

TOMBIGBEE COMMUNICATIONS CUSTOMER PRIVACY POLICY

This Customer Privacy Policy applies to Phone, Internet, and related services (“Services”) delivered by Tombigbee Communications, LLC, an Alabama limited liability company doing business as Tombigbee Communications.

This Customer Privacy Policy has been provided to you in your Welcome Kit and is also available online under “Legal Notices” at www.freedomfiber.com.

Why is Tombigbee Communications Providing This Policy to Me? Tombigbee Communications believes it is important for each subscriber to its Services to know how we collect, store and use our customer’s personally identifiable information. Furthermore, as a subscriber to services provided by Tombigbee Communications, you may be entitled under Section 631 of the Federal Cable Communications Policy Act of 1984, as amended (the “Cable Act”), to know the following:

- the limitations imposed by the Cable Act upon cable operators in the collection and disclosure of personally identifiable information about subscribers;
- the nature of personally identifiable information we collect;
- the nature of the use of personally identifiable information;
- under what conditions and circumstances we may disclose personally identifiable information and to whom;
- the period during which we maintain personally identifiable information;
- the times and place at which you may have access to your personally identifiable information; and
- your rights under the Cable Act concerning personally identifiable information and its collection and disclosure.

Personally identifiable information is information that identifies a particular person; it does not include aggregate data that does not identify a particular person or persons.

In addition, Section 702 of the Federal Telecommunications Act of 1996, as amended, (the “Telecommunications Act”) provides additional privacy protections for certain information related to our phone services:

- information about the quantity, technical configuration, type, destination, location, and amount of your use of the phone services; and
- information contained on your telephone bill concerning the phone services you receive.

That phone information, when matched to your name, address, and telephone number is known as Customer Proprietary Network Information (“CPNI”). This notice, which includes our CPNI Policy, describes what CPNI information we obtain, how we protect it, and how it may be used. If you are a customer of our phone services, you have the right, and Tombigbee

Communications has a duty, under the Federal Telecommunications Act, to protect the confidentiality of CPNI. We will also honor any restrictions applied by state law, to the extent applicable.

WE EXPLAIN BELOW UNDER SECTION IV. CUSTOMER ACCESS AND CHOICE “HOW DO I GIVE OR WITHHOLD MY APPROVAL FOR TOMBIGBEE COMMUNICATIONS TO USE CPNI TO MARKET ADDITIONAL PRODUCTS AND SERVICES TO ME?” HOW YOU CAN APPROVE OUR USE OF CPNI OR WITHDRAW YOUR APPROVAL.

Special Note: Our CPNI Policy applies to the telephone communications-related services provided by Tombigbee Communications. The term “you” refers to you as a subscriber to one or more of our Services.

I. COLLECTION

What Kind of Information Does This Notice Apply To? The Cable Act applies to personally identifiable information furnished to a cable provider or that a cable provider has collected using its cable system, in connection with the provision of cable service or other services. While we do not believe that the Cable Act is currently applicable to Tombigbee Communications, we have nevertheless elected to adopt many of the privacy policies required by the Cable Act to provide further assurances to our customers about how their personally identifiable information is collected and treated. The Telecommunications Act applies to CPNI related to our regulated phone services, and certain orders of the Federal Communications Commission (“FCC”) apply the CPNI rules to our interconnected voice over Internet protocol communications services. This notice applies to our high-speed Internet service and our phone services as provided for by applicable law and except as otherwise noted.

Special Note: This notice only covers information that is collected by Tombigbee Communications in connection with the provision of our telecommunication services to you as a subscriber to one or more of these Services. It does not cover information that may be collected through any other products, services, or websites, even if accessed through our Services and even if co-branded with them. You should read the privacy policies for these other products, services, and websites to learn how they handle your personal information.

The Telecommunications Act authorizes us to use, disclose, or permit access to individually identifiable CPNI in our provision of:

- the telecommunications service from which this information is derived; or
- services necessary to, or used in, the provision of these services, including the publishing of directories.

The Telecommunications Act prohibits us from using CPNI for any purposes other than those listed above except as permitted or required by law or with your approval.

What Kind of Personally Identifiable Information and CPNI Does Tombigbee Communications Collect? Tombigbee Communications collects information from you at several different points when you initiate and use our Services. Some of this information is personally identifiable information, but much of it is not. We collect certain personally identifiable information that our subscribers furnish to us in connection with the provision of Services. In order to provide reliable, high quality service to you, we keep regular business records containing information about you that may constitute personally identifiable information. These records include some, but typically not all, of the following information:

- your name;
- billing address;
- telephone number;
- social security number;
- credit card number; and
- service address;
- E-mail address;
- driver's license number;
- bank account number;
- other similar account information.

