

## Customer Privacy Policy for Cable Television, Internet and Phone Service Effective: February 27, 2015

CTV East Alabama ("CTV") takes the protection of our subscribers' ("you," "your" or "customer") privacy seriously. This Privacy Policy is intended to give you a general understanding of how we protect your privacy in connection with our cable television, Internet, phone and any other service we may provide to you using our cable system (individually, each is a "service"; collectively, the "services").

This Policy only covers information about you that is collected by CTV in connection with the provision of our services. This Policy does not cover information that may be collected through any other products, services, or websites, even if accessed through our services and even if co-branded with our services. You should read the privacy policies for these other products, services, websites and providers to learn how they handle your personal information.

Depending upon the service to which you subscribe, parts of this Policy may not be applicable to you. Please review this Policy in conjunction with your service agreement. We may modify this Policy at any time. The most current version of this Policy can be found on <http://ctvea.net>. If you find the changes unacceptable and if those changes materially and adversely impact your use of the service, you may have the right to cancel your service. If you continue to use the service following the posting of a revised Policy, we will consider that to be your acceptance of and consent to the Policy as revised.

### What type of information does CTV collect?

CTV collects both personally identifiable information and non-personal information about you when you subscribe to our service. CTV uses its system to collect personally identifiable information about you: (a) when it is necessary to provide our services to you; (b) to prevent unauthorized reception of our services; and (c) as otherwise provided in this Policy. CTV will not use its cable system to collect your personally identifiable information for other purposes without your prior written or electronic consent. CTV also collects personally identifiable and non-personal information about you when you voluntarily provide information to CTV, as may be required under applicable law, and from third parties, as described in this Policy.

Personally identifiable information is any information that identifies or can potentially be used to identify, contact, or locate you. This includes information that is used in a way that is personally identifiable, including linking it with identifiable information from other sources, or from which other personally identifiable information can easily be derived, including, but not limited to, name, address, phone or fax number, email address, spouses or other relatives' names, driver's license or state identification number, financial profiles, social security number, bank account information, and credit card information. Personally identifiable information does not include information that is collected anonymously (i.e., without identification of the individual or household) or demographic information not connected to an identified individual or household.

Non-personal information, which may or may not be aggregated information about our customers and may include information from third parties, does not identify individual customers. Examples of non-personal information include IP addresses, MAC addresses or other equipment identifiers, and other data. Our systems may automatically collect certain non-personal information when you use an interactive or transactional service. This information is generally required to provide the service and is used to carry out requests that a customer makes through a remote control or set-top box.

We may also collect and maintain information about your account, such as billing, payment and deposit history; maintenance and complaint information; correspondence with or from you; information about the service options that you have chosen; information the equipment you have, including specific equipment identifiers; and information about your use of our services, including the type, technical arrangement, quantity, destination and amount of use of certain of those services, and related billing for those services.

### Why does CTV collect personally identifiable information?

CTV collects and uses personally identifiable information to:

- properly deliver our services to you;
- provide you with accurate and high-quality customer service;
- perform billing, invoicing and collections;
- provide updates, upgrades, repairs or replacements for any of our service related devices or software used in providing or receiving services;
- protect the security of the system, prevent fraud, detect unauthorized reception, use, and abuse of CTV's services or violations of our policies or terms of service;
- keep you informed of new or available products and services;
- better understand how the service is being used and to improve the service;
- manage and configure our devices, systems and network(s);
- maintain our accounting, tax and other records; and
- comply with applicable federal and state laws and regulations, as well as for the general administration of our business.

If you use an interactive or transactional service, for example, responding to a survey or ordering a pay-per-view event, the system will collect certain additional personally identifiable information, such as account and billing information or customer-provided locale and service preferences, to properly bill you for the services purchased and to provide you with a more personalized experience. In addition, certain information, such as your connections to our system (e.g., information related to your equipment and program selections), is automatically collected to, for example, make it possible for your digital boxes to receive and process the signals for the services you order.

CTV may also collect personally identifiable information from third parties to verify information that you have provided to us, and may collect personally identifiable information from credit reporting agencies to, for example, determine your creditworthiness, credit score, and credit usage. CTV also may maintain research records containing information obtained through voluntary subscriber interviews or surveys.

