

# Northeast Iowa Telephone Company Privacy Policy

Northeast Iowa Telephone Company ("NEIT" or "Company") is committed to protecting its customers' privacy. Please review this Privacy Policy to better understand how NEIT collects information, how that information is used, and your options as to the collection and use of information. This Privacy Policy is applicable to NEIT's customers and to visitors of NEIT's website and is intended to provide information regarding NEIT's methods for collection and use of information.

# What types of information does NEIT collect?

Whether you are communicating with NEIT or using a NEIT service, NEIT may collect two types of information: personal information and non-personal information. "Personal information" refers to information that is particular to you, such as, your name, address, phone number, fax number, and e-mail address. "Non-personal information" refers to information that does not by itself identify a specific individual. This information includes websites visited, network traffic data, services and features used or call record details.

# How do we collect information from you?

NEIT may collect information from you through communications such as via the web, or by phone, email or mail delivery, or through the services provided to you as the customer.

You may visit our site without divulging any personal information; however, there are areas of this site that might require personal information in order to contact NEIT directly, specifically, when registering e-mails, obtaining remote access, and contacting online technical support.

Information may be collected in the following ways:

### Browsing our site

- -IP addresses may be collected for the purposes of system administration, to gather broad demographic information, and to monitor the level of activity on our site.
- -Information may be collected regarding the referring URL, which browser you used to come to our site, and the pages of our site that you viewed during your visit and any search terms entered on our site.
- -E-mails may be sent by the customer to NEIT on this website. NEIT may retain the information in any e-mail that you send to us, such as your name, e-mail, address, or telephone number.

#### Broadband Internet Service

-NEIT may monitor the network and take measurements of network performance and the performance of your Internet connection to improve the customer's, or NEIT's, overall service levels.



-during communications with NEIT for service support, we may also access information about your customer premise equipment such as computers and wireless modem devices or other device settings to provide customized technical support or to install specific applications or services for your use.

-NEIT reserves the right to access broadband traffic from individual accounts for the purposes of general maintenance and management of the network, as well as upon request by law enforcement officials.

-In certain geographic service areas where we receive certain types of federal high-cost universal service support, we may be required by the FCC to measure and collect information concerning the speed and latency of broadband services provided to randomly-selected subscribers. Pursuant to applicable FCC guidelines, any required testing would be accomplished by using one of three options: (1) existing Measuring Broadband America testing infrastructure (MBA testing), (2) existing network management systems and tools (off-the-shelf testing), or (3) provider-developed self-testing configurations (self-testing). The FCC has adopted requirements regarding when tests would begin, when exactly we may perform the tests, and the number of active subscriber locations we would be required to test. Once testing begins, test results must be reported and certified to the Universal Service Administrative Company (USAC) and Iowa Utilities Board (IUB) on an annual basis. However, no personally identifiable information is included in the test results reported to the USAC or IUB. If you are randomly-selected for testing, the FCC-required performance testing is in addition to the automatic testing we may do to measure or monitor performance and improve our service levels generally.

## Provision of Information by Third Parties

-NEIT may obtain credit information about you from third parties when you purchase products or services from NEIT.

#### How is your personal information used?

NEIT uses your information in connection with delivering its products and services to you. NEIT may also use the information supplied in order to personalize portions of your service. Some of these personalized services are made available directly by NEIT, while others may be offered by its content partners. In addition, NEIT analyzes and evaluates customer preferences, comments, and criticisms of its offerings in order to make improvements to the present and future versions of the individual service.

NEIT may use personal information it collects to provide you with information or samples that you have requested. In addition, we may use the non-personal information we collect to provide you with a better service experience in the future. NEIT does not rent, sell or trade your private information to any non-affiliated third party.



#### With whom do we share your information?

Unless you request otherwise, we may share certain personal or non-personal information with our affiliated companies with whom we have established business relationships.

NEIT will never willfully disclose individually identifiable information about its customers to a third party without first receiving that customer's permission unless NEIT believes in good faith that the law requires it, or to protect the rights or property of NEIT.

# How does NEIT protect your personal information?

NEIT takes reasonable precautions to protect your personal information against unauthorized access by requiring employees to use secured access authentication and passwords to obtain customer information and by storing electronic file information on a secure server, which is accessible only by authorized personnel.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure and we will not be held liable should a third party illegally obtain your personal information via Internet transmission. While we have made significant efforts to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk.

NEIT takes special care to protect the safety and privacy of young people using its services. NEIT does not knowingly collect information about children. NEIT believes that children should get their parents' consent before giving out any personal information. NEIT encourages parents and legal guardians to participate in their child's experience using NEIT's services. Children should always ask a parent for permission before sending personal information to NEIT.

## How does the customer provide consent?

By using NEIT's services, you agree with our Privacy Policy and our practices and procedures contained herein regarding the collection and sharing of your information. To opt out of the sharing of your information for marketing purposes, please contact NEIT.

## How often are changes made to the Privacy Policy and how will you learn of the changes?

NEIT reserves the right to change, modify or update this Privacy Policy at any time without notice. In the event of any modification, we will post the changes in this Privacy Policy so that you will always know what information we are gathering and how we might use that information. However if such changes are material, we will either announce the change on the home page of the site or take such other action as we deem appropriate under the circumstances. Accordingly, you should periodically visit this page to determine the current Privacy Policy to which you are bound.