

## **SUBSCRIBER PRIVACY POLICY**

### **PLEASE READ THIS PRIVACY POLICY CAREFULLY**

**OUR COMMITMENT TO PRIVACY.** The Ponderosa Telephone Company, and its affiliates, (collectively "Ponderosa") is committed to respecting the privacy rights of our customers. This includes all privacy rights created under the California Consumer Privacy Act of 2018 including the right to know, right to delete, right to opt-out, and the right to non-discrimination. We believe that when you use any of our products or services, you should understand when and how personal information is collected, used, disclosed and protected. We do not sell your personal information to third parties without your consent.

We created this Subscriber Privacy Policy (the "Policy") to give you confidence when you use our services or products, and to demonstrate our commitment to fair information practices and privacy protection. This Policy is only applicable to our services or products and does not apply to services or products offered by other companies. By signing up for service with us, you consent to our collection and use of your personal information as permitted by law and described in this Policy.

**YOUR CALIFORNIA PRIVACY RIGHTS.** California customers, pursuant to the California Consumer Privacy Act, have the following rights: (1) the right to know the categories and specific pieces of personal information that are being collected about them; (2) the right to delete personal information gathered about them that is not subject to one of the exceptions in the California Consumer Privacy Act; (3) the right to instruct a company not to sell their personal information and to request the company to instruct all third parties who received this information to stop selling the information; and (4) the right to not be discriminated against for exercising any of their privacy rights. As permitted by the federal law governing Customer Proprietary Network Information ("CPNI"), Ponderosa Telephone shares personal information between its affiliates for its own marketing purposes, but we do not disclose or sell customers' personal information to third parties for the third parties' direct marketing purposes. We do sometimes disclose personal information to third parties when we use agents, contractors, or companies to perform services on our behalf, however, we advise them that they must protect your personal information, and that they may not disclose such information except in limited circumstances permitted under the California Consumer Privacy Act, such as cooperating with law enforcement. California customers may contact us and exercise any of their rights under the California Consumer Privacy Act by contacting us toll-free at 1.800.682.1878, e-mailing us at [customercare@goponderosa.com](mailto:customercare@goponderosa.com), or sending any correspondence to Ponderosa Customer Care, PO Box 21, O'Neals, CA 93645.

**INFORMATION WE COLLECT.** We collect information about users of our products or services in the normal course of our business, and through our website. When you sign up for service with us, you provide us with personal information that we use to provide you service. We may also collect information from other sources and combine it with your account information.

**Personal Information.** We collect information that you give us when you purchase, contract for, or use our products or services. We also collect additional information when you place a call on

your phone. This information is used for billing purposes so you can be appropriately charged (and, in some cases, to investigate fraudulent uses). For example, we may collect:

- Name
- Address
- E-mail address for contact purposes
- Social Security number
- Employer information
- Date of birth
- Driver's license number
- Telephone numbers
- Log information necessary for email server management
- For email addresses provided by Ponderosa, content of e-mail messages, and responses
- Log information necessary for Domain Name System server management
- Log information of authentication attempts and connected session information necessary for network and account security
- Log information necessary for web server management
- IP information necessary for network management
- Device information necessary for configuration and management of customer equipment
- Other personal information (e.g., answers to security questions) necessary for network and account security

**Website Information.** Our web servers automatically receive certain types of information when you use our websites, for example, your domain name and IP address(es), date and time of visits, the type of browser you use, the website from which your visit originated, page visits, time spent on web pages, and other similar website “traffic data.” No personal information about you is revealed in this process. We do not set any personally identifiable information in cookies. We only use cookies to collect website usage information so that we can determine how to improve our websites, complete transactions you request, and track your selections in order to make appropriate recommendations about our products and services. You can generally choose whether to accept cookies by changing the settings on your website browser. However, if you choose to disable this function, your experience at our websites may be diminished and some features may not work as they were intended.

**Information from Other Sources.** We may obtain information about you from outside sources and add it or combine it with your account information. For example, we may receive credit information when you decide to subscribe to one of our services. We may also use marketing information from third parties to help us better serve you or inform you about other products or services. We sometimes receive updated delivery and address information from our shippers or similar sources. We also receive information from agents from whom you purchase our products and services. We do not sell any of this information to other companies; we use it for our own business and marketing purposes.

**USE AND SHARING OF PERSONAL AND AGGREGATE INFORMATION.** We use your personal and website use information in order to provide optimal customer service, engage in our business activities, and inform you about other products or services.

