

# Privacy Policy

## Coastal Fiber Privacy Policy

Coastal Fiber, in partnership with Darien Telephone Company, is committed to respecting and protecting the privacy of our customers. As discussed below, we have strict policies governing access by employees and others to customer communications and information. We access customer accounts, records, or reports for authorized business purposes only. We educate our employees about their obligation to safeguard customer information and communications, and we hold them accountable for their actions. In short, privacy is a priority for Coastal Fiber in all aspects of our business.

This Customer Privacy Policy is divided into four sections: Section I: general principles that express Coastal Fiber's commitment to assuring strong and meaningful customer privacy protection; Section II: Coastal Fiber's protection of the confidentiality of Customer Proprietary Network Information (CPNI); Section III: Coastal Fiber's "Do Not Call" practices, which are designed to protect our customers from unwanted telemarketing; and Section IV: Coastal Fiber's contact information should you have any questions about this policy or Coastal Fiber's privacy practices more generally.

### General Privacy Principles

The following principles express Coastal Fiber's commitment to assuring strong and meaningful customer privacy protection, and are intended to guide Coastal Fiber's efforts to balance customer privacy with customer interest in receiving quality

services. These principles apply to our use of “individual” customer information – that is, information about specific customers. “Individual” customer information includes “personal information” – information particular to you, including your address, phone number, fax number and email address – and “non-personal information” that may include information such as your network traffic data, services and features used or call record details. These policies are fully consistent with applicable laws and regulations governing privacy, including the regulations of the Federal Communications Commission (“FCC”). Individual customer information is distinct from “aggregated” customer information, which does not reveal a customer’s identity. Further, the examples provided below are intended to be illustrative, not all-inclusive.

## **1. Coastal Fiber Obtains and Uses Individual Customer Information for Business Purposes Only.**

Coastal Fiber obtains and uses customer information that helps us to provide our customers with quality telecommunications services. In addition to supporting the direct provision of service, this information may be used to protect customers, employees, and property against fraud, theft or abuse; to conduct industry or consumer surveys; and to maintain good customer relations. Access to databases containing customer information is limited to employees who need that information to perform their jobs. These employees are required to follow strict rules when handling customer information, and are subject to disciplinary action if they fail to do so.

In order to better serve our customers, we may ask them questions to elicit additional information about their special needs and interests. For example, we may ask whether customers

work at home, whether any members of the household have special needs, or whether teenagers reside in the household in order to determine whether customers may be interested in or might benefit from additional lines or services. In all cases, the information we gather is used to facilitate the provision of quality customer service. We do not share this information with third parties to market non-Coastal Fiber services to our customers.

## **2. Coastal Fiber Collects Information from Customers in a Number of Different Ways.**

Coastal Fiber may collect information from you through communications such as via the web, or by phone, email or mail delivery, or through the services provided to you as the customer.

You may visit our site without divulging any personal information; however, there are areas of the website that might require personal information in order to contact Coastal Fiber directly, specifically, when registering e-mails, obtaining remote access, and contacting online technical support.

Information may also 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, which browser you 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.
- E-mails may be sent by the customer to Coastal Fiber on

this website. Coastal Fiber may retain the information in any e-mail that you send to us, such as your name, e-mail, address, or telephone number.

### **Broadband Internet Service**

- Coastal Fiber may monitor the network and take measurements of network performance and the performance of your Internet connection to improve the customer's, or Coastal Fiber's, overall service levels.
- During communications with Coastal Fiber for service support, we may also access information about your customer premise equipment such as computers and wireless modem devices or other device settings to provide customized technical support or to install specific applications or services for your use.
- Coastal Fiber reserves the right to access broadband traffic from individual accounts for the purposes of general maintenance and management of the network, as well as upon request by law enforcement officials.

### **Provision of Information by Third Parties**

Coastal Fiber may obtain credit information about you from third parties when you purchase products or services from Coastal Fiber.

### **Information Collected on Our Websites**

We collect data about visitors to our subscriber website, using some automated means such as Google Analytics, and reserve the right to use other methods such as cookies, clear GIFs, and passive automatic electronic collection. We may work with third-party companies to engage in such collection.