With respect to phone services, examples of CPNI include information typically available from telephone-related details on your monthly bill, such as:

- location of service;
- type of service;
- amount of use of service;
- and other information contained on your bill for local and long distance services.
- technical configuration of service;
- quantity of service;
- calling patterns;

CPNI does not include your name, address, and telephone number, because the Telecommunications Act classifies that information as "subscriber list information" which is not subject to the protections applicable to CPNI. However, that information is also subject to certain protections as described below under **Section III. DISCLOSURE "To Whom May Tombigbee Communications Disclose Personally Identifiable Information?"**

We also collect and maintain certain other information about your account. For example, this information may include:

- billing, payment, and deposit history;
- additional service information;
- records indicating the number of gateways and telephones connected to our system;
- maintenance and complaint information; and
- additional information about the service options you have chosen.

Some of our Services permit you to establish secondary accounts, and if you do so we collect similar information in order to establish and service the secondary accounts. During the initial

provisioning of our Services, and during any subsequent changes or updates to our Services, Tombigbee Communications may collect technical information about your computer hardware and software, telephones, and/or other service-related devices, and customization settings and preferences. Additionally, if you rent your residence, we may have a record of whether landlord permission was required prior to installing our facilities necessary to provide Services as well as your landlord's name and address.

II. USE

How Does Tombigbee Communications Use Personally Identifiable Information and CPNI? We

collect, maintain, and use personally identifiable information and CPNI as permitted by the Cable Act and the Telecommunications Act and other applicable laws. We use this information primarily to conduct business activities related to providing you with our Services, and to help us detect theft of service. Generally speaking, we use personally identifiable information in connection with:

- billing and invoicing;
- surveys;
- marketing;
- maintenance and operations;
- hardware and software upgrades; and
- administration;
- collection of fees and charges;
- service delivery and customization;
- technical support;
- fraud prevention.

More specifically, we also use personally identifiable information to:

- install, configure, operate, provide, support, and maintain our Services;
- confirm you are receiving the level(s) of Service requested and are properly billed;
- identify you when changes are made to your account or services;
- make you aware of new products or services that may be of interest to you;
- understand the use of, and identify improvements to, our Services;
- detect unauthorized reception, use, or abuse of our Services;
- determine whether there are violations of any applicable policies and terms of service;
- manage the network supporting our Services;
- configure Services and other service-related devices; and
- comply with state and federal law.

The Telecommunications Act further permits Tombigbee Communications to use, disclose, and permit access to CPNI obtained from our customers, either directly or indirectly, to:

- initiate, render, bill, and collect for telecommunications services;
- protect our rights and property, and protect our users of these services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, these services;
- provide any inbound telemarketing, referral, or administrative services to you

- for the duration of the call, if you initiated the call and you approve of the use of this information to provide these services; and
- to provide call location information concerning the user of a commercial mobile phone service.

With respect to phone services, unless we obtain your approval in accordance with our policies described below under **Section IV. CUSTOMER ACCESS AND CHOICE “How Do I Give or Withhold My Approval for Tombigbee Communications to Use CPNI to Market Additional Products and Services to Me?”** Tombigbee Communications may not use CPNI to market products and services to you other than the phone services.

Tombigbee Communications transmits, and may collect and store for a period of time, personally identifiable and non-personally identifiable information about you when you use our high-speed Internet and phone services to:

- send and receive E-mail, video mail, and instant messages;
- transfer and share files;
- make files accessible;
- visit websites;
- place or receive calls;
- leave and receive voice-mail messages;
- establish custom settings or preferences;
- communicate with us for support; or
- otherwise use the services and their features.

Our transmission, collection, and storage of this information is necessary to render the Services. In certain situations, third-party service providers may transmit, collect, and store this information on our behalf to provide features of our Services. These third parties are not permitted to use your personally identifiable information except for the purpose of providing these features.

We may also combine personally identifiable information, which we collect as described in this notice as part of our regular business records, with personally identifiable information obtained from third parties for the purpose of creating an enhanced database or business records. We may use this database and these business records in marketing and other activities related to our Services. We also maintain records of research concerning subscriber satisfaction and viewing habits, which are obtained from subscriber interviews and questionnaires.

