

## Wellman Cooperative Telephone Association

### Video Subscriber Privacy Notice

**Your Legal Rights.** As a subscriber to Wellman Cooperative Telephone Association (WCTA) cable/video service or to other services provided over the video system, you are entitled to this notice regarding WCTA's 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 WCTA or that WCTA has 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 WCTA may collect and the ways WCTA may use this information
- Under what circumstances and to what parties WCTA may disclose personally identifiable information
- How long WCTA 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.** WCTA collects personally identifiable information as needed to provide cable/video service or other services to subscribers or to detect unauthorized reception of service. The Cable Act prohibits WCTA from using the video system to collect personally identifiable information about you for any other purpose without your prior written or electronic consent. The personally identifiable information WCTA collects typically includes but is not necessarily limited to: name, address, telephone number, social security number, and credit card or bank account information. WCTA 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, WCTA may have a record of whether landlord permission was required to install WCTA 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, WCTA also may collect information such as your locality and the service preferences you indicate through your voluntary interaction with the system. WCTA may also maintain research records containing information obtained through voluntary subscriber interviews or surveys.

**Use of Your Information.** As permitted by the Cable Act, WCTA uses personally identifiable information in order to provide cable/video service and other services to you, and to help WCTA 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 WCTA 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 WCTA to understand the use of, and identify improvements to, WCTA services
- To prevent fraud, including the unauthorized use of WCTA service
- To operate and safeguard WCTA's network and systems
- For legal, accounting and other purposes related to WCTA's business
- To ensure WCTA's compliance with the law
- For other purposes related to WCTA's business which WCTA clearly identifies at the time WCTA request the information

**Disclosure of Your Information.** WCTA follows industry-standard practices to prevent unauthorized use, disclosure or access to personally identifiable information. WCTA considers all personally identifiable information contained in WCTA's business records to be confidential. WCTA is, 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 WCTA's video systems or as required by law or legal process. WCTA may also use or disclose personally identifiable information about you without your consent to protect WCTA customers, employees or property, in emergency situations, and to enforce WCTA's rights under WCTA's terms of service and policies, in court or elsewhere. WCTA's disclosure of personally identifiable information to other parties (such as WCTA's 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, WCTA may engage such parties to assist in billing and collections, administration, surveys, marketing, service delivery and customization, maintenance and operations, and fraud prevention. WCTA may also disclose personally identifiable information about you to outside auditors and regulators. WCTA 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 the video system. In the event of a merger, acquisition, or sale of all or a portion of WCTA's assets, WCTA subscribers' personally identifiable information will, in most instances, be transferred as part of the transaction.

**Disclosure Required by Law.** WCTA makes every reasonable effort to protect WCTA subscribers' privacy as described in this notice; however, WCTA 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 WCTA 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, WCTA is 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 WCTA 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 WCTA's 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 WCTA is required by law to make the disclosure. Before WCTA ever makes subscriber name and address information available to any other parties, WCTA will provide you with notice and an opportunity to prohibit or limit such disclosure.

**Maintaining Your Information.** WCTA will maintain personally identifiable information about you no longer than necessary for the purpose for which it was collected. This means WCTA 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. WCTA will destroy the information if WCTA has no pending requests, orders or court orders for access to this information, after WCTA determines 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 WCTA a written request using the contact information as listed on your monthly statement for cable/video service. WCTA 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, WCTA will work with you to ensure that the appropriate corrections are made. WCTA reserves 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 WCTA immediately. WCTA will take immediate steps to address your concerns. If you believe that you have been aggrieved as a result of WCTA's violation of applicable provisions of the Cable Act, you may enforce the limitations imposed on WCTA 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, WCTA will provide you with a copy of WCTA's subscriber privacy notice on an annual basis. WCTA may modify this notice at any time. WCTA 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, WCTA will consider such continued use as your acceptance of the change.