

# Privacy Policy

Protecting our customers' privacy is a priority at Central Telecom Long Distance, Inc. and we are committed to maintaining strong privacy protections. The privacy of your information is a significant responsibility and we value the trust you place in us.

Our Privacy Policy is designed to inform you about the information we may collect, how we might use it, and your options regarding certain uses of this information. This policy also describes privacy rights you have under certain federal laws.

This policy applies to website visitors and customers of Central Telecom Long Distance, Inc. in the United States and the products and services we provide.

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## Information we collect and how it is used

We may collect information when you communicate with us and when you use our products, services and sites. This may include information you provide such as name and contact information, images, voice recordings or prints, the reason for contacting us, driver's license number, Social Security Number and payment information. Service usage information we may collect includes call records, websites visited, network data, product information and identifiers, service options you choose and other similar information.

We use this information to establish, monitor and maintain your account and billing records; measure credit and payment risk; provide account-related services; deliver and maintain your products and services; help you with service-related issues or questions; manage and protect our networks, services and users from fraudulent, abusive, or unlawful uses; help us improve our services and research and develop new products and services; authenticate you; determine your eligibility for new products and services and contact you with marketing offers.

When you contact us or we contact you, we may monitor or record that communication or keep a record of the transaction to help us train employees and better serve you.

We may automatically measure and monitor network performance and the performance of your connections to improve your, or our, service levels and products. Information about your use of Central Telecom Long Distance, Inc. products and services may be aggregated or otherwise de-identified for business and marketing uses by us or by third parties. For example, aggregate or de-identified data may be used to improve our services, measure and analyze the use of services and to help make services and advertising more relevant to you. You can opt out of certain of these uses.

When you establish an online account or register on our sites, we may collect information about your user identification, password and secret questions and answers. We use this information to authenticate you when you sign in.

#### **Information provided to us by third parties**

When you purchase products or apply for service with us, we may obtain credit information about you from outside credit reporting agencies to help us with customer authentication and credit-related decisions.

Central Telecom Long Distance, Inc. may obtain information from outside companies such as those that collect consumer information including demographic and interest data. Examples of this information include gender, age range, education, sports enthusiast, frequent diner or pet owner. We might use this data and combine it with other information we have about you to help us predict your preferences, to direct marketing offers that might be more relevant to you, and to help us better analyze customer information for business modeling purposes.

When you use social media credentials to login to or interact with a Central Telecom Long Distance, Inc. site or offer, we may collect information about your social media profile, such as your interests, “likes” and friends list. We use this information, for example, to personalize your Central Telecom Long Distance, Inc. experiences and marketing communications, to enhance our services and to better serve you. You can control this data sharing via options in your social media accounts.

We also obtain contact information and other marketing lead information from third parties, website “refer-a-friend” options or social media platforms and may combine it with information we have to contact you or direct Central Telecom Long Distance, Inc. marketing offers to you.

#### **Information collected on Central Telecom Long Distance, Inc. websites and apps**

When you use Central Telecom Long Distance, Inc. websites, information is collected about your visit including browsing, searching and buying activity as you interact with our sites and identifiers; account information; web addresses of the sites you come from and go to next. We use this information for operational, performance measurement and other business purposes; and to help us deliver more relevant Central Telecom Long Distance, Inc. marketing messages on our websites, on non- Central Telecom Long Distance, Inc. websites, by our representatives, via email, or via other Central Telecom Long Distance, Inc. services. This information is also used to tailor the content you see, manage the frequency with which you see an advertisement, tailor advertisements to better match your interests and understand the effectiveness of our advertising. We also may use this information to assess the effectiveness of our sites and to help you should you request help with navigation problems on our sites. Certain Central Telecom Long Distance, Inc. vendors may place and read cookies on our sites to help us deliver Central Telecom Long Distance, Inc. marketing messages on our sites and on non-

Central Telecom Long Distance, Inc. sites. We require that these vendors provide consumers with the ability to opt out of their use of information for these purposes.

### **Information you provide**

When you contact us for information we may use the information you supply to provide you with information about Central Telecom Long Distance, Inc. services, programs and offerings. Certain promotions may require that we disclose information such as contest winners or provide information for prize fulfillment, and as required by law or permitted by the promotion's official rules. Information you provide on our websites about your preferred location and other preferences may be used to provide you with more relevant product recommendations, services and special offers.

If you provide information to us in the context of an event or promotion that Central Telecom Long Distance, Inc. sponsors with another organization, or if you visit a co-sponsored site or use a co-sponsored service, you also may be providing information to the co-sponsor. You should refer to that co-sponsor's privacy policy for information about its practices which may differ from Central Telecom Long Distance, Inc.'s practices.

We also collect information from you when you participate in surveys or provide other feedback to us regarding our products or services, when you register to receive news or public policy updates, or when you apply for a job with or a grant from Central Telecom Long Distance, Inc. We use this information only for the purpose for which you provide it.

