

EXHIBIT 2

CityBridge Privacy Policy

Effective March 17, 2017

CityBridge LLC ("CityBridge", "we", "us", and "our") is committed to protecting and respecting your privacy. This Privacy Policy describes how we collect, use and share information about you through your use of our Public Communications Structures ("Structures"), including any related websites or advertising from the Structures (together, the "Services"). While we cannot guarantee the security of your information, we have taken appropriate steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

The Services are provided by CityBridge in fulfilment of its obligations under an agreement between the City of New York and CityBridge. CityBridge is not an agency, office, department or affiliate of the City of New York. We provide the City of New York limited information created in the course of providing the Services, which is described in the section below titled "How We Share Information with the City Of New York."

Please read this Privacy Policy carefully to understand how we will treat your information. BY REGISTERING WITH US OR OTHERWISE AFFIRMATIVELY INDICATING YOUR CONSENT, YOU CONSENT TO THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY. IF, FOR ANY REASON, YOU DO NOT CONSENT TO THESE PRACTICES, PLEASE DO NOT USE THE SERVICES.

Please click on the sections below to learn more about our Privacy Policy:

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WHO WE ARE

As used in this Privacy Policy, "CityBridge" means CityBridge LLC.

INFORMATION WE MAY COLLECT FROM YOU

Registration:

If you register with us to use the Services, during registration, we collect:

- A user name;
- Your email address;
- A password for your account.

Using the Services

We collect certain information to help us operate and provide the Services to you. We collect this "Technical Information" when you use the Services, including:

- MAC address (anonymized), IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device type, and device identifiers;
- Information about your visits, including the full URL clickstream to, through and from (including date and time) websites owned or operated by CityBridge, including: <https://www.link.nyc/> and <https://wifi.citybridge.com/>;
- Information used to facilitate your use of the Services, such as access to third-party websites and services, including URL requests, destination IP addresses, configuration details, or other information necessary to provide access to the Services;
- We will not store your browsing history or track the websites you visit when you use your personal device to access the Services.

We retain anonymized MAC addresses for 1 year in order to facilitate automatic log-in to the network without reregistration. We delete all other Technical Information about individual sessions 60 days from the end of the session.

Information You Provide to Us

If you send us an email, fill out a feedback form, call us, or choose to communicate with us in another way, we will collect that information in order to respond to your request, feedback, or question. We will use and share information you provide to us only as described in this Privacy Policy.

Personally Identifiable Information

Some of the information we collect, including information we collect during registration, or in the course of providing the Services or through your communications with us, such as your name or email address, may personally identify you. We will treat this information as "Personally Identifiable Information," along with any Technical Information that is combined with Personally Identifiable Information.

Anonymized Information

We may combine Technical Information or non-Personally Identifiable Information about your use of the Services with similar information about other users in an anonymized manner.

Location Information

We do not collect information about your precise location. However, we know where we provide WiFi services, so when you use the Services we can determine your general location.

Other Collection of Information

CityBridge will not ask for or request sensitive information such as government identifiers, medical information, or financial information (other than for payment of optional services). Please do not provide this information to us through emails, feedback forms or in any other way.

We may offer additional paid products and services. For these products and services, we will collect payment information in order to process any order from you. This payment information is processed by a third-party payment processor. We do not process, record or maintain your payment card or bank account information.

Sometimes we supplement anonymized Technical Information we collect from you with information collected by third parties. Third parties may include advertising partners or other providers that help us understand our users.

We will not share any information that is not anonymized with any third parties for their own use.

HOW YOUR INFORMATION MAY BE USED

We will not add or insert advertising on your personal device. We may use any information we collect to:

- Allow us to operate the Services, including administration, internal operations, troubleshooting, data analysis, testing, research, statistical and survey purposes;
- Manage your access to the Services;
- Send you information about the Services or your usage of the Services;
- Comply with laws and regulations;
- Maintain the security of the Services.

We may use Technical Information that is unassociated with you and your device to:

- Improve the Services and present content in the best way for you and for your device;
- Deliver relevant advertising on the Structures;
- Measure or understand the effectiveness of advertising we serve on the Structure to you and improve the effectiveness of advertising;

In addition, with your express opt-in consent, we may use your information, including Personally Identifiable Information, to:

- Provide you with information about goods or services that may interest you; and
- Permit selected third parties to provide you with information about goods or services that may interest you.

HOW WE SHARE YOUR INFORMATION

CityBridge will not sell Personally Identifiable Information and CityBridge will not share Personally Identifiable Information with any third party for that third party's own use.

We may share information, including Personally Identifiable Information, with our third-party service providers and agents to the extent reasonably necessary to provide you with the Services. For example, we use a third party platform for email and cannot communicate with you without disclosing your email address to our third party email provider. These third parties use any information we share only to support CityBridge and our efforts to provide the Services.

We may share any information, including Personally Identifiable Information with:

- Service providers and sub-contractors to the extent reasonably necessary to enable us provide the Services;
- A third party that acquires CityBridge or a majority of its assets, if that third party obtains the rights to provide the Services and subject to the provisions of this Privacy Policy;
- A third party with whom we must legally share information about you;
- You, upon your request;
- Other third parties with your express consent to do so.

