

TTV NOW PRIVACY STATEMENT

This Privacy Statement explains our practices, including your choices, regarding the collection, use, and disclosure of certain information, including your personal information, by Solomon Telekom Company Limited (STCL) and Telekom Television Limited (TTL) relating to the TTV NOW app. This statement relates to the TTV NOW product that Our Telekom SVOD Subscribers can purchase to watch TV channels and On Demand programme content. Please note that information about your playback experience is collected when you use the TTV NOW app. If you are not happy to be included in our usage reporting, please do not install the app. If you install this app you accept the STCL Terms of Use.

1. Collection of Information. We receive and store information about you such as:
 - 1.1. Information you provide to us which includes:
 - 1.1.1. your name, Facebook email address, and Pre-paid mobile SIM number. We collect this information in a number of ways, including when you Sign-up, while using our service, interact with our customer service, or participate in surveys or marketing promotions;
 - 1.1.2. information when you choose a Parental Control level, setting a Data Usage level in your app Settings, or otherwise provide information to us through our service or elsewhere.
 - 1.2. Information we collect automatically: We collect information about you and your use of our service, your TTV NOW plan purchases, interactions with us, as well as information regarding the network, network devices, your computer or other TTV NOW capable devices you used to access our service such Chromecast, and other mobile devices, computers, and other connected personal devices connected to your Mobile Hotspot. This information includes:
 - 1.2.1. your activity on the TTV NOW service, such as title selections, shows you have watched, and search queries;
 - 1.2.2. details of your interactions with our customer service, such as the date, time and reason for contacting us and your mobile number;
 - 1.2.3. device IDs or other unique identifiers, including for your network devices, and devices that are accessing TTV NOW connected via your mobile Hotspot or Wi-Fi network;
 - 1.2.4. device and software characteristics (such as type and configuration), connection information including type (Hot Spot, Wi-Fi, cellular), statistics on the TTV NOW app and web page views, IP address (which may tell us your general location), browser and standard web server log information;
 - 1.2.5. information collected via the use of cookies (See our "Cookies" section for more details.)
 - 1.3. Information from partners: We may collect information from other companies with whom TTL has a relationship ("Partners"). These Partners include the TTV NOW app Platform Provider, and might include (depending on what services you use):
 - 1.4. search queries and commands applicable to TTV NOW that you make through Partner devices;
 - 1.4.1. service activation information such as your Facebook email address or other contact information;

- 1.4.2. IP addresses, device IDs or other unique identifiers, as well as associated pre-paid promotion, billing and user interface information that support user authentication during the TTV NOW service registration experience.
2. Use of Information
 - 2.1. We use information to provide, analyse, administer, enhance and personalize our services and marketing efforts, to process your registration, your orders and your payments, and to communicate with you on these and other topics. For example, we use such information to:
 - 2.1.1. determine your general geographic location, determine network troubleshooting to help us quickly and efficiently respond to inquiries about our service.
 - 2.1.2. secure our systems, prevent fraud and help us protect the security of TTV NOW accounts;
 - 2.1.3. prevent, detect and investigate potentially prohibited or illegal activities, including fraud, and to enforce our terms (such as determining whether and for which TTV NOW plans you are eligible to view and determining whether a particular device is permitted to use the account consistent with our Terms of Use);
 - 2.1.4. analyse and understand our audience, improve our service (including our user interface experiences and service performance) and optimise content selection, recommendation algorithms and delivery;
 - 2.1.5. communicate with you concerning our service so that we can send you news about TTV NOW, details about new features and content available on TTV NOW, special offers, promotional announcements, consumer surveys, and to assist you with operational requests.
3. Disclosure of Information
 - 3.1. We disclose your information for certain purposes and to third parties, as described below:
 - 3.1.1. Our Platform Provider has limited access to subscriber details including your Facebook name and email address, mobile number and activity on the TTV NOW app. This is to assist us should there be any queries regarding the service, your usage including payments you have made which can be accessed when we receive a service query from you;
 - 3.1.2. and for other purposes described in the Use of Information section of this Privacy Statement.
 - 3.2. Service Providers: We use other companies, agents or contractors ("Service Providers") to perform services on our behalf or to assist us with the provision of services to you. For example, we engage Service Providers to provide the TTV NOW platform, marketing, communications, security, infrastructure and IT services, to optimise our service, to provide customer service, to analyse and enhance data (including data about users' interactions with our service), and to process and administer consumer surveys. In the course of providing such services, these Service Providers may have access to your personal or other information. We do not authorise them to use or disclose your personal information except in connection with providing their services (which includes maintaining and improving their services). Please note that our Service Providers are responsible for their own privacy practices.
 - 3.3. Promotional offers: We may offer promotions. In fulfilling these types of promotions, we may send text messages to you.

