



FACTSHEET

Revised: 13-Dec-07

Stratos' Privacy Commitment to Our Customers

Stratos' Privacy Commitment

We understand that our customers value the privacy of their personal information, and we are committed to meeting our customers' expectations of confidentiality. In keeping with that goal, we have developed this privacy policy to provide you, the customer¹, an outline of our guidelines for the collection, use, and disclosure of your personal information.

Our Privacy Policy is Based on Ten Principles

Our privacy policy is based on the following ten privacy principles:

1. **Accountability** – Stratos is responsible for a customer's personal information collected, used, retained and disclosed by the organization and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.
2. **Identifying Purposes for Collection of Personal Information** – Stratos will identify the purposes for which personal information is collected at or before the time the information is collected.
3. **Obtaining Consent for Collection, Use or Disclosure of Personal Information** – Stratos will obtain the consent of customers for the collection, use, or disclosure of personal information, except in special circumstances, such as in the case of an emergency.
4. **Limiting Collection of Personal Information** – Stratos will limit the collection of personal information to that which is necessary for the purposes identified. Personal information will be collected by fair and lawful means.
5. **Limiting Use, Disclosure and Retention of Personal Information** – Stratos will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes.
6. **Accuracy of Personal Information** – Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
7. **Security Safeguards** – Stratos will protect personal information by security safeguards appropriate to the sensitivity of the information.
8. **Openness Relating to Policies and Practices** – Stratos will make readily available to customers specific information about its policies and practices relating to the management of personal information.
9. **Access to Personal Information** – Upon request, Stratos shall inform a customer of the existence, use, and disclosure of his or her personal information and shall grant that individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.
10. **Challenging Compliance** – A customer shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance with its privacy policies.

Collecting Your Personal Information

Personal information is information about an identifiable individual. At Stratos², we will only collect personal

¹ For the purposes of this policy, the term "customer" is defined as identifiable, individual persons that purchase services and equipment from Stratos; this policy is only applicable to individuals that fit this definition.

² The term "Stratos" means Stratos Global Corporation and all of its wholly owned direct and indirect subsidiaries, which includes, without limitation, the following: Stratos Wireless Inc.; Stratos Mobile Networks, Inc.; Stratos Mobile Networks (USA), L.L.C.; Stratos Offshore Services Company; Stratos Communications, Inc.; Stratos Telecom, Inc.; Stratos VSAT, Inc.; Stratos Global (Japan) KK; Stratos Communications (Australia) Pty. Limited; Stratos New Zealand Limited; Stratos Global Limited; and, Stratos Aeronautical Limited.



BEYOND THE HORIZON®

information from you and about you that will enable us to establish and maintain a business relationship with you for the provision of products and services. This requires that we collect personal information from you or about you, such as your name, address, telephone number, fax number, e-mail address, credit card information, employment information, date of birth, credit bureau reports, reports from other credit references provided by you, banking information, physical location of your satellite terminal, and Accounting Authority or Service Provider with whom you have arranged payment. As well, in cases where your service subscription relates to maritime or aero usage, we will also request information from you and about you such as the name, address, telephone number, fax number, and e-mail address of an emergency contact; the name, call sign, country of registry, type and MMSI of your vessel; details of your radio licenses; and, tail number, country of registry, manufacturer, model and fuselage/airframe number of your aircraft. For credit research purposes, we also request your SIN or social security number, though your provision of this information is optional.

Additionally, to ensure our ability to optimally serve you, we collect information relating to your products and services, usage, billing records, payment history and demographic information.

Collecting Information Helps Us Serve You Better

With your consent, Stratos may use your personal information for a variety of purposes, such as:

- To establish and maintain responsible customer relationships, including keeping records of the relationship in order to facilitate timely and accurate invoicing and to administer our billing and accounting systems;
- To answer any billing, account or technical enquiries from our customer base;
- To activate, de-activate, suspend, un-suspend, bar or un-bar your satellite terminal;
- To establish and maintain supplier relationships to support the acquisition of communications products and services required for the delivery and provision of Stratos' products and services;
- To deliver products to our customers;
- To make credit approvals and related practices such as monitoring customer payment histories, evaluating customer credit standing and exchanging credit information with credit reporting agencies and bureaus as required;
- To measure and improve the effectiveness of our web sites or marketing efforts;
- To communicate with our customers about additional Stratos products and services that may be of interest to them or to send other special interest customer communications;
- To research and develop new products, services or programs to better serve the needs of our customers; and,
- To meet legal and regulatory requirements.

For statistical purposes, we may also collect and use summarized customer information in a format that no longer identifies an individual or individuals ("Aggregate Information"). Stratos reserves the right to use this Aggregate Information in any way it deems appropriate.

