

DIGITV APP PRIVACY POLICY

DigiTV app (the “**app**”) is provided by **Alternative Networks Limited**, a company duly incorporated and existing under the laws of Belize, and whose registered office is situated at Esquivel Telecom Center, #1 Saint Thomas Street, Belize City, Belize (**‘we’, ‘our’ or ‘us’**).

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on how and why we collect, store, use and share any information relating to you (“**your information**”).

It also explains your rights in relation to your information and how to contact us or the relevant regulator in the event you have a complaint. Our collection, storage, use and sharing of your information is regulated by law, including under the Data Protection Act, 2021 of Belize.

We are the controller of your information obtained via the app, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

If you are aged under 18 years old you may only use the app with the consent of your parent or legal guardian. We do not intend to collect the information of anyone under 18 years old. If you are aware that any information of anyone under 18 years old has been shared with the app, please let us know so that we can delete that data.

The app is distributed on Google Play Store, Apple Store and other reputable app-stores and is solely intended for use by people in Belize.

This privacy policy is divided into the following sections:

- What this policy applies to
- Information we collect about you
- Location services/data
- How your information is collected
- How and why we use your information
- Marketing
- Who we share your information with
- How long your information will be kept
- Transferring your information out of Belize
- Your rights
- Keeping your information secure
- How to complain
- Changes to this privacy policy
- How to contact us

If you are aged under 18, we recommend that you speak to an adult that you trust if you have any difficulties reaching an informed decision regarding the activation of any use of your information or our treatment of your information.

What this policy applies to

This privacy policy relates to your use of the app only.

The app may from time to time have links to other apps, websites or services owned and operated by our parent company, Belize Telemedia Limited or our parent company's other subsidiary, DigiWallet Limited, who are our trusted third parties, to make additional products, information and services available to you. These other apps, websites or services may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other apps, websites or services, please consult their privacy policies as appropriate.

Information we collect about you

The information we collect about you depends on the particular activities carried out through the app. We will collect and use the following information about you:

Category of data	In more detail
Identity and account data you input into the app. Registration is mandatory in order to use the app.	—your name, address and contact information, including email address and telephone number —information to check and verify your identity, eg date of birth —your gender, if you choose to give this to us —your account details, such as username and password —your replies to security questions.
Data collected when you use specific functions in the app	—data you store online with us using the app (while such data may not always be protected by the Data Protection Act, 2021, we will assume it is and treat it in accordance with this policy).
Data collected when you permit the collection of location data	—details of your location with a high degree of precision.
Other data the app collects automatically when you use it	—your activities on, and use of, the app which reveal your preferences, interests or manner of use of the app and the times of use —IP address, device type, IMEI numbers, MAC address of networks, other unique device identification, device operating system, browser type, mobile network information, app version number, storage usage, data usage, time zone settings etc.

You must provide the above listed information to use the app and its services unless we tell you that you have a choice.

Sometimes you can choose if you want to give us your information and let us use it. Where that is the case, we will tell you and give you the choice before you give the information to us. We will also tell you whether declining to share the information will have any effect on your use of the app or our services.

We collect and use your information for the purposes described in the section **“How and why we use your information”** below.

Location services/data

The app may from time to time request your consent to use location services to precisely identify your location each session (ie each time the app is opened or has been placed in the background). We require access to that data in order to ensure that you are using or accessing the app from within Belize, and we also require it for our marketing purposes.

If you do not provide your consent, you may use the app but that will mean some features of the app may not function. To withdraw your consent at any time you may do so from within the settings menu of your device and or the app (that will not affect the lawfulness of our use of that data in reliance on the consent before it was withdrawn).

We will not process your location data other than for the purpose of ensuring that you are using or accessing the app from within Belize, and for our marketing purposes.

The location services in the app will not operate unless location services/data are generally enabled on your device. You may disable such functionality at any time in the settings menu of your device.

How your information is collected

We collect information from you directly when you input it into the app or indirectly, such as your activity while using the app.

How and why we use your information

Under the Data Protection Act, 2021, we can only use your information if we have a proper reason, eg:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see **"How to contact us"** below).

The table below explains what we use your information for and why.

What we use your information for	Our reasons
To create and manage your account with us	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you. OR

What we use your information for	Our reasons
	To perform our contract with you or to take steps at your request before entering into a contract.
Providing services and/or the functionalities of the app to you	Depending on the circumstances: —to perform our contract with you or to take steps at your request before entering into a contract —for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you.
Conducting checks to identify you and verify your identity or otherwise to help prevent and detect fraud against you or us	To comply with our legal and regulatory obligations. OR For our legitimate interests, to minimise the risk of account or identity theft or fraud that could be damaging for you, a third party or us.
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, ie to protect our business, interests and rights.
Communications with you not related to marketing, including about changes to our terms or policies or changes to the app or service or other important notices	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, ie to provide the best service to you.
Protect the security of systems and data used to provide the app and its services	To comply with our legal and regulatory obligations. We may also use your information to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us.

What we use your information for	Our reasons
Operational reasons, such as improving efficiency, training and quality control or to provide support to you	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you.
Statistical analysis to help us understand our customer base	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you.
Updating and enhancing customer records	Depending on the circumstances: —to perform our contract with you or to take steps at your request before entering into a contract. —to comply with our legal and regulatory obligations. —where neither of the above apply, for our legitimate interests, eg making sure that we can keep in touch with our customers about existing orders and new products.
Disclosures and other activities necessary to comply with legal and regulatory obligations, eg to record and demonstrate evidence of your consent to our use of your information where relevant.	To comply with our legal and regulatory obligations
Marketing our services to existing and former customers	For our legitimate interests, ie to promote our business to existing and former customers. See ' Marketing ' below for further information.
The audit of the app and or our business	For our legitimate interests of maintaining the security and or integrity of the app and or our business.
To share your information with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency In such cases, information will be anonymised where possible and only shared where necessary	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, ie to protect, realise or grow the value in our business and assets and that of our parent company, Belize Telemedia Limited and or that of our parent company's other subsidiary, DigiWallet Limited.

