

## **Privacy Policy (effective May 5<sup>th</sup>, 2008)**

### **Premium Choice Broadband's Commitment**

Premium Choice Broadband ("PCB") is committed to keeping your personal information private. Please read this Privacy Policy carefully, as it pertains to our collection of information about you, how we may handle that information, how we secure that information, whether we may disclose that information, the options you have regarding how we use the information, and your ability to control and correct the information. Because we respect your right to privacy, we will not trade, sell, or disclose to any third party any form of personally identifiable information without your consent, however obtained, except as stated in this policy. This policy applies only to PCB, and does not apply to websites to which you can link through our website. We do not and cannot control other websites, and you should familiarize yourself with the privacy policy governing any website you use. In addition, we are not responsible for any tracking, spyware, or other software that may be used by such other parties.

### **Collected Information**

The information PCB gathers comes from information you voluntarily provide to us, including personal, business, and demographic information you supply, along with other information we gather through the registration process, as well as tracking information that is gathered when you visit and navigate our website. Some of this information identifies a particular person, but much of it does not. Please be aware that other companies' or individuals' websites that are linked to or otherwise featured on and accessed through our site may gather information about you as well and such gathering is not governed by this policy.

We limit our collection of your information to that information that is necessary for PCB to do business with you. Such information may include:

- Your contact information (e.g., name, service and mailing address, telephone number, and e-mail address)
- Driver's license number and/or social security number
- Company name (for corporate accounts)
- Certain information required to process payments (e.g., credit card, debit card or check card numbers)
- Information regarding your household usage (e.g., number of children, number of Internet users technology you use)

Other than as may be disclosed in this policy, we will not share, sell, trade or rent your information to anyone.

## **Use of Cookies**

In order to enable our website to best suit your needs, we use a standard feature of browser software nicknamed “cookies.” Cookies are used to remember the way you have used our website in the past, thereby allowing us to better tailor our website to your needs. Cookies allow our website to recall information you may have used to personalize certain pages on our website and are meant to be a convenience to you. Cookies cannot run programs or transmit viruses, and instead are merely text files placed on your hard disk by a web page server.

You can set your computer to disallow cookies. Doing so, however, will prevent you from enjoying any personalization features PCB may offer. We use both temporary (also known as “session”-based) cookies that contain certain information about your use of our website at any particular time and “persistent” cookies that contain certain account-related information. Persistent cookies are only used for registered users. Session-based cookies are automatically disabled or deleted when you close your browser. Persistent cookies remain stored on your computer system until you disable or delete them.

## **Why We Collect This Information and How We Use It**

We collect this information to process your application or service order, to set up and maintain an account for you, to provide adequate service to you, and to conduct market research. We may use the contact information you provide to contact you regarding any questions regarding, or changes to, your account, to provide you with updates regarding your service or PCB in general, or to respond to your requests for service or customer support. You should be aware that PCB may store and file any correspondence you send to us, whether directly through the internet website, through e-mail, or otherwise.

## **Disclosure of Information**

The information that we collect about you is treated as confidential. In addition, we will not read, listen to or disclose to any third parties private e-mail correspondence, conversations, or other communications, except as described in this Policy, that are transmitted using our services.

Disclosure of information we obtain about you to will be limited to (a) disclosures to our business partners or to others who work for or are affiliated with us, (b) disclosures required by law, (c) disclosures required to protect our rights and property or the personal safety of others, and (d) disclosures in connection with a sale of PCB’s assets.

## **Customer Proprietary Network Information (“CPNI”)(Applicable to Internet Phone Service Only)**

Certain federal privacy rules related to the use, disclosure or access to a particular form of

personal information derived specifically from the provision of Internet Phone Service (“IPS”) also apply to PCB. This information is called customer proprietary network information or “CPNI.” CPNI includes, with limitation, certain call detail information (including the call number, date and time, and location).

PCB is obligated to ensure the confidentiality of CPNI under Federal Communications Commissions rules, and we cannot disclose, permit access to, or use CPNI other than as permitted by law. Furthermore, we are required to provide our IPS customers with specific notifications advising you of your rights regarding our use, disclosure and access to CPNI for marketing purposes.