Our system may collect anonymous and/or aggregate information using set-top boxes and other equipment. We may use this information to determine which programs are most popular, how many people watch a program to its conclusion, and whether people are watching commercials, for example. We may provide subscriber lists or certain anonymous and/or aggregate information to third parties working on our behalf such as audience measurement or market research firms, for example. These firms may combine this information with other aggregated or non-aggregated demographic information (such as census records) to provide us with audience analysis data, though we will require them to remove personally identifiable information about our subscribers from this data. We may use this information to improve our cable television service and other services and make programming and advertising more relevant to our subscribers. We may also use this information to distribute and deliver relevant programming and advertising to you without disclosing personally identifiable information about you to programmers or advertisers. We may also combine personally identifiable information that we collect, as described in this Policy with personally identifiable information obtained from third parties for our own use to better understand our customers and provide more relevant services.

### Who sees the information collected by CTV?

CTV will only disclose personally identifiable information to others if: (a) a customer provides written or electronic consent in advance, or (b) it is permitted or required under federal or applicable state law. Specifically, federal law allows CTV to disclose personally identifiable information to third parties:

- when it is necessary to provide CTV's services or to carry out CTV's business activities;
- for mailing list or other purposes, subject to your ability to limit this last type of disclosure as described below; or
- as required by law or legal process.

To provide services and carry out our business activities, certain authorized people have access to your information, including our employees, entities affiliated through common ownership or control with CTV and third parties that provide and/or support our provision of the services. The frequency of disclosures varies according to business needs, and may involve access on a regular basis.

Unless you object in advance, federal law also allows CTV to disclose through "mailing lists," personally identifiable information, such as your name, address and the level of your service subscription, to non-affiliated entities, including advertisers and marketing entities, for non-service related purposes, including product advertisement, direct marketing and research. As part of its business activities, if CTV enters into a merger, acquisition, or sale of all or a portion of our assets, CTV may transfer its customers' personally identifiable and non-personal information as part of the transaction.

If allowed by and after complying with any federal law requirements, CTV may disclose personally identifiable information about you to representatives of government or to comply with valid legal process. In these situations, CTV may be required to disclose personally identifiable information about a customer without the customer's consent and without notice to the customer. Law enforcement agencies may, by federal or state court order, and without notice to you, obtain the right to install a device that monitors your Internet and e-mail use, including addresses of email sent and received and in some cases the content of those communications; and/or your use of our telephone service, including listings of incoming and outgoing calls and in some cases the content of those calls.

In some instances where there are valid legal requests for or orders for disclosure of your information, we may notify you of the requests or orders and then it may be up to you to object or take specific action to prevent any disclosures pursuant to those requests or orders. We may also use or disclose personally identifiable information about you without your consent (a) to protect our Customers, employees, or property, (b) in emergency situations,

(c) to enforce our rights in court or elsewhere, or directly with you, for violations of service terms, conditions or policies and/or (d) as otherwise required by law, for example, as part of a regulatory proceeding.

#### **How does CTV use cookies?**

We may collect information on our websites using cookies, web beacons or similar technologies. These methods permit us to collect various types of information, including which pages you visit, how you use the services, which of our email messages you read, and other information. CTV may use this information to understand usage patterns and perform analyses, to provide you with more personalized service and to improve your online experience. Most web browsers permit users to disable or reject cookies, though doing so may limit the personalization available to you and your access to sections of our website.

CTV may partner with third-party advertising companies who may utilize cookies, web beacons, or other technology to deliver or facilitate the delivery of targeted advertisements. CTV also uses third-party advertising companies to identify and present tailored online advertisements for its goods and services. CTV does not share or provide personally identifiable information we may collect, such as names, e-mail addresses and phone numbers with our advertisers without your express permission. Some content or applications, including advertisements, on our website are served by third-parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

#### **Can I prohibit or limit CTV's use and disclosure of my personally identifiable information?**

You have the right to prohibit or limit certain kinds of disclosures and marketing. You may not opt-out of service-related communications. If you do not want your name, address, level of service or other personally identifiable information disclosed to third parties in a "mailing list" as explained above, please contact us via the form available at <http://ctvea.net/contact/>. Customers cannot opt-out of the collection of non-personally identifiable data for the purpose of audience measurement or website analytics.

