

# CROWN CASTLE COMMERCIAL WEBSITE PRIVACY STATEMENT

## 1. Introduction

Crown Castle International Corp., its subsidiaries and affiliated entities (collectively, "Crown Castle", "us", "our" or "we") respect your privacy and are committed to protecting it through our compliance with this Privacy Statement (hereinafter, "Statement").

This Statement describes the types of information we may collect from you or that you may provide when you access and use this website and related online applications, materials and resources (collectively, the "Website") and our practices for collecting, using, maintaining, protecting and disclosing that information.

This Statement applies to information we may collect:

- on this Website;
- in e-mail, text and other electronic messages between you and this Website;
- through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website; or
- when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Statement.

This Statement does not apply to information collected:

- by us offline or through any other means, including on any other website operated by any third party; or
- by any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this Statement carefully to understand our practices regarding your information and how we will treat it. If you do not agree with our practices, your choice is to not use our Website. By accessing or using this Website, you agree to this Statement. This Statement may change from time to time (see Section 16 below). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the Statement periodically for updates. If you do not agree with any of these terms, please do not use the Website or submit any Personal Information (as defined below).

## 2. What information do we collect?

We may collect several types of information from and about the users of our Website, including:

- information by which you may be personally identified, such as name, postal address, e-mail address, telephone number, and any other information the Website collects that is defined as personal information or personally identifiable information under applicable law ("Personal Information");
- information that is about you but individually does not identify you, such as profession, occupation or job title;
- information about your internet connection, the equipment you use to access our Website and usage details;
- details relating to the engagements or business relationship you have with us or which may be proposed, or which you have inquired about, together with any additional information necessary to engage with you, including responding to your inquiries;

- records and copies of your correspondence (including e-mail addresses), if you contact us;
- information you provide to us through our services, customer surveys or our representatives from time to time;
- any additional information relating to you that you provide to us directly or indirectly through use of our Website or online presence, through our representatives or otherwise; and
- other types of information referred to elsewhere in this Statement.

We may collect information:

- directly from you when you provide it to us, for example, when you request information from us, request an agreement regarding a wireless communications site, download material or correspond with us;
- from third parties such as your authorized agent or representatives of your company or via third-party databases;
- from referrals from other individuals or companies;
- from other third parties, for example, our business partners; and
- from publicly available sources of information.

In certain instances, we may link or combine Personal Information, non-Personal Information and information you provide us through other sources (for example, at a trade show or seminar) in connection with the use of such information.

### **3. How do we use cookies and other automatic data collection technologies?**

Like many other commercial websites, this Website uses a standard technology called "cookies", which can be used to provide you with tailored information from a website. A cookie is a small text file that is sent from a website to your browser, which may then be stored on your system if you have enabled "cookies" in your browser settings. Some portions of the Website may use cookies to enhance your online experience, enabling personalized responses, customized information and other features to better serve you. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website. You can set most browsers to notify you when you receive a cookie from a website, giving you the chance to decide whether to accept it. This approach gives you control over the depth and type of online experience and level of privacy that you desire. However, if you decide to limit or disable cookies, your ability to interact with and/or receive the full functions of the Website and the services provided through the Website may be compromised.

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- details of your visits to our Website, including traffic data, location data, logs and other communication data and the resources that you access and use on the Website; and
- information about your computer and internet connection, including your IP address, operating system and browser type.

The information we collect automatically does not include Personal Information.

We may use third-party web analytics services on our Website, such as those of Google Analytics. These service providers use cookies and web beacons to help us analyze how users use the Website. The information collected by the cookies and web beacons will be disclosed to these service providers, who use the information to evaluate your use of the Website. Google Analytics transmits website use data to Google servers. Google Analytics does not identify individual users or associate your IP address with any other

data held by Google. We use reports provided by Google Analytics to help us understand website traffic and usage of the Websites. To find out more about Google Analytics use of data, please visit "How Google uses data when you use our partners' sites or apps", (located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)) for more information. For information about how Google uses the information, see the [Google Privacy Policy](#). To learn about opting out of Google Analytics, you may visit <http://tools.google.com/dlpage/gaoptout>.

