

SandyNet Privacy Policy

At SandyNet, we value the trust our subscribers and community have placed in us, and we honor that trust through our commitment to protect your privacy. We know that subscribers care about how and when we collect, use, maintain and share information about them and the procedures that we have in place to protect their information.

I. Types of Information Collected

- A. Information that you provide to us. We collect the information that you provide to us when you create an order or account with us, when you use online account tools, when you call or email us, and when you call or otherwise communicate with us.
 - 1. Name
 - 2. Business entity name (if a business account)
 - 3. Contact information (such as billing address, service address, email address, phone numbers)
 - 4. Payment information (such as credit card or bank account information)
 - 5. Credit application information (such as social security number, driver's license number, or other government issued identifier)
 - 6. Account access authentication information (such as password, security question answers)
 - 7. Information on custom settings or preferences
 - 8. Customer communications and other communications records (such as records of call with customer service representatives)
- B. Information collected when you use the services.
 - 1. Utility billing account number
 - 2. Billing, payment, and deposit history
 - 3. Maintenance information
 - 4. The types of service you subscribe to
 - 5. The device identifiers and network addresses of equipment used with your account
 - 6. Records indicating the number and types of devices connected to our network
 - 7. Technical information about your service-related devices, including customization settings and preferences
 - 8. Network traffic data
 - 9. Information about your use of the services and their features, including internet or online information such as web addresses and other activity data to render internet service
- C. Information provided by third parties. We also obtain data and information about you from third parties. For example, when you request new or additional services from us, we may obtain credit information from credit reporting agencies.

Additionally, if you rent your residence, we may have a record of whether landlord permission was required prior to installing our services as well as your landlord's name and address.

II. **How Information is Collected and Used**

The information we collect is used to provide and improve services and our network. This information is also used to communicate with you and create measurement and analytics reports. We use information that identifies you personally when authenticating your account or when communicating with you. We also use information that is de-identified (i.e., cannot be connected back to you personally) or aggregated (I.e., data that is grouped together and not tied to any specific individual). We also use the information we collect to deliver and personalize our communication with you. For example, we may use the contact information you provide to inform you of Service updates, or the status of a service request, outages, invite you to participate in a survey, collect amounts you owe, or in connection with other activities related to the Service(s). We will provide you with service-related announcements, such as a pricing change, a change in operating policies, a service appointment, or new features of one or more of the Services(s) you receive from us through email, texts, call, letters, SandyNet provided equipment and other communication methods.

- A. To provide and improve the services, we use the information we collect to conduct business related activities related to providing you with the services.
 - 1. Establishing your account
 - 2. Measuring credit and payment risk
 - 3. Billing and invoicing
 - 4. Authenticating access to your account
 - 5. Account administration
 - 6. Service delivery
 - 7. Maintenance and operations, including management of the network and devices supporting our service and our systems
 - 8. Technical support
 - 9. Hardware and software upgrades for devices and systems
 - 10. Understanding the use of our service
 - 11. Improving our services
 - 12. Identifying new products and services
 - 13. Communicating with you
 - 14. Marketing and advertising
 - 15. Detecting unauthorized reception, use, or abuse of services and protecting subscribers from fraudulent, abuse, or unlawful use of, or subscription to, the services
 - 16. Analyzing customer usage data, such as the amount of bandwidth that is being used, the peak times of usage, or the types of services that are being used
 - 17. Collecting fees and charges

18. Protecting our rights, our personnel, and our property
19. Complying with applicable law

III. How Information is Protected

We follow industry-standard practices to secure the information that we collect to prevent the unauthorized access, use or disclosure of information about our customers. These security practices include technical, administrative, and physical safeguards. Although we take the responsibility of safeguarding your information seriously, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose your information.

