors*, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
 - *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
- **Online Advertising Partners:** We partner with companies that assist us in advertising our Services, including partners that use cookies and online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising.
- **Law Enforcement and Governmental Entities:** If allowed by and after complying with applicable local laws requirements, we may disclose your information to representatives of a government or to comply with valid legal processes. In these situations, we may be required to disclose information about a customer without the customer’s consent and without notice to the customer. In some instances where there are valid legal requests or orders for disclosure of your information, we may notify you of the requests or orders and then it may be up to you to object or take specific action to prevent any disclosures pursuant to those requests or orders. Law enforcement agencies may, with the appropriate legal document/order, and without notice to you, obtain the right to install a device that monitors your internet and email use, including addresses of email sent and received and, in some cases, the content of those

communications, and/or your use of our telephone service, including listings of incoming and outgoing calls and in some cases the content of those calls.

- **Sale, Merger or Acquisition:** We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with or during negotiations of any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot guarantee that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this Policy.
- **Child Exploitation and Human Trafficking:** We are required by law to report any evidence we may have or become aware of relating to violations of laws concerning child exploitation and/or human trafficking.

HOW DO WE PROTECT YOUR INFORMATION

We use administrative, technical, and physical safeguards to protect your privacy and have taken key steps to protect your information, including but not limited to, establishing technological and organizational security controls to protect your information. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose your information. If a breach were to occur, we will notify as required by applicable law.

YOUR OPTIONS AND RIGHTS REGARDING YOUR INFORMATION

How to access your information

You may obtain information about your account by using our online account manager or mobile apps or by getting in touch with us using the contact information below. You may also examine the records containing your information by contacting us and setting up an appointment. **If you wish to inspect our records containing your information, our offices are open from 9:00 am to 5:00 pm Monday through Friday local time**, excluding holidays. Local protocols may apply. If your review reveals an error in our records, we will correct it. You will only be permitted to examine records that contain information about your account.

- **Liberty Communications of Puerto Rico / Liberty Mobile of Puerto Rico / Liberty Mobile of USVI/ Broadband VI**
 - Telephone: (787) 657-3050
 - Email: servicio@libertypr.com
- **C&W (Flow, BTC, Cable & Wireless Networks and Cable & Wireless Business)**
 - Email: privacy@cw.com
- **C&W Panama**
 - Telephone: +507 8822529
 - Email: privacidad@cwpanama.com
- **Liberty Telecomunicaciones de Costa Rica**
 - Call Center: 1693
 - WhatsApp: 63111693
 - Facebook: @costaricaliberty
 - Twitter: @liberty_cr
 - Instagram: liberty_cr
 - Email: privacidadcr@lla.com

Please be aware that we will require you to provide information to verify your identity before we make any changes or disclose information to you.

Your choices regarding the use and disclosure of your information

You have the right to prohibit or limit certain kinds of disclosures and marketing. You may contact us to ask us to put your name on our internal company “do not call” and “do not mail” lists so that you generally do not receive marketing or

promotional telephone calls or postal mail from us or made at our request (you may still receive some marketing, such as in our billing statements and other service-related communications and in communications that you initiate). Similarly, you may always opt out of receiving future email marketing messages from us by clicking on the link in the applicable marketing email and following the instructions provided there.

You also have the right to prohibit or limit disclosure of your information to third parties for “mailing list” or other purposes as described above in this Policy. To restrict such disclosures, you may contact us at the contact information in the previous section. Please include your name, address, and account number when contacting us for this purpose.

Your enforcement rights

You may have all or some of the following rights with respect to your information, depending on your location or residency. Please contact us to exercise your rights.

- **Access and Portability:** Request access to personal data we hold about you or request transmission of your data to a third party.
- **Correction:** Request that we rectify inaccurate or incomplete personal data we store about you.
- **Erasure:** Request that we erase personal data when such data is no longer necessary for the purpose for which it was collected when you withdraw consent and no other legal basis for processing exists, or when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- **Restriction of Processing:** Request that we restrict our processing of personal data if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise, or defense of legal claims; or if your request to object to processing is pending evaluation.
- **Objection to Processing:** Object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms or for the purpose of asserting, exercising, or defending legal claims.
- **Transfers:** Obtain information about and a copy of the safeguards we use to transfer personal data across borders.
- **Complaints:** Lodge a complaint about our data collection and processing actions with your jurisdiction’s privacy supervisory authority.