III. DISCLOSURE

When May Tombigbee Communications Disclose Personal Information to Others in Connection with Phone Service? Tombigbee Communications may disclose to others

personally identifiable information in connection with features and services such as Caller ID, 911/E911, and directory services as follows:

- We may transmit your name and/or telephone number to be displayed on a Caller ID device unless you have elected to block such information. Please note that Caller ID blocking may not prevent the display of your name and/or telephone number when you dial certain business or emergency numbers, 911, 900 numbers, or toll-free numbers with prefixes like 800, 888, 877, or 866.
- We may provide your name, address, and telephone number to public safety authorities and their vendors for inclusion in E911 databases and records, inclusion in “reverse 911” systems, or to troubleshoot 911/E911 record errors.
- We may publish and distribute, or cause to be published and distributed, telephone directories in print, on the Internet, and on disks. Those telephone directories may include subscriber names, addresses, and telephone numbers, without restriction to their use.
- We may also make subscriber names, addresses, and telephone numbers available, or cause such subscriber information to be made available, through directory assistance operators.
- We may provide subscribers’ names, addresses, and telephone numbers to unaffiliated directory publishers and directory assistance providers for their use in creating directories and offering directory assistance services.
- Once our subscribers’ names, addresses, and telephone numbers appear in telephone directories or directory assistance, they may be sorted, packaged, repackaged and made available again in different formats by anyone.

We take reasonable precautions to ensure that non-published and unlisted numbers are not included in our telephone directories or directory assistance services, but we cannot guarantee that errors will never occur.

When is Tombigbee Communications Required by Law to Disclose Personally Identifiable Information and CPNI? We make every reasonable effort to protect subscriber privacy as described in this notice. Nevertheless, we may be required by law to disclose personally identifiable information or individually identifiable CPNI about a subscriber. These disclosures may be made with or without the subscriber’s consent, and with or without notice, in compliance with the terms of valid legal process such as a subpoena, court order, or search warrant.

Tombigbee Communications may be required to disclose personally identifiable information and individually identifiable CPNI to a private third party in response to a court order, and we may be required to notify the subscriber of the court order. For example, Tombigbee Communications may be required to disclose personally identifiable information and individually identifiable CPNI about subscribers to high-speed Internet and phone services to a government entity in response to a subpoena, court order, or search warrant. We are usually

prohibited from notifying the subscriber of any disclosure of personally identifiable information to a government entity by the terms of the subpoena, court order, or search warrant.

How Does Tombigbee Communications Protect Personally Identifiable Information? We follow industry-standard practices to take such actions as are necessary to prevent unauthorized access to personally identifiable information by a person other than the subscriber or us. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information.

How Long Does Tombigbee Communications Maintain Personally Identifiable Information? Tombigbee Communications maintains personally identifiable information about you in our regular business records while you are a subscriber to our Services. We also maintain this information for a period of time after you are no longer a subscriber if the information is necessary for the purposes for which it was collected or to satisfy legal requirements. These purposes typically include business, legal, or tax purposes. If these purposes no longer apply, we intend to destroy the information according to our internal policies and procedures.

IV. CUSTOMER ACCESS and CHOICE

How Can I See My Personally Identifiable Information or CPNI and Correct It, If Necessary? You may examine and correct, if necessary, the personally identifiable information regarding you that is collected and maintained by Tombigbee Communications in our regular business records. In most cases, the personally identifiable information contained in these records consists solely of billing and account information. We will correct our records if you make a reasonable showing that any of the personally identifiable information we have collected about you is inaccurate.

You may examine the records containing your personally identifiable information at the Tombigbee Communications office located at 3196 County Hwy 55, Hamilton, AL 35570, upon reasonable prior notice to us and during our regular business hours. If you wish to examine these records, please contact us by mail or telephone at 205-921-6712, giving us a reasonable period of time to locate and, if necessary, prepare the information for review, and to arrange an appointment. You will only be permitted to examine records that contain personally identifiable information about your account and no other account. Appropriate photo-identification, such as a driver license, will generally be required.

If you make an affirmative, written request for a copy of your CPNI, we will disclose the relevant information we have to you at your account address of record, or to any person authorized by you, if we reasonably believe the request is valid. However, subscribers to our phone services should be aware that we generally do not provide them with records of any inbound or outbound calls or other records that we don't furnish in the ordinary course of business (for example, as part of a bill) or which are available only from our archives, without valid legal process such as a court order. In addition, we cannot correct any errors in customer names, addresses, or telephone numbers appearing in, or omitted from, our or our vendors' directory

lists until the next available publication of those directory lists. Further, we may have no control over information appearing in the directory lists or directory assistance services of directory publishers or directory assistance providers which are not owned by us or our subsidiaries.