Central Telecom Long Distance, Inc. may send you emails that communicate information about your account or about products, services, marketing offers or promotions that may be of interest to you. When you open a Central Telecom Long Distance, Inc. email or click on links within these emails, we may collect and retain information to provide you with future communications that may be more interesting to you. Please note that Central Telecom Long Distance, Inc. will not ask you to send us, via email, sensitive personal or account information.

### **Information we share**

#### **Information shared within the Central Telecom Long Distance, Inc. family of companies:**

Central Telecom Long Distance, Inc. may share customer information within our family of companies for a variety of purposes, including, for example, providing you with the latest information about our products and services and offering you our latest promotions. You can limit the sharing of certain types of customer information, known as Customer Proprietary Network Information, or CPNI, within the Central Telecom Long Distance, Inc. family of companies for marketing services to you different from your current services.

Customer Proprietary Network Information (CPNI) is information that relates to the type, quantity, destination, and technical configuration, and location, amount of use and related billing information of your telecommunications services. Federal law governs our use and sharing of CPNI.

**Information shared outside the Central Telecom Long Distance, Inc. family of companies:**

Except as explained in this Privacy Policy, in privacy policies for specific services, or in agreements with our customers, Central Telecom Long Distance, Inc. does not sell, license or share information that individually identifies our customers, people using our networks, or website visitors with others outside the Central Telecom Long Distance, Inc. family of companies that are not performing work on Central Telecom Long Distance, Inc. 's behalf without the consent of the person whose information will be shared.

Central Telecom Long Distance, Inc. uses vendors and partners for a variety of business purposes such as to help us offer, provide, repair, restore and bill for services we provide. We share information with those vendors and partners when it is necessary for them to perform work on our behalf. For example, we may provide your credit card information and billing address to our payment processing company solely for the purpose of processing payment for a transaction you have requested. We require that these vendors and partners protect the customer information we provide to them and limit their use of Central Telecom Long Distance, Inc. customer data to the purposes for which it was provided. We do not permit these types of vendors and partners to use this information for their own marketing purposes.

As described in more detail in other sections of this policy, Central Telecom Long Distance, Inc. also may share certain information with outside companies, for example, to assist with the delivery of advertising campaigns, or preparing and sharing aggregate reports. This information does not identify Central Telecom Long Distance, Inc. customers individually.

We may disclose information that individually identifies our customers in certain circumstances, such as:

- to comply with valid legal process including subpoenas, court orders or search warrants, and as otherwise authorized by law; in cases involving danger of death or serious physical injury to any person or other emergencies;
- to protect our rights or property, or the safety of our customers or employees;
- to protect against fraudulent, malicious, abusive, unauthorized or unlawful use of or subscription to our products and services and to protect our network, services, devices and users from such use;
- to advance or defend against complaints or legal claims in court, administrative proceedings and elsewhere;
- to credit bureaus or collection agencies to determine credit risk, for reporting purposes or to obtain payment for Central Telecom Long Distance, Inc. billed products and services;

- to a third-party that you have authorized to verify your account information;
- to outside auditors and regulators; or with your consent.

When you purchase services offered jointly by Central Telecom Long Distance, Inc. and one of our partners, customer information may be received by both Central Telecom Long Distance, Inc. and our partner that is providing your service. For these jointly offered services, you should also review the partner company's privacy policy which may include practices that are different from the practices described here.

If Central Telecom Long Distance, Inc. enters into a merger, acquisition or sale of all or a portion of its assets or business, customer information will also be transferred as part of or in connection with the transaction.

#### **Information provided to or used by advertising entities or social networks**

You may see third-party advertisements on some Central Telecom Long Distance, Inc. websites, services, apps and devices. Some advertisements are chosen by companies that operate on our sites and other sites (for example, ad servers, ad networks, or technology platforms) to place ads on behalf of advertisers. These companies may place and access cookies on your device to collect information about your visit on websites and may collect device advertising identifiers from your mobile operating system to learn about your use of apps, including ours. The information they collect from our sites and apps is in a form that does not identify you personally and may be combined with similar data they obtain from other websites and apps to help advertiser's better reach audiences they wish to target. Targeting may be accomplished by tailoring advertising to interests that they infer from your interactions on our sites and apps and your interaction with other sites and services where these companies also are present. If you choose to interact with specific advertisers who advertise on our apps sites or services, the information you provide to them is subject to the conditions of their specific privacy policies.

Additional information about your options regarding the use of your information for advertising purposes can be found below. Please note that Central Telecom Long Distance, Inc. does not have control over or access to information contained in the cookies that are set on your computer by ad servers, ad networks or third-party advertisers.

Similarly, advertising may be customized based on predictions developed from your use of applications and industry self-regulatory principles also apply. This type of advertising involves the use of device advertising identifiers.

We also may permit advertisers on our sites, apps and services to place ads based on certain information we have about your Central Telecom Long Distance, Inc. products and services as well as geographic and demographic data. Information used for this purpose does not identify you individually.

