

## Wellman Cooperative Telephone Association

### VIDEO SUBSCRIBER PRIVACY NOTICE

**Your Legal Rights.** As a subscriber to Wellman Cooperative Telephone Association cable/video service or to other services provided over our video system, you are entitled to this notice regarding our privacy practices and your rights under Section 631 of the Cable Communications Policy Act of 1984 (the "**Cable Act**"). This notice covers personally identifiable information that you have furnished to us or that we have collected while providing cable or video service to you. Personally identifiable information is information that identifies a particular person. It does not include aggregate customer information that does not identify a particular person. Under the Cable Act, you are entitled to know:

- The nature of any personally identifiable information we may collect and the ways we may use this information
- Under what circumstances and to what parties we may disclose personally identifiable information
- How long we will maintain your personally identifiable information
- The times and places where you may access your personally identifiable information
- Your rights under the Cable Act concerning personally identifiable information

**Information Collected.** We collect personally identifiable information as needed to provide our cable/video service or other services to subscribers or to detect unauthorized reception of service. The Cable Act prohibits us from using our video system to collect personally identifiable information about you for any other purpose without your prior written or electronic consent.

The personally identifiable information we collect typically includes: name, address, telephone number, driver's license number, social security number, and credit card or bank account number. We may also collect other information related to your ordering and use of service such as: service and credit records, past correspondence with you, the services you subscribe to and your navigation through those services, the purchases you make over the system, and the types and number of devices you use to connect to the system. If you rent your residence, we may have a record of whether landlord permission was required to install our service facilities as well as your landlord's name and contact information. To provide you with the highest quality service and a more personalized experience, we also may collect information such as your locality and the service preferences you indicate through your voluntary interaction with the system. We may also maintain research records containing information obtained through voluntary subscriber interviews or surveys.

**Use of Your Information.** As permitted by the Cable Act, we use personally identifiable information in order to provide cable/video service and other services to you, and to help us detect theft of service. This means maintaining good business records for a number of business activities, including but not limited to records needed:

- To render service and ensure that you are receiving the services you ordered
- To allow us to properly maintain those services and to make improvements or upgrades when necessary
- To confirm that you are being properly billed
- To inform you of new products or services that may be of interest to you
- To allow us to understand the use of, and identify improvements to, our services
- To prevent fraud, including the unauthorized use of our service
- To operate and safeguard our network and systems
- For legal, accounting and other purposes related to our business
- To ensure our compliance with the law
- For other purposes related to our business which we clearly identify at the time we request the information

**Disclosure of Your Information.** We follow industry-standard practices to prevent unauthorized use, disclosure or access to personally identifiable information. We consider all personally identifiable information contained in our business records to be confidential. We are, however, authorized under the Cable Act to disclose personally identifiable information if the disclosure is necessary to provide or conduct a legitimate business activity related to cable/video service or other services provided over our video systems or as required by law or legal process. We may also use or disclose personally identifiable information about you without your consent to protect our customers, employees or property, in emergency situations, and to enforce our rights under our terms of service and policies, in court or elsewhere.

Our disclosure of personally identifiable information to other parties (such as our affiliates, vendors, and agents) will depend on whether it is necessary to conduct a legitimate business activity related to cable/video service or other services rendered to you. For example, we may engage such parties to assist us in billing and collections, administration, surveys, marketing, service delivery and customization, maintenance and operations, and fraud prevention. We may also disclose personally identifiable information about you to outside auditors and regulators. We may also collect, use, and

disclose information in non-personally identifiable or aggregate formats, such as ratings surveys and service usage and other statistical reports, which do not personally identify you, your particular viewing habits, or any transaction you have made over our system.

In the event of a merger, acquisition, or sale of all or a portion of our assets, our subscribers' personally identifiable information will, in most instances, be transferred as part of the transaction.

**Disclosure Required by Law.** We make every reasonable effort to protect our subscribers' privacy as described in this notice; however, we may be required by law to disclose personally identifiable information about a subscriber without his or her consent and without notice in order to comply with a valid legal process such as a subpoena, court order or search warrant. The Cable Act may require that we disclose personally identifiable information to a third party or governmental entity in response to a court order or other legal process. In the event the court order is sought by a non-governmental entity, we are required to notify you of the court order and your opportunity to appear in court and contest the order. If the court order or other legal process is sought by a governmental entity, the Cable Act requires that we disclose the information to the government unless the records sought involve your video programming selections, in which case you will be given the opportunity to appear and contest any claims made in support of the court order or legal process.

**Limitations on Disclosure.** The Cable Act permits cable operators to disclose subscriber name and address information to other parties, but only after providing subscribers with the opportunity to limit or prohibit such disclosure. It is our policy not to disclose any personally identifiable information about you to any other parties (other than affiliates, vendors and business partners as necessary to conduct a legitimate business activity related to cable/video service or other services rendered to you), unless you provide your prior consent or we are required by law to make the disclosure. Before the company ever makes subscriber name and address information available to any other parties, it will provide you with notice and an opportunity to prohibit or limit such disclosure.

**Maintaining Your Information.** We will maintain personally identifiable information about you no longer than necessary for the purpose for which it was collected. This means we may also maintain this information for a period of time after you are no longer a subscriber if it is necessary for business, legal or tax purposes. We will destroy the information if we have no pending requests, orders or court orders for access to this information, after we determine that it is no longer necessary for the purposes for which it was collected and in compliance with any applicable federal, state or local laws or requirements.

**Access to Your Information.** If you would like to see your personally identifiable information, please send us a written request to our address as listed on your bill for cable/video service. We will be glad to arrange a convenient time and location during regular business hours for you to see the information upon furnishing proper identification. You will only be permitted to examine records that contain personally identifiable information about you and no one else. If you believe any of your personally identifiable information is inaccurate, we will work with you to ensure that the appropriate corrections are made. We reserve the right to charge you for the cost of photocopying any documents that you request.

**Violations.** If you believe that your privacy rights have been violated, please contact us immediately. We will take immediate steps to address your concerns. If you believe that you have been aggrieved as a result of our violation of applicable provisions of the Cable Act, you may enforce the limitations imposed on us through a civil lawsuit seeking damages, attorneys' fees and litigation costs. Other rights and remedies may be available to you under federal, state or local laws.

**Changes to this Notice.** As required by the Cable Act, we will provide you with a copy of our subscriber privacy notice on an annual basis. We may modify this notice at any time. We will notify you of any material changes through written, electronic or other means as permitted by law. If you continue to use your service following notice of the change, we will consider such continued use as your acceptance of the change.