

# BPM, Inc dba Noxapater Telephone Company, Inc. Telephone Company Privacy Policy

(Updated November 1, 2020)

## 1. Introduction

BPM, Inc dba Noxapater Telephone Company, Inc. ("NTC", "we", "us" or "our") is dedicated to earning your trust by protecting your personal information. This Privacy Policy is designed to inform you about the information we collect, how we use it and with whom we share it. This Policy is included by reference and extends the BPM, Inc dba Noxapater Telephone Company, Inc. General Terms of Service.

We encourage you to read this Privacy Policy carefully. It explains:

- What information we collect and from whom
- How we collect information
- How we use collected information
- How we share collected information
- How we protect collected information
- How to choose how we contact you and how to contact us
- How we may use cookies (Cookie Policy)

## Scope

This Privacy Policy explains our practices about collecting, using and sharing information. It applies to NTC and any Affiliate with whom we share and collect information. As used herein, "Affiliate" refers to any of the BPM, Inc dba Noxapater Telephone Company, Inc. family of companies. "Third Parties" refers to entities we may share information with, and require they maintain appropriate privacy and data security measures consistent with this Privacy Policy. We use "Third Parties" to refer to agents, vendors, service providers, suppliers, subcontractors, and independent contractors with whom we have a business relationship.

You authorize **NTC** to collect your information when you interact with us. When you apply for, access, purchase, or use our products, services, applications and websites ("Services"), you agree to our collection, potential or actual use and sharing of your information as described in this Privacy Policy.

Some products and services which are branded **NTC** or co-branded with a Third Party may have a stand-alone privacy policy. When a different privacy policy applies, **NTC** will provide you with an opportunity to review the applicable terms of service and privacy policy.

When you purchase or use products or services not provided by **NTC**, you are subject to the privacy policy provided by an independent third party. For example, while using your **NTC** broadband service, you may:

- Download, purchase or use applications not provided by **NTC**
- Post on social media or use other third-party sites
- Purchase from an online retailer

**NTC** is not responsible for the data practices of those independent third parties.

## Changes to the Privacy Policy

**NTC** may update our Privacy Policy at any time to reflect new legal requirements, changes within our business, or to clarify our practices. Please periodically refer back to this Privacy Policy to learn what changes, if any, have been made based on the last updated date posted with the updated Privacy Policy.

## 2. Information We Collect

### Personal Information We Collect

Personal Information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include anonymous or de-identified information that cannot personally identify you, your accounts or devices.

## Types of Information We Collect About You

We may collect the following different types of Personal Information about you, your associated accounts, or your devices based on your use of our Services, as well as your business relationship with us or with our Third Parties:

Personal Identifiers. Personal Identifiers are Personal Information that identifies the person such as name, physical and email addresses, telephone numbers, date of birth, Social Security Numbers, Driver's License Numbers, credit card or financial account information or Customer Proprietary Network Information ("CPNI"). Personal Information does not include anonymous or de-identified information that cannot personally identify you, your accounts or devices.

Customer Proprietary Network Information ("CPNI"). CPNI is a specific type of Personal Information that relates to and includes information that we have about you because of the Services we provide to you. Please refer to our CPNI section below for more information.

Protected Classification Characteristics under state or Federal Law. This information may include age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information). As a potential federal contractor, NTC may be required to invite job applicants to voluntarily identify classifications and characteristics such as gender, race, and veteran or disability status. This information, when provided in the application and hiring process, will be kept confidential and is not used as a basis in any employment decision nor will it be made available to individuals involved in the interview/employment process.

Credit and Financial Information. Credit and Financial information are specific types of Personal Information that relate to your financial or commercial relationship with us, including your credit history, credit card numbers, banking information, and payment history for opening and managing your account as well as for billing and collection purposes.

Network and Device Information. Network and device information is collected when you use our Services. Certain information such as Advertising IDs and persistent device identifiers may directly or indirectly identify you or your device and may be considered a type of Personal Information. Device identifiers include information that identifies the devices connected to the Internet through NTC' Internet Service, such as the IP address(es) assigned to the connection and the hardware addresses in use. Advertising ID is a string of numbers and letters that identifies a device (e.g., smartphone, tablet) and can be used by advertisers and other third parties to track the user's movement and usage of applications. It is different for each operating system, and the user can reset it or disable its intended use. Examples include Google's GAID (Google Advertiser Identification) and Apple's IDFA (Identifier For Advertisers). Network and device information also may include connection performance information, amount of bandwidth used, times and dates of connection, call records, websites and URLs visited, advertisements clicked, browsing history, domain type, interaction with a website, IP addresses, and device data (e.g., operating system, software configurations). For example, as part of network operations and when you visit a NTC website, we may automatically collect certain information such as your domain type, your IP address, and click stream information as well as record your interaction with a NTC website (e.g., movement of cursor) to gauge the effectiveness of our websites, improve our online operations, enhance your online experience with customized content, and focus our marketing efforts to better meet the needs of our customers. We may collect cookies, web beacons and similar technology. Please refer to our Cookie Policy below.

