

# MTCO Communications - Privacy Policy

## About Our Privacy Policy

In this Privacy Policy, the word "MTCO," "we," "us" or "our" refers to MTCO Communications, Inc.

Whenever you do something like buy one of our products, watch a show or download an app, information is created. Because we know your privacy is important, we have a Privacy Policy to explain how we collect, use and protect that information.

**Effective April 2016**

## A Quick Summary of Our Privacy Policy

Our privacy policy applies to your use of our products and services. We will always provide you with notice of material changes to this Policy. In order to do things like constantly improve our services, products and relationship with you, we may collect different types of information that help us learn more about how you use our offerings.

### Here's some of the information we collect:

- **Account Information** includes your name, address, telephone number, e-mail address, service-related details such as payment data, security codes, service history and other information like that;
- **Network Performance & Usage Information** tells us how you use our networks, our products and our services, and how well our equipment and networks are performing;
- **Web Browsing & Wireless Application Information** tells us about the websites you visit and the mobile applications you use on our networks;
- **TV Viewing Information** tells us about which programs you watch and record and similar information about how you use our video services and applications.

### Here are the three basic ways we collect it:

- We get information from you when you do things like make a purchase from us;
- We collect it from how you use our products and services;
- We obtain information from other sources like credit agencies and other service providers.

### Here are just some of the ways we use it. To:

- Provide services and improve your customer experience;
- Send you bills for your services;
- Respond to your questions;
- Address network integrity and security issues;
- Do research and analysis to maintain, protect, develop and improve our networks and services;
- Let you know about service updates, content, offers and promotions that may be of interest to you;

- Improve entertainment options;
- Deliver Relevant Advertising;
- Assist in the prevention and investigation of illegal activities and violations of our Terms of Service or Acceptable Use Policies.

**Some examples of who we share your Personal Information with:**

- To give you the best customer experience and to help you get everything we have to offer.
- With other companies and entities, to:
  - Respond to 911 requests and other emergencies or exigencies;
  - Comply with court orders and other legal process;
  - Assist with identity verification, and preventing fraud and identity theft;
  - Enforce our agreements and property rights; and
  - Obtain payment for products and services including the transfer or sale of delinquent accounts to third parties for collection

**Our privacy commitments**

- We don't sell your Personal Information to anyone for any purpose. Period.
- We keep your Personal Information in our business records while you are a customer, or until it is no longer needed for business, tax or legal purposes.
- We will keep your information safe using encryption or other appropriate security controls.

**We Do Not Knowingly Collect Personally Identifiable Information From Children**

MTCO Communications does not target children (under the age of thirteen) for collection of personally identifiable information through our Website or offline, and it is against our policies to knowingly gather that kind of information from children. Federal law requires website operators who knowingly collect personal information from children under the age of thirteen to first get parental consent, and children should always get permission from their parents before sending any information about themselves (such as their names, email addresses, postal addresses and phone numbers) over the Internet, to us or to anyone else. Persons under the age of eighteen are not eligible to subscribe to MTCO's television, Internet access, telephone or other services.

# MTCO Communications Privacy Policy FAQ

## QUESTIONS ABOUT THE SCOPE OF THIS POLICY

1. What does this Policy cover?

This Privacy Policy covers our practices regarding the information we collect about our customers and users (how we collect it and how we use it). Use of our products and services, as well as visits to our websites, are subject to this Privacy Policy.

2. What about my family members and other users of my MTCO account? Does this Policy apply to them?

Yes. You're responsible for making sure all family members or other users under your account understand and agree to this Policy.

3. When is information not covered by this Policy?

Any time you give information to companies other than MTCO. Some examples are:

- When you download applications or make purchases from other companies while using our Internet service;
- When you go to a non-MTCO website from one of our websites or applications (by clicking on a link or an advertisement, for example);
- If you use public forums - such as social networking services, Internet bulletin boards, chat rooms, or blogs - the information is publicly available, and we cannot prevent distribution and use of that information by other parties;
- When you purchase or use non-MTCO products (such as wireless devices, internet browsers and mobile applications) in combination with MTCO services;
- When we license our brand to other companies for their use in marketing and selling certain non-MTCO products and services, information you give those companies is not covered by this Policy.

4. Can my information be covered by this policy and other privacy policies at the same time? Yes, that can happen. For example:

If you connect to our Wi-Fi service through another network, such as one provided in a hotel, airport or other venue, any information collected from your use of that network could be subject to either the MTCO policy or the venue policy, and sometimes both.

The same thing applies if you connect to our network through your employer's corporate network, or any network operated by a non-MTCO company.

We think it's a great idea to take a look at the privacy policies of any companies you do business with to learn how they use your information.

5. What about business customers?

We may have written product or service agreements with our business customers that contain specific provisions about confidentiality, security or handling of information.

When one of these agreements differs from or conflicts with this Policy, the terms of those agreements will apply. In all other instances, the terms of this Policy apply.

## QUESTIONS ABOUT THE INFORMATION WE COLLECT, HOW WE COLLECT IT AND HOW WE USE IT

### 1. What information do we collect?

We may collect different types of information based on your use of our products and services and on our business relationship with you.