- 3.4. Protection of TTV NOW and others: TTV NOW and its Service Providers may disclose and otherwise use your personal and other information where we or they reasonably believe such disclosure is needed to (a) satisfy any applicable law, regulation, legal process, or governmental request, (b) enforce applicable terms of use, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address illegal or suspected illegal activities (including payment fraud), security or technical issues, or (d) protect against harm to the rights, property or safety of TTV NOW, its users or the public, as required or permitted by law.
- 3.5. Business transfers: In connection with any reorganisation, restructuring, merger or sale, or other transfer of assets, we will transfer information, including personal information, provided that the receiving party agrees to respect your personal information in a manner that is consistent with our Privacy Statement.
4. Access to Account and Profiles
 - 4.1. One-time registration function: For ease of access the app interfaces with the login client which saves your login and one-time 6-digit code to your account and device. This function uses technology that enables the app on your device to easily login to the TTV NOW service without requiring re-entry of any password or code, when you revisit the service.
 - 4.2. Giving others access to your account: If you share your SIM card or otherwise allow others to have access to your account, they will be able to see shows you have watched, ratings, and account information. You have seamless account login through the TTV NOW mobile app, which enables login to the TTV NOW app and for content to be displayed on approved display devices connected to the same Hotspot as your device. If you use that feature, those devices will remain signed into your account unless you later log out of those devices or are out of range of your Pre-paid mobile hotspot to be effective.
 - 4.3. Unlink Account: To remove access to your TTV NOW account you can go to the app Account Settings and select "Unlink Account". If you sell your mobile you should "Unlink" your device and remove your SIM card. If you don't subsequent users may be able to access your account, including your personal information.
 - 4.4. 4-digit PIN: This is a number set by you in the app Settings after you first Signup. The 4-digit PIN allows you to manage your Parental Rating settings and is not part of any data we collect or can retrieve for you should you lose it. You can reset your PIN where it will be sent to your Account email address.
 - 4.5. Personal Information: You can request access in writing to STCL, your personal information or usage we hold about you. We respond to all reasonable requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may reject requests that are unreasonable or not required by law, including those that would be extremely impractical, could require disproportionate technical effort. We may retain information as required or permitted by applicable laws and regulations, including to honour your choices, for our billing or records purposes and to fulfil the purposes described in this Privacy Statement. We take reasonable measures to destroy or de-identify personal information in a secure manner when it is no longer required.
 - 4.6. Security: We use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorised access, use and

modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information.