Your ad choices

You have options to limit the information that our partners and we collect for online advertising purposes.

- You may disable cookies in your browser or mobile device using their settings menus. Your mobile device may give you the option to disable advertising functionality. Because we use cookies to support Service functionality, disabling cookies may also disable some elements of the Services.
- The following industry organizations offer opt-out choices for companies that participate in them: the [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), and the [European Interactive Digital Advertising Initiative](#).
- Use our cookie settings menu.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized. Nor will exercising these options prevent other companies from displaying personalized ads to you. If you delete your cookies, you may also delete your opt-out preferences. We do not respond to “Do Not Track” signals at this time.

OTHER IMPORTANT INFORMATION

How long do we keep personally identifiable information?

We may store information about you for as long as we have a legitimate business need for it.

Cross-border data transfer

We are part of an international group of companies (the “Liberty Latin America Group”) and may collect, process, and store your information in various countries. We may also transfer your information within the Liberty Latin America Group and to our service providers. The data privacy laws governing the use and transfer of data in other countries may not be the same as those in your country; however, we will ensure that an adequate level of protection is provided to protect your information.

Information about children

Our Websites and apps are intended for users aged 13 and older. We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 13, we will delete that information. Please contact us with any concerns.

PRIVACY DISCLOSURES FOR SPECIFIC JURISDICTIONS

United States, Puerto Rico and U.S. Virgin Islands - Customer Proprietary Network Information (“CPNI”)

When we provide telecommunications services to you, we may collect certain information that is made available to us solely by virtue of our relationship with you, such as the type, destination, technical configuration, location, and amount of use of such services. This information, and related billing information, is known as Customer Proprietary Network Information (“CPNI”). You have a right, and we have a legal duty under United States federal law to protect the confidentiality of CPNI. Consistent with federal law, we may use and disclose your CPNI without your permission to protect our rights or property; to protect users of our Services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such Services; to comply with any laws, court orders, or subpoenas (please note that we may be compelled to disclose your CPNI in certain circumstances); to provide Services to you pursuant to your contract with us for telecommunications services; to provide inside wiring installation, maintenance, and repair services; to conduct research on the health effects of cellular radios; to market services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, certain centrex features, or other services within the same category or categories of service to which you already subscribe; to provide customer premises equipment and features; to provide call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

While federal law allows us to use CPNI for the above purposes, you have the right to restrict us from the following additional uses of your CPNI:

- Use or share your CPNI to market services except as provided above; or
- Share your CPNI with our affiliates or agents to provide or market services to which you do **not** subscribe.

Such uses better enable us to provide you with offers more tailored to your interests and needs, but you can restrict such use of your CPNI by contacting us via letter at Liberty Puerto Rico, Dispute & Claims Department, P.O. Box 192296, San Juan, PR 00919-2296, via email at servicio@libertypr.com, or by phone at any time at 787-355-3535. If you do not notify us within 30 days of your receipt of this notice, we will assume that we have your permission to use and disclose CPNI for these marketing purposes. You may revoke your permission (opt-out) at any time. Your permission, or revocation of permission, remains valid until you tell us otherwise. The Services we provide to you will **not** be affected if you deny or revoke your permission. If you restrict your CPNI use, you may still receive marketing from us, but it would not be based on using your CPNI. For your protection, we will not disclose your call detail records over the phone unless you authenticate your identity. We will also require the use of a password to log into accounts where you can view your CPNI online.

Jamaica

To contact Flow Jamaica’s Data Protection Officer, please send a letter or email to the following:

Data Protection Officer
2-6 Carlton Crescent
Kingston, Jamaica
Att. Legal Department
privacy@cw.com

HOW CAN YOU CONTACT US ABOUT THIS POLICY

If you have any comments or queries concerning this Policy or you wish to request access to your information, please email us at the appropriate address included in the Your Options and Rights Regarding Your Information section above or at privacy@lla.com.