Central Telecom Long Distance, Inc. websites and services may include social network or other third-party plug-ins and widgets that may provide information to their associated social networks or third-parties about your interactions with Central Telecom Long Distance, Inc. pages you visit or services you use, even if you do not click on or otherwise interact with the plug-in or widget.

## **How to limit the sharing and use of your information.**

You have choices about how Central Telecom Long Distance, Inc. shares and uses information.

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

Customers of Central Telecom Long Distance, Inc. telecommunications services may choose to limit the use and sharing of CPNI for Central Telecom Long Distance, Inc.'s marketing services outside of services you currently have. Notice about our use and sharing of CPNI and the choices you have may be provided on your monthly bill, over the phone, via text, in contracts or in other ways.

Central Telecom Long Distance, Inc. Wireline consumers and certain business customers may opt out by calling 1-888-988-9818. Central Telecom Long Distance, Inc.

### **Telemarketing**

Federal "Do Not Call" laws allow you to place your phone numbers on the National Do Not Call Registry to prohibit many telemarketing calls to those numbers. To add your numbers to this list, please call 1-888-382-1222 or visit the National Do Not Call Registry.

Most telemarketing laws allow companies to contact their own customers without consulting the federal or state Do Not Call list. If you would like to be removed from Central Telecom Long Distance, Inc.'s residential telemarketing list, please contact us at 1-888-988-9818. Please allow 30 days for your telephone number to be removed from any sales programs that are currently underway.

### **Marketing e-mail, text messages, postal mail and door-to-door calls**

Marketing emails you receive from Central Telecom Long Distance, Inc. include an unsubscribe instruction (usually found at the bottom of the email) that you may use to opt out of receiving future marketing-related emails.

You may opt out of receiving marketing-related postal mailings or prevent door-to-door marketing solicitations from Central Telecom Long Distance, Inc. by calling 1-888-988-9818. Text message solicitations from Central Telecom Long Distance, Inc. also contain an "unsubscribe" feature that you can use to prevent future marketing text messages

from us. Please note that Central Telecom Long Distance, Inc. may use bulk mail service for some marketing mailings. These services deliver offers to all homes in a neighborhood or zip code. This type of mailing will continue even if you opt out of receiving marketing-related postal mailings from Central Telecom Long Distance, Inc.

### **Information used for online advertising**

You have choices about whether certain information collected on websites, including Central Telecom Long Distance, Inc.'s, is used to customize advertising based on predictions generated from your visits over time and across different websites and apps. Please note that many opt outs use browser cookies or device controls and are specific to the device and browser you are using. If you buy a new computer, change web browsers or devices or delete the cookies on your computer, you may need to opt out again. In addition, ads you receive may still be tailored using other techniques such as publisher, device or browser-enabled targeting. You should check the privacy policies of the products, sites, apps and services you use to learn more about any such techniques and your options.

You also may limit the collection of certain website information by deleting or disabling cookies. Most computers' Internet browsers enable you to erase stored cookies, block all cookies, or receive a warning before a cookie is stored. Disabling cookies may prevent you from using specific features on our sites and other websites, such as ordering products or services and maintaining an online account.

### **Information security and data retention**

Central Telecom Long Distance, Inc. has technical, administrative and physical safeguards in place to help protect against unauthorized access to, use or disclosure of customer information we may collect or store. Employees are trained on the importance of protecting privacy and on the proper access to, use and disclosure of customer information. Under our practices and policies, access to sensitive personally identifiable information is authorized only for those who have a business need for such access. Personally identifiable and other sensitive records are retained only as long as reasonably necessary for business, accounting, tax or legal purposes.

Although we work hard to protect personal information that we collect and store, no program is 100% secure and we cannot guarantee that our safeguards will prevent every unauthorized attempt to access, use or disclose personal information. Central Telecom Long Distance, Inc. maintains security and incident response plans to handle incidents involving unauthorized access to private information we collect or store.

### **Accessing and updating your information**

We strive to keep our customer records as accurate as possible. You may correct or update your Central Telecom Long Distance, Inc. customer information by calling a

Central Telecom Long Distance, Inc. customer service representative at 1-888-988-9818

## **Changes to this policy**

We reserve the right to make changes to this privacy policy, so please check back periodically for changes. You will be able to see that changes have been made by checking to see the effective date posted at the end of the policy. If Central Telecom Long Distance, Inc. elects to use or disclose information that identifies you as an individual in a manner that is materially different from that stated in our policy at the time we collected that information from you, we will give you a choice regarding such use or disclosure by appropriate means, which may include use of an opt out mechanism.

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## **Contact us**

If you have questions, concerns or suggestions related to our Privacy Policy or our privacy practices, contact us at: Central Telecom Long Distance, Inc. 102 S. Tejon Street, Suite 1100 Colorado Springs, CO 80903. 888-988-9818

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