

Privacy Policy

Effective: April 29, 2020

Our Privacy Policy explains how CTIA-The Wireless Association (“CTIA”) collects, uses, and discloses information about you. The terms “CTIA,” “we,” “us,” and “our” include CTIA-The Wireless Association, our affiliates, and subsidiaries. We use the terms “member,” “you,” and “your” to mean any person using the CTIA Town Square Engagement Platform (“Platform”) or attending related events, including any organization or person using the Platform on an organization’s behalf. This Privacy Policy applies to the processing of information about members and other individuals that we collect when you use our Platform, which means any website, application, or services we offer, or when you communicate with us. This Privacy Policy does not apply to the information that you may provide to third parties, such as members, and others with whom you may share information about yourself.

1. COLLECTION OF INFORMATION

1.1 Information You Provide to Us

We collect information that you provide directly to us. For example, we collect information that you provide when you create an account, choose expertise areas or groups, submit use cases, identify yourself as a point of contact for a use case, fill out a form, or communicate with us. The types of information that we may collect include your name, username, password, email address, the name of the company that you work for, the postal address of the company that you work for, phone number, photos, choices of interests and groups, and any other information that you choose to provide.

As a registrant of our Platform, you are automatically granted access to a shared forum. In addition, you may also choose to participate in targeted forums as part of a private group. As such, we will be required to process information you provide for this purpose in order to administer your account, and to indicate that you are a member of the groups that you want to join.

1.2 Information We Collect Automatically When You Use the Platform

When you use our Platform, we automatically collect information about you, including:

- **Log In Information:** We collect log in information about your use of the Platform, including the type of browser that you use; the time, duration and frequency of your access; Platform pages viewed; your IP address; your interaction with emails from the Platform; and the page you visited before visiting our Platform.
- **Device Information:** We collect information about the computer or mobile device that you use to access our Platform, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Location Information:** We may collect information about the location of your device each time you use our Platform based on your consent to the collection of this information.
- **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers collect information using various technologies, including cookies and pixel tags (which

are also called clear GIFs, web beacons, or pixels). Cookies are small data files stored on your hard drive or in device memory that help us improve our Platform and your experience, and track usage of our Platform. Pixel tags are electronic images that may be used in our Platform or emails, and track usage of our Platform and effectiveness of communications.

- Other Information: With your permission, we may collect other information from your device, such as photos from your camera roll, contacts of individuals you wish to find or connect with, or calendar information you want to manage via the Platform.

1.3 Information We Collect From Other Sources

We may collect information about you from other sources, such as through certain features on the Platform you elect to use, but only where these third parties either have your consent or are otherwise legally permitted or required to disclose your information to us. Examples include:

- Invitations: If you receive an invitation through our Platform, we may receive certain personal information, such as your name, email address, or phone number. CTIA stores this contact information only to send these invitations and evaluate their success. You may unsubscribe from future invitations using the “Unsubscribe” link in those messages. You may also contact us at smartcities@ctia.org to request that we remove this information from the Platform.
- Member Content: We may receive information about you when you or another member uploads photos or posts other content to the Platform.
- Information From Other Third-Party Sources: In order to provide you with more tailored recommendations, we may obtain information about you from publicly and commercially available sources and other third parties as permitted by law.

2. USE OF INFORMATION

2.1 Operating Our Platform

We may use information about you for various purposes related to operating our Platform, to allow us to:

- Provide, maintain, and improve our Platform, including to develop new products and services, and manage the performance of our Platform;
- Display information about you, for instance, your membership in certain groups, which will be visible on the groups page to all members of the Platform, and to identify comments that you post to a group’s page, which will only be viewable by other members of the group;
- Personalize the Platform, for example, to suggest content in which we think you may be interested;
- Monitor and analyze trends, usage, and activities in connection with our Platform;

- Detect, investigate, and prevent abuse, and other illegal activities; to protect the rights, property, or safety of CTIA and others; to enforce compliance with our policies; and to comply with applicable law and government requests; and
- Perform administrative tasks, and enforce or manage legal claims.

2.2 Communicating With You

We may use information about you for various purposes related to communicating with you, including to:

- Respond to your comments, questions, and requests, and provide customer service;
- Communicate with you, in accordance with your account settings about products, services, and events offered by us and others, to provide news and information that we think will be of interest to you, to conduct online surveys, to contact you about events on our Platform that are being held near your location, and to otherwise communicate with you in accordance with Section 2.3;
- Notify you about communications of other members, in accordance with the communication preferences that you indicate in your account; and
- Send you technical notices, updates, security alerts and support, and administrative messages.

2.3 Advertising And Other Uses

We may use information about you for various other purposes, including to:

- Provide content, features, or suggestions regarding groups or events that match your profile or interests;
- Combine with information that we collect for the purposes described in this Privacy Policy; and
- Carry out any other purposes described to you at the time that we collected the information.