We Need Your Consent

We seek your consent to use, collect, and disclose your personal information. This consent, while typically in writing via the application forms we use for such things as activating services or establishing credit, may be oral or written, express or implied.

Please note that if you do not consent to providing certain information, such as credit information, details requested on our activation forms, or a billing address, we may not be able to provide you with the product or service that you desire.

Disclosing Your Personal Information Amongst Stratos' Affiliates

In order to effectively and efficiently continue operations, personal information that you provide to a Stratos affiliate is shared amongst the other companies within the Stratos family.

Disclosing Your Personal Information to Third Parties

It is our policy to not share personal information outside of the Stratos family. However, there are instances where we are reasonably required to share your information with a third party. Such third parties include:

- Agents acting on behalf of Stratos, such as our authorized Stratos Dealers or Distributors, or companies hired to perform installations, maintenance, warranty work, or billing functions.
- Other communications service providers or commissioning entities, in order to provide efficient and effective communication services (e.g., to terminate a satellite call on a terrestrial line or to activate,



- deactivate, suspend, un-suspend, bar or un-bar service on your satellite terminal);
- Delivery companies, in order to deliver our products to our customers;
- Credit card companies, in order to validate and process a credit card transaction;
- Credit bureaus and credit references that you provide in order to responsibly manage our credit relationship with you;
- Information Technology or other professional consultants in order to improve our systems and processes;
- Other companies and professional advisors in conjunction with an amalgamation or sale of corporate assets or interests; and,
- As may otherwise be required by local and foreign law, as applicable.

We will use reasonable efforts, using contractual or other arrangements, to ensure that third parties use your personal information in a manner that is consistent with this policy. Should you not wish us to disclose your personal information to these third parties, we may be unable to process your application or transaction, communicate with you about products that may be of interest to you, or provide other benefits.

As well, there are special circumstances where we may disclose your personal information without your consent or knowledge. These situations include where information is forwarded to a collection agency for the collection of past due bills, where it would be reasonably in the best interest of an individual but where consent cannot be obtained in a timely manner; where the life, health or security of an individual is threatened or otherwise at risk; where the purpose is related to the detection or prevention of fraud or for law enforcement; where disclosure is to our legal counsel; or as may otherwise be required by law.

Use of "Cookies"

During user interaction with one of our Internet sites, we may use a browser feature known as a "cookie" to collect information anonymously and track user patterns on our web sites. A cookie is a small text file containing a unique identification number that identifies your browser, but not you, to our computers each time you visit one of our sites that uses cookies. These cookies tell us which pages of our web sites are visited and by how many people, helping us to enhance their on-line experience.

Unless you specifically advise us, we will not know who you are, even though we may assign your computer a cookie. We cannot use cookies, by themselves, to disclose the individual identity of any site user, and we never combine information gathered by a cookie with personally identifiable information without your consent.

Most major web sites use cookies and most major browsers are set up to accept them. You may reset your browser either to notify you when you have received a cookie, or to refuse to accept cookies. You do not need cookies to visit Stratos web sites. However, if you refuse to accept cookies, you may not be able to use some of the features available on our web sites, such as personalization features.

Our Commitment to Maintaining Your Privacy

We take all necessary precautions to safeguard the privacy of your personal information, whether it is stored electronically or in paper format. Your information is maintained in secure facilities, protected from unauthorized access, and retained only as long as is reasonably required. Electronic files are backed up for redundancy and password protected to ensure access only by authorized employees.

Although we cannot take responsibility for any theft, misuse, unauthorized disclosure, loss, alteration or destruction of data by a third party, we take reasonable precautions to prevent such unfortunate occurrences.

Access to Personal Information

It is our policy to provide our customers with access to their personal information upon request. However, please note that access to information may be restricted, for example, where it contains proprietary information or personal information relating to another individual. In these cases, we will make every effort to sever your information from the restricted information or we will advise you of the reasons for restricting access, as well as any costs that may be involved in responding to your request for access.

Should you notify us of outdated or incorrect information, we will make the appropriate changes as quickly as possible.



How Can I Contact Stratos?

Should you have any questions, concerns or complaints about our privacy policies, please contact:

Mr. Rob Hull
P.O. Box 5754
34 Harvey Road
St. John's, NL
A1C 5X3 Canada
E-mail: privacy.officer@stratosglobal.com
Fax: +1 709 724 5300

We will respond to your request or investigate your concern as quickly as possible.

Will this Privacy Policy Change?

To accommodate changes in our business, products, services, technology, and legal developments, we may add, change, or remove portions of the policy as we feel it is appropriate to do so. Updated policies will be posted to our web site at www.stratosglobal.com, please refer to the date on the policy and check back for updates.

