

UNION SPRINGS TELEPHONE COMPANY, INC. PRIVACY POLICY

Effective Date: March 25, 2024

SCOPE

This Privacy Policy applies to Union Springs Telephone Co., Inc.'s (USTC) (1) websites and (2) home, business and wholesale services (the "Services"). This Privacy Policy describes how USTC processes personal information when you visit the Site or use the Services. It describes what types of information USTC collects, how that information is used, USTC's sharing practices, and your choices.

This Privacy Policy does not apply to third party websites, third party application providers or to the internet generally. USTC may make content or services from other website available to you from links located on our Site. USTC is not responsible for the privacy, security, or content of such websites. USTC also uses third parties to advertise its Services on websites and applications owned or managed by parties that are unaffiliated with USTC. You should review the privacy policy of each third-party website and application you visit to determine how that website or application protects your privacy.

INFORMATION COLLECTION

We collect the following personal information from you directly:

- *Information we receive from customers in connection with USTC home services.* If you register for or become a home services customer of USTC, we collect certain information by and through your use of the home services we provide. This may include basic subscriber information such as your name, address, email address, phone number, Social Security number, date of birth, account PIN, login details, copy of driver's license, and payment information (such as credit card or bank account details).
- *Information we receive from customers through use of USTC business services.* If you are a business services customer of USTC, we collect certain information by and through use of the business services we provide. This may include business contact information such as name, title, company, email address, login details, and phone number. When we handle information about you on behalf of our business customers, we do so at their instruction. To learn about the information our business services customers have us process, please contact us by using the contact section below..
- *Information you provide when you sign in to the Services.* When you sign in to the Services from our Site, we collect your username, and password.
- *Information you provide when you subscribe to receive our latest offers.* When you subscribe to receive our latest offers, we may collect your name, zip code, email address, and phone number.
- *Information you provide when you contact us.* We may collect certain information you provide to us via telephone, email or through use of any chat box on the Site. Please note that all communications submitted via telephone or through a chat box may be recorded for quality assurance.
- *Information you provide when you apply for special programs.* When you apply for special programs, such as Lifeline Assistance or the Affordable Connectivity Program, we may collect your name, date of birth, phone number, address, Application ID, Social Security number, USAC ID, Tribal ID Number, and a scan of your Government ID.
- *Information you provide when you make purchases on the Site.* When you make purchases or payments on our Site, we may collect your name, email address, phone number, address, and payment information (such as credit card or bank account details).

- **Information you provide when you use our mobile applications.** When you use our mobile applications, we may collect your address, email address, and payment information (such as credit card or bank account details).
- **Information you provide in connection with employment activities.** We may collect personal information from you in connection with our recruiting and hiring activities and administration of our human resources programs and functions.
- **Information you choose to provide to personalize your services.** At times, we may offer you an opportunity to provide additional information to further personalize your services. If you choose to do so, you may complete a profile, answer a survey, or provide us with additional information regarding your interests and preferences. You may also choose to interact with USTC on social media and provide information via such interaction.
- **Information you provide in connection with support.** At times, and with your prior express consent, we may collect personal information from you and ask you to share your browser screen with us in order to provide you with support services on our Site.
- **Miscellaneous.** When you provide us with personal information about other individuals, we will use that information in accordance with this privacy policy. If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please contact us at support@ftcweb.net. Separately, we obtain address information about you from third party sources, such as the US Postal Service, to verify your address so we can properly ship your order to you and to prevent fraud. We may obtain credit information about you from an outside credit reporting agency and use this information for customer authentication and credit-related purposes. To perform a credit check, we collect information that may include your name, email address, phone number, address, and Social Security number.

We also gather the following information automatically from your use of our Site and Services:

- **Metadata and USTC touchpoints.** We collect information related to the your device and our network, applications downloaded to your device, amounts of data used, volume, length, visits to USTC stores, contacts with customer care, service history, billing history, device history, and your use of our Site and other Services. We also collect information related to use of our business services such as mailbox usage, legal hold support, email security, data loss prevention, and e-discovery support.
- **Location data.** If you make a 911 call, we may collect Wi-Fi and other location information.
- **Home services information.** We collect information related to the use of our home services including the type and amount of usage of the home services, amounts of data used on the internet, phone and/or TV, as applicable. If you are a home phone customer, we collect call detail information (such as numbers contacted by you), location information and other information used to provide services to you. If you are a USTC TV customer, we collect data concerning viewership. We also collect information related to contact with customer care, service history, billing history, device history, your use of our Site and Services, and your use of third-party sites and services accessed through our Services.
- **IP address and unique device identifier.** We collect your IP address and unique device identifier for the administration and operation of our Site and Services, to understand how visitors interact with our Site and Services, to improve our Site and Services, and for analytics and marketing purposes.
- **Social media plugins.** Our Site may include social media features, widgets and plugins, such as the "Like" or "Share" Facebook buttons. These features may collect your IP address, which pages you are visiting on our Site, and may set a cookie to enable the feature to function properly.
- **Website usage information.** We use cookies (small bits of code stored on a visitor's computer hard drive or device) and similar tracking technologies, which enable a website