Location Information. Location Information is collected when you provide it directly to us and when you use our Services. Location Information may include your physical address, zip code, and a physical address associated with an IP address. Certain types of Location Information may be considered Personal Information.

Sensory Data. Information including electronic, visual and audio information may be collected when you contact us, or we contact you via our Customer Care services, such as voice recordings.

Professional or Employment Related Information. This information includes current and past employment (for example, company name, job title, and dates of employment) and other professional information.

Education Information. This information includes degrees and transcripts.

## Collection of Information About Children

Our Services are intended for general audiences. We do not knowingly collect information from children under the age of (13) thirteen. If you allow a child to use our Services, any information we collect associated with their usage will be treated as your account information in accordance with this Privacy Policy.

## Information You Provide to Us

You provide information to **NTC** when you directly interact with us. When you come into a business office, call us, access our websites, initiate a web chat, participate in a sponsored program, or take a survey, you may provide information such as your name, mailing address, telephone number or email address. You may provide your reason(s) for interacting with us, answers to surveys, voice recordings, and recordings collected in business offices. If you apply for a position with **NTC**, you may provide your employment or education history, as well as your authorization to collect your background information as part of the hiring process.

When you initiate establishing an account with us, you may provide your date of birth, Social Security Number, Driver's License Number, credit card information, and create authentication information such as PIN number or security questions and answers.

## Information We Collect Automatically

We automatically collect your information when you access or use our Services. We may collect information about your activity and use of Services such as calls sent and received including the associated numbers; date, time and call duration; websites, applications, or services accessed; browsing history; clickstream data; referral URLs and pages visited; and search terms.

We may automatically collect data about your device such as your Advertising IDs; equipment serial number(s); operating system, device settings; software configuration; make and model of the device; applications installed on the device; signal strength; IP address; and connection speeds.

We may automatically collect information when you visit our websites, use our mobile applications, or register for our sponsored events.

We may automatically collect information when you directly interact with an employee in a business office or call into one of our Customer Care centers. We may record the communication, and any transaction that occurs when you contact us, or when we contact you, via our Customer Care services, online webchat portal, or email.

Cookies. NTC may use cookies, web beacons, pixels, and other tracking technology (collectively "Cookies") to deliver, monitor and improve our websites, applications or emails and display relevant content. For more details on Cookies please refer to our Cookie Policy below, which describes the information we may collect through Cookies, how we may use it and how you can manage your Cookie Preferences.

## Information Collected From Others

We may acquire information about you from credit agencies, financial institutions and other independent third-party sources. These entities may collect information from varying sources such as public records, loyalty cards and social media.

The information we collect may include credit reports, consumer reports, criminal records, military records and references, and have information such as gender, age, education level, occupation, marital status, children in household, home value, and categories of interest like reading, music, or sports. We may also obtain information from current NTC customers through referral programs and may combine it with information we have to contact you, or direct NTC marketing offers that may be of interest to you. In addition, we may acquire information about you from independent third-party sources in the form of background checks during the hiring process. These entities may collect information from varying sources such as public records. Such information collected may include credit reports, criminal records, military records, references, gender, age, education level, occupation and marital status.

## 3. Use

### Business Purpose of Collection and Use

As explained above, we may use, or disclose, the Personal Information we collect for one or more of the following business purposes:

We may use your information to determine your eligibility for Services; provide you with Services; verify your identity; complete, fulfill, manage, and communicate with you about transactions and Services; establish and maintain your account; request credit reports and measure your credit worthiness and payment risk; and properly bill, collect, and refund for Services. We may use information to route your calls and messages; enforce our Terms of Service; respond to account, device, or issues related to Services; undertake internal research for testing, research, analysis and development of new Services; and measure the effectiveness of and improve our Services.

