



## Broadband Privacy Notice

*Effective March 10, 2020*

If you receive this letter, our records indicate you are a current BrightRidge customer. BrightRidge is committed to protecting Users' privacy in accordance with applicable State and Federal laws. This Privacy Notice and Policy is applicable to services which may include data, high speed internet, voice, and video (referred to as the "Services"). Additionally, it describes BrightRidge's collection, use, disclosure and retention of information of those using the Services ("Users"), how Users can review and correct errors to that information, and enforcement of rights regarding personally identifiable information.

### Collection of Subscriber Information

Information about subscribers is collected as necessary in order to provide the requested Services and to detect unauthorized reception or use of BrightRidge Services. In order to provide reliable, high-quality service to Customers, BrightRidge keeps regular business records containing information provided by the Customer such as name, address, E-mail address, telephone number, identifying information, financial information and other similar information. BrightRidge collects and maintains information about Customer accounts such as billing, payment and deposit history, maintenance and complaint information, and Service options ordered. In addition, BrightRidge may combine information collected as a part of its regular business records with personally identifiable information obtained from third parties for the purpose of creating an enhanced database to use in marketing and other activities. BrightRidge may maintain records of research concerning subscriber satisfaction and viewing habits, which are obtained from subscriber interviews and questionnaires.

We use this information to:

- Install, operate and maintain the Services
- Confirm you are receiving the level of Service requested and are properly billed for the Service(s)
- Identify you when changes are made to your account
- Identify when changes are made to an account
- Provide information on new products or services
- Detect unauthorized reception of the Services
- Determine whether applicable policies and terms of service are being violated

- Comply with applicable State and/or Federal laws
- As otherwise necessary, to provide the Services or otherwise conduct business related to the Services

Except as otherwise provided in this Privacy Notice, Acceptable Use Policy, and applicable Terms and Conditions, BrightRidge does not assume any responsibility, control, oversight, ownership or other interest in the email messages, websites, specific Internet usage history, voicemail, content or other electronic data of its Users; provided that BrightRidge is permitted to use such information as necessary to bill Users and to provide the Services.

Even if such electronic information is stored in, contained on, or transmitted over its property, equipment or facilities, BrightRidge shall not have any responsibility, control, oversight, ownership, or other interest in such information. Users are and shall remain solely responsible for such electronic information including its accuracy.

### Internet and Voice Privacy

BrightRidge does not use, share, or sell User's E-mail messages, website browsing, specific Internet usage history, voicemail, or other electronic data generated from a User's Internet and voice Services. BrightRidge does not control or monitor a User's actions with respect to such User's Internet and voice activities but may control or monitor certain information related to its Internet and voice Services in order to provide, support, optimize such Services, comply with the law, and meet its obligations with respect to such Services.

### Disclosure of Information

Personally identifiable information ("PII") will only be disclosed for legitimate business activities related to the Services including, but not limited to:

- Billing and collections Administration Surveys
- Marketing
- Maintenance
- Fraud prevention
- Compliance with applicable laws and regulations

In addition, personal identifiable information may be disclosed to others, such as our employees, contractors, and agents for our internal business purposes, as well as outside auditors, professional advisors, service providers, potential business partners, regulators, and franchise authorities with or without your written consent if necessary, to render the Services or to conduct a legitimate business activity related to the Services.

Although BrightRidge makes every reasonable effort to preserve our Users' privacy as described, BrightRidge will cooperate with law enforcement, including without limitation under subpoena, court order, or search warrant. BrightRidge may also use or disclose personal identifiable information without User' consent to protect our customers, employees, or property, in emergency situations or to enforce our rights in court or elsewhere.

BrightRidge reserves the right to include usage information in aggregate formats, such as ratings surveys and other statistical reports, as long as information does not personally identify the User, specific viewing habits, or the nature of any transaction made using the Services.

### **Security**

BrightRidge takes reasonable security precautions to protect Users' personally identifiable information from unauthorized access, use, and disclosure. For example, billing records on computers in a controlled and secure environment. However, BrightRidge cannot guarantee these security precautions will prevent every unauthorized attempt to access, use, or disclose User' personally identifiable information.

### **Marketing Services**

BrightRidge may disclose User's name and address for mailing lists in connection with promotion of BrightRidge products, services, and other legitimate business activities, subject to the Customer Proprietary Network Information (CPNI) Policy found at [www.brightridge.com](http://www.brightridge.com). If User wishes to remove his/her name or limit the use of their name and address at any time they can contact the Customer Service department at 423-952-5000.

### **Retention of Information**

BrightRidge's maintenance of PII will be in accordance with our Records Retention Document. BrightRidge destroys PII consistent with the requirements of applicable law and our Records Retention Document, if/when the purpose for which such information was collected has been accomplished and BrightRidge no longer needs to retain the information for compliance with law, reporting, or other legitimate business activities.

### **Right to Review and Correct Information**

Users may request an appointment to examine and make a copy of information BrightRidge creates relating to the User at our main business office located at 2600 Boones Creek Rd, Johnson City, TN 37615. Requests and examinations must be made during normal business hours. A reasonable amount of time will be required to locate and, if necessary, prepare the information for review. To make a request, contact BrightRidge Customer Service at 423-952-5000.

### **Special Notice Concerning Customer Proprietary Network Information**

In addition to the provision of this Privacy Notice, Federal law protects your privacy rights as a customer of BrightRidge's fiber optic phone Service. These rights are in addition to the existing safeguards that BrightRidge already has in place to protect your privacy rights. The Federal Communications Commission requires BrightRidge to notify you of your right to restrict the use of your Customer Proprietary Network Information ("CPNI").

### **What is CPNI?**

CPNI is personally identifiable information that a telecommunications carrier collects when providing phone services to a customer. CPNI typically consists of the type of telephone Service, telephone numbers you have called, call duration and timing of those calls, as well as call frequency and any call management services you use.

### **Additional Information Regarding Your CPNI Rights**

BrightRidge may use the CPNI information to provide you with general information and marketing related to communications products and series. However, you have the right to deny or withdraw access to CPNI at any time or to instruct us to disclose CPNI to unaffiliated third parties by written request. Any approval or denial for the use of CPNI is valid until you affirmatively revoke or limit such approval or denial. A denial of your approval will not affect the Services to which you subscribe.

**BrightRidge reserves the right to modify this Privacy Notice and Policy at any time. BrightRidge will notify Customers of any material changes via written, electronic, or other means permitted by law, including by posting on our website. If Customers find the changes unacceptable, they have the right to cancel the Services. Continued use of the Services after receiving notice of such changes will be considered as acceptance of the changes.**