We may share Technical Information that is unassociated with you and your device:

- With analytics, search engine, or other service providers that help us improve the Services;
- To advertisers and advertising networks to select and serve relevant advertisements.

REQUESTS FOR YOUR INFORMATION BY GOVERNMENT AGENCIES

We will not disclose your information unless disclosure is required by law, such as in response to a subpoena or court order. In the event that we receive a subpoena or court order demanding that we provide a governmental entity with your Personally Identifiable Information, we will attempt to notify you of such request by sending an email to the email address that you provide during registration. If we do not have your current email address, then we will not be able to notify you of any requests.

HOW WE SHARE INFORMATION WITH THE CITY OF NEW YORK

We may provide Technical Information that is unassociated with you and your device to the City of New York, such as statistics on usage, which may also be available through the City's Open Data Portal. We do not provide Personally Identifiable Information or other information to the City of New York about you or your individual use of the system, except as may be required by law.

COOKIES

The Services may use cookies and similar technologies to support the functionality of the Services. This provides a better experience when you visit our websites and allows us to improve the Services.

DO NOT TRACK

The websites owned or operated by CityBridge do not support a "Do Not Track" feature, which provides a signal that you do not wish operators to track certain of your online activities over time and/or across different websites.

YOUR CHOICES

When you register with us, you may choose to receive certain communications from us related to the Services. You can update your communications choice at any time by clicking "unsubscribe" at the bottom of these emails.

There are certain communications regarding your use of the Services, for example if you need to reset your password or responding to a question from you, which are necessary for the operation of the Services. You will continue to receive these emails, if appropriate, even if you choose not to receive our optional communications.

Certain websites you visit may provide options regarding advertisements you receive. For more information or to opt out of certain online behavioral advertising, please visit <http://www.aboutads.info>.

SECURING YOUR INFORMATION

All information you provide will be stored by, and may only be transferred or accessed by, entities in the United States. The security of your information is important to us. We encrypt Personally Identifiable Information we store about you. We also encrypt WiFi connections we provide for compatible devices. To determine whether your device is compatible, please visit [here](#). Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee against access to your Personally Identifiable Information by unauthorized third parties. The security of your data transmitted to or through our Services is at your own risk. Once we have received your information, we will use appropriate and necessary administrative, technical and physical controls to prevent unauthorized access.

If an unauthorized person gains access to your information we will notify you as soon as feasible at the last email address you have provided us unless we determine that no harm is reasonably likely to occur from the unauthorized disclosure.

We will make reasonable efforts to retain Personally Identifiable Information that you provide to us during registration no longer than 12 months after your last login. If you do not access the Services for 12 months or longer, you may be required to register again.

OTHER SERVICES

Environmental Sensors

Structures may include environmental sensors that collect information about the environment surrounding the Structures. These environmental sensors collect data such as temperature, humidity, ambient noise, light, pressure and air pollutants, but do not collect data from or about you.

- Other than the City or governmental law enforcement, we will only share data collected by environmental sensors if 1) we are legally required to, 2) it is necessary to operate and maintain the System and the Services, or 3) we get advanced, written permission from the City.

Cameras

Structures may include two cameras mounted on each side of the Link above the ad panels. The cameras capture images of the area surrounding the Structure, and those images may include you, but the use of video footage will be limited to the following conditions.

- We will not keep any footage captured by any camera for longer than seven days, unless the footage is necessary to investigate an incident.

- We will not use or disclose data collected by our cameras except (1) to improve the Services and ensure the performance and security of the Structures, (2) to detect or address illegal activity on or associated with our Services, (3) to identify, contact or bring legal action against someone who appears to be causing injury to or interfering with our property, or (4) if we believe that disclosure is required by law or useful to protect your safety or the safety of others, including when there is an emergency involving potential harm, loss of security, or serious injury to people or threats of such emergencies.
- We will not use facial recognition technology for any reason, and we will not use our cameras to track your movement throughout the city.

The Tablets also contain a built-in camera. When available, the camera could be used for video calls in the future. The Link tablet camera will only activate if initiated by a LinkNYC user for a specific feature. It will not automatically activate during phone calls, wayfinding, charging or accessing city services.

USB Ports

Structures may include one or more USB ports. Our USB ports provide electricity to charge your devices and cannot collect any information from your device.

CHILDREN

The Services are not directed toward children under 13 years of age nor does CityBridge knowingly collect information from children under 13. If you are under 13 years of age, you are not permitted to submit any Personally Identifiable Information to CityBridge.

LINKS TO THIRD PARTY SITES

Our Services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

CHANGES TO OUR PRIVACY POLICY

If you provide us with your current email address, we will send an email to that email address, notifying you of any material updates or changes we may make to the Privacy Policy prior to the changes becoming effective. All changes will also be posted on this page so please check back frequently. After we notify users of changes to the Privacy Policy, users will have the option to decline continued use of the services if they do not consent to the changes.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to: CityBridge, 10 Hudson Yards, 26th Floor, NY, NY 10001 or hello@link.nyc.