

# Data Privacy Statement for NetComm Wi-Fi devices

## About NetComm and its Wi-Fi Product

NetComm Wireless Pty Ltd (ACN 002 490 486) is a wholly owned subsidiary of Casa Systems, Inc. Throughout this document, a reference to “We”, “we”, “Us” or “us” are a reference to NetComm Wireless Pty Ltd. We are a leading global innovator of telecommunication solutions aiming to give everyone the connected life they need.

The NetComm Wi-Fi device has been designed to connect to a cloud-based analytics platform based in Australia that will process, and store certain device and network parameters (see next section for more details) collected from the device to improve your home Wi-Fi experience. To do so, the NetComm Wi-Fi device must be setup in accordance with the Quick Start Guide, included in the box, and connected to the internet. Your Internet Service Provider (**ISP**) may use the data collected to automatically optimise radio performance of the NetComm Wi-Fi device and provide remote technical support.

The Wi-Fi device may be marked with your ISP’s brand so you may need to check the device’s label to determine that it is a NetComm Wi-Fi device.

## What kinds of device and network parameters do the Wi-Fi products collect?

We collect a range of information through the NetComm Wi-Fi device. This includes:

- MAC/IP address;
- serial numbers;
- WLAN identifiers;
- model numbers;
- device health metrics;
- radio spectrum parameters; and
- network connection and packet throughput statistics.

(collectively referred to in this Data Privacy Statement below as “**Data**”)

Only some of the Data, such as those types listed above might reasonably identify you and would therefore be considered ‘personal information’. Where we handle personal information, we are bound by applicable privacy laws such as Privacy Act 1988 (Cth) and Privacy Act 1993 (NZ) (**Privacy Laws**).

If the Data is not collected, your ISP may not be able to properly resolve technical problems remotely should you require assistance. Also, the device might not be able to function as intended to optimise your home Wi-Fi experience. If you do not wish for your Data to be collected, you should not use the NetComm Wi-Fi device.

## Who has access to the Data and what purpose is it used for?

Both NetComm and your ISPs may have access to the Data via a cloud-based Wi-Fi analytics platform. The ISPs may use the Data to provide services to you (such as detecting and resolving Wi-Fi problems). ISPs may combine this Data with other information they hold about you.

We may use the Data to provide your ISP with the cloud-based analytics service mentioned above and related services to your ISP. Although we do not do so currently, we may use the Data to improve the quality of our product and services. We may also aggregate the Data we collect from you with data from other users.

NetComm provide secure access to and may disclose the Data to third party service providers who assists us with the delivery of the services mentioned in this document.

**Is the Data Transferred offshore?**

The Data is stored in the secure cloud provided by Amazon Web Services (AWS) in Australia. However, if we decide to store the Data in another country we will notify and update your ISP and this Data Privacy Statement.

From time-to-time we may also give secure access to the Data to a third-party contractor, licenced to maintain and support the Wi-Fi analytics platform, located in another country such as the USA and India. We will only do this where it is necessary or appropriate to achieve the purposes set out in this Data Privacy Statement or our Privacy Policy.

**Where can I find more information?**

More detailed information about the way NetComm Wireless collects, uses, discloses or otherwise handles your personal information can be found in our Privacy Policy at <https://www.casa-systems.com/wp-content/uploads/2021/02/Casa-Systems-Privacy-Policy.pdf>.

Our Privacy Policy includes information about how you access your personal information or seek correction of your Personal Information that we hold. It also includes information about how you may make a complaint about how your personal information has been handled.

Our Privacy Policy and applicable Privacy Laws, only apply where the data is 'personal information' under applicable Privacy Laws.

For more information on how your ISP collects, uses, discloses or handles your personal information, visit your ISP's privacy policy. Other ISP terms and conditions may also apply to your use of the NetComm Wi-Fi Device and their use, collection, disclosure and handling of your personal information.