



Privacy Policy

If you are a California resident, please [click here](#) for more information about your specific privacy rights.

ACCESSIBILITY – if you are having any trouble accessing this Privacy Notice or the website, please call our toll-free number at (800) 233-5158.

AMERICAN RIBBON MANUFACTURES, INC. (“we”, “our”, or “us”) collects and processes information about you as described in this Privacy Notice (this “Notice”). In this Notice, we use the term “Personal Information” to refer to information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked directly or indirectly, with a particular individual, household or device. WE are committed to protecting the privacy of those with who we interact. This Privacy Notice contains details about how we collect, use, and share Personal Information that we obtained from and about you when you interact with us. Please read this Notice carefully.

1. Applicability.

This Notice does not apply to job applicants or our employees. Whenever you interact with us on behalf of another individual or entity, such as by providing or accessing Personal Information about individual, you represent that your interactions and exchanges comply with applicable data protection laws. You shall have sole responsibility for any violation of privacy laws as a result of failure to inform the other individual about how their Personal Information will be processed or to obtain any necessary consent from such individual.

2. What Personal Information Do We Collect?

a. **Information You Provide.** We may collect personal information from you directly, such as where you use our mobile application, join and participate in our programs, take surveys, enter a contest, participate in promotions, or otherwise communicate with us. We may also collect demographic information that you provide to us, such as your zip code or age or other Personal Information that

could identify, relate to, describe, or is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with you.

- b. **Information Collected Automatically.** We may also collect Personal Information from you by “passive” means, such as when you interact with our website, or mobile application. We may collect your website browsing patterns or IP address to analyze the trends, to administer our website, and to gather broad demographic information for aggregate use.
- c. **Social Media.** Our website or mobile application may, from time to time, contain links to and from social media platforms. You may choose to connect to us through a social media platform, such as Facebook or Instagram, and when you send us a direct message, we may collect additional information from you, such as your screen names, profile picture, and contact information through the social media platform so that we can respond to your direct inquiry. Please be advised that social media platforms may also collect information from you. When you click on a social plug-in, such as Facebook’s or Instagram’s “Like” button, that particular social network plugin will be activated and your browser will directly connect to that provider’s servers. We do not have control over the collection, use and sharing practices of social media platforms and encourage you to review their usage and disclosure policies and practices, including the data security practices, before using social media platforms.
- d. **Information from Third Parties.** We may receive information about you and your interactions with us from third parties, such as from third party service and content providers, companies that provide personal and criminal background information in accordance with Visa[®] and MasterCard[®], and others interacting with us.

Categories of Personal Information We Collect

The types of information that we collect about you are similar to the information provide in your Sales Agen Agreement with us, and many include:

- a. **Identifiers**, such as your name, alias, postal address, country of residence, unique personal identifier, online identifier, internet protocol address, email address, account name, phone number, social media identifiers, social security number, driver’s license number, passport number, or other similar identifiers.
- b. **Financial information**, such as your bank account number, credit card number, debit card number, government-issued Tax ID, or any other financial information.
- c. **Protected class and demographic Information**, such as age, gender, sex, citizenship, gender identity, or date of birth.
- d. **Commercial information and preferences**, including records of personal property, creditworthiness, products or services purchased, obtained, or considered.

- e. **Internet or other electronic network activity information**, such as information regarding your interactions with us (including interacting with us online, and via the application).
- f. **Geolocation information**, such as longitude and latitude from you IP address or mobile device when using the application.
- g. **Audio, electronic, visual, thermal, olfactory, or similar information**, such as video recordings of our premises and audio recordings when you speak with our Partner Support Service Department.

3. How Do We Use Your Information?

- a. **To enable interactions between you and us**, such as to facilitate the sale of our services; provide you with and support your interactions with us; diagnose, repair and track service and quality issues; provide requested information; communicate with you about your account, or our data practices; install and configure changes and updates to programs and technologies related to interactions with us; authenticate those who interact with us; or to respond to your requests, complaints, and inquiries.
- b. **For our own internal business purposes**, such as to evaluate or audit the usage and performance of programs and technologies related to interactions with us; evaluate and improve the quality of your interactions with us and programs and technologies related to interactions with us; design new services, process and catalog your responses to surveys or questionnaires; perform internal research for technological development and demonstrations; conduct data analysis and testing; maintain proper business records and other relevant records.
- c. **For legal, safety or security reasons**, such as to comply with legal requirements; protect our safety, our property or rights of those who interact with us, or others; and detect, prevent, and response to security incidents or other malicious, deceptive, fraudulent, or illegal activity.
- d. **For any other purposes for which you provide consent.**
- e. **For marketing.** We may use your Personal Information when you participate in marketing surveys, questionnaires, promotions, events, contests. We may use your Personal Information for short-term transient use, including for contextual marketing customization. We may use your Personal Information to enhance our content and to potentially send you commercial emails, and text messages.

