

**Granby Telephone Company/GTC Broadband
Disclosures Concerning Internet Service**

PRIVACY POLICY

This Privacy Policy covers GTC Broadband and GTC Telephone Company and their affiliated companies (collectively "GTC" or "Provider") and provides notice of how GTC collects, uses, and shares customer information in the course of providing its services. GTC recognizes the importance of customer privacy and seeks to ensure that customer information remains protected, regardless of how GTC receives personal information – whether in person at its office, online, over the telephone, or through the services GTC provides. Provider may use third parties to assist or provide various services or support to be used by our customers. Provider may provide these third parties with customer information in order to provide the services and support. Otherwise, Provider will not release the personal information you have entrusted to our company to other people, companies or agencies without a signed consent form from you, except as required by law or subpoena by a court or administrative agency of competent jurisdiction. Provider may collect different types of personal and other information based on your use of our products and services and our business relationship with you.

Some examples include:

1. Contact Information that allows us to communicate with you -- including your name, address, telephone number, and email address;
2. Billing information related to your financial relationship with us -- including your payment data, credit history, credit card number, Social Security numbers, security codes, and service history;
3. Equipment, Performance, Provider Website Usage, Viewing and other Technical Information about your use of our network, services, products or websites.
4. We may use the information we collect in a variety of ways, including to; provide you with the best customer experience possible; provide the services you purchase, and to respond to your questions; communicate with you regarding service updates, offers, and promotions; address network integrity and security issues; investigate, prevent or take action regarding illegal activities, violations of our Terms of Service or Acceptable Use Policies; and provide local directory and directory assistance.

5. Electronic mail ("email") and other transmissions passing through or over the Internet and through Provider's systems are not secure, and Provider cannot guarantee the security or privacy of any of your information or communications. Provider will not intentionally monitor or disclose any private electronic communications, except to the extent necessary to identify or resolve system problems or as otherwise permitted or required by law.

Sharing of Customer Information

GTC provides related services, such as Internet access and voice services. GTC shares information as allowed by law or with customer consent to improve its networks, the services we provide, and our customer service. GTC will disclose information about a customer's account to others if the customer asks us to do so in writing. GTC may also share customer information to plan, provide, bill and collect for service. GTC also shares information with companies that provide Internet service, email, telephone equipment, and other services that are included in GTC's service packages. GTC may share customer information when appropriate to comply with the law, court orders, or subpoenas; and to protect rights, property, and safety of GTC's employees, customers, property, and third parties. GTC also reserves the right to report to appropriate law enforcement or government agencies any activities that GTC reasonably believes to be harmful or illegal.

Customer Proprietary Network Information (CPNI)

Under FCC rules, CPNI is confidential information that GTC and other telecommunications carriers obtain when providing your traditional local and long-distance services to you, such as the specific telecommunications services you choose and how much you use them, and the billing information related to those services. CPNI does not include your name, address, and telephone number. CPNI may be used by GTC for billing purposes, to ensure quality of service, and to market products which may be of interest to you. GTC does not disclose CPNI to other companies without your consent except as allowed or required by law. Further information about GTC's CPNI Policy is available upon request.

Changes to this Privacy Policy

This Privacy Policy may be updated from time to time to reflect changes in the law and evolving technology. GTC will notify customers of any material changes by posting a notice on its website. Continued use of GTC's services after our posting of changes to this privacy policy mean that you acknowledge, assent, and agree to comply with such changes. The current version of the privacy policy replaces and supersedes all previous versions.

How GTC Broadband Collects Your Information

GTC Broadband WiFi App Policy

GTC Broadband collects, and processes information provided directly by you when you install the App and register for an account to use the App. Specifically, this information includes:

- Your name, email address, location, phone number.
- Browser information and session cookies related to your access and use of the App.
- Data insights GTC Broadband attains based on correlation and analytics of your information collected in providing the App, which may be used in aggregated and dis-aggregated formats or to obtain trend analytics, to provide the App; and
- Use of the above-described collected information in aggregated and dis-aggregated formats to enhance our current App or to provide App features.

How GTC Broadband Uses the Information

GTC Broadband uses the information collected as described in this Privacy Policy, including personal information, to:

- Provide you with the App as described in the Agreement.
- Implement, improve and/or enhance the App, including to make future releases available to you.
- Carry out GTC Broadband obligations as described or authorized in the Agreement and this Privacy Policy.
- Enforce GTC Broadband rights arising from the Agreement between you and GTC Broadband; and
- Fulfill any other purpose authorized by you and reasonably required for the App.

Effective Date of this Privacy Policy

This Privacy Policy is effective as of **January 1, 2020**.

Contacting Us

If you have questions about this Privacy Policy, please email us at:

gtcbroadband@jscomm.net, or write to us at: GTC Broadband, 126 South Beaver Ave., P.O. Box 200, Granby, MO 64844.