The Website permits data collection for internet-based advertising. Crown Castle and third-party vendors, including Google, use cookies to inform, optimize, and serve ads based on past visits to our Website. More specifically, our Website has implemented and used display advertising, and we utilize Google Analytics to implement a specific feature called remarketing. Remarketing is a feature of Google Ads that allows us to optimize the delivery of ad content specifically targeted to a visitor's interests based upon previous visits to our site. Please visit <https://support.google.com/analytics/answer/2611268> for more information about remarketing lists in Google Analytics.

If you do not want to use the remarketing feature from Google, you can disable it by changing the appropriate settings at <http://www.google.com/settings/ads>.

There is also a Google Analytics opt-out browser add on that you can download at <https://tools.google.com/dlpage/gaoptout/>.

#### **4. How we may use your information**

We may use the non-Personal information we may collect and any Personal Information that you provide to us:

- to verify your identity;
- to present our Website and its contents to you;
- to pre-fill online forms;
- to allow you to participate in interactive features on our Website;
- to notify you about changes to our Website or any products or services we offer or provide through it;
- to provide you with information, products or services that you request from us;
- to communicate with you in the normal course of business dealings;
- to communicate and negotiate with you in relation to your property, or other agreements or assets;
- to assist you to receive or subscribe to our services;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- to provide you with notices about your account, including expiration and renewal notices;
- to send you marketing and sales information or to contact you regarding product research;
- to send announcements, newsletters and updates regarding our business, products, services, special offers and other promotional information;
- to maintain the smooth operation of our business, such as for billing, account maintenance and recordkeeping;
- to assist us with any internal investigations in relation to protection against fraud or unlawful activities or activities that have a potential to breach Crown Castle's policies;
- as we deem necessary or appropriate to protect the rights, property, safety and personnel of Crown Castle and others;
- as required by law;
- in any other way we may describe when you provide the information;
- to fulfil any other purpose for which you provide the information; and

- for any other purpose with your consent.

We may use your information to contact you about products and services that may be of interest to you. If you do not want us to use your information in this way, please see Section 6 below.

## **5. Disclosure of Personal Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Information that you provide as described in this Statement:

- to our subsidiaries and affiliates;
- to contractors, service providers and other third parties we use to support our business, including, but not limited to third parties that provide advertising services on our behalf;
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by us about our Website users is among the assets transferred;
- to third parties to market their products or services to you by delivering marketing communications, promotional materials, and/or advertisements;
- to fulfil the purpose for which you provide it;
- for any other purpose disclosed by us when you provide the information; or
- with your consent.

We may also disclose your Personal Information:

- to comply with any court order, law or legal process, including to respond to any government or regulatory request;
- to enforce or apply our terms of use and other agreements, including for billing and collection purposes; or
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Crown Castle, our customers or others, including, for example, exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## **6. Your choices regarding Personal Information you provide to us**

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Cookies. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

## **7. Accessing and correcting your Personal Information**

While Crown Castle seeks to ensure that information is collected and maintained accurately, inaccuracies may occur. Should you find incorrect Personal Information or wish to update your Personal Information, you may make changes online by logging into the Website and visiting your account profile page or you may notify Crown Castle in writing at [CrownCastleCompliance@crowncastle.com](mailto:CrownCastleCompliance@crowncastle.com). We may not accommodate a request to change

information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. In some cases, we cannot delete your Personal Information except by also deleting your user account.

Crown Castle shall not knowingly collect information from children under the age of 13. If you become aware that your child or any child under your care has provided us with information without your consent, please contact in writing at [CrownCastleCompliance@crowncastle.com](mailto:CrownCastleCompliance@crowncastle.com).

