



Starry Privacy Notice
Updated December 29, 2022

**We believe your personal information belongs to you.
And we want to keep it that way.**

Starry is committed to protecting your privacy

This Privacy Notice summarizes our commitments to our customers, Site visitors, App users, and others who provide us with information, and then explains in detail how we collect, use, and share the information that we collect, and why we do so.

As an Internet Service Provider, we understand and respect the privacy responsibility that comes with our central role in consumers' lives. This Privacy Notice explains how we collect, use, share, and store information, including personal information, when you use Starry Internet Service (Service), including any Starry equipment required for use of the Service; when you visit our websites (Sites); or when you use our mobile applications (Apps).

We collect information to support our Service, specifically to market and provide the Service. We are not a big data company or an advertising platform, and we do not collect information that we do not need. We also believe that our customers' information is theirs, not ours. This is the foundation of our approach to privacy. In everything we describe below, we strive to make sure that your rights to your personal information are protected.

Our commitments

Our customers

- When you subscribe to and use the Service, we collect the least amount of personal information necessary to provide the Service to you, to improve the Service, to provide customer care, and to market the Service and other Starry products and services to you.
- We do not sell any of the personal information we collect through the Service.
- We only share information about you with third parties in the limited circumstances described in this Privacy Notice, and most commonly to provide and market our Service to you, as described in the chart below.
- Your web browsing history is your business, not ours. When you use the Service, we collect web browsing information to route your traffic to the Internet; we will not sell your web browsing history for marketing purposes.
- We strive to protect your information from unauthorized access, use, and disclosure.
- The personal information that we collect is your information. You can ask us for a copy of all of your

personal information that we currently hold, and we will provide it to you in a timely fashion in a format that you can share with third parties. If you are not a current subscriber, you can also ask that we delete your personal information.

- We will notify you of material changes to this Privacy Notice.

Our app users and site visitors, including those who fill out a form on our site

- We collect the least amount of information possible for the limited purposes described in this Privacy Notice, including as necessary to market the Service and other Starry products and services to you, to establish business relationships with you, to understand how the Sites and Apps are used, to improve our Service, and to communicate with you about our Service.
- We do not sell the information that we collect through our Sites or Apps.
- We only share information about you with third parties in the limited circumstances described in this Privacy Notice, and mostly for digital marketing. We use standard web-based tools that result in information being shared with third parties for advertising purposes, like cookies, beacons, and pixels. We also use third party analytics tools to track the performance of our Sites and our advertising campaigns. These categories of third parties are identified in the chart below.
- We strive to protect your information from unauthorized access, use, and disclosure.
- The personal information that we collect through forms on our Sites is your information. If you previously submitted information through a form on our Sites, for example to request information about our Service, then you can ask us for a copy of your personal information that we currently hold. In some circumstances, you can also ask that we delete your personal information.
- We provide clear notice of material changes to this Privacy Notice.

Information we collect from and about you

When you subscribe to the Service, we collect information that you provide to us directly, including contact information and billing information.

When you subscribe to the Service, we collect contact information from you, including your name, physical address, billing address (if different from service address), telephone number, email address, and the username and password used to establish your account with us. We also collect your credit card number, expiration date, and CVV through our third-party payment processor. We collect this information only with your consent and provide a link to this Privacy Notice at any point at which we collect your information.

We also keep information in our records about your communications with us, such as when you contact Starry customer care or otherwise correspond with us, or if you respond to Starry surveys.

If you subscribe to the Service, we collect technical information about your use of the Service.

We collect certain technical information about your use of the Service for four purposes: 1) to route your traffic to and from the Internet; 2) to ensure quality of service and security, and manage our network; 3) to provide customer care; and 4) to comply with lawful government requests. This information includes:

- **Your IP Address:** we assign you a dynamic IP address to use the Service. An IP address is a necessary identifier for you to access the Internet. In some circumstances, customers may be assigned a shared IP address.
- **Device Information:** we collect the MAC addresses of devices that connect to your Wi-Fi network, which we primarily use to provide customer care.
- **Speed Test Information:** if you run a speed test on your Starry Wi-Fi router (or through the Apps), we

collect the results, including the download speed, upload speed, and ping roundtrip time. We also collect this information for network monitoring purposes.

