

## **CPNI PRIVACY POLICY**

### **Customer Proprietary Network Information (CPNI)**

Customer Proprietary Network Information, or CPNI, is information that we know about you solely because you are our customer. It includes the type, technical arrangement, quantity, destination, and amount of use of telecommunications services and related billing for these services. You have a right, and we have a duty under state and federal law, to protect the confidentiality of CPNI. This notice will explain our CPNI privacy policy. Like you, we are concerned about protecting your privacy. We work hard to provide you with the best products and services, but we remain sensitive to customer privacy issues.

### **How We Obtain Information and How We Use It**

Generally, the information we obtain from you is necessary to provide you with the services you already subscribe to, and to design and offer new services for your future use. For example, we need to know your name, address, and the services you subscribe to in order to provide and bill for your phone service. When you call us, we may access your account records and refer to your bill, calling patterns, and other information we have to answer your questions or to recommend the best services to fit your needs.

### **Disclosure Of CPNI**

We may access your CPNI to offer you: (i) services of the type you already purchase from us, and (ii) the full range of products and services available from us that may be different from the type of services you currently buy from us. In addition to the local telephone services, our services may include Long Distance, Cable Television Service and Internet Service. If you already subscribe to one of these service categories, we may use your CPNI to market additional services within that category without first seeking your approval. Use of your information will permit us to offer you a package of services tailored to your specific needs. We may also share your information with our affiliates who already provide services to which you subscribe. We are not required to seek your approval before sharing your CPNI with these affiliated companies for this purpose.

At times, we may wish to use your CPNI to offer you services that are different from the types of services you already buy from us or our affiliates. You must notify us if you do not want us to use your CPNI in this way. Such notice is called "opting out." To "opt out," you must contact your local telephone office within 30 days of receiving this notice. If you do not contact us within 30 days, we will assume that we have your permission to begin using your CPNI to offer services different from those you currently purchase from us or our affiliates.

Your decision will remain effective until you change it by notifying us in writing or by calling our business office. Please be aware that if you choose to "opt out," your services will not be affected in any way.

### **Disclosure of CPNI to Unaffiliated Third Parties**

In the future, we may wish to disclose your CPNI to unaffiliated third parties with whom we have a business relationship so that they can provide you with products or services that may fit your needs. If we enter into such relationships, we cannot disclose CPNI to such third parties without your "opt in" consent, which means that you must expressly allow us to share your CPNI in such a

manner. We will notify you before we disclose your CPNI to such third parties and provide you with the ability to provide your consent in writing. You should also note that if we release your CPNI to such third parties, they will be legally obligated to keep your CPNI confidential. As with “opt out” approval, your decision will remain effective until you change it by notifying us in writing or by calling our business office, and your decision will not affect your services in any way.

We may provide account information to collection agencies when customers do not pay their bills. We restrict the use that can be made of this information to collection activities for our charges and for the charges we bill for others.

We may also use CPNI to protect customers, employees, or property, such as to investigate fraud, harassment, or other types of unlawful service activities involving us or carriers we do business with. In some cases, we may need to provide this information to the government or others who make a lawful demand for it.

We may provide CPNI to regulatory or administrative agencies so that they can accomplish their regulatory tasks (*e.g.*, responding to a customer complaint) or to maximize the efficiencies of our own processes (*e.g.*, ensuring mailing addresses are correct). Other disclosures will be driven by legal requirements imposed on us. We must comply with “legal process,” such as a subpoena or court order or other similar demand, associated with either criminal or civil proceedings.

If we or any of our affiliates or subsidiaries are acquired by another entity or merge with a third party, our customers’ personally identifiable information may be transferred as part of the transaction.

### **Additional Authorization**

You may find it convenient to allow us to provide CPNI to someone else in your household or business. We will be able to honor your request upon written authorization from you. Please contact us for an authorization form.

### **Future Changes to This Privacy Policy**

We may update this policy from time to time when necessary to comply with state and federal law, or to inform you of changes to our own CPNI policies. We will send you an updated policy and obtain any additional required approval before using your CPNI in a manner different than we have outlined here.