



## Subscriber Privacy Policy

C Spire is committed to protecting and securely maintaining our customers' privacy. The following privacy policy applies to those customers who subscribe to C Spire's video programming, high-speed Internet and /or telephone service (individually and collectively "the Service") and describes the customer information that C Spire collects and retains, how C Spire uses and protects such information, the limited circumstances in which C Spire discloses certain information, and your rights pertaining to such information. Please review this policy, and if you are a telephone service subscriber, the Customer Proprietary Network Information ("CPNI") Policy set forth below, in conjunction with your terms of service and our acceptable use policy.

C Spire will communicate with you about this Policy annually and whether or not we have revised the policy. We will update this privacy policy as necessary and provide you with access to the most recent version by posting it on our website at <https://www.cspire.com>. We encourage you to review our policies (including our Acceptable Use Policy and Service Agreement) by visiting our website periodically for the latest information and updates. If you continue to use the Services following changes to our policies, whether or not you have reviewed them in full, we will consider that you have acted and consented to the policies and the changes. If you find these policies or any changes unacceptable, you have the right to tell us about them or cancel service.

You can learn more about your privacy rights by visiting the websites of the Federal Trade Commission at <https://www.ftc.gov> and the Federal Communications Commission at <https://www.fcc.gov>.

## Information Collected by C Spire

C Spire collects both personally identifiable and non-personal information about you when you subscribe to our Service. Personally identifiable information is any information that identifies or can potentially be used to identify, contact, or locate you. Personally Identifiable Information may include but is not limited to items such as the following: your name, service address, billing address, telephone number(s), social security number, driver's license number, demographic information, user ID's, passwords, email addresses, credit history, or other information obtained from third parties, bank account information, and credit card information, correspondence, repair or service requests, account notes, and related communications records. Personally identifiable information does not include information that is collected anonymously (i.e., without identification of the individual or household) or demographic information not connected to an identified individual or household.

Non-personal information, which may or may not be aggregated information about our Customers and may include information from third parties, does not identify individual Customers. C Spire may combine third party data with our business records as necessary to better serve our Customers. Examples of non-personal information include IP addresses, MAC addresses or other equipment identifiers, among other data. Our systems may automatically collect certain non-personal information when you use an interactive or transactional service. This information is generally required to provide the service and is used to carry out requests a customer makes through a remote control or set-top box.

We may also collect and maintain information about your account, such as billing, payment and deposit history; maintenance and complaint information; correspondence with or from you, information about the service options that you have chosen; information about the equipment you have, including specific equipment identifiers; and information about your use of our services, including the type, technical arrangement, quantity, destination and amount of use of certain of those services, and related billing for those services.

C Spire also collects customer-provided customization settings and preferences. By using our service, you consent to our collection of this information and other information communicated to C Spire such as correspondence, responses to surveys or emails, information provided in chat sessions with us, registration information, or participation in promotions or contests.

If you subscribe to our video service, then in certain of our systems, our set-top boxes automatically collect information that may be used to determine which programs are most popular, how many set-top boxes are tuned to watch a program to its conclusion and whether commercials are being watched, as well as other audience measurement focused information. Our processes are designed to track this information and audience statistics on an anonymous basis. Information such as channel tuning, the time the channel is changed, and when the set-top box is "on" or "off" is collected at a secure database in an anonymous format. C Spire, or our contractors or agents, may from time to time share anonymous information with our advertisers, content providers, or other third parties with whom we have a relationship. We will not provide our advertisers, content providers, or these other third parties with personally identifiable information about you unless we have received your consent first, except as required by law. (*See "Who sees the information collected by C Spire?"*)

## Reasons C Spire Collects Personally Identifiable Information

C Spire collects and uses personally identifiable information to properly deliver our Services to you; provide you with accurate and high quality customer service; perform billing, invoicing and collections; provide updates, upgrades, repairs or replacements for any of our service-related devices or software used in providing or receiving services; protect the security of the system, prevent fraud, detect

unauthorized reception, use, and abuse of C Spire's Services or violations of our policies or terms of service; keep you informed of new or available products and services; better understand how the Service is being used and to improve the Service; manage and configure our device(s), system(s) and network(s); maintain our accounting, tax and other records; and comply with applicable federal and state laws and regulations, as well as for the general administration of our business.