- **Data Consumption:** while we do not impose any limits on the amount of data you can use as a customer, we do keep a record of the amount of data that you use for our own network management purposes.
- **Outage Alerting:** your Starry Wi-Fi router may alert our customer care team that it is experiencing an Internet outage. This is an important part of our quality of service program to help resolve any outage issues, to the extent they occur.
- **URLs:** we do not store any web browsing information, but we do have to collect the uniform resource locator and IP address that you direct your web browser to connect to in order to route your traffic to a selected website.
- **Fixed Location Information:** we may associate your IP address with your physical address.

When you visit our Sites, we collect information through your browser, primarily for marketing purposes.

When you visit our Sites, we collect information through passive means for the purpose of digital advertising. This may include your IP address, the browser you are using, the pages that you viewed on our Sites, the website that referred you to our Sites, or the website that you navigate to from our Sites. We may also collect general location information, such as the city or zip code that correlates with your IP address. We use cookies, pixels, beacons, and analytics tools for these purposes.

We collect this information for several purposes, including to recognize new or past visitors, to serve interest-based or targeted advertising for the Service, and to observe browsing behaviors on our Sites or across our advertisements on third party websites.

When you fill out a form on our Sites, we collect information that you voluntarily provide and only with your consent.

If you fill out a form on our Sites, for example, to subscribe to the Service, to check if the Service is available in your home, or to request the Service in your building, then we will collect the information entered on that form upon your submission of the form. This could include your name, email address, phone number, and physical address. We also collect certain information to establish business relationships, primarily with the owners or managers of multi-family housing buildings. This includes the name, email, zip code, and employer of such building owners or managers. We will make clear before collecting this information that you are providing it to us by submitting the form and will explain why we are collecting it. We also will provide a link to this Privacy Notice at every point at which we collect information.

We collect information from others.

We may collect information from other sources, including commercially available demographic information and interest data, and business contact information. We may collect names, phone numbers, and email addresses of property owners and property managers in order to market and sell our Service.

We combine information.

We may combine information that we have collected offline with information collected through your use of the Service or any other services we provide to you (if you are a customer), and our Sites and Apps. In addition, we may combine information that we receive from a third party with information that we already have, if that third party has the right to provide the information to us.

We do not knowingly collect information from children.

We do not knowingly collect information from children under the age of 13.

We use the information to improve our Service, to provide customer care, and for marketing purposes.

We use information to understand how the Service is being used, to evaluate and improve the Service, to provide customer care, and to manage our network. This information allows us to continually improve our technology and Service over time. We may use your information to make our Sites and Apps, products, and other services better, as well as to develop new products and services.

We also may use the information we collect to market our Service to you. For example, we may provide you with information about new products, special offers, new features, or updates. This may include emails, texts, physical mail, or digital advertisements. Marketing communications by email or text will include an option for you to opt-out of such communications in the future and will reference this Privacy Notice. You can read our Text/SMS Terms and Conditions (<https://starry.com/legal/sms-terms>) for further details, including opt-out instructions.

We share information with third parties when necessary to provide and market our Service, when we have your consent, or when required by law

Below are the categories of personal information that we collect and share, the reasons for doing so, and the types of third parties with which we share the information where applicable. For security reasons, this is not an exhaustive list.

Category of Information	Primary Purpose for Collection and Use of Information	Categories of Recipients to Whom We Disclose Information
Identifiers , such as first and last name, service address, email address, account login, or other similar identifiers	Provide service, customer care, billing, marketing	Payment processors, sales management platforms, customer care platforms, dispatch platforms, marketing platforms
Other identifying information , such as community information, and information about building owners or property managers where applicable	Provide service, marketing	Sales platforms, marketing platforms
Internet or other electronic network activity information , including IP address, MAC address, browser information, and referring websites	Provide service, customer care, marketing	Internet traffic exchanges, customer care platforms, marketing platforms, network management platforms
Financial information , such as credit card information and billing address	Billing	Payment processors

Sources of the personal information that we collect. We collect information about you directly from you in many cases. In addition to the information that we collect from you directly, we may collect information created as a result of your interaction with the Company or from other sources, including third parties and service providers.