We may use information to protect our network from fraudulent, abusive or unlawful practices; authenticate individuals; and monitor sales transactions for potential fraud. We may access or disclose your information to respond to legal investigations; protect and defend our legal rights and property; protect the safety and security of customers or members of the public including during emergency circumstances; and comply with the law or legal processes such as court orders and subpoenas. We may also use your information to evaluate internal controls and audits for compliance, including those conducted by NTC's internal and external audit service providers.

We may use your information to personalize promotions offered to you; market new Services to you based on your interests; tailor content you see in advertisements; administer contests, sweepstakes, promotions, and event sponsorships; and conduct industry or consumer surveys.

We may also use information collected from Cookies to improve our Online Services (as defined below in our Cookie Policy), complete transactions you request, make recommendations and deliver advertising or similar content. For more information, please refer to our Cookie Policy.

Aggregate and De-Identified Information. Aggregated and de-identified information have been changed in a manner that prevents others from identifying you. We may use aggregated or de-identified information to manage, protect and improve our network and Services; develop network work plans; conduct traffic flow analyses; investigate service issues; develop credit and fraud risk models; train our associates; and research new products, services and applications. We also may develop analytical tools

and methods to measure the effectiveness of marketing and advertising campaigns; develop promotions and offers; and analyze customers' usage patterns. We also may measure the performance of our Services within a specific geographic area.

#### 4. Sharing Information

We will not disclose your information outside of **NTC**, its Affiliates, or Third Parties other than as described in this Privacy Policy unless we have your express or implied consent. We may, however, disclose information to companies affiliated with **NTC** or Third Parties (i) to provide the Services you have requested; and (ii) for administrative, analytical, and marketing purposes as described in this Privacy Policy.

We may disclose your Personal Information to the following categories of third-party entities as follows:

To our Third-Party Service Providers. We may share your information without your consent with Affiliates and Third Parties acting as our service providers that perform activities on our behalf ("Service Providers"), such as billing and collecting for our Services; assisting in operating our network; managing our platforms and websites; fulfilling and distributing orders; providing customer support; setting up customer accounts; fulfillment of event and sweepstake prizes; and promoting and marketing our Services. Such Third Parties that receive information are prohibited from using the information for any purpose other than those for which they are permitted by law or they have contractually agreed to; and if they are processing your information, they have agreed to appropriate privacy and security provisions for the type of information shared.

To Local, State, or Federal Government Authorities or other business partners for legitimate business purposes. We may share certain information, for purposes permitted or required by law, without your consent such as to prevent fraud; comply with legal requirements; provide emergency assistance; enforce our Terms of Service and agreements; protect our rights and property, and in the event of the sale of part or all assets or other corporate reorganization; conduct audits; and facilitate the calculation of taxes, fees, or other financial obligations.

To Account Owners and Authorized Parties. Account owners are parties who are financially responsible for an account ("Account Owners"). Account

Owners may grant specific individuals access to their account(s) who are defined as Authorized Parties ("Authorized Parties"). Authorized Parties may act on the Account Owner's behalf for specific account activities. For example, Account Contacts may make inquiries regarding the account, receive information about the account, pay the bill, change the service plan and make other changes to the account. Authorized Parties cannot change the Personal Information of Account Owners or other Authorized Parties. Account Owners may add, change or remove an Authorized Contact at any time.

Aggregate or De-Identified Information. We may share with Third Parties information that has been collected about you that has been de-identified or aggregated in a manner that prevents others from identifying you. The de-identified or aggregated information may be used for marketing or other analytic purposes, such as to monitor subscriber network interactions and broadband performance, or other customer experiences to evaluate customer experience and identify ways to better manage and improve our Services, and help make advertising more relevant to you.

Advertising. As mentioned in our Cookie Policy, **NTC** may allow third parties to place Cookies on your device when you access our websites, applications or advertisements and collect the preferences you demonstrate when interacting with them. These third parties may use the collected information to personalize advertising that may be of interest to you when you are on other websites or applications, generate advertising leads, or conduct marketing surveys. **NTC** provides you with the ability to opt-out of third-party advertising Cookies as explained in our Cookie Policy.

Your web browser may request advertisements directly from third party advertising network servers which do not have a business relationship with us. These advertisements may place Cookies that can view, edit, or set other third-party Cookies in your web browser. **NTC** is not responsible for the practices, including the use of Cookies, by third party websites, mobile applications or online services linked to or from **NTC** Services or for the content contained therein.