## **8. Security of your Personal Information**

Crown Castle has implemented measures to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. These measures may include the use of certain technology to encrypt Personal Information. Crown Castle generally stores Personal Information on servers that are protected by firewalls.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in publicly accessible areas like message boards. The information you share in public areas may be viewed by any user.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **9. Facebook Lead Ads**

Crown Castle occasionally runs lead ads on [www.facebook.com](http://www.facebook.com), and follows Facebook's Lead Ad Terms <https://www.facebook.com/ads/leadgen/tos>. Should a Facebook user click one of our ads and choose to submit their data to us (including, but not limited to, Personal Information), the user has willingly and expressively given us the right to contact them via phone and/or email, even if they are subscribed on the Do Not Call List. Participation in these Facebook Lead Ads and the forms generated by them are voluntary and you may choose whether or not to disclose information via this format. If you submit data (including, but not limited to, Personal Information) to us through one of our Facebook Lead Ads, such data will be governed by this Statement. Notwithstanding anything to the contrary contained herein, we will not sell Facebook Lead Ad Data under any circumstances.

## **10. If you are a registered user**

If you are a user accessing CCI sites™ (a platform for our customers to research and access information regarding our sites), we may ask you to register and/or provide information that personally identifies you for the purposes of interacting with CCI sites. If you choose not to disclose and register your Personal Information, you may not be able to use CCI sites effectively and may choose to research our facilities in an alternate manner, such as by contacting us via telephone.

If you contact us via telephone, you may also be asked to verify your identity for security reasons. Should you choose not to provide your Personal Information for verification, Crown Castle may not be able to assist you with your query.

### **11. If you are a property owner**

If you are a property owner who wishes to obtain further information about Crown Castle's operations or opportunities to transact with Crown Castle, you may submit your Personal Information through our Website or contact us directly by e-mail, mail or telephone to speak to a Crown Castle representative. Our ability to respond to your queries will depend on you disclosing Personal Information such as your name, return address, e-mail address or telephone number and details relating to your property.

Crown Castle may also use Personal Information obtained via a third party to contact you directly regarding the possibility of entering into an arrangement relating to your property. If you do not wish for your Personal Information to be used in this manner, please let us know and we will refrain from doing so.

### **12. If you are a member of the public**

If you are a member of the public seeking to learn more about Crown Castle's business and operations, you may submit your Personal Information through our Website via our "Contact Us" section. We collect your Personal Information to identify you and to revert to you with respect to any queries you may have or to provide you with any information you may seek. Should you choose not to provide us with your Personal Information for verification, Crown Castle may not be able to assist you with your query.

### **13. If you contact us with regard to employment opportunities**

Crown Castle will from time to time advertise employment opportunities via publicly available websites and through employment agencies. In order to apply for employment at Crown Castle, you will be required to provide your Personal Information so we can verify your identity and suitability for employment. We may store your Personal Information in our system and contact you at a later date for future employment opportunities.

### **14. Service announcements**

From time to time, Crown Castle may send out service-related announcements. For instance, if our service is temporarily suspended for maintenance, Crown Castle may send our customers and property owners an e-mail notification.

### **15. California residents**

Crown Castle processes the personal information of employees who are residents of California (CA). We are committed to protecting the privacy and security of your personal information. This privacy statement describes how we collect and use personal information about you during and after your working relationship with us. It applies to all employees who are also CA residents. We are responsible for deciding how we hold and use personal information about you. We are required under the California Consumer Privacy Act ("CCPA"), as amended, effective January 1, 2020, to provide you with notice at the time of collection.

Data Protection Principles: We will comply with applicable data protection law. This says that the personal information we hold about you must be: (i) used lawfully, fairly and in a transparent way; (ii) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes; (iii) relevant to the purposes we have told you about and limited only to those purposes; (iv) accurate and kept up to date; (v) kept only as long as necessary for the purposes we have told you about; and (vi) kept securely.