We share personal information to provide the Service.

Information, including your IP address and referring websites, may be made publicly available to certain third parties when you use the Service. It is necessary for us to share this information with third parties in order to connect you to the Internet. For example, your IP address needs to be shared to route traffic to and from the

Internet to your home and is visible to websites on the Internet.

We share information, including some personal information, to market the Service.

We share information for marketing purposes, including for digital advertising as described in this Privacy Notice. This information most frequently includes your email address, IP address, information contained in a cookie that we store on your web browser, or information provided through a pixel or beacon that is used by advertising partners to serve our ads. We do not sell this information to third parties for their own advertising purposes.

Our Sites use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses cookies and pixels to help us analyze how users interact with our Sites, compiles reports on the Sites' activity, and provides other services related to the Sites' activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a return visitor, and any referring website. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's privacy policies.

You can opt out of information collection and targeted advertising mechanisms using these tools here:
<https://preferences-mgr.truste.com/>

We share information to develop business relationships.

We may share certain information we collect to establish business relationships, primarily with the owners or managers of multi-family housing buildings. We store this information in sales platforms and load it into other marketing-related tools to help us manage these relationships.

We may also share personal information with your explicit consent.

We may ask for your explicit permission to share information about you with our business partners for purposes not covered in this Privacy Notice. We will only share personally identifiable information about you for a third party's own marketing purposes if you affirmatively consent to such sharing, and we will make it clear at the point of collection that you are sharing your information with both Starry and our identified business partner. You also will have an opportunity to review each company's respective privacy notices before you provide your information.

We may share information with a successor to all or part of our business.

We may share information as part of any merger, acquisition, or sale of our company or our assets, or the transition of the Service to another entity. For example, if part or all of our business is sold, we may include customer information as part of that transaction.

We may link to third party sites or services that we do not control.

We generally do not host links to third parties on our Sites, but you may find them in press releases, blog posts, or other parts of the Sites. If you click on a link to a third-party site, you will be taken to a website that we do not control; this Privacy Notice does not apply to the privacy practices of that website. Read the privacy policy of other websites carefully. We are not responsible for the content or privacy policies of these third-party sites.

Additionally, we may include applications from third parties on our Sites or through our Apps, which allow interaction or content sharing by users. Some of these applications provide specific services or content from a third party, such as a Facebook "Share" or "Like" button, and are visible to you when you visit our Sites. Your interaction with these programs typically allows the third party to collect some information about you through cookies they place on your device and other tracking mechanisms. In some cases, the third party may recognize you through its cookies even when you do not interact with their application. Please review the third parties' respective privacy policies to better understand their data collection practices and the controls they make available to you.

We may also share information for certain other purposes.

We may otherwise share information without your permission as required by law or regulation; to investigate or defend against third party claims or allegations; or to protect our rights, property, and the personal safety of our employees or that of our customers or others. We will only share information about you with law enforcement pursuant to valid legal processes and we will not share the content of your communications without a valid warrant, unless such sharing is required in an emergency. We will use all reasonable means to attempt to notify you of a valid law enforcement request unless legally prohibited, an emergency situation exists involving danger of death or serious physical injury to a person, or we are unable to ensure that you, and no one else, will receive the notice.

To the extent that we process any de-identified or disaggregated data, we will take reasonable measures to ensure that the data cannot be associated with a natural person and we will not attempt to re-identify the data for further purposes.

You have choices about how we use your information

As described, we collect information on forms on our Sites with your consent. We strive to be as clear as possible about what information we collect, why we collect it, what we do with it, and how we share it. You will receive a copy of our Privacy Notice (likely as a link) and must agree to our Privacy Notice before we provide you with the Service or before submitting a form on the Site. This information is also available on our Site at <https://starry.com/legal>. Note that we do not provide financial incentives for the collection, use, or sale of personal information (and as described, we do not sell any personal information).

You can ask us to stop sending you marketing emails or texts. To stop receiving our promotional emails and texts, follow the instructions in any promotional message you receive from us (see here for text message terms and opt-out information). Even if you opt-out of receiving our marketing messages, we will continue to send you transactional messages. These include responses to your questions and information about any services we provide you.

