

PRIVACY POLICY

Your privacy is very important to us. Beaver Valley Cable does not sell customer browsing data to third parties. For further information, please see complete policy below.

I. Privacy Statement for Cable TV, High-Speed Internet, and Digital Phone Services

Your (“you,” “your,” or “Customer”) privacy is very important to Beaver Valley Cable Co. (“we,” “us,” “our,” “BVC”). We want our customers to understand our privacy policies, including when information is used and why. This statement is a full disclosure of our privacy practices.

Please note that this notice only contains information about BVC’s cable TV, high-speed internet, and digital phone services. It does not cover information that may be collected through any other products, services, or websites accessed using any of BVC’s services. You should read the privacy policies for these other products, services, and websites to learn how they may or may not use your personal information.

In the provision of our services, we have access to certain information related to customers and potential customers. BVC must gather and collect some of this information to provide reliable, quality services.

A. STATEMENT OF LAW

We are providing this notice in accordance with Section 631 of the Cable Communications Policy Act of 1984, as amended, (“Cable Act”), a Federal law that requires all cable operators to notify customers of the collection, use, and disclosure of personally identifiable information regarding cable customers. In addition, Section 222 of the Communications Act of 1934, as amended (“Communications Act”) and FCC regulations provide additional privacy protections for certain information related to our phone and internet services.

B. PRIVACY DISCLOSURE CABLE TV

The Cable Act authorizes cable operators to use the cable system to collect Personally Identifiable Information (“PII”) concerning any customer to obtain information necessary to render cable service or other services to our customers, and to detect unauthorized reception of cable communications. The Cable Act prohibits us from using PII for any other purpose without your prior written or electronic consent.

PII is information that identifies a particular person. It does not include anonymous or aggregate data that does not identify a particular person or persons. PII we collect may include:

- name,
- service address,
- billing address,

- email address,
- telephone number,
- driver's license number,
- social security number,
- bank account number,
- credit card number, and
- other similar account information.

BVC also collects other information about your account. This information may include:

- billing records,
- payment and deposit history,
- account number,
- additional service information,
- service maintenance and repair records,
- premium service subscription,
- device identifiers and network addresses of equipment used with your account,
- records indicating the number of television sets, set-top boxes, modems, telephones, home security and automation devices, or other devices connected to our cable system; and
- customer correspondence and communications records.

BVC considers the PII contained in our business records to be confidential and will take necessary action to prevent unauthorized access to information. As a cable operator, BVC may disclose PII concerning any customer if the disclosure is

a. Necessary to render, or conduct a legitimate business activity related to the cable service or other services provided to the

customer: These kinds of disclosures typically involve billing and collections, administration, surveys, marketing, service delivery and customization, maintenance and operations, incident verification and response, service notifications, and fraud prevention, for example. We may also collect, use, and disclose information about you in de-identified, anonymous, or aggregate formats, such as ratings surveys, service usage, and other statistical reports, which do not personally identify you, your particular viewing habits, or the nature of any transaction you have made over the cable system. The frequency of any disclosure of PII varies in accordance with our business needs and activities. We may sometimes disclose PII about you to our affiliates or to others who work for us. We may also disclose PII about you to outside auditors, professional advisors, service providers and vendors, potential business merger, acquisition, or sale partners; and regulators.

b. Required by law or legal process: As a cable operator, we may be required to disclose PII to a third-party or governmental entity in response to a court order. If the court order is sought by a non-

governmental entity, we are required under the Cable Act to notify you of the court order. If the court order is sought by a governmental entity, the Cable Act requires that the cable customer be afforded the opportunity to appear and contest in a court proceeding relevant to the court order any claims made in support of the court order. At the proceeding, the Cable Act requires the governmental entity to offer 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.

c. Of the names and addresses of customers for “mailing list” or other purposes (subject to each customer’s right to prohibit or limit this disclosure): As a cable operator, BVC is authorized to disclose limited PII to others, such as charities, marketing organizations, or other businesses, for cable or non-cable “mailing list” or other purposes. From time to time, we may disclose your name and address for these purposes. However, you have the right to prohibit or limit this kind of disclosure by contacting us by telephone or by sending us a written request to a contact in the Complaint Procedure below, Section II(H).

Any “mailing list” and related disclosures that we may make are limited by the Cable Act to disclosures of customer names and addresses where the disclosures do not reveal, directly or indirectly, (i) the extent of any viewing or other use by the customer of a cable

service or other service provided by us; or (ii) the nature of any transaction made by the customer over our cable system.

As a cable TV customer, you may review (and correct, if necessary) any personal information held by us that pertains to you. These records the BVC office during the hours of 8 AM to 5 PM, Monday through Friday. We request that you contact us in advance by telephone or letter so that we may locate the information and set up an appointment for your review.

C. PRIVACY DISCLOSURE PHONE

The Communications Act requires BVC to protect the confidentiality of your proprietary information. We are statutorily permitted to use, disclose, or permit access to individually identifiable Customer Proprietary Network Information (CPNI) without your affirmative consent when providing you with phone service or services necessary to or used in provision of phone service, including publishing directories. BVC may also use CPNI for billing and collection, emergency services, and to protect our network and customers from fraud, abuse, and unlawful use, as permitted by the Communications Act.

Examples of CPNI include:

- location of service,
- technical configuration of service,

- type of service,
- quantity of service,
- amount of use of service,
- Your name, address, and telephone number are not CPNI. These data are classified under the Communications Act as “subscriber list information,” which is not subject to CPNI protections and may be shared with any person upon request for the purpose of publishing directories.

