

## Data Privacy Policy

Consolidated Telephone Company ("CTC") respects the privacy of all of its users and is committed to protecting such privacy in accordance with this Privacy Policy. This Privacy Policy explains CTC's treatment of your personally identifiable information collected in connection with your activities on or related to this website ("CTC Website") and all services ("CTC Services") made available on this site. This Privacy Policy also explains how you can ask questions and make suggestions about our privacy practices and review and update your personal information.

We urge you to read this Privacy Policy carefully and to check back periodically as this Privacy Policy may change from time to time. Please note that this Privacy Policy does not apply to the practices of companies or websites, which are not owned or controlled by CTC

### INFORMATION COLLECTED

In the course of operating the services, we may collect two types of information about our users: Personal Information and Non-Personal Information.

**Personal Information:** is personally identifiable information, such as your name, address, email address, birth date and gender. Personal Information is collected by us when you choose to provide it to us when registering for a service, such as when you choose to subscribe to a CTC Service, enter a CTC promotion or choose to receive a CTC newsletter. In addition, if you choose to contact any of our customer service representatives, we may keep a record of that correspondence so that we may fully address the subject matter. We may also receive Personal Information from our business partners and other third parties, provided that such third parties confirm to us that you have permitted them to share such information.

Business contact information such as the name, title, business address, email address or telephone number of a business or professional person or an employee of an organization is not considered Personal Information.

**Non-Personal Information:** is information of an anonymous nature, such as an Internet Protocol Address (IP Address), the domain used to access a CTC Service, and the type and version of browser or operating system being used. Aggregate information, such as demographic statistics of our users (e.g. average age or geographical allocation of our users), number of visitors and average time spent on a CTC Service, is also considered Non-Personal Information.

Non-Personal Information is collected or derived by us in the course of operating CTC Services. For example, our Web servers may automatically collect Non-Personal Information which is provided through your browser or stored on a Cookie or through a Web Beacon when you choose to visit a CTC Service. Non-Personal Information is used by CTC as described here.

### USE OF PERSONAL INFORMATION

Personal Information may be used by us for the following purposes:

Providing you with CTC Services and information you have requested from us, including your use of the CTC Site. We may from time to time use your Personal Information to contact you about changes, enhancements or similar notices related to CTC Services;

If you indicated that you were interested in receiving offers or information from CTC or certain of our selected sponsors or advertisers, CTC or such sponsors or advertisers may send you email materials and other mailings about products and services that we feel may be of interest to you. If at any time you would like to end your subscription to any such email materials, follow the directions posted at the bottom of the email material;

If you enter a contest or other promotion offered on CTC Website, we may, under the rules of the promotion, use your name and certain other information to administer the promotion, such as contacting, announcing and promoting the winners of the promotion;

CTC may also use Personal Information if it has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law or in order to protect or defend a legal interest.

#### **DISCLOSURE OF PERSONAL INFORMATION**

We will not sell or rent your Personal Information to anyone. We will only disclose your Personal Information to third parties:

Where you have specifically given us your consent to disclose your Personal Information for a designated purpose;

Who are acting on our behalf as our agents, suppliers or service providers, solely to enable us to more efficiently provide you with CTC services. Such entities act under strict contractual controls, requiring them to maintain the confidentiality of all such Personal Information and to use such information solely for purposes related to the provision of CTC Services;

As may be set out in the Terms of Service applicable to a CTC Service, to facilitate the provision of such CTC Service, such as fulfilling legal requirements;

As required by law, including by an order of any court, institution or body with jurisdiction or authority to compel the production of information, or in order to protect or defend a legal interest;

#### **LINKS TO OTHER SITES AND ADVERTISEMENTS**

A CTC Service may contain links to other websites and services. While we try to link only to sites and services that share our high standards and respect for privacy, please understand that we are not responsible for the content of, or the privacy practices employed by, other companies or websites. This Privacy Policy applies only to CTC Services referencing this Privacy Policy.

#### **SECURITY**

The security of your Personal Information is important to us. CTC takes technical, contractual, administrative, and physical security steps to protect Personal Information that you provide to us. We instruct our employees with access to your Personal Information that it is to be used only in adherence with the principles set forth in this Privacy Policy and the laws applicable to each specific business.

In certain areas, such as when you provide credit card information to us, we work to help protect the security of your credit card information during transmission by using industry standard Secure Sockets Layer (SSL) encryption technology.

You can help protect the security of your Personal Information as well. For instance, never give out your password, since this is what is used to access your Account or Registration Information. Also remember to log out of your account and close your browser window when you finish using a CTC Service or surfing the Web, so that other people using the same computer won't have access to your information.

#### **CHANGES TO THIS PRIVACY POLICY**

CTC may from time to time change its Privacy Policy as new CTC Services are added or old ones changed. Changes will be effective when notice of such change is posted on CTC Website. Please check this Privacy Policy regularly for updates by checking the date of "Last Updated" at the top of this document.

#### **ADDITIONAL PRIVACY PROCEDURES**

Privacy procedures specific to a CTC Service can be found on CTC Website at the location of the particular CTC Service. Those procedures are an addendum to this policy, and are provided to you at the place where they will be of most use and relevance to you.

## **ACCESSING AND CHANGING ACCOUNT/ REGISTRATION INFORMATION**

CTC provides you with the means to access, update, edit or delete any Account or Registration Information you may have provided to us at any time on your own by going to the appropriate page in the Account or Registration section of the relevant CTC Service, and changing or deleting such information as desired.

If you decide at any time that you do not want to receive any e-mail materials to which you have subscribed, you may choose to unsubscribe to these e-mails by following the instructions at the bottom of the e-mail material.

## **MOBILE APPLICATION**

CTC collects and processes information provided directly by you when you install the CTC Complete WiFi App and register for an account to use the CTC Complete WiFi App. Specifically, this information includes:

- Your name, email address, location, user's phone or contact book data, user's inventory of installed apps, and user's screen recording;
- Browser information and session cookies related to your access and use of the CTC Complete WiFi app; Data insights attained based on correlation and analytics of your information collected in providing the CTC Complete WiFi app, which may be used in aggregated and dis-aggregated formats or to obtain trend analytics, to provide the CTC Complete WiFi app; and
- Use of the above-described collected information in aggregated and dis-aggregated formats to enhance our current CTC Complete WiFi app or to provide app features.

### **How CTC Uses the Information**

CTC uses the information collected as described in this Privacy Policy, including personal information, to:

- Provide you with the CTC Complete WiFi app;
- Implement, improve and/or enhance the CTC Complete WiFi app, including to make future releases available to you;
- Carry out obligations as described or authorized in the CTC Complete WiFi App Terms and Conditions and this Privacy Policy;
- Enforce CTC rights arising from the Agreement between you and CTC; and
- Fulfill any other purpose authorized by you and reasonably required for the CTC Complete WiFi app.

## **QUESTIONS, COMMENTS OR SUGGESTIONS**

If you have questions, comments or suggestions about this Privacy Policy or CTC privacy practices that were not answered here, please contact us at [marketing@goctc.com](mailto:marketing@goctc.com).