- **Account Information:**
  - **Contact Information** that allows us to communicate with you. We get this information when you order or register for our services. This would include information like your name, address, telephone number and e-mail address.
  - **Billing Information** related to your financial relationship with us, such as the services we provide to you, the telephone numbers you call and text, your payment history, your credit history, your credit card numbers, Social Security number, security codes and your service history.
- **Technical & Usage Information** related to the services we provide to you, including information about how you use our networks, services, products or websites. Some examples include:
  - **Equipment Information** that identifies the equipment on our networks, such as equipment type, device IDs, device status, serial numbers, settings, configuration and software.
  - **Network Performance & Usage Information** about the operation of the equipment, services and applications you use on our networks. Examples of this might include resources you use when uploading, downloading or streaming data to and from the Internet. We also collect information like transmission rates and delays, data associated with remote monitoring services and security characteristics.
  - **Web Browsing & Mobile Application Information** such as IP addresses, URLs, data transmission rates and delays.
- **TV Viewing Information** is generated by your use of any of our IPTV digiMAX services. These services may include video on demand, pay per view, DVR services, applications to watch your TV on the go for tablet or smartphone (such as the watchTVeverywhere app) and similar MTCO services and products, including the programs and channels you and those in your household watch and record, the times you watch and how long you watch. We also collect information related to your use and interaction with the equipment in your home, including the TV receivers, set top boxes, remotes and other devices you may use to access our services.

### 2. How Do You Collect Information?

In three basic ways:

- **You Give It To Us** when you make a purchase or set up an account with us;

- **We Automatically Collect Information** when you use our networks, products and services.
  - **We Obtain Information from Outside Sources** like credit reports, marketing mailing lists, and commercially available geographic and demographic information along with other publicly available information, such as public posts to social networking sites.
3. How Do You Use My Information?  
We use your information to improve your experience and to make our business stronger. Some examples include:
- Providing and managing your services, responding to your questions and addressing problems;
  - Delivering customized content, or advertising, such as personalized offers for products and services that may be of interest to you;
  - Communicating service updates, offers and promotions;
  - Protecting network integrity and security, ensuring quality control, optimizing capacity and preventing misuse;
  - Network enhancement planning, engineering and technical support;
  - Conducting research and analysis for maintaining, protecting and developing our networks and our services;
  - Preventing illegal activities, suspected fraud, and potential threats to our networks and our customers' networks;
  - Investigating violations of our Terms of Service, Acceptable Use Policies, or other service conditions or restrictions; and
  - Protecting the safety of any person.
4. Do you use the information I store using one of your cloud services?  
We only use it to provide you with that service, unless we first get your permission to use it for something different.

## QUESTIONS ABOUT INFORMATION SHARING

1. Do you provide information for phone books and Caller ID?  
Yes and No.  
Yes, we share the names, addresses and telephone numbers of our wireline telephone customers with businesses that publish telephone directories and provide directory assistance services. We are required by law to do that. We honor your request for non-published or non-listed phone numbers. Once we provide published listing information to those businesses, they may use, sort, package, repackage and make it available again in different formats to anyone.  
Yes, we also provide wireline calling name and number information for CallerID.
2. Do you share my Personal Information with other companies for them to market to me?  
No, we do not share your personal information for other companies to market to you.
3. Are there any other times when you might provide my Personal Information to other companies or entities?

Yes. We share your Personal Information with companies that perform services for us, like processing your bill. Because we take our responsibility to safeguard your Personal Information seriously, we do not allow those companies to use it for any purpose other than to perform those services, and we require them to protect it in a way consistent with this Policy.

There are also occasions when we provide Personal Information to other companies or other entities, such as government agencies, credit bureaus and collection agencies, without your consent. Some examples include sharing to:

- Comply with court orders, subpoenas, lawful discovery requests and other legal or regulatory requirements, and to enforce our legal rights or defend against legal claims;
  - Obtain payment or make refunds for products and services that appear on your MTCO billing statements, including the transfer or sale of delinquent accounts or refund obligations to third parties for collection or payment;
  - Enforce our agreements and protect our rights or property,
  - Assist with identity verification and e-mail address validation;
  - Notify, respond or provide information to a responsible governmental entity in emergency or exigent circumstances or in situations involving immediate danger of death or serious physical injury; and
  - Notify the National Center for Missing and Exploited Children of information concerning child pornography of which we become aware through the provision of our services.
4. Do you share my personally identifiable TV Viewing Information with other companies?  
No, we do not.

#### **Notice Regarding Disclosure of Personally Identifiable Information of IPTV Subscribers in Response to A Court Order**

- In the case of a court order obtained by a non-governmental entity, MTCO is authorized to disclose personally identifiable information collected from TV subscribers as a result of the subscriber's use of TV service only after providing prior notice to the subscriber.
  - In the case of a court order obtained by a governmental entity, MTCO is authorized to disclose personally identifiable information collected from TV subscribers as a result of the subscriber's use of TV service only if, in the court proceeding relevant to the order:
    - The governmental entity offers clear and convincing evidence that the subject of the information is reasonably suspected of engaging in criminal activity and that the information sought would be material evidence in the case; and
    - The subject of the information has an opportunity to appear and contest the governmental entity's claim; and
    - We have provided notice to the subscriber as required by applicable state law.