What Personal Information is Collected and How it is Used: For job applicants, please refer to Crown Castle's PRIVACY NOTICE TO CALIFORNIA JOB APPLICANTS REGARDING THE COLLECTION OF PERSONAL INFORMATION for what information we collect about job applicants and how we use and disclose it.

For employees and former employees, please refer to Crown Castle's PRIVACY NOTICE TO CALIFORNIA EMPLOYEES REGARDING THE COLLECTION OF PERSONAL INFORMATION for what information we collect about employees and former employees and how we use and disclose it.

Additional copies of either notice may be requested by contacting us at [CrownCastleCompliance@crowncastle.com](mailto:CrownCastleCompliance@crowncastle.com).

Failure to Provide Personal Information: If you fail to provide certain information when requested, we may not be able to address our employment or contract obligations (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of Purpose: We will only use your personal information for the purposes we have disclosed in our notice(s). If we need to use your personal information for an unrelated purpose, we will notify you. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data Security: While no data security system can fully protect personal information from unauthorized data breaches, Crown Castle has implemented reasonable safeguards and controls, consistent with its legal obligations under CA and other local, state and federal laws. Crown Castle is committed to: (i) seeking to safeguard all personal information that you provide to us; (ii) seeking to ensure that it remains confidential and secure; and (iii) taking all reasonable steps to ensure that personal privacy is respected. All our data is stored in written or electronic form on our servers and computers and in various physical locations. We maintain physical, electronic and procedural safeguards to protect your personal information from misuse, unauthorized access or disclosure and loss or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members, Crown Castle and third parties who need to know that information for the purposes identified in our notice(s).

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

Data Retention: We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee of Crown Castle, we will retain and securely destroy your personal information in accordance with Crown Castle's record retention policies.

## **16. Notice to overseas users**

Your Personal Information may be stored on our servers in the United States of America.

## **17. Links to third-party websites**

If any link is offered connecting to a third-party website, it is as a courtesy to the third party. Sites linked to and from our Website are not under the control of Crown Castle, and Crown Castle has no responsibility or liability for the content and privacy practices of any such linked site at any time. Links from our Website are not an endorsement of the site operator, related products or information to which our site may be linked. If you decide to access a third-party site linked to our Website, you do so at your own risk. Therefore, Crown Castle recommends that you review the individual privacy statement and terms and conditions of each website that you intend to use. CROWNCASTLE HEREBY EXPRESSLY DISCLAIMS LIABILITY FOR ANY INFORMATION, MATERIALS, PRODUCTS OR SERVICES POSTED OR OFFERED AT ANY OF THE THIRD PARTY WEBSITES LINKED TO THIS WEBSITE. NOR IS CROWN CASTLE LIABLE FOR ANY FAILURE OF PRODUCTS OR SERVICES OFFERED OR ADVERTISED AT THOSE WEBSITES.

## **18 . Statement subject to change**

Crown Castle may regularly review and update this Statement. Please note that this Statement is subject to change at any time without notice. Customers, property owners and other users are encouraged to check frequently for future updates. It is our process to post any changes we make to this Statement on this page. If we make any material changes to how we treat our users' Personal Information, we may notify you by e-mail to the primary e-mail address specified in your account or through a notice on our Website home page. The date this Statement was last revised is identified at the bottom of the page. You are responsible for ensuring we have an up-to-date, active and deliverable e-mail address for you, and for periodically visiting our Website and this Statement to check for any changes or updates.

## **19. Questions or comments**

To ask questions or comment about this Statement and our privacy practices, contact us at:

Mailing address: Crown Castle USA Inc.  
Attn: Legal Department  
2000 Corporate Drive  
Canonsburg, PA 15317

E-mail: [CrownCastleCompliance@crowncastle.com](mailto:CrownCastleCompliance@crowncastle.com)  
Phone: 724-416-2000

Date of last revision: December 27, 2019

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