### **Log Files.**

Our log tracking collects visitors' IP addresses to analyze trends, administer our website, track visitor movement, and gather broad demographic information to help determine the type of information visitors are interested in seeing on our website. This tracking only collects IP addresses and not personally identifiable information. Visitors are not personally identifiable within our log files. Coastal Fiber only uses this information for internal purposes and does not share this information with non-affiliated companies or institutions.

### **Cookies.**

A "Cookie" is a piece of information that is sent from a Coastal Fiber web server to a visitor's browser and stored on the visitor's hard drive. Coastal Fiber uses Cookies when a customer or visitor orders a product or registers for a specific program. The Cookie stores information that allows Coastal Fiber's website to remember a customer or visitor the next time he or she visits it. Cookies also allow us to tailor our website to better match customers' or other visitors' interests and preferences. The applicable party may choose to disable Cookies by changing his or her browser settings; however, such party may not be able to access some of the information or features on our website after doing so.

## **3. Coastal Fiber Informs Customers Regarding How Information Is Used.**

Coastal Fiber uses customer information in a transparent fashion, and discloses to customers the types of information Coastal Fiber obtains about them how and when that information is used, when that information might be disclosed, the stringent measures we employ to protect that information, and ways that customers can restrict the use or disclosure of that information. This Privacy Policy is available on our website at

www.coastalfiber.com and from Coastal Fiber service representatives.

#### **4. Coastal Fiber Gives Customers Opportunities To Control Access to Information.**

Coastal Fiber is committed to providing customers with opportunities to control how Coastal Fiber uses customer information about them. Customers may opt out of our direct mailings and other service marketing programs. A customer may indicate a change in such preferences at any time by contacting Coastal Fiber customer service.

We do use individual customer information internally for planning purposes – so that we can, for example, develop, test and market new products and services that meet the needs of our customers. Ordinarily, such information is combined into aggregations that do not include individual customer identities. Under certain circumstances, we are required by law to disclose the aggregated information to other companies, but in such cases customer identities are not included.

#### **5. Coastal Fiber Enables Customers To Control How Coastal Fiber Discloses Individual Information.**

Ordinarily, Coastal Fiber will only share individual customer information with persons or entities outside the company to assist us in the provision of services to which the customer subscribes, or as required by law or to protect the safety of customers, employees, or property. We do not use third-party marketers, nor do we share access to individual customer information derived from the provision of Coastal Fiber

telecommunications services with other companies interested in marketing other services to our customers – and we would not do so without the consent of the customer. Coastal Fiber is committed to ensuring that customer information is not used without the knowledge and permission of our customers.

However, there are exceptions to our general practice. For example, unless you request otherwise, we may share certain non-sensitive information with our affiliated companies with whom we have established business relationships. In addition, if Coastal Fiber enters a merger, acquisition, or sale of all or a portion of its assets, a customer's personally identifiable information will, in most instances, be transferred as a part of the transaction, subject to required notices to affected customers. In addition, we may, where permitted by law, provide information to credit bureaus, or provide information and/or sell receivables to collection agencies, to obtain payment for Coastal Fiber billed products and services. We are also required by law to provide billing name and address information to a customer's long distance carrier and other telephone companies to allow them to bill for telecommunications services. (By law, customers with non-published or unlisted service have the right not to have their billing name and address disclosed when they make a calling card call or accept a collect or third party call. However, if they do restrict disclosure, they will be unable to make calling card calls or accept collect and third party calls.) Similarly, we are required to provide directory publishers with subscriber listing information – name, address, and phone number, and for yellow page advertisers, primary advertising classification – for purposes of publishing and delivering directories. In addition, under certain circumstances, we may share customer information with other carriers or with law enforcement, for example, to prevent and investigate fraud or other unlawful use of communications

services.

## **6. All Coastal Fiber Employees Are Responsible For Safeguarding Customer Communications and Information.**

Coastal Fiber takes reasonable precautions to protect your personal information against unauthorized access. Coastal Fiber requires Coastal Fiber personnel to be aware of and protect the privacy of all forms of customer communications as well as individual customer records. Coastal Fiber makes clear that employees who fail to comply with its privacy policies will face disciplinary action, which can include dismissal. All employees are trained regarding their responsibilities to safeguard customer privacy. We strive to ensure that information we have about our customers is accurate, secure, and confidential, and to ensure that our employees comply with our privacy policy.