#### **How long does CTV maintain personally identifiable information?**

CTV will maintain personally identifiable information about you as long as you are a subscriber to CTV's service and as long as necessary for the purpose for which it was collected. If you are no longer a subscriber to any CTV service and the information is no longer necessary for the purpose for which it was collected, CTV will only keep personally identifiable information as long as necessary to comply with applicable legal requirements.

#### **How does CTV protect customer information?**

CTV takes the security of our Customers' personally identifiable information seriously. CTV takes such actions as are reasonably necessary to prevent unauthorized access by entities other than CTV to personally identifiable information. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information.

You need to help protect the privacy of your own information. You must take precautions to protect the security of any personally identifiable information that you may transmit over any home networks, wireless routers, wireless (Wi-Fi) networks or similar devices by using passwords, encryption and other techniques to prevent unauthorized persons from intercepting or receiving any of your personally identifiable information. You are responsible for the security of your information when using unencrypted, open access or otherwise unsecured networks in your home.

#### **Can I see the information that CTV collects about me?**

You have a right under the Cable Act to see your personally identifiable information that CTV collects and maintains. The information CTV has about its Customers is maintained at its offices and systems. In most cases, the personally identifiable information contained in these records consists solely of billing and account information. If you would like to see your information, please mail a written request to CTV, ATTN: LEGAL, 2400 Sportsman Drive, Phenix City, Alabama 36867. You may also submit your request via the form available at <http://ctvea.net/contact/>. CTV will be glad to make an appointment for you to come in to our office during regular business hours. If your review reveals an error in our records, CTV will correct it. You will only be permitted to examine records that contain personally identifiable information about your account and no other account.

#### **Does CTV protect children's privacy?**

CTV is concerned about children's privacy and does not knowingly collect personally identifiable information from anyone under the age of 13 over its services. Other services or web pages accessed through CTV's service may have different policies on collection of information pertaining to children and you should consult their privacy policies and read their notices if you have any concerns about the collection or use of such information by those entities. If you have any questions about our privacy policy with respect to children, please contact us.

#### **What can I do if I believe CTV has violated my rights or have questions about the privacy policy?**

You may enforce the limitations imposed on us by federal law with respect to the collection and disclosure of personally identifiable subscriber information about you, through a civil action under federal law, in addition to other rights and remedies that may be available to you under federal or other applicable laws. If you have questions about this Privacy Policy, you may submit them via the contact form available at <http://ctvea.net/contact/>.

#### **Additional Provisions for Customer Proprietary Network Information or "CPNI"**

If you subscribe to a CTV service classified as a "telecommunications service," federal law creates additional protections with respect to information known as "customer proprietary network information" or "CPNI." CPNI refers to the quantity, technical configuration, type, destination, location, and amount of your use of a telecommunications service that is made available to us solely by virtue of our relationship with you, as a customer. CPNI also includes information in your bills pertaining to your telephone service. CPNI does not include subscriber list information, such as your name, address and telephone number or other information that has been published in any directory format. Examples of CPNI include information about your phone service found on your monthly telephone bill, your current telephone charges, your long distance and local service billing records, directory assistance charges, usage data, and calling records.

For your protection, we will not disclose your call detail records over the phone to an inbound caller, and we require the use of a password to log into accounts where you can view your CPNI online. We will use, disclose, or permit access to CPNI to provide you with the services to which you subscribe, including for use in directories; to bill and collect for communications services; to protect our rights or property, or to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services; to provide inside wiring installation, maintenance, or repair services; as required by law; or as expressly authorized by the customer. Although federal law permits us to use CPNI for certain marketing, we have elected not to use such information for marketing. We also do not provide or sell your CPNI to any third party for marketing activities.

Pursuant to an order of the Federal Communications Commission (the "FCC"), our broadband Internet access service is now classified as a "telecommunications service" and certain information relating to your use of our broadband Internet Service is CPNI and subject to associated privacy protections and use restrictions. In the absence of specific guidance from the FCC, we will take reasonable, good faith steps to protect the CPNI of our broadband Internet customers in accordance with the requirements of the Communications Act, as applicable, and as described in this notice.