IV. How Long Information is Retained

SandyNet maintains information that personally identifies subscribers in our regular business records while the account is considered active. We also maintain service information for a minimum of 10 years after a service has been cancelled or disconnected to comply with the City of Sandy's state-approved record retention schedule in accordance with OAR Chapter 166, Division 200. After the retention period has been met, SandyNet destroys, de-identifies, or makes anonymous the information according to SandyNet's internal policies and procedures.

V. Sharing and Disclosures of Information

A. To provide and support our services, we sometimes use other providers to undertake work on our behalf. That work can include any of the following:

1. Process payment transactions
2. Carry out fraud and credit checks
3. Run surveys
4. Collect fees and charges
5. Provide customer service, marketing, infrastructure, and information technology services
6. Perform auditing and accounting
7. Provide professional advice and consulting
8. Assist with maintenance and operations
9. Assist with security incident verification and response and fraud prevention

B. When we use other organizations, we still control your personal information, and have strict controls in place to make sure that your information is properly protected. For example, we require third party service providers to treat the information that we share as confidential and to only use it for purposes of providing services for which they have been engaged to perform.

C. Voice Service Disclosures

If you subscribe to our voice service, we may disclose information about you to others in connection with features and services such as Caller ID, 911/E911, and directory services. The following information may be transmitted:

1. We may transmit your name and/or telephone number to be displayed as 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 such as 911, 900 numbers, or toll-free 800 numbers, or similar numbers.

2. We may provide your name, address, and telephone number to public safety authorities and their vendors for inclusion in E911 database and records.
3. We may publish and distribute, or cause to be published and distributed, telephone directories in print, on the internet or on disks. Those telephone directories may include subscriber names, addresses, and telephone numbers without restriction to their use.
4. We may also make subscriber names, addresses and telephone numbers available through directory assistance operators.
5. Once a subscribers' name, any addresses, and any telephone numbers appear in directories or directory assistance services, they may be sorted, packaged, repackaged, and made available again in different formats by anyone.
6. We take reasonable precautions to ensure that non-published and unlisted numbers are not included in telephone directories or directory assistance services, but we cannot guarantee that errors may not occur.

D. Legal Disclosures

There are times when we may be required by law or legal process to disclose information about you to lawyers and parties in connection with litigation and to law enforcement personnel. These disclosures may be made without consent or notice in compliance with the terms of valid legal processes such as a subpoena, court order, or search warrant. We may also disclose information that personally identifies you as a permitted by law when:

1. It is necessary to protect our customers, employees, or property
2. In emergency situations
3. Enforce our rights under our terms of service and policies

E. Customer Proprietary Network Information (CPNI)

CPNI is the information that is generated when you use internet or VoIP (voice) service. Examples of CPNI include call details (such as the numbers you call, the numbers that call you, the call times, and dates) and your rate plan and features. Under Section 222 of the Communications Act of 1934, broadband providers who offer VoIP have a duty to protect the confidentiality of CPNI. Additionally, the Federal Communications Commission (FCC) rules provide additional privacy protection specific to voice services. SandyNet is allowed to use CPNI for billing, providing services, 911 calls, and to comply with court-ordered information requests. We are permitted to disclose CPNI information to the customer whose data it is, and to persons our subscribers have authorized to receive this information. We will require authentication, such as a password, for any customer-initiated telephone contract where call detail information is being

requested. SandyNet does not share any CPNI information for marketing purposes.

VI. How Subscribers Can Access and Correct Information

It is important that your account records contain accurate information. By providing adequate personal identification, you may review your account information and inspect personally identifiable information during office hours. Subscribers shall have the right to correct inaccurate information under their accounts.

VII. Updates to the Privacy Policy

SandyNet will provide subscribers with a copy of the current privacy policy at the time we enter into an agreement to provide any internet or voice service to the subscriber. We may modify this policy at any time. You can view the most current version of this policy on our website. If we make material changes to the privacy policy, we will provide subscribers with at least 30 days' notice. If you continue to use the service following notice of the changes, we will deem that to be your acceptance and consent to the changes in the revised privacy policy.