3. SHARING OF INFORMATION

3.1 Through Our Platform

We share some of the information that we collect by displaying it on our Platform according to your member profile and account settings. Some information, such as user name, group membership, and expertise areas, are viewable by all registered members of the Platform. Some information, such as comments posted to a group discussion are only visible to registered members of the Platform who are also members of a specific group. We recommend that you check the group settings and what information will be available before joining a group to ensure that you are happy with the information that is visible to others.

3.2 With Our Service Providers

We may use service providers in connection with operating and improving the Platform to assist with certain functions, such as email transmission, conducting surveys or contests, data hosting, and aspects of our technical and customer support. We take measures to ensure that these service providers access, process, and store information about you only for the purposes we authorize, subject to confidentiality obligations.

3.3 Following The Law And Protecting CTIA

We may access, preserve, and disclose information about you to third parties, including the content of messages, if we believe disclosure is in accordance with or required by applicable law, regulation, legal process, or audits. We may also disclose information about you if we believe that your actions are inconsistent with our [Terms of Use](#) or related guidelines and policies, or if necessary to protect the rights, property, or safety of, or prevent fraud or abuse of, CTIA or others.

3.4 Social Sharing And Other Tools

The Platform may offer social sharing features and other integrated tools which let you share public facing resources with third-party services. The use of third-party services' will be governed by the third-parties' privacy policies, and we do not control the third-parties' use of the shared data. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please review the privacy policies of the services that provide these features.

3.5 Other Situations

We may de-identify or aggregate information about you and share it freely, so that you can no longer be identified. We may also share information about you with your consent or at your direction or where we are legally entitled to do so.

4. ADDITIONAL DETAILS

4.1 Security

We employ technical and organizational measures designed to appropriately protect your information that is under our control and that we process on your behalf from unauthorized access, collection, use, disclosure, copying, modification, or disposal both during transmission and once we receive it. We store all information that you provide to us on secure servers. We train employees regarding our data privacy policies and procedures, and permit authorized employees to access information on a need to know basis, as required for their role. We use firewalls designed to protect against intruders and test for network vulnerabilities. However, no method of transmission over the internet or method of electronic storage is completely secure.

Where you have a password, which enables you to use our services, you are responsible for keeping this password complex, secure, and confidential. If you would like to update or change your password, you may select the "Reset Password" link on the login page. You will be sent an email that allows you to reset your password.

4.2 Data Retention

We may delete your account if at any time you cease to be employed by a company that is a member of CTIA; you cease to be a member of the Smart Cities working group; you cease to be a member of the Smart Cities Taskforce; or you violate either the [Terms of Use](#) or the [Community Guidelines](#). If you have any questions regarding the deletion of your account you may contact us at smartcities@ctia.org

We retain certain information that we collect from you while you are a member of the Platform, and in certain cases where you have deleted your account, for the following reasons: so you can use our Platform; to ensure that we do not communicate with you if you have asked us not to; to better understand the traffic to our Platform so that we can provide all members with the best possible experience; to detect and prevent abuse of our Platform, illegal activities, and breaches of our policies and to comply with applicable legal, tax, or accounting requirements. When we have no ongoing legitimate business need to process your information, we will either delete or anonymize it.

4.3 Policy Scope

This Privacy Policy does not apply to information that you provide to third parties, such as other members and others with whom you may share information about you. Our Platform may direct you to a third-party service, such as social media services, or a portion of our Platform may be controlled by a third party (typically through the use of a frame or pop-up window separate from other content on our Platform). Disclosure of information to these third parties is subject to the relevant third party's privacy policy. We are not responsible for the third-party privacy policy or content, even if we link to those services from our Platform or if we share information with these third parties.

4.4 Revisions To This Policy

We may modify this Privacy Policy from time to time. When we do, we will provide notice to you by publishing the most current version and revising the date at the top of this page. If we make any material changes to this Privacy Policy, we will provide additional notice to you, such as by sending you an email or displaying a prominent notice on our Platform. In any case, the new Privacy Policy will be effective upon posting, and your continued use of the Platform will indicate your consent to all the updated terms and conditions of every then current Privacy Policy.

5. YOUR CHOICES

5.1 Your Choices: Account Information

You may update or correct your account information by editing your account settings or by sending a request to smartcities@ctia.org. You will also be able to choose what information others see about you and who may contact you by using the "Privacy Settings" section in your Account.

5.2 Your Choices: Cookies

We may use and allow others to use cookies, web beacons, device identifiers, and other technologies to collect information about your use of the Platform and other websites and online services. You may disable the cookie function, by selecting the appropriate setting on your device. Please note that disabling cookies may result in our Platform or its features not functioning properly.

5.3 Your Choices: Promotional Communications

You can control messages that you receive from CTIA, other members, and third parties by selecting the “Unsubscribe” link in the message that you receive, or by adjusting the communication preferences in your account settings. We will also send you a link to these settings when you first sign up to use the Platform and in subsequent messages. If you opt out, we may still send you non-promotional messages, such as those about your account or our ongoing business relations.

6. CONTACT US

If you have any questions about this Privacy Policy or how we use your information, please contact us at smartcities@ctia.org.