BVC may disclose CPNI to others in connection with features and services, such as Caller ID, 911/E911, and directory services as follows:

- We may transmit your name and/or telephone number to be displayed on a Caller ID device unless you have elected to block such information. Please note that Caller ID blocking may not prevent the display of your name and/or telephone number when you dial certain business or emergency numbers, 911, 900 numbers, or toll-free 800, 888, 877, 866 or 855 numbers.
- We may provide your name, address, and telephone number to public safety authorities and their vendors for inclusion in E911 databases and records, inclusion in “reverse 911” systems, or to troubleshoot 911/E911 record errors.
- We may publish and distribute, or cause to be published and distributed, telephone directories in print, on the Internet, and on disks. Those telephone directories may include customer names,

addresses, and telephone numbers, without restriction to their use.

- We may also make customer names, addresses, and telephone numbers available, or cause such customer information to be made available, through directory assistance operators.
- We may provide customers' names, addresses, and telephone numbers to unaffiliated directory publishers and directory assistance providers for their use in creating directories and offering directory assistance services.
- Once our customers' names, addresses, and telephone numbers appear in telephone directories or directory assistance, they may be sorted, packaged, repackaged and made available again in different formats by anyone.
- We take reasonable precautions to ensure that non-published and unlisted numbers are not included in our telephone directories or directory assistance services, but we cannot guarantee that errors will never occur.

BVC may also be required to disclose CPNI in compliance with a valid legal process as described in section I(E) of this notice, below.

The Communications Act prohibits us from using CPNI for any purposes other than those listed above except as permitted or required by law or with your approval. Please note that BVC does not use CPNI in marketing in any way. Any marketing you may receive from BVC is developed without use of CPNI.

D. PRIVACY DISCLOSURE INTERNET

Note: BVC's Internet access service is provided by "Empire Access" in partnership."

Due to the nature of internet access service, BVC has access to certain Personally Identifiable Information (as defined above in I(B)) and CPNI (as defined above in I(C)). Additionally, BVC has access to other types of information known as Non-Personally Identifiable Information—information that has the capability of identifying a customer, but requires an essential linking step to identify that can only be provided by BVC. This information includes log files, IP addresses, MAC addresses, or other equipment identifiers when not associated with customers' names or account information. Non-Personally Identifiable Information also includes aggregated data, which is data associated with categories of services or customers that does not contain specific details about the identity of the person to whom it relates.

BVC values its customers' privacy and is committed to only collecting information necessary to manage its networks and/or comply with valid legal processes. BVC strives to provide the best service possible and often uses non-personally identifiable information and aggregate data to understand how the network is operating and being used, as well as to monitor the quality of service.

Additionally, BVC maintains logs that contain MAC addresses and IP addresses. BVC does not store anything regarding URLs visited or web cookies. The logs allow BVC to monitor and troubleshoot Internet service and comply with state and federal law and legal processes. Please see section I(E) for more information on how BVC discloses information to comply with legal processes. BVC may use this information as necessary to protect BVC's rights or property, to protect the BVC network from viruses, worms, and excessive spam; and to enforce BVC's Acceptable Use Policy, and other BVC policies and agreements.

BVC does not sell individually identifiable web browsing history or individually identifiable information to third party marketers.

E. OTHER PRIVACY DISCLOSURES (ALL SERVICES)

Legal Processes: We make every reasonable effort to protect customer privacy as described in this notice. Nevertheless, we may be required by law to disclose Personally Identifiable Information, individually identifiable CPNI about a customer. These disclosures may be made with or without the customer's consent, and with or without notice, in compliance with the terms of valid legal process such as a subpoena, court order, or search warrant.

We may be required to disclose Personally Identifiable Information and individually identifiable CPNI to a private third party in response to a court order, and, if so, we are required to notify the customer of the court order. We may also be required to disclose Personally

Identifiable Information and individually identifiable CPNI about customers to high-speed Internet, phone, and home security services to a government entity in response to a subpoena, court order, or search warrant, for example. We are usually prohibited from notifying the customer of any disclosure of Personally Identifiable Information to a government entity by the terms of the subpoena, court order, administrative order or search warrant.

Data Retention and Security: We do not maintain this information any longer than is necessary for our business purposes. This period is at least for the duration of active service plus 15 years to comply with tax and accounting requirements. Information such as credit references, previous address, social security and driver's license numbers are maintained for purpose of identity regarding the applicants for our services, credit checks and collection purposes. BVC takes measures to protect your information from unauthorized access, use, and disclosure using industry-standard methods such as firewalls, encryption, and system access controls. Despite these protection efforts, please note that no computer or network-based product can provide "perfect security," thus BVC cannot guarantee that your information is completely risk-free.

Emergencies: We may also use or disclose Personally Identifiable Information about you without your consent to protect our customers, employees, or property, in emergency situations, to enforce our rights under our terms of service and policies, in court

or elsewhere, and as otherwise permitted by law. In emergency situations, 911 Response Centers and/or Police may contact us for directions to a customer's home. We will release this information unless you contact us in advance.

Corporate Merger/sale: If we (or our parent company) enter into a merger, acquisition, or sale of all or a portion of our assets, customers' Personally Identifiable Information will, in most instances, be one of the items transferred as part of the transaction.

Billing: All bills are mailed at regular intervals to the billing address indicated in our records to the attention of the account holder only. In order to perform the billing function, answer questions relating to billing, and collect on overdue accounts, customer service representatives, credit, and collections representatives and billing personnel have access to the billing systems, which contain Personally Identifiable Information and CPNI.

Other Statutes: We comply with the Electronic Communications Privacy Act and all copyright laws including the Digital Millennium Copyright Act.