Third Party Applications You Install on Your Device. We have no authority over third party applications that you may install or use on your devices. By installing or accessing these applications, you may consent to allowing third parties access to information including your Network and Device Information

or Location Information. Network and Device Information shared may include Advertising IDs or device identifiers in order to provide more personalized experiences, including for marketing purposes such as delivering interest-based advertising. Third party websites, applications, and online services you are able to access on the Internet are outside the control or limits of this Privacy Policy.

Directory Information. Our telephone customers can designate their listings as published, non-published or non-listed for directories we may publish or for directory assistance services. To carry out your decision to have a published number, we share information with directory listing vendors. NTC cannot remove customer information from, or correct errors in customer names, addresses, or telephone numbers appearing in, directory lists until the next available publication of those directory lists. Further, we may have no control over information appearing in the directory lists or directory assistance services of directory publishers or directory assistance providers which are not owned by us. Because of the complexity of this process and the involvement of others, errors sometimes occur. If you elected to have your information published in directories, that information becomes public and may be used by others for their own marketing or to create marketing lists.

## 5. CPNI

Customer Proprietary Network Information ("CPNI") is created by our relationship with you as your telecommunications service provider. CPNI includes the type and quantity of certain telecommunications services you subscribe to and includes details about your calling activities, including call detail information such as the date and time of a call; duration of a call; call-originating and call-terminating phone numbers.

CPNI does not include published names, addresses, and phone numbers, or information generated by or associated with data and video services.

We may use your CPNI to provision your Services; generate, bill and collect for your Services; respond to your requests; enforce our Terms of Service; and protect against fraudulent use of our network. We may use CPNI to recommend other products and services to you. NTC also may share your CPNI with its Affiliates and Third Parties to market NTC Services on our behalf. The CPNI rules permit our use of this information for these purposes

provided that we safeguard it from unauthorized access, use, or disclosure. We employ reasonable security measures to help protect your CPNI from unauthorized access, use, or disclosure. Use of CPNI is subject to federal laws and regulations.

When you become a customer of **NTC** and no later than every two years thereafter, a notice will be provided to you explaining your rights about CPNI ("CPNI Notice"). You can expect to receive your CPNI Notice with your bill or by another permitted and reasonable method.

## 6. Protecting Your Information

**NTC** takes reasonable security safeguards to protect against such risks as loss, unauthorized access, destruction, use, modification, or disclosure of information. **NTC** uses a variety of commercially reasonable and appropriate safeguards to protect information residing on its systems including, without limitation, server firewalls and physical facility security.

We restrict access to information to those who need to know that information in order to operate, develop or improve our Services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations. We also have appropriate practices and procedures designed to protect your information. We train our employees on the proper handling and securing of information which includes reporting potential privacy concerns.

We will not store your Personal Information beyond what is necessary for business or legal purposes, including for internal service evaluation and quality assurance purposes, except as otherwise required by law.

We cannot prevent every unauthorized attempt to access information. If you suspect an issue with access to your information, please contact us by calling **1-662-724-2192**.

## 7. Privacy Rights

### Accessing Your Information

**NTC** takes reasonable measures to assure you that the information we collect, use and share is accurate, complete and current. We make good

faith efforts to provide you with access to your information to allow you to correct inaccuracies your request, unless the law or legitimate business reasons require us to keep it. Account Owners and Authorized Parties who wish to review or change their Personal Information may do so by contacting us.

We are not required to process requests for information that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or may be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In cases in which we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

## Controlling Unsolicited E-Mail ("Spam")

**NTC** is concerned about controlling unsolicited e-mail or "spam." Although **NTC** continues to actively review and implement new technology to help prevent this activity, there is no currently available technology that will permit **NTC** to totally prevent the sending and receiving of unsolicited e-mail. Using junk e-mail tools and being cautious about the sharing of your e-mail address while online may help reduce the amount of unsolicited e-mail you receive. For more information about this and other related topics go to the Federal Trade Commission's website at <http://www.onguardonline.gov>.

## Right to Non-Discrimination

**NTC** does not discriminate against you for exercising any of your privacy rights set forth above. If you exercise your rights, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services;
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## Cookie Preferences

NTC's websites may use our own- and third-party Cookies to improve services and to provide you the best user experience. Through the use of Cookies, Personal Information may be collected and then shared, disclosed, or transferred to third-parties. If you wish to opt-out of Cookies on NTC websites, please see the banner that appears on NTC pages to opt-out. Those requests will take effect immediately and without confirmation or correspondence from NTC. For more information on Cookies, please see the Cookie Policy below.