If you use an interactive or transactional service, for example, responding to a survey or ordering a pay-per-view event, the system will collect certain additional personally identifiable information, such as account and billing information or customer-provided locale and service preferences, to properly bill you for the services purchased and to provide you with a more personalized experience. In addition, certain information (such as your connections to our system) is automatically collected, for example, to make it possible for your digital boxes to receive and process the signals for the services you order.

C Spire may also collect personally identifiable information from third parties to enhance our customer database for use in marketing and other activities. C Spire also collects personally identifiable information from third parties to verify information you have provided us and collects personally identifiable information from credit reporting agencies to, for example, determine your creditworthiness, credit score, and credit usage. C Spire also may maintain research records containing information obtained through voluntary subscriber interviews or surveys.

If you subscribe to our high-speed Internet service, C Spire transmits personally identifiable and non-personal identifiable information about you over the Service when you send and receive e-mail and instant messages, transfer, and share files, make files accessible, visit websites, or otherwise use the Service and its features. Our transmission of this information is necessary to allow you to use the Service as you have chosen and to render the Service to you.

### **Persons Who See the Information Collected by C Spire**

C Spire will only disclose personally identifiable information to others if: (a) Customer provides written or electronic consent in advance, or (b) it is permitted or required under federal or applicable state law. Specifically, federal law allows C Spire to disclose personally identifiable information to third parties: when it is necessary to provide C Spire's services or to carry out C Spire's business activities; as required by law or legal process; or for mailing list or other purposes, subject to your ability to limit this last type of disclosure.

To provide services and carry out our business activities, certain authorized people have access to your information, including our employees, entities affiliated through common ownership or control with C Spire and third parties that provide and/or include: billing and collection services; installation, repair and customer service subcontractors or agents; program guide distributors; software vendors; program and other service suppliers for audit purposes; marketers of C Spire's products and services; third party auditors; our attorneys and accountants; and/or strategic partners offering or providing products or services jointly or on behalf of C Spire.

The frequency of disclosures varies according to business needs and may involve access on a regular basis. C Spire restricts third parties' use of your information to the purposes for which it is disclosed and prohibits third parties from further disclosure or use of your personally identifiable information obtained from us, whether for that third party's own marketing purposes or otherwise.

Unless you object in advance, federal law also allows C Spire to disclose through "mailing lists," personally identifiable information, such as your name, address and the level of your service subscription, to non-affiliated entities, including advertisers and marketing entities, for non-service-related purposes, including product advertisement, direct marketing and research. Under no circumstances will C Spire disclose to these advertising entities the extent of your viewing habits or the transactions you make over the system. C Spire, or our contractors or agents, may from time to time share non-personal and/or aggregate information such as the number of Service subscribers who match certain statistical profiles (for example, the number of subscribers in various parts of the country) with our advertisers, content providers, or other third parties with whom we have a relationship.

We may provide anonymous data to third parties who may combine it with other information to conduct more comprehensive audience analysis for us and for television advertisers. This data helps program networks and cable operators decide on which programs, channels, and advertising to carry. C Spire may also use that information to distribute targeted advertising to you without having disclosed any of your personally identifiable information to the advertisers. These advertisements may invite interactive or transactional follow-up from you. By using any of C Spire's interactive services, you consent to our collection of this additional information.

Unless you consent first or except as required by law, only anonymous information is disclosed to audience measurement services. As part of its business activities, if C Spire enters into a merger, acquisition, or sale of all or a portion of our assets, C Spire may transfer customers' personally identifiable and non-personal information as part of the transaction.

