

## **Conneaut Online Privacy and Data Security Policy**

The Conneaut Telephone Co. is committed to protecting your privacy when you visit the [www.conneauttelephone.com](http://www.conneauttelephone.com) website. Accordingly, Conneaut has instituted policies intended to ensure that your personal information is handled in a safe, secure and responsible manner. This privacy policy will inform you regarding the kind of information that Conneaut collects, how it is used and with whom it may be shared. As new technologies emerge, this policy may change at any time without advance notice. Conneaut encourages you to review this privacy policy each time you visit the website. Any changes will not affect Conneaut's usage or disclosure of information collected prior to the change in policy.

### **Storage, Use and Disclosure of Customer Information**

#### **Collection of Personally Identifiable Information**

To maximize your online experience, Conneaut may request that you provide Personally Identifiable Information when you access your account online and/or authorize an online payment. This may include your name, address, age, telephone numbers, account number, service ID number, billing and transaction information, social security number, user IDs and passwords, credit card information, e-mail addresses, contact information and any other information you voluntarily provide to Conneaut.

#### **Use of Personally Identifiable Information**

Conneaut will use all of the Personally Identifiable Information provided by you at the [www.conneauttelephone.com](http://www.conneauttelephone.com) website only to the extent necessary to provide you with full access to the Conneaut website and services. Conneaut may also aggregate information about customer and website users for a variety of purposes, including disclosure to third parties. However, such aggregate information will contain no Personally Identifiable Information and cannot be used to identify individual customers. Conneaut will maintain a subscriber's Personally Identifiable Information only for so long as the information serves a business purpose. Such business purposes include, but are not limited to, the maintenance of records for financial and tax accounting purposes. In the event that Conneaut determines that certain Personally Identifiable Information no longer serves a business purpose, that information will be destroyed.

#### **Disclosure of Personally Identifiable Information**

Conneaut publishes and distributes without restriction telephone directories that include customer names, addresses and telephone numbers. Conneaut is also required by law to provide customer names, addresses and telephone numbers to unaffiliated directory publishers for their use in creating telephone directories. If you do not wish to be included in these directories you may choose to have a non-published number that will not be included in the Conneaut directory nor provided to third parties. Conneaut will not disclose any other Personally Identifiable Information obtained through the

www.conneauttelephone.com website to third parties outside of Conneaut and its affiliates, vendors and business partners without the prior consent of the customer unless Conneaut has the good faith belief that disclosure is necessary for the following reasons:

- As required by law;
- To prevent unlawful or unauthorized uses of communication services;
- When Conneaut reasonably believes that disclosure is necessary to protect the safety of its customers, employees, property or the public;
- To protect and defend Conneaut's property rights.

If Conneaut discloses your Personally Identifiable Information pursuant to one of the above-mentioned conditions, it will do so only to the extent necessary.

In the event Conneaut receives a request for Personally Identifiable Information from government or law enforcement personnel or a request for discovery pursuant to civil litigation, Conneaut's policy is to cooperate only to the extent required by law. Accordingly, Conneaut will voluntarily disclose to law enforcement, without providing you with advance notice, Personally Identifiable Information and communications if Conneaut reasonably believes that an emergency involving immediate danger of death or serious injury requires disclosure without delay. Due to the number of requests received by Conneaut and the disclosure prohibitions that oftentimes accompany criminal subpoenas, Conneaut will not inform you of any such request.

To the extent that it is necessary for Conneaut to employ affiliates, vendors or other third party partners to provide you with the requested services, Conneaut will only disclose Personally Identifiable Information to such third parties if they maintain a level of confidentiality comparable to that provided in this policy and, with the understanding that the third parties may only use the Personally Identifiable Information to the extent necessary to provide the requested service. Conneaut may share information pursuant to the sale, transfer or merger of all or a portion of Conneaut's business.

### **Website Access Information**

Conneaut will automatically collect website access information every time you access the www.conneauttelephone.com website. This may include your IP address, domain name, bandwidth used, URLs visited within Conneaut's website, system and connection performance, type of browser and operating system, dates and time of access and the Internet address of the website from which you linked directly to Conneaut's site. The website access information is collected without any corresponding Personally Identifiable Information. Most of this information is collected via cookies or other analysis technologies.

## **Use of Website Access Information -- Cookies and Behavioral Targeting**

Conneaut, its onsite advertisers or others with connections to the website may use "cookies" to collect information about your website visit in effort to match the website's functions to your preferences. A cookie is a piece of code that web servers store on a user's hard drive that allows a website to store and later retrieve information from a user's computer. It will only retrieve web access information, as described above, and will not collect Personally Identifiable Information. The cookies will also recognize repeat website users and allow for a personalized visit to the website by remembering any options or preferences selected by the user on a previous visit. Conneaut may choose to share website access information with vendors, advertisers and others. Some of Conneaut's advertisers may utilize information collected by the cookies for behavioral advertising. If you do not wish to permit data collection for this purpose, advertisers that are members of the Network Advertising Initiative permit you to opt-out of the behavioral advertising programs at the following website: <http://www.networkadvertising.org>. If you wish to prevent cookies from being stored on your hard drive, you can alter the settings on your web browser to prohibit storing any new cookies as well as to delete any cookies previously stored in your files. However, if you choose to delete the cookies, you may lose some functionality and personalization of the website. Please note that your cookie preferences will be unique to each computer used to access the website. If you access the website from a different computer you will need to renew any opt-out choices.

