

## Chapin Telephone Company – Privacy Policy

Chapin Telephone Company (“the Company”) is committed to protecting its customers’ privacy. Please review this Privacy Policy to better understand how the Company collects information, how that information is used, and your options as to the collection and use of your information. This Privacy Policy is applicable to the Company’s customers and visitors to its website and is intended to provide information regarding the Company’s methods for collecting and use of information.

### What Types of Information Does the Company Collect?

Whether you are communicating with the Company or using its service, the Company may collect the following categories of personal information about you:

**Identifiers:** We may collect data that can identify a particular person such as a name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, e-mail address, account name, or other similar identifiers.

**Customer records information:** We may collect information pertaining to customers and their services including: name, signature, social security number, address, telephone number, employment information, bank account number, credit or debit card number, or other financial information.

**Commercial information:** We may collect records of products or services purchased, obtained, or considered or other purchasing or consuming histories or tendencies.

**Internet or other electronic network activity information:** We may collect information regarding your browsing history, search history, and information regarding your interactions with our website, applications, or advertisements.

**Geolocation data:** We may collect information regarding the precise geolocation information about a particular individual or device, especially when utilizing our website.

**Customer Proprietary Network Information (CPNI):** We may collect information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer that is made available to the Company solely by virtue of the Company-customer relationship and information in bills pertaining to telephone exchange service or telephone toll service received by a customer of Company, except subscriber list information.

## How do We Collect Information from You?

The Company may collect information from you through communications such as phone, mail, or through the services provided to you as a customer.

Information may be collected in the following ways:

- **Browsing Our Site**
  - IP addresses may be collected for the purposes of system administration, to gather broad demographic information, and to monitor the level of activity on our site.
  - Information may be collected regarding the referring URL, browser used to come to our site, and the pages of our site that you viewed during your visit and any search terms entered on our site.
  - Information may be collected using Internet Cookies which track, personalize, and save information. Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your own browser to remove cookies and to reject cookies. If you choose to remove or reject cookies, this could affect certain features or services of our website.
  - Emails may be sent by a customer to the Company on this website. The Company may retain the information in any email that you send to us, such as your name, email, address, or phone number.
  
- **Broadband Internet Service**
  - The Company may monitor the network and take measurements of network performance and the performance of your Internet connection to improve the customer's or the Company's overall service levels.
  - During communication with the Company for service support, we may also access information about your customer premise equipment such as computers and wireless devices or other device settings to provide customized technical support or to install specific applications or services for your use.
  - The Company reserves the right to access broadband traffic from individual accounts for the purpose of general maintenance and management of the network, as well as upon request by law enforcement officials.
  
- **Provision of Information by Third Parties**
  - The Company may obtain credit information about you from third parties when you purchase products or sign up for services with The Company.

## How is Your Personal Information Used?

The Company uses your information in connection with delivering its products and services to you. The Company may also use the information supplied to personalize portions of our service. Some of these personalized services are made available directly by the Company, while others may be offered by a partner. In addition, the Company may analyze and evaluate customer preferences, comments, and criticism of its offerings to make improvements to the present and future versions of the service.

The Company may use personal information it collects to provide you with information or better services. In addition, we may use the non-personal information we collect to provide you with a

better experience in the future. The Company does not rent, sell, or trade your private information to any non-affiliated third party.

### **With Whom Do We Share Your Information?**

- **With our Member/Customers:** The Company may share your personal information with our Member/Customers to make sure your experience is at the highest level possible and that you have the fullest service that the Company has to offer. This is subject to applicable legal restrictions, such as those that exist for Customer Proprietary Network Information (CPNI).
- **With Vendors that Perform Services for The Company:** We may share your personal information with vendors that perform services on our behalf and only as necessary for them to perform those services. We a) require those vendors to protect any personal information they may receive in a professional manner consistent with our policy and b) we will not provide personal information to anyone for the marketing of their own products and services without your consent.

### **Other Circumstances Which May Warrant Sharing Your Personal Information**

- Complying with any court ordered subpoenas or any other legal process.
- To assist with identity verification and prevent fraud and identity theft.
- Enforcing our agreement and property rights.
- Obtaining payments for products and services that appear on your The Company billing statements, or those of our Member/Customers, including the transfer or sale of delinquent accounts to third parties for collection.

### **Protection of Underage Children**

The Company' websites or usage of is not intended for children under the age of 13 years. The Company does not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register for use of any of our products or services. In the event The Company learns that we have collected personal information from a child under the age of 13 years without verification or parental consent, we will delete such information as quickly as possible.

### **How Does the Company Protect Your Personal Information?**

The Company takes reasonable precautions to protect your personal information. We use a combination of physical, administrative, and technical safeguards. Internally, we require employees to use secured access authentication and passwords to obtain customer information and we store electronic file information on a secure server, which is accessible only by authorized personnel.

No data transmission over the Internet can be guaranteed to be 100% secure and we will not be held liable should a third party illegally obtain your personal information via an Internet transmission. While we do our due diligence to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk.

## **How Long Do We Keep Your Information?**

We only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **Controls for Do-Not-Track Features**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## **How Does the Customer Provide Consent?**

By using the Company services, you agree with our Privacy Policy and practices and procedures contained herein regarding the collection and sharing of your information. To opt out of the sharing of your information for marketing purposes, please contact the Company at 989-661-2222.

## **Am I Entitled to Notification in the Event of a Data Breach?**

The Company will abide by all legally applicable data breach notification laws.

## **Will this Privacy Policy Change?**

The Company reserves the right to change, modify, or update this Privacy Policy at any time without notice. In the event of any modification, we will post the changes in this Privacy Policy so that you will know what information we are gathering and how we might use that information. However, if such changes are material, we will either announce the change on the home page of the site or take such other actions as we deem appropriate under the circumstances. Accordingly, you should periodically visit this page to determine the current Privacy Policy to which you are bound.