How and why we use your information—in more detail

Purpose	Processing operation	Lawful basis relied on under Data Protection Act, 2021	Relevant categories of your information
Communications with you not related to marketing, including about changes to our terms or policies or changes to the products or other important notices	Addressing and sending communications to you as required by data protection laws, ie: Data Protection Act ,2021	Processing is necessary for compliance with a legal obligation to which we are subject - section 7(1)(b)(iii) Data Protection Act, 2021	—your name, address and contact information, including email address and telephone number —your account details (username)
	Addressing and sending communications to you as required by us from time to time.	Processing is necessary for compliance with a legal obligation to which we are subject - section 7(1)(b)(iii) Data Protection Act, 2021	—your name, address and contact information, including email address and telephone number —your account details (username)
	Addressing and sending communications to you about changes to our terms or policies or changes to the products or other important notices	Our legitimate interests (Article 6(1)(f)), which is to be as efficient as we can so we can deliver the best service to you	—your name, address and contact information, including email address and telephone number —your account details (username)

How and why we use your information—sharing

See “**Who we share your information with**” for further information on the steps we will take to protect your information where we need to share it with others.

Marketing

We will use your information to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services, including those of our parent company, Belize Telemedia Limited and our parent company's other subsidiary, DigiWallet Limited.

We have a legitimate interest in using your information for marketing purposes (see above '**How and why we use your information**'). This means we do not need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at admin@alternativenetworks.bz
- using the 'unsubscribe' link in emails.

We will always treat your information with the utmost respect and never sell or share it with other organisations outside the Belize Telemedia Limited group, for marketing purposes.

For more information on your right to object at any time to your information being used for marketing purposes, see "**Your rights**" below.

Who we share your information with

We routinely share your information with:

- service providers we use to help us run our business or make the app available for download on your device, or service providers who provide the services or functionalities in the app, or hosts of the systems that deliver the app's functionalities and services, and analytics providers'; and
- our parent company, Belize Telemedia Limited and our parent company's other subsidiary, DigiWallet Limited.

We only allow the companies referred to above to handle your information if we are satisfied they take appropriate measures to protect your information. We also impose contractual obligations on service providers to ensure they can only use your information to provide services to us and to you.

We or the third parties mentioned above occasionally also need to share your information with:

- our external auditors, eg in relation the audit of the app, our accounts or business—the recipient of the information will be bound by confidentiality obligations
- our or their professional advisors (such as lawyers and other advisors)—the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts or tribunals and regulatory bodies to comply with legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisors) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your information will be bound by confidentiality obligations

How long your information will be kept

Your Information will be kept for the duration of your subscription to the app and for up to 6 (six) years thereafter. Following the end of the that retention period, we will delete or anonymise your information.

Transferring your information out of the Belize

Countries outside Belize have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your information to countries outside Belize. In those cases, we will comply with applicable Belize laws designed to ensure the privacy of your information.

We will transfer your information from Belize to:

- our hosting service providers located outside Belize in the European Union member countries, the United States of America, Canada, Australia, New Zealand, CARICOM member states, and
- who are bound by a contractual confidentiality obligation to us in relation to your information.

Under data protection laws, we can only transfer your information to a country outside Belize where:

- there are appropriate safeguards in place which offer you at least the same protection as the Data Protection Act, 2021, together with enforceable rights and effective legal remedies for you.

Any changes to the destinations to which we send your information or in the transfer mechanisms we use to transfer your information internationally will be notified to you in accordance with the section on **“Change to this privacy policy”** below.

Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your information	The right to be provided with a copy of your information which we have processed or which we control.
Correction (also known as rectification)	The right to require us to correct any mistakes in your information
Erasure (also known as the right to be forgotten)	The right to require us to delete your information—in certain situations specified in section 13 of the Data Protection Act, 2021.
Restriction of use	The right to require us to restrict use of your information in certain circumstances specified in section 13 of the Data Protection Act, 2021, eg if you contest the accuracy of the data.
Data portability	The right to receive your information that you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—as specified in section 16 of the Data Protection Act, 2021.

To object to use	The right to object specified in section 11 of the Data Protection Act, 2021: —at any time to your information being used for direct marketing (including profiling) —in certain other situations to our continued use of your information, eg where we use your information for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
The right to withdraw consents	If you have provided us with a consent to use your information, you have a right to withdraw that consent easily at any time You may withdraw consents by contacting us at admin@alternativenetworks.bz Withdrawing a consent will not affect the lawfulness of our use of your information in reliance on that consent before it was withdrawn

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see **“How to contact us”** below).

When contacting us please:

- provide enough information to identify yourself (eg your full name, address and customer account number) and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates

Keeping your information secure

We have appropriate security measures to prevent your information from being accidentally lost or used or accessed unlawfully. We limit access to your information to those who have a genuine business need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

Please contact us if you have any queries or concerns about our use of your information (see below “**How to contact us**”). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Data Protection Commissioner.

Changes to this privacy policy

We may change this privacy policy from time to time. When we make significant changes we will take steps to inform you, for example via the app or by other means, such as email.

How to contact us

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
57 Joseph Andrews Drive, San Ignacio, Cayo District, Belize admin@alternativenetworks.bz +501-824-3035