## **Disclosure of Internet Access Information**

Government entities may subpoena from Conneaut personal account information and other internet access information. Conneaut does not assume any duty to notify you in the event it receives such a request.

## **Internet Communications**

Conneaut does not read email messages, instant messages, online chats or the content of other online communications that reside on or pass through Conneaut's networks or servers unless Conneaut is the designated recipient of such communication or unless specifically authorized by the recipient of the communications as part of the technical support process. If you provide your email address to Conneaut you give Conneaut permission to reply via email to answer a specific inquiry or to provide follow-up contact. Conneaut generally does not store copies of emails sent or received unless the user stores the email in an account file or Conneaut is legally required to do so. Conneaut will electronically scan incoming and outgoing email messages to identify and filter out spam, viruses and related problems that could harm your equipment, the network or other users.

## **Disclosure of Internet Communications**

In general, Conneaut will not knowingly divulge to any third party the contents of a communication stored on Conneaut's servers that has not been addressed to Conneaut without the prior consent of the sender or the intended recipient. In general, the content of Internet Communications may not be disclosed to law enforcement through the use of a subpoena. However, Conneaut may voluntarily disclose, without prior notice, the contents of Internet Communications if Conneaut has the good faith believe that disclosure is necessary for the following reasons:

- As required by law;
- As necessary to forward the communication to its destination;
- As necessary to provide the requested service;
- As necessary to protect Conneaut's rights;
- In connection with a report for missing or exploited children;
- To a law enforcement agency if the contents were inadvertently obtained and appear to pertain to the commission of a crime; or
- To a government entity if an emergency involving danger of death or serious physical injury requires disclosure without delay.

## **Privacy Policies of Advertisers and Other Websites**

This privacy policy applies only to users of the <http://www.conneauttelephone.com/> website. Conneaut makes no endorsement or representations and is not responsible regarding the content, features or privacy of any linked website. Any advertisers or websites linked with the Conneaut website will have their own terms and conditions that you should review on their websites.

## **Your Legal Rights**

If you feel that Conneaut has infringed upon your legal privacy rights with its collection, use or disclosure of your confidential information, you have the right to seek relief in a civil action filed under federal law.

PLEASE NOTE: This Online Privacy Policy applies only to use of the <http://www.conneauttelephone.com/> website. CableSuite 541's Privacy Policy can be reviewed [here](#). Please contact the Conneaut Telephone Company for its policy regarding Customer Proprietary Network Information (CPNI).

## **Data Security**

### **Customer Responsibilities**

You have a responsibility to maintain the security of your personal computer to ensure your privacy is fully protected. Accordingly, you should use and regularly update your

antivirus software, firewall and operating system. You should never share personal information with any entity whose identity you cannot confirm. Please visit the Federal Trade Commission website for more tips and tricks on how to protect your online data and privacy (<http://www.ftc.gov/bcp/menus/consumer/data/privacy.shtm>).

### **Conneaut's Data Security Measures**

Conneaut uses 2048 bit RSA encryption technology to collect Personally Identifiable Information through the <http://www.conneauttelephone.com/> website. Conneaut then stores all collected information in an encrypted format within controlled and secure environments with restricted access. Conneaut is committed to taking all commercially reasonable measures to protect the security of its customer data but does not guarantee that its measures will prevent all unauthorized access. In the event that Conneaut becomes aware of any unauthorized access it will promptly notify all effected users of the breach.

### **Third Party Website**

Conneaut's data security policies apply only to the [www.conneauttelephone.com](http://www.conneauttelephone.com) website. Conneaut does not control the data security of any Websites you may access using Conneaut or its affiliated internet services. Accordingly, you should review the privacy policies of any accessed websites before disclosing any confidential information.

## **Website Terms and Conditions**

### **Notification of Conneaut Services and Promotional Programs**

Conneaut may send transactional and/or relationship messages to your personal email account. If you do not wish to receive any marketing emails informing you about Conneaut's services and promotional programs you may opt-out of receiving such emails by updating your account information by calling 440-593-7140.

### **Minor's Access to the Website**

Children under the age of 13 may not use the [www.conneauttelephone.com](http://www.conneauttelephone.com) website for any purpose. Children under the age of 18 are not permitted to provide personal information on the [www.conneauttelephone.com](http://www.conneauttelephone.com) website and Conneaut will not accept orders from minors without the permission of their parents or guardians. If you believe your child may have submitted personal information to the [www.conneauttelephone.com](http://www.conneauttelephone.com) website, please contact us at 440-593-7140 and we will delete the information.

### **Reviewing and Updating Account Information**

If you need to review or update your account information, please contact a customer care representative by email at [billing@suite224.net](mailto:billing@suite224.net) or by telephone at 440-593-7140.

### **Limitation of Liability**

Conneaut operates and maintains this site for the convenience of its customers and visitors and is committed to abiding by the terms of this Privacy Policy. However, we do not warrant against breaches of the Privacy Policy and make no promises to you, express or implied, by posting this Privacy Policy.

### **Comments and Questions**

For any comments or questions regarding this Policy, please contact us by email at [sales@suite224.net](mailto:sales@suite224.net) or by telephone at 440-593-7113.