



December 16, 2022

New York City Office of Technology & Innovation  
Attn: Chantal Senatus  
2 Metrotech Center, P-1 level  
Brooklyn, NY, 11201

Re: Compliance with Franchise Agreement Privacy Policy Provisions - Audit Update

This letter is sent in response to the letter request of the New York City Office of Technology & Innovation (“OTI”) dated as of November 29, 2022. As noted in that letter, OTI previously elected to audit the books, records and computer systems of CityBridge, LLC (“CityBridge”), the owner and operator of the LinkNYC program, for compliance with the CityBridge Franchise Agreement (as amended, the “Franchise Agreement”) privacy provisions. The results of that audit (the “Privacy Audit Report”) identified four (4) findings requiring remediation. The purpose of this letter is to report on the remediation status by CityBridge for each finding. Capitalized terms not otherwise defined have the meanings given such terms in the Privacy Audit Report or in the Franchise Agreement, as applicable.

First, **Privacy Audit Report Item “PF-01”** indicated that *“CityBridge does not anonymize the MAC Address of user devices as stated in the Privacy Policy and Franchise Agreement.”* As of the date hereof, CityBridge hereby confirms remediation for this finding was successfully completed. Specifically, a hashed MAC solution to hash MAC addresses so they are anonymized (in addition to being already encrypted) was successfully tested and deployed to production environments.

Second, **Privacy Audit Report Item “PF-02”** indicated that *“Users of the LinkNYC system are provided an Intersection privacy policy vs. LinkNYC privacy policy.”* As of the date hereof, CityBridge hereby confirms remediation for this finding was successfully completed. Specifically, CityBridge confirms that the correct LinkNYC privacy policy has been successfully deployed and verified such that it is correctly displayed by the captive portal. Additionally, the root cause investigation has been successfully completed and the LinkNYC privacy policy is now visible to users of the LinkNYC Wi-Fi network.

Third, **Privacy Audit Report Item “PF-03”** indicated that *“LinkNYC welcome emails do not consistently include the required “unsubscribe” option on some test devices as per the CityBridge privacy policy.”* As of the date hereof, CityBridge hereby confirms remediation for this finding was successfully completed. Specifically, CityBridge confirms that the LinkNYC welcome email has been updated so that all welcome emails include an unsubscribe link.

Fourth, **Privacy Audit Report Item “PF-04”** indicated a *“Gap in required information to be displayed on the Splash Page.”* As of the date hereof, CityBridge hereby confirms remediation for this finding was successfully completed. Specifically, CityBridge confirms the LinkNYC “Splash Page” has been successfully updated to reference the correct Wireless Network Terms of Use and Privacy Policies.

Sincerely,

Margaux Knee  
SVP, General Counsel, CityBridge

cc:  
Nick Colvin, CEO, CityBridge  
Matthew Fraser, CTO, OTI  
Luz Fontana, Chief of Staff, OTI  
Brett Sikoff, Executive Director, OTI

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