If you subscribe to our telephone service, your name, address and/or telephone number may be transmitted via Caller ID, published and distributed in affiliated or unaffiliated telephone directories, and available through affiliated or unaffiliated directory assistance operators. We take reasonable precautions to ensure that non-published and non-listed numbers are not included in the telephone directories or directory assistance services, although we cannot guarantee that errors will never occur. Please note that Caller ID blocking may not prevent the display of your name and/or telephone number when you dial certain business numbers, 911, 900 numbers



or toll-free 800, 866, 877 or 888 numbers.

If allowed by and after complying with any federal law requirements, C Spire may disclose personally identifiable information about Customer to representatives of government or to comply with valid legal process, except as provided below, disclosures shall not include records revealing customer's selection of video programming. Disclosures to representatives of government may be made pursuant to an administrative subpoena, warrant, court order, our reasonable discretion in cases of emergency or serious physical injury, or other permitted means. In these situations, C Spire may be required to disclose personally identifiable information about a Customer without Customer's consent and without notice to the Customer. Law enforcement agencies may, by federal or state court order, and without notice to you, obtain the right to install a device that monitors your Internet and e-mail use, including addresses of email sent and received and in some cases the content of those communications; and/or your use of our telephone service, including listings of incoming and outgoing calls and in some cases the content of those calls. In some instances where there are valid legal requests for or orders for disclosure of your information, we may notify you of the requests or orders and then it may be up to you to object or take specific action to prevent any disclosures pursuant to those requests or orders.

Where a governmental entity is seeking personally identifiable information of a Customer who subscribes to C Spire's video services only or records revealing customer's selection of video programming, the Cable Act requires a court order and that the video subscriber be afforded the opportunity to appear and contest in a court proceeding relevant to the court order any claims made in support of the court order. At such a proceeding, the Cable Act requires the governmental entity to offer clear and convincing evidence that the subject of the information is reasonably suspected of engaging in criminal activity and that the information sought would be material evidence in the prosecution of the case. Except in certain situations (such as with respect to those who owe or are owed welfare or child support) state welfare agencies may obtain the names, addresses, and certain other customer information as it appears in C Spire's subscriber records under the authority of an administrative subpoena.

We may also use or disclose personally identifiable information about you without your consent (a) to protect our Customers, employees, or property, (b) in emergency situations, (c) to enforce our rights in court or elsewhere, or directly with you, for violations of service terms, conditions or policies and/or (d) in order to comply with the Digital Millennium Copyright Act or as otherwise required by law, for example, as part of a regulatory proceeding.

### **Your Right to Limit Our Use and Disclosure of Personally Identifiable Information**

If you do not want your name, address, level of service or other personally identifiable information disclosed to third parties in a "mailing list" as explained above, please register this preference by contacting us in writing or by telephone at 800-735-9546. Customers of our video service may not opt-out of the collection of audience measurement data.

Also, if you do not want to receive marketing messages (e.g., phone calls, emails, and direct mail) from C Spire, you may call 800-735-9546 or make a written request to have your privacy preferences updated. Please note that such request will not eliminate all telephone calls, emails or direct mail sent to you from C Spire as we may continue to send non-marketing account-related messages to you.

### **What to Do if You Believe C Spire Has Violated Your Rights**

You may enforce the limitations imposed on us by federal law with respect to the collection and disclosure of personally identifiable subscriber information about you, through a civil action under federal law, in addition to other rights and remedies that may be available to you under federal or other applicable laws.

### **C Spire's Retention of Personally Identifiable Information**

C Spire will maintain personally identifiable information about you as long as you are a subscriber to C Spire's Service and as long as necessary for the purpose for which it was collected. If you are no longer a subscriber to any C Spire Service and the information is no longer necessary for the purpose for which it was collected, C Spire will only keep personally identifiable information as long as necessary to comply with laws governing our business. These laws include, but are not limited to, tax and accounting requirements that require record retention. C Spire will also maintain personally identifiable information to satisfy pending requests for access by a subscriber to his/her information or pursuant to a court order. C Spire will destroy customers' personally identifiable information when the information is no longer necessary for the purpose for which it was collected, when there are no longer pending requests for such information, and when it is no longer necessary to retain the information under applicable laws.