**Use of Personal Information.** We do not sell your personal information to third parties without your consent. We may use your personal information to verify your identity, check your qualifications for services, or to follow up with transactions initiated on the Site. We may also use your contact information to send you additional information about our company. If, at any time, you do not wish to receive these communications, please let us know by calling us toll-free at 1.800.682.1878, e-mailing us at [customercare@goponderosa.com](mailto:customercare@goponderosa.com), or sending any correspondence to Ponderosa Customer Care, PO Box 21, O'Neals, CA 93645. When we use other agents, contractors, or companies to perform services on our behalf, we advise them that they are to protect your confidential information, and not disclose such information except in limited circumstances permitted under the California Consumer Privacy Act such as cooperating with law enforcement.

**Use of Website Information.** We use aggregate information to analyze our Site traffic, but we do not examine this information for individually identifying information. We may use anonymous IP addresses to help diagnose problems with our server, administer our site, or display website content according to your preferences.

**Use of Information in Business Transfers.** Information about our users, including personal information, may be disclosed as part of any merger, acquisition, sale of company assets, or transition of service to another provider, as well as in the unlikely event of an insolvency, bankruptcy, or receivership in which personal information would be transferred as one of the business assets of the company.

**Use of Information to Protect Ponderosa and Others.** We will disclose personal information only if required to do so by law or in good-faith belief that we need to do so to: (1) conform or adhere to legal requirements; (2) comply with civil, criminal, or regulatory investigations; (3) protect and defend our rights or our property, or the users of the Site; (4) act in case of emergency to protect the safety of the public or users of the Site; and (5) provide information to consumer reporting agencies.

**CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI).** Under federal law, you have the right and we have the duty to ensure the confidentiality of information about your telephone usage, the types of services purchased, who you call, telephone usage, bill summary, and current charges. This information is sometimes referred to as "Customer Proprietary Network Information," or "CPNI." We do not disclose this information with outside affiliates other than our authorized agents. Before we share your CPNI information with any person or entity other than our authorized agents, we will first notify you of your rights under the law, describe how we intend to use the CPNI and give you the option to opt-out of such information usage.

**CHILDREN'S ONLINE PRIVACY PROTECTION ACT.** We understand and are committed to respecting the sensitive nature of children's privacy online. We recognize that many parents

purchase products and services for family use, including use by children under the age of 16, without our knowledge. Any information collected from such accounts would appear to us as the personal information of the subscribing adult customer, and will be treated as such under this Policy. If we learn or have reason to suspect that we have identifiable personal information for a user under the age of 13, we will ask a parent to confirm his/her consent in advance of further collection, use or disclosure of personal information from that child. At any time, parents may exercise all privacy rights on behalf of their minor children, including the right to know, the right to delete, the right to opt-out, and the right to non-discrimination.

**PRESENCE, LOCATION, AND TRACKING.** If you call 911 for emergency services, we provide your location to a public safety answering location, emergency dispatch provider, fire services, law enforcement officials, or hospital emergency or trauma care facility. The law may permit us to disclose the location of a device on our network without a user's consent to: (1) a user's legal guardian or member of user's immediate family; (2) database management services or information providers solely to assist in delivering emergency services; or (3) a government entity if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure without delay.

**NETWORK AND INFORMATION SECURITY.** We maintain a variety of physical, electronic, and procedural safeguards to prevent the loss, misuse, and alteration of the information that we obtain from you, but we cannot guarantee our ability to prevent loss, misuse, or alteration.

**THIRD-PARTY WEBSITE AREAS BEYOND COMPANY'S CONTROL.** Our website may contain links to other websites. If you choose to visit those other websites, our Policy is no longer in effect. We are not responsible for the privacy practices or content of other websites, and it is your responsibility to review the privacy policies of other websites to ensure that you agree to their policies.

**UPDATING THIS POLICY.** We may revise, amend, or modify this Policy from time to time. Notice of any revision, amendment, or modification will be posted on the Site, and/or on your start pages and/or by email and/or in mailings to your primary email account and will be effective on the date noted in the posting. This Policy may not be amended or modified by you except by means of a written document signed by both you and one of our authorized representatives. By continuing to use our services and products after the amendments are effective, you accept and agree to abide by them.

**CONTACTING US.** If you wish to exercise your privacy rights or have any questions, comments or complaints concerning this Policy, please contact us toll-free at 1.800.682.1878, e-mailing us at [customercare@goponderosa.com](mailto:customercare@goponderosa.com), or sending any correspondence to Ponderosa Customer Care, PO Box 21, O'Neals, CA 93645.