Tombigbee Communications reserves the right to charge you for the cost of retrieving and photocopying any documents or records that you request.

How Do I Give or Withhold My Approval for Tombigbee Communications to Use CPNI to Market Additional Products and Services to Me?

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. IF YOU DO NOT APPROVE, YOU MUST AFFIRMATIVELY TELL US BY OPTING OUT OF THIS USE OF CPNI. You may deny or restrict our right to use your CPNI for this purpose by calling the numbers listed below.

If you deny or restrict your approval for us to use your CPNI, you will suffer no adverse effect, now or in the future, on how we provide any Services to which you subscribe. Any denial or restriction of your approval remains valid until your Services are discontinued or you affirmatively revoke or limit such approval or denial.

How Do I Place Myself on Tombigbee Communications’s “Do Not Call” and/or “Do Not Mail” Lists?

You may contact Tombigbee Communications at 205-921-6712 to ask us to put your name on our internal company “do not call” and “do not mail” lists so that you do not receive marketing or promotional telephone calls or postal mail from us or made at our request. You also have the right to prohibit or limit disclosure of your personally identifiable information for “mailing list” or other purposes as described above in this notice by contacting us at 205-921-6712.

Tombigbee Communications’ use of your account information for marketing and promotional activities is also subject to your right to limit or restrict us from making those offers as described above in “How do I give or withhold my approval for Tombigbee Communications to use CPNI to market additional products and services to me?” in this notice.

If you prefer to contact Tombigbee Communications in writing instead of by telephone, you may send a written request to the address listed below under “How do I contact Tombigbee Communications?” Be sure to include your name and address, your Tombigbee Communications account number, and a daytime telephone number where you can be reached in the event we have any questions about your request. The written request should be signed by the person who is identified in our billing records as the subscriber. If you have a joint account, a request by one party will apply to the entire account. If you have multiple accounts, your notice must separately identify each account covered by the request.

What E-mail Communications Will Tombigbee Communications Send to Me and How Do I Manage Them? We may send a welcome E-mail and sometimes other information to new subscribers to our Services (including each new secondary account holder, where applicable). We may also send service-related announcements to our subscribers from time to time. For example, we may send you an E-mail announcement about a pricing change, a change in operating policies, a service appointment, a maintenance event, or new features of one or more of the Services you receive from us. You may not opt-out of these service-related communications. If you fail to check your primary E-mail address for service-related announcements, you may miss important information about our Services, including legal notices, for example.

We reserve the right to send you promotional or commercial E-mail as permitted by applicable law. You can manage the promotional or commercial E-mails Tombigbee Communications may send to you by following the instructions contained in the E-mails.

What Can I Do If I Think My Privacy Rights Have Been Violated? If you believe that you have been aggrieved by any act of ours in violation of the Cable Act or other applicable law, we encourage you to contact us directly as described below in “How do I contact Tombigbee Communications?” in order to resolve your question or concern. You may also be entitled to enforce the limitations imposed on us by applicable law with respect to your personally identifiable information through a civil lawsuit seeking damages, attorney’s fees, and litigation costs. Other rights and remedies may also be available to you under federal or other applicable laws.

Will Tombigbee Communications Notify Me If It Changes This Notice? Tombigbee Communications reserves the right to modify this notice at any time. We will notify you of any material changes through written, electronic, or other means and as otherwise permitted by law. If you find the changes to this notice unacceptable, you have the right to cancel your Services. If you continue to use the Service following notice of the changes, we will consider that to be your acceptance of and consent to the changes in the revised privacy notice. This includes your consent for any personally identifiable information that we may collect and use starting on the effective date of the revised notice, as well as for any personally identifiable information that we have collected prior to the effective date of the revised notice.

How Do I Contact Tombigbee Communications? If you have any questions or suggestions regarding this privacy notice, or wish to contact us about your personal information, please reach us as follows:

- **Phone:** 205-921-6712
- **Web site:** www.freedomfiber.com
- **Mail:** 3196 County Hwy 55, Hamilton, AL 35570

Tombigbee Communications reserves the right to modify this Customer Privacy Policy at any time in its sole and absolute discretion. Changes and modifications will be effective when

posted and any use of the Services after the posting of any changes will be considered acceptance of those changes.

This Tombigbee Communications Customer Privacy Policy was last updated on October 27, 2017.