We never tamper with, intrude upon or disclose the existence or contents of any communication or transmission, except as required by law or the proper management of our network. Access to databases containing customer information is limited to employees who need it to perform their jobs – and they follow strict guidelines when handling that information. We use safeguards to increase data accuracy and to identify and authenticate the sources of customer information. We use locks and physical security measures, sign-on and password control procedures, and internal auditing techniques to protect against unauthorized use of terminals and entry into our data systems. Coastal Fiber requires that records be safeguarded from loss, theft, unauthorized disclosure, and accidental destruction.

In addition, sensitive, confidential, or proprietary records are protected and maintained in a secure environment. It is our



policy to destroy records containing sensitive, confidential, or proprietary information in a secure manner. Hard copy confidential, proprietary, or sensitive documents are made unreadable before disposition or recycling, and electronic media must be destroyed using methods that prevent access to information stored in that type of media. Just as employees would report stolen property, missing records and suspicious incidents involving records are referred to Coastal Fiber Management. We encourage our employees to be proactive in implementing and enforcing Coastal Fiber's privacy policies. If employees become aware of practices that raise privacy or security concerns, they are required to report them to their supervisors.

Coastal Fiber's regulatory department is responsible for ensuring that all Coastal Fiber business units and their employees comply with privacy laws and regulations. Coastal Fiber also requires any consultants, suppliers, and contractors that may come into contact with customer proprietary information to observe these privacy rules with respect to any of our customers' individual customer information. They must abide by these principles when conducting work for us, and they will be held accountable for their actions.

## **7. Coastal Fiber Takes Special Care to Protect the Safety and Privacy of Young People Using Its Services.**

Coastal Fiber does not knowingly collect information about children. Coastal Fiber believes that children should get their parents' consent before giving out any personal information. Coastal Fiber encourages parents and legal guardians to participate in their child's experience using Coastal Fiber's services. Children should always ask a parent for permission

before sending personal information to Coastal Fiber.

## **8. Coastal Fiber Complies with All Applicable Privacy Laws and Regulations Wherever Coastal Fiber Does Business.**

Customer and policymaker perceptions of privacy have changed over time and will continue to do so. Changes in technology can also alter what is appropriate in protecting privacy. Laws may change accordingly. We regularly examine – and update as necessary -Coastal Fiber’s privacy policies and internal procedures to ensure compliance with applicable law and evolving technology. Coastal Fiber also will monitor customer needs and expectations. Coastal Fiber will work with policymakers and consumers to ensure that we continue to safeguard privacy, giving customers choices, flexibility and control. Coastal Fiber considers privacy laws and regulations to be the minimum standards to which we will adhere in protecting privacy. In addition to complying with the law, Coastal Fiber will adhere to its internal privacy policies and procedures wherever we do business.

## **9. Coastal Fiber Gives an Authorized Gov’t Agency Access to Customer Information Only Upon Valid Request.**

Coastal Fiber may release customer information in response to requests from governmental agencies, including law enforcement and national security agencies, in accordance with federal statutory requirements or pursuant to court order. Before releasing any customer information, Coastal Fiber will ensure that the underlying governmental request satisfies all procedural and substantive legal requirements and is otherwise proper. For example, Coastal Fiber will ensure that any court

orders are valid, properly issued, and legally enforceable. Except as required by law or with the approval of the customer, Coastal Fiber will not release any customer information in response to subpoenas or similar requests issued by private parties. Further, Coastal Fiber will be diligent in authenticating the validity of any “governmental” request to ensure that the request actually originates from an authorized government agency.

## **Further Information**

While we have made significant efforts 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. Unfortunately, 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 Internet transmission.

Coastal Fiber 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 always 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 action 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.

If you have any questions or comments concerning this Customer Privacy Policy, or if you believe that the Company has not adhered to its privacy policy, please [contact us](#), call Coastal Fiber’s customer service department. You may also contact Coastal Fiber via regular mail at Coastal Fiber, P.O. Box 575,

Darien, GA 31305.