Visitors to the Sites can take steps to limit the personal information that we collect and share. You may take certain actions to limit our access to personal information collected through our Sites, including your IP address and referring website. You may opt-out of receiving many behavioral ads and targeted advertisements through a web tool available here. And as described, you can opt-out of the use of this information for analytics through Google Analytics here.

You can also browse our Sites using a browser private mode, which may prevent us from collecting information about you and your browser.

Consumers may ask for a copy of their personal information, ask that we correct the personal information that we have, or ask that we delete their personal information. If you have provided your personal information to receive Service, entered personal information through a form on our Sites, or have given us personal information in other ways, you can request a copy of the personal information about you that we currently hold and you can request that we delete this information. You can also request that we correct any inaccurate personal information that we have about you by contacting Starry's customer care team at 888-231-9403 or support@starry.com.

Additionally, you can make different types of requests through the form below: (1) to know the categories of personal information we collect, the reason we collect it, the categories of third parties with which we share it, and the categories of sources from which the information is derived; (2) to know this information plus the specific pieces of your personal information that we have on file; or (3) to delete all of your personal information we have on file. You can also contact our customer care team by calling 888-231-9403, or emailing support@starry.com,

to make these requests.

When you make a request, we will collect four basic pieces of personal information, which we will match with our records to reasonably verify your identity. After you submit the form, you will receive an email confirmation with instructions on an additional step that we require you to take to help verify your identity and email address. We endeavor to respond promptly to your request once we reasonably verify your identity. Note that if you request your personal information more than twice in a twelve-month period, we may be unable to respond. And rest assured, we do not discriminate against any consumer who makes these requests.

If we are unable to verify your identity, we may deny your request. Because we cannot validate the identity of visitors to our Sites, we are unable to share a copy of your personal information or delete your personal information that we have from you if you have only visited our Sites. However, visitors to our Sites can reference the chart above for details about the personal information we collect, the reasons why we collect it, the categories of third parties with which we share the information, and the categories of sources from which we collect the information. In addition, if you are a current customer, we may be unable to process requests to delete your personal information because, as noted in the chart above, we collect only the information we need to provide our service. As a result, we necessarily need to continue to use your information to continue to serve you.

If you have questions regarding your personal information request, or would like to appeal Starry's response to your request, you may resubmit your request by using the Starry Information Form (<https://starry.com/legal/privacy/request>) or contact us at privacy@starry.com.

Consumers may submit requests through authorized agents

You may authorize a third party to submit a request on your behalf as your authorized agent. Your authorized agent can submit a request using the same form provided above. We will validate your identity using the same process described in this Privacy Notice, and will only provide requested personal information to your email address that we have on file. If your authorized agent must receive the information directly to their own email address instead of yours, you or the agent may contact Starry directly at privacy@starry.com.

We strive to protect the information we collect

We use technical, administrative, and physical safeguards to protect against unauthorized access to, use of, or disclosure of the information that we collect and store. But no security program is 100 percent secure. As a result, we cannot guarantee that we will prevent every unauthorized attempt to access, use, or disclose information.

We conduct an annual review of our policies and may change this Privacy Notice from time to time

We conduct a data protection assessment and review our policies on an annual basis, and subsequently throughout the calendar year as needed, to determine whether updates are necessary, or to reflect any changes in circumstances and to comply with applicable regulations. We also conduct annual employee training to familiarize employees with our privacy and data security policies, as discussed herein.

You will find the most current version of this Privacy Notice at www.starry.com/legal. As noted, we may make

changes to this Privacy Notice at any time. The text of this Privacy Notice was updated on December 29, 2022, to comply with applicable regulations. If we make any changes that we believe are material, we will provide you notice at least 30 days in advance. In most cases, if you continue to use the Service, visit the Sites, or use the Apps after we have posted or otherwise notified you of changes to this Privacy Notice, that will indicate your acceptance of those changes.

Contact us

If you have any questions about this Privacy Notice, please email us at privacy@starry.com.

You can also write to us at:

Starry, Inc.

Attn: Legal Department

38 Chauncy Street, 5th Floor

Boston, MA 02111