When converted to de-identified, anonymized, or aggregated format, data no longer constitutes Personal Information and we may use this information for any purpose.

4. With Whom Do We Share Your Personal Information.

We may share your Personal Information with the categories of recipients described below:

- a. **Affiliates and subsidiaries:** WE may share your Personal Information within our parents, corporate affiliates business units, and other companies that share common ownership.
- b. **Third party service providers:** We may share your Personal Information with Visa[®] and MasterCard[®], third party service providers working on our behalf in order to facilitate our interactions with you or request or support our relationship with you, such as hosting service providers, IT providers, operating systems and platforms, internet service providers, analytic companies, and marketing Providers (e.g., we may share your email address with our outbound email marketing provider). We may contract with other companies to provided certain services, including, identity verification, email distribution, market research, and promotions management. We provide these companies with only the information they need to perform their services and work with them to ensure that your privacy is respected and protected. These companies are prohibited by contract from using this information for their own marketing purposes or sharing this information with anyone other than us.
- c. **Business Partners:** We may also provide your Personal Information or provide access to your Personal Information to our business partners to complete requested transactions or in connection with certain promotional offers in which you participate.
- d. **For legal, security and safety purposes:** We may share your Personal Information with third parties such as law enforcement or other government agencies to comply with law or legal requirements; to enforce or apply our Terms of Use and other agreements; and to protect our rights and our property of safety of our users or third parties.
- e. **In connection with a transaction:** If we sell some or all of our assets, merge or are acquired by another entity, including through a sale or in connection with bankruptcy, we will share your Personal Information with that entity.

We may also de-identify, anonymize, or aggregate Personal Information to share with third parties for any purpose.

5. Children's Privacy.

Interactions with us are intended for individuals 16 years of age and older. Our interactions are not directed at, marketed to, nor intended for, children under 16 years of age. We do not knowingly collect any information, including Personal Information, from children under 16 years of age. If you believe that we have inadvertently collected Personal Information from a child under the age of 16, please contact us at the address below and we will use reasonable efforts to delete the child's information from our databases.

6. Cookies, Online Analytics and Links to Third Party Websites.

Cookies

We use "cookies", which are small text files that store on your computer or equipment when you visit certain online pages, web beacons and similar technologies to record your preferences and actions and track your use of our services. We may also use cookies to monitor traffic, improve our website and make it easier and/or relevant for your use. We use these technologies to:

- Remind us who you are when you access our services which helps us to provide you with services tailored to your specific needs and interest;
- Determine the browser you are using so our services work properly;

- Assist us with sending you notifications;
- Generate analytics regarding your use of our services; and
- Estimate our audience size by determining whether your visit is your first.

You can set your browser or device to refuse all cookies or to indicate when a cookie is being sent. If you delete your cookies or if you set your browser or device to decline these technologies, some services may not function properly. Our services do not currently change the way they operate upon detection of a Do Not Track or similar signal.

Our website may contain links to other sites, including, among others, those of advertisers, other third parties and companies whose trademarks may appear on our website. We are not responsible for the privacy practices or the content of the sites to which we link.

7. Security.

We maintain reasonable security procedures and technical and organizational measures to protect your Personal Information against accidental or unlawful destruction, loss, disclosure, alteration, or use. However, no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially reasonable means of protect your Personal Information, we cannot guarantee absolute security. When you provide us with financial information, we encrypt the transmission of that information by using industry practices as outlined by the Payment Card Industry Data Security Standard (PCI DSS). If you have reason to believe that your Personal Information is no longer secure (for example, if you feel that the security of your account has been compromised), please contact us immediately at aribbon@frontier.com.

8. Terms of Use.

The Terms of Use of interactions with us incorporated by reference into this Notice and can be found here.

9. Changes to Privacy Notice.

We may update this Notice from time to time. The current Notice will be effective when posted. Please check this Notice periodically for updates. If any of the changes are unacceptable to you, you should cease interacting with us. When required under applicable law, we will notify you of any changes to this Notice by posting an update on this website. When required under applicable law, we will seek affirmative consent from you before making material changes to the way we handle Personal Information previously collected from you. If you do not provide such consent, your Personal Information will continue to be used in a manner that is consistent with the version of this Notice under which it was collected.

10. Contact Us.

If you have questions regarding this Notice, please contact us at:

Phone: (800) 233-8158

Email: aribbon@frontier.com

To opt-out of receiving promotional email messages from us, please click on the “Unsubscribe” link contained at the bottom of each email or by contacting us using the information above.

Your California Privacy Rights

If you are a California resident, this section applies to you. If you are not a California resident, the rights described in this section do not apply to you.