- 4.7. Children: You must be 18 years of age or older to subscribe to the TTV NOW service. While individuals under the age of 18 may utilise the service, they may do so only with the involvement, supervision, and approval of a parent or legal guardian.
- 4.8. Changes to This Privacy Statement: We will update this Privacy Statement from time to time in response to changing legal, regulatory or operational requirements. We will provide notice of any such changes (including when they will take effect) in accordance with law. Your continued use of the TTV NOW service after any such updates take effect will constitute acknowledgement and (as applicable) acceptance of those changes. If you do not wish to acknowledge or accept any updates to this Privacy Statement, you may “Unlink” your use of the TTV NOW service. To see when this Privacy Statement was last updated, please see the "Last Updated" date below.
- 4.9. Cookies: We and our Service Providers use cookies for various reasons. We want you to be informed about our use of these technologies, so this section explains the types of technologies we use, what they do, and your choices regarding their use.
- 4.10. Cookies and similar technologies, and resettable device identifiers: Cookies are small data files that are commonly stored on your device when you browse and use websites and online services. Like cookies, these other technologies may store small amounts of data on your device. In many cases, declining cookies may impair app functionality associated with those cookies.
- 4.11. Why does TTV NOW use these technologies? We may use these types of technologies for various reasons, like making it easy to access our services by remembering you when you return; to provide, analyse, understand and enhance the use of our services; to enforce our terms, prevent fraud; to improve site performance, monitor visitor traffic and actions on our site; and to deliver and tailor our marketing, and to understand interactions with our emails and marketing. To help you better understand how we use cookies and resettable device identifiers, please see the information below:
 - 4.11.1. Essential cookies: These cookies are strictly necessary to provide our website or online service. For example, we and our Service Providers may use these cookies to authenticate and identify our members when they use our websites and applications so we can provide our service to them. They also help us to enforce our Terms of Use, prevent fraud and maintain the security of our service.
 - 4.11.2. Performance and functionality cookies: These cookies help us to customise and enhance your online experience with TTV NOW. For example, they help the app and us to remember your preferences and prevent you from needing to re-enter information you previously provided (for example, during Sign-up). We may also use these cookies to collect information (such as popular pages, conversion rates, viewing patterns and other information) about our visitors' use of the TTV NOW service so that we can enhance and personalise our website and service and conduct market research. Deletion of these types of cookies may result in limited functionality of our service.

TTV NOW uses contractual and technical measures designed to prevent, to the best of its abilities, Partners from accessing information regarding specific title selections you make, or shows you have

watched on our service. We do not share information about title selections or your shows you have watched on our service.

5. How can I exercise choice regarding these technologies?

To exercise choice regarding cookies: There are a number of ways to exercise choice regarding cookies. For example, many popular browsers provide the ability to clear browser storage, commonly in the settings or preferences area; see your browser's help function or support area to learn more.

6. Device Permissions: The app applies standard device permissions that are used to play content, pause content if a call is received and prevent the device from going to sleep while watching a programme.

Glossary

“Basic Plan” Basic tier content (Live TV and VOD) is a mixture content broadcast on the TTL Free-to air television channels. For example TTV1, 2, 3.

“Data” When using the TTV NOW app, the Data charge is zero rated which means you are not charged when watching TTV NOW content and is included in the TTV NOW Plan you purchase. Zero data does not apply to data consumed by any other active applications or background services running on your mobile at the time.

“Geo-blocked” Is a technology that uses IP addresses to restrict internet delivered content being used outside a designated geographical area. TTV NOW is a geo-blocked service where content can only be viewed within the Solomon Islands.

“IMEI number” means the unique 15-digit number of your mobile phone set by the mobile phone manufacturer (i.e. not the SIM card number)

“Live streaming” means geoblocked linear TV channels that TTL streams live via the app. Due to encoding and distribution processing, live streams can be up to a minute behind the actual source and so is not actually seen in real-time.

“Media” means the methods Our Telekom chooses to use to communicate with its Customers, not limited to: social media, television, text blasts, newspapers, email, radio and billboards.

“Premium Plan” Premium plan content (Live TV and VOD) consists of the Basic plan content plus other high value content.

“SVOD” means Subscription Video on Demand is the pre-recorded (not Live TV) portion of the TTV NOW plans. SVOD comprises of tagged content that can be played only if an associated Plan is purchased. For example if a Basic Plan is purchased the only Basic tagged content will play and Premium tagged content will not play.

“Unlink” means removing the association of your Pre-paid mobile number from your Facebook account when you “Sign-up” to TTV NOW.

“View” means the ability for the Customer to play, watch and listen to the Live TV or VOD content and is geoblocked to the Solomon Islands.