### **C Spire's Protection of Customer Information**

C Spire takes the security of our customers' personally identifiable information seriously. C Spire takes such actions as are reasonably necessary to prevent unauthorized access by entities other than C Spire to personally identifiable information. C Spire uses security and/or encryption technology to secure certain sensitive personally identifiable information when it collects such information over the system. C Spire restricts access to its customer database and secures the content by use of firewalls and other security methods. C Spire limits access to databases containing customers' personally identifiable information to those specifically authorized employees and agents of C Spire and other parties identified in the "Who sees the information collected by C Spire?" section above. However, we



cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information.

You need to help protect the privacy of your own information. You and others who use your equipment must not give identifying information to strangers or others whom you are not certain have a right or need to the information. You also must take precautions to protect the security of any personally identifiable information that you may transmit over any home networks, wireless routers, wireless fidelity (WiFi) networks or similar devices by using encryption and other techniques to prevent unauthorized persons from intercepting or receiving any of your personally identifiable information. You are responsible for the security of your information when using unencrypted, open access or otherwise unsecured networks in your home.

### **Type of Information that C Spire Collects**

You have a right under the Cable Act to see your personally identifiable information that C Spire collects and maintains. The information C Spire has about its Customers is maintained at the local offices where service is provided, in our systems, and at our corporate headquarters. If you would like to see your information, please send a written request to your local C Spire office. To find the location of your local office please visit <https://www.cspire.com>. C Spire will be glad to make an appointment for you to come in to your local office during regular business hours. If your review reveals an error in our records, please let us know and C Spire will correct it. You may also be able to access certain information about you and/or your account by telephone or online at <https://www.cspire.com>, depending upon the information you have provided.

### **Children's Privacy**

C Spire is concerned about children's privacy and does not knowingly collect personally identifiable information from anyone under the age of 13 over its Service unless otherwise expressly identified. At those specific parts of our Service, C Spire will provide a special notice or other information describing the additional privacy protections that may apply. C Spire urges children to always obtain a parent or legal guardian's permission before sending any information about themselves over the Internet and urges parents and legal guardians to be vigilant regarding children's Internet usage. Other third-party services or web pages accessed through C Spire's Service may have different policies on collection of information pertaining to children and you should consult their privacy policies and read their notices if you have any concerns about the collection or use of such information by those entities.

### **Cookies and Web Beacons**

A cookie is a small file that stores information in your browser on your computer. C Spire places cookies in your browser that contain some of the information you provide when you register with us and when you set up a personalized service or customize your settings and preferences on our website. C Spire does not store highly sensitive personal information such as your password, e-mail address or credit card number in cookies. Cookies enable C Spire to summarize overall usage patterns for analysis. In addition, C Spire uses cookies to provide personalized services. This improves your online experience by adjusting to your preferences and tastes by remembering you and any options you select. You can control what cookies are accepted by your computer through the settings on your web browser or by deleting them from your files. Doing so, however, may limit the personalization available to you and your access to sections of our website.

A web beacon is an invisible graphic on a web page that is programmed to collect non-personally identifiable information about your use of a given site. Like cookies, web beacons allow C Spire and its technology providers to summarize overall usage patterns for our analysis and provide personalized services. C Spire does not share or provide personally identifiable information we may collect, such as names, e-mail addresses and phone numbers with our advertisers without your express permission. However, C Spire may provide site usage information linked to your personally identifiable information to law enforcement or others in compliance with valid legal process.