We may use, disclose or permit access to CPNI in order to offer you additional IPS offerings and related features; to provide any related equipment, maintenance, and repair services; to protect PCB’s rights or property; or to protect PCB’s customers. You must provide express authorization for us to disclose or use your CPNI for any other purpose. PCB complies with federal requirements with respect to its development and implementation of an internal software system to flag and track access to IS customer records that contain CPNI. We also train all employees who have access to CPNI with respect to how and when they may use CPNI. We track all access to customer account information. Under federal law, we are permitted to release call detail information and/or records only by e-mailing them to your e-mail address that you have registered with PCB (that you have had for at least 30 days); calling you on your PCB IPS number (that has been active with us for at least 30 days); allowing you to access this information using a password protected online account; or allowing you to access this information at a PCB retail location with a valid government-issued photo ID. To further protect your information, we will notify you of any attempted changes to your account information to ensure that you are authorizing such changes.

### **Opt-Out Policy**

PCB is committed to protecting the privacy of all of your personally identifiable information, including your CPNI. Although we may use your CPNI to better enable us, our agents or affiliates to offer you new or different services or products tailored to your needs or circumstances, you have the right to deny us access for such use or disclosure if you desire to do so. If you do not elect to opt-out through one of the methods indicated in your Opt-out Notification within 30 days of receipt, we will assume your consent to such disclosure. If you do not choose to opt-out initially, you are nevertheless entitled to disapprove, deny or withdraw access to your CPNI at any time by contacting Customer Care at [customerservice@premiumchoicebroadband.com](mailto:customerservice@premiumchoicebroadband.com), and such opting out will not affect the provision of any PCB services to which you currently subscribe. We will provide you with reminder Opt-Out Notifications as required by law to ensure that you remain fully aware of your rights with respect to CPNI.

## **Opt-in Policy**

PCB must obtain your express consent to disclose or permit access to your CPNI to its business partners for marketing purposes. If you desire to consent to such use, you must indicate your consent by one of the methods set forth in your Opt-In Notification. Again, you are entitled to change your CPNI opt-in consent at any time by contacting Customer Care at [customerservice@premiumchoicebroadband.com](mailto:customerservice@premiumchoicebroadband.com) and indicating your intent to change your preference.

## **Security**

PCB takes the security of your personal information very seriously and we use a number of methods to protect your personal information from unauthorized access, use or disclosure. Access to the personal information we collect and store is very limited, and we have strict internal guidelines to protect your information. We use encryption, such as the Secure Socket Layer scheme, when transmitting personal information over the Internet. Regardless of our efforts and available technology, however, we cannot guarantee the complete security of our database, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the internet. PCB updates our policies and security measures as appropriate.

## **Protection of Children**

The safety and privacy of children using our services is important to us. We neither sell products or services to kids, nor knowingly collect personally identifiable information from those under the age of 18. For the safety and protection of your children, we encourage you to monitor your children's usage of the internet.. Although PCB does not collect information regarding children, you should be aware that if you allow your child to use our services, your child will be able to communicate with and disclose personal information to other users of all ages. PCB does not knowingly link to any websites that collect information from children. Talk to your children about safe usage of the internet, and encourage them not to disclose personal information. Tips on safely using the internet are available through the Federal Trade Commission.

## **Spam Policy**

PCB takes all spam (unsolicited e-mail) and other inappropriate and unlawful usage complaints seriously. We may use customer information to investigate, monitor and prevent such activity, and will close the accounts of customers who use the services for such activity.

## **Questions**

If you have questions regarding this policy, please contact PCB at [customerservice@premiumchoicebroadband.com](mailto:customerservice@premiumchoicebroadband.com).

### **European Union Data Considerations**

Personal information collected on this site may be stored and processed in any country in which PCB or its affiliates, subsidiaries or agents maintain facilities, and by using this site, you consent to any such transfer of information outside of your country. PCB abides by the safe harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union.

### **Privacy Policy Changes**

Any changes to our privacy policy will be posted at this location. We suggest that you review this page often so that you will be aware of any changes to this policy. Your continued use of PCB services and access of this website following any changes to this policy constitute your acceptance of any such changes.