## QUESTIONS ABOUT DATA PROTECTION AND SECURITY

1. Do we sell your Personal Information?

No. We do not sell your Personal information to anyone, for any purpose. Period.

2. How long do we keep your Personal Information?

We keep your Personal Information as long as we need it for business, tax or legal purposes. After that, we destroy it by making it unreadable or undecipherable.

3. What safeguards does MTCO have in place?

We've worked hard to protect your information. And we've established electronic and administrative safeguards designed to make the information we collect secure. Some examples of those safeguards include:

- All of our employees are subject to the MTCO Company Policy Handbook and certain state-mandated codes of conduct. All employees must follow the laws, rules, regulations, court and/or administrative orders that apply to our business - including, specifically, the legal requirements and company policies surrounding the privacy of communications and the security and privacy of your records. We take this seriously, and any of our employees who fail to meet the standards we've set forth are subject to disciplinary action. That includes dismissal.
- We've implemented technology and security features and strict policy guidelines to safeguard the privacy of your Personal Information. Some examples are:
  - Maintaining and protecting the security of computer storage and network equipment, and our security procedures require employee user names and passwords to access sensitive data;
  - Applying encryption or other appropriate security controls to protect Personal Information when stored or transmitted by us;
  - Limiting access to Personal Information to only those with jobs requiring such access; and
  - Requiring caller/online authentication before providing Account Information so that only you or someone who knows your Account Information will be able to access or change the information.
  - Although we strive to keep your Personal Information secure, no security measures are perfect, and we cannot guarantee that your Personal Information will never be disclosed in a manner inconsistent with this Policy (for example, as the result of unauthorized acts by third parties that violate the law or this Policy).

4. Will you notify me in case of a security breach?

Laws and regulations guide us in how to give you notification when certain types of sensitive information are involved in a security breach. We will provide you with notice in accordance with these laws and regulations.

5. Can I review and correct my Personal Information?

Yes. We are happy to help you review and correct the Personal Information we have associated with your account and billing records. Please contact us.

## QUESTIONS ABOUT FUTURE CHANGES

1. What happens if there is a change in corporate ownership?  
Information about our customers and users, including Personal Information, may be shared and transferred as part of any merger, acquisition, sale of company assets or transition of service to another provider. This also applies in the unlikely event of an insolvency, bankruptcy or receivership in which customer and user records would be transferred to another entity as a result of such a proceeding.
2. Will I be notified if there are changes to this policy?  
We may update this Privacy Policy as necessary to reflect changes we make and to satisfy legal requirements. We will post a prominent notice of the change on our websites. We will provide you with other appropriate notice of important changes at least 30 days before the effective date.

## Customer Proprietary Network Information (CPNI)

The Federal Communications Commission (FCC) is adopting new rules for communication companies to protect your privacy rights as a customer of MTCO Communications. These rights are in addition to the existing safeguards that MTCO already has in place to ensure your privacy rights. The FCC requires MTCO to notify you as a subscriber of your right to restrict the use of, disclosure of, and access to your Customer Proprietary Network Information (CPNI). You have the right, and MTCO has a duty, under Federal law, to protect the confidentiality of your CPNI.

**CPNI:** CPNI is information MTCO possesses solely due to the customer-carrier relationship that is necessary for MTCO to serve your telecommunications needs.

CPNI is defined by the FCC as information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and information contained in the bills pertaining to telephone exchange or toll service received by a customer of a carrier.

CPNI does not include information that is in the public domain or available from other non-MTCO sources. For example, census data, subscriber list information, and published directory information is public data.

**Examples of CPNI:** This includes MTCO's knowledge of the types of services to which you subscribe such as Caller ID, the quantity of your calls, or the amount of your long distance bill or a list of phone numbers you have called. In other words, CPNI is information about when, where, and how often a customer makes use of telecommunications services.

**Permitted Use of CPNI by MTCO without your permission:** CPNI can be used by MTCO for certain purposes without your permission. MTCO may use CPNI to offer you new or enhanced services that are related to the category of services to which you currently subscribe. MTCO may also use CPNI to respond to your inquiry regarding services you currently use or related services MTCO offers. In addition, MTCO may use CPNI in connection with repair and



maintenance services, billing and collection, to protect property and to prevent fraud.

**WHAT THIS MEANS TO YOU:** As part of MTCO's compliance with the CPNI rules, all customers choose a random, unique password. You will be asked to provide this password when you contact MTCO, either via telephone or in person, before any of our representatives are allowed to divulge CPNI information. You can add a second authorized user on your account (they will also need to have this password). Business customers will need to establish one (or two) main contacts to handle this information.

If you have any questions regarding our privacy policy and security processes, or need further assistance, please contact Customer Service at 309-367-4197 or 1-800-8509-6826, or click on the *Support* tab at [www.mtco.com](http://www.mtco.com). We can also be reached via mail at MTCO Communications, PO Box 800, Metamora, IL 61548.