### **Targeted Marketing**

C Spire wants to make its advertisements for its goods and services more relevant to you. C Spire collects and uses non-personal information, such as information about your visits to our websites and IP address, and personally identifiable information, such as information you provide C Spire and from your C Spire account, to identify and present such tailored advertisements for C Spire's goods and services. In addition, C Spire may partner with a third-party advertising company who may utilize cookies, web beacons, or other technology to deliver or facilitate the delivery of targeted advertisements about C Spire's goods and services on third-party websites. C Spire will not provide this partner with access to your name, address, e-mail address, telephone number or other personally identifiable information. When these targeted online advertisements are based on your personally identifiable information and displayed on third-party websites, you may opt-out by requesting to have your privacy preferences updated. After doing so, we recommend that you also remove any unwanted cookies from your browser.

### **Additional Information**

If you have any questions about our privacy protections and policies, please contact your local customer service office. You can find the phone number for your local customer service office on your monthly bill statement or by visiting our website at <https://www.cspire.com>.



## **Residential Customer Proprietary Network Information (CPNI) Policy**

The following CPNI Policy is in addition to requirements set forth in C Spire's Subscriber Privacy Policy and is subject to some permitted uses and disclosures of your name, address, and/or telephone number outlined in the Subscriber Privacy Policy. The information that we have (1) relating to the quantity, technical configuration, type, destination, location, and amount of your use of voice service, and / or (2) contained on your bill concerning the voice services that you receive is subject to additional privacy protections. That information, when matched to your name, address, and telephone number is known as Customer Proprietary Network Information (CPNI). Examples of CPNI include information typically available from details on a customer's monthly bill - the type of line, technical characteristics, class of service, current voice service charges, long distance and local service billing records, directory assistance charges, usage data, and calling patterns.

As a subscriber to our voice services, you have the right, and C Spire has a duty, under federal law to protect the confidentiality of CPNI. C Spire offers many communications-related services, such as, for example, C Spire Internet services. From time to time we would like to use the CPNI information we have on file to provide you with information about our communications-related products and services or special promotions. Our use of CPNI may also enhance our ability to offer products and services tailored to your specific needs. We would like your approval so that we, our agents, affiliates, joint venture partners, and independent contractors may use this CPNI to let you know about communications-related services other than those to which You currently subscribe that we believe may be of interest to you. You do have the right to restrict this use of CPNI.

IF WE DO NOT HEAR FROM YOU WITHIN 30 DAYS OF THIS NOTIFICATION, WE WILL ASSUME THAT YOU APPROVE OUR USE OF YOUR CPNI FOR THE PURPOSES OF PROVIDING YOU WITH INFORMATION ABOUT OTHER COMMUNICATIONS-RELATED SERVICES. YOU HAVE THE RIGHT TO DISAPPROVE OUR USE OF YOUR CPNI, AND MAY DENY OR WITHDRAW OUR RIGHT TO USE YOUR CPNI AT ANY TIME BY CALLING THE TELEPHONE NUMBER REFLECTED ON YOUR MONTHLY BILLING STATEMENT OR 800-735-9546. We will also honor any restrictions applied by state law, to the extent applicable. C Spire also offers various other services that are not related to the communications services to which you subscribe. Under the CPNI rules, some of those services, such as C Spire video services, are considered to be non-communications related services.

Occasionally, you may be asked during a telephone call with one of our representatives for your oral consent to C Spire's use of your CPNI for the purpose of providing you with an offer for products or services not related to the voice services to which you subscribe. If you provide your oral consent for C Spire to do so, C Spire may use your CPNI for the duration of such voice call in order to offer you additional services. Any action that you take to deny or restrict approval to use your CPNI will not affect our provision to you, now or in the future, of any service to which you subscribe. You may disregard this notice if you previously contacted us in response to a CPNI Notification and denied use of your CPNI for the purposes described above. Any denial of approval for use of your CPNI outside of the service to which you already subscribe is valid until such time as your telephone services are discontinued or you affirmatively revoke or limit such approval or denial.