Summary of Personal Information Collected

Pursuant to the California Consumer Privacy Act of 2018, below is a summary of the Personal Information we have collected from consumers in the previous 12 months and the categories of third parties with whom we have shared Personal Information. Information about the categories of sources from which we collect Personal Information and the purposes for which we use Personal Information are described above in “What Personal Information Do We Collect?” and “How Do We Use Your Personal Information?”, respectively.

Categories of Personal Information We Collect	Categories of Third Parties With Whom We Shared for a Business Purpose, or Sold, Personal Information
Identifiers	Business partners to complete requested transactions or in connection with certain promotional offers in which you participate. Service Providers, such as IT providers, accountants, logistic providers, analytics companies, and marketing providers.
Protected Characteristics	Service providers, such as IT providers, accountants, logistics providers, analytics companies, and marketing providers.
Financial Information	Service providers, such as IT providers, accountants, logistics providers, analytics companies, and marketing providers.
Internet Usage Information	None
Commercial Information	Service providers, such as IT providers, accountants, logistics providers, analytics companies, and marketing providers.
Geolocation Information	Service providers, such as IT providers, accountants, logistics providers, analytics companies, and marketing providers.
Audio, electronic, visual, thermal, olfactory, or similar information	None
Biometric Information	None
Professional or employment-related information	None
Inferences drawn from any of the information identified above	None

We do not sell any Personal Information.

Programs

The application is a voluntary program that provides you with various benefits.

In order for you to act as a Sales Partner and to provide you with the support and benefits to be effective, we use the type of personal information about you described below to identify you as a Sales Partner and provide you with relevant messaging.

The following are the categories of personal information that we collect from you in connection with your business relationship with us:

- Identifiers (e.g., name, mailing address, email address, driver's license number, phone number, and banking account number);
- Characteristics of protected classifications (e.g., age)
- Commercial information (e.g., products or services sold);
- Geolocation data (e.g., latitude or longitude); and
- Inferences drawn from any of the above (e.g., preferences or characteristics).

The value to our business of the application is dependent on a number of factors, including, for example, whether and to what extent you take advantage of the information provided in the application.

We also incur a variety of expenses related to the application. We make this investment in order to offer a more personalized and relevant experience.

You can choose to opt in to using the application by downloading the app from either the App Store or the Google Play Store.

If you no longer wish to use the application, you can withdraw at any time by emailing us at: aribbon@frontier.com

Your Rights

California residents have certain rights regarding the collection, use, and sharing of Personal Information. California residents may exercise the following rights by calling (800) 233-8158.

- **Right to Know.** You have the right to request information about the categories of Personal Information we have collect about you in the previous 12 months, the categories of sources from which we collected such Personal Information, the purpose for collecting such Personal Information, the categories of third parties with whom we have sold or share such Personal Information. You may also request information about the specific pieces of Personal Information we have collected from you.
- **Right to Delete.** You have the right to request that we delete Personal Information that we have collected from you.
- **Right to Opt Out.** You have the right to opt-out of the sale of your Personal Information. We will not discriminate against you in any manner prohibited by applicable law for exercising these rights.

You may request access to your Personal Information twice in any 12-month period, measured from the date we receive your first request. If you submit a request to obtain your Personal Information more than twice in any 12-month period, we will either: (i) proceed with honoring your request; or (ii) deny your request in writing.

Verification: In order to exercise your rights, we will need to obtain information to locate you in our records to verify your identity depending on the nature of the request. If you are submitting a request on behalf of an entity, we will need to verify each member of the entity in the manner set forth above. In connection with a request for the specific Personal Information we hold about you, you must provide your first and last name, ISO number, your email address, the email address you provided when you enrolled, your street address, and your city and state of residence to verify your identity, as well as a signed declaration under penalty of perjury that you are who you say you are. In connection with a request for the categories of Personal Information we hold about you, we will request your first and last name, ISO number, your email address, the email address you provided when you enrolled in (if applicable), your street address, and your city and state of residence to verify your identity. For a Right to Delete request, we will request first and last name, ISO number, email address, the email address you provided when you enrolled, street address, and city and state of residence to verify your identity.

Authorized Agents: You may use an authorized agent to exercise your rights on your behalf. If you are making any of the requests above through an authorized agent, you or the authorized agent must provide written authorization and we will verify the identity of you and the authorized agent as described above. Alternatively, we will accept a legal Power of Attorney under the California Probate Code to the authorized agent. To make a request using an authorized agent, please fax documentation demonstrating the agent's authority to exercise rights on your behalf to (570) 476-7611.

Timing: We will respond to Requests to Delete and Requests to Know within 45 calendar days, unless we need more time in which case we will notify you and may take up to 90 calendar days total to respond to your request.