## 8. Communicating With NTC

Questions and comments about this Privacy Policy may be directed to:

BPM, Inc dba Noxapater Telephone Company, Inc.  
Attn: Legal Dept.  
P.O. Box 727  
Bay Springs, MS 39422

Our office number during regular business hours is 662-724-2192.

To opt-out of receiving marketing communications from NTC, NTC customers may make this request via email to [custserv@traceroad.net](mailto:custserv@traceroad.net) or by mail to:

BPM, Inc dba Noxapater Telephone Company, Inc.  
Attn: Legal Dept.  
P.O. Box 727  
Bay Springs, MS 39422

## 9. Cookie Policy

NTC may use cookies, web beacons, pixels, and other tracking technology (collectively "Cookies") to deliver, monitor and improve our websites, applications or emails and display relevant content. This Cookie Policy describes the information we collect through Cookies, how we may use it and how you can manage your Cookie Preferences.

This Cookie Policy applies to **NTC** websites, emails, and applications (collectively "Online Services"). By continuing to access or use our Online Services, you agree to our use of Cookies. **NTC** may use Cookies on our Online Services and any device which interacts with our Online Services will receive them. **NTC** also may work with Third Parties to place **NTC** advertisements on their websites and place Cookies in your browser when you visit their websites.

## What Are Cookies?

A Cookie is a small text file sent to and stored on your computer or other internet connected device to identify your browser or store information. A first party Cookie is set up by the website being visited by the user. A third-party Cookie is set up by a domain that is not the entity hosting the website. Cookies are widely used to make websites work, work in a more efficient way, and identify and track users.

Web beacons are small graphic images on a web page or an HTML email that works with Cookies to monitor web usage, link web pages to servers, interact with emails, and personalize advertising.

## Why Use Cookies?

**NTC** and our Third Parties may use Cookies on our Online Services to improve our Services and provide you with the best possible web experience. We may use Cookies in order to identify you; provide relevant, interest-based advertising; remember your preferences; secure your access; know when content has been shown to you; provide aggregated auditing, research, and reporting for advertisers; understand and improve our Online Services; and detect and defend against fraud and other risks. When we send you an email, we may use Cookies to understand if you have accessed the information provided in the email. We may combine information collected through the Cookies with your Personal Information in order to provide you a personalized experience including advertising about products and services you may find of interest. The information we collect from Cookies also may allow us to identify you across devices, such as smartphones, tablets, computers or related browsers.

**NTC** may allow Third Parties to place their Cookies on our websites or within our advertisements. And, your web browser may request advertisements directly from independent third-party advertising network servers which do not have a business relationship with us. These advertisements may place Cookies that can view, edit, or set third party tag technology, just as if you had requested a web page from the third-party site. **NTC** is not responsible for the practices including the use of Cookies, employed by third party websites, mobile applications or online services linked to or from **NTC** Services, or for the content contained therein.

Third party websites, mobile applications, and online services that you are able to access on the Internet are outside the control or limits of this Privacy Policy.

## How Can I Manage My Cookie Preferences?

To provide you with the best possible experience with our Online Services, we may use different types of Cookies. We categorize these Cookies into the following types:

- Strictly Necessary Cookies: These Cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these Cookies, but some parts of the site will not then work. These Cookies do not store any personally identifiable information.
- Performance/Functional Cookies: These Cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these Cookies collect is aggregated and therefore anonymous. If you do not allow these Cookies we will not know when you have visited our site, and will not be able to monitor its performance.
- Targeting/Advertising Cookies: These Cookies may be set through our site by our advertising partners. They may be used by those

companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these Cookies, you will experience less targeted advertising.

If you wish to opt-out of Cookies, please see the banner that appears on **NTC** pages to opt-out. Those requests will take effect immediately and without confirmation or correspondence from **NTC**.

## How Can I Stop My Internet Browser From Tracking My Information?

Most browsers accept Cookies by default. Depending upon your computer and mobile devices, you may be able to set your browser to control Cookies on your computer and mobile devices. If you do not want to receive Cookies, you may adjust your browser's settings to reject or delete Cookies. To do so, please follow the instructions provided by your browser, which are usually located within the "Help," "Tools," or "Edit" menus. Deleting or rejecting Cookies may impact your ability to effectively interact with our Online Services, third party websites or advertisements or otherwise limit your experience, including your ability to find pricing and availability of products and services in your area.