to “personalize” itself for each visitor by remembering information about individual visits to the website. We use cookies to store your preferences, display content based upon what you view on our Site to personalize your visit, analyze trends, administer the Site, track movements around the Site, facilitate advertising, and collect traffic data. We may share website usage information about visitors to our Site with third-party advertising companies for the purpose of managing and targeting advertisements and for market research analysis. For more information about your choices regarding the use of your information for targeted advertising, please see the “Your Choices” section below.

- **Web Beacons.** Pages of the Site and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit USTC, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- **Aggregated information about traffic and usage of our Site.** We may use Google Analytics to obtain aggregated information about the traffic and usage of our Site. Google Analytics uses cookies to capture information such as the URL of the page you are viewing, your browser information, and your geographic region. For more information about how Google Analytics collects and processes data, please visit: <https://policies.google.com/technologies/partner-site>. To opt out of having your information used by Google Analytics, please visit: <https://tools.google.com/dlpage/gaoptout/>.
- **Tracking information.** Tracking technologies such as SessionCam are used on the Site by USTC and our marketing partners, affiliates, and analytics or service providers. These technologies are used in analyzing trends, administering the site, tracking users’ movements and interactions on the Site, recording and logging keystrokes, and gathering demographic information about our user base as a whole. We may receive reports based on the use of these technologies on an individual as well as aggregated basis.

HOW WE USE YOUR INFORMATION

- To determine customer eligibility for our Services;
- To provide Services to our home services and business services customers;
- To fulfill your order and send order confirmation;
- To administer, authenticate, and maintain accounts;
- To send you information regarding our Services;
- To respond to customer service issues;
- To send you marketing communications about our Services whether via regular mail, email, or SMS;
- To respond to questions and concerns;
- To conduct research and analysis;
- To display content based on your interests and/or location;
- To manage our network;
- To improve our Site, Services, and marketing efforts; and
- To perform human resource activities

THIRD PARTIES

We will share your personal information with third parties in the ways that are described in this Privacy Policy.

We may provide your personal information to third parties that provide services to help us with our business activities such as shipping your order, offering customer service and analysis,

providing and administering our Site and Services, and/or providing software platforms for the Site. These third parties are authorized to use your personal information in accordance with the privacy compliance obligations we impose on them.

We may also disclose your personal information to third parties with your prior consent.

In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We may also disclose your personal information as required by law, such as to comply with a subpoena, or similar legal process; when we believe in good faith that disclosure is necessary to protect our rights, protect your safety, or the safety of others; investigate fraud or respond to a government request; or if we are involved in a merger, acquisition, or sale of all or a portion of our assets. You will be notified of any changes in ownership or uses of your personal information as well as any choices you have regarding your personal information where required by and in accordance with applicable law.

YOUR CHOICES

Upon request, USTC will provide you with information about whether we hold any of your personal information. You may request access to, correction of, or request that we stop collection of and/or delete certain information by emailing your request to support@ftcweb.net.

In our capacity as a processor for our business services customers, you may have certain rights with respect to your personal information. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct their query to the applicable business services customer (the data controller).

In certain circumstances we may be required by law to retain your personal information, or may need to retain your personal information in order to continue providing our Services.

Our website does not respond to browser "Do Not Track" signals. However, if you wish to block cookies, you can configure your browser settings to reject them. You can also delete all cookies that are already on your computer's hard drive by following your browser's instructions for clearing them. Note that disabling some or all cookies may impair our Site's functionality.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website at <https://www.networkadvertising.org>. You may also be able to opt out of receiving third-party behavioral ads by visiting the Digital Advertising Alliance ("DAA") website at <http://www.aboutads.info/choices>. We are not responsible for the effectiveness of or compliance with any third parties' opt-out options.

CPNI

Section 222 of the Telecommunications Act of 1996, as amended (the "Telecommunications Act") establishes certain criteria regarding the use of certain telephone customer information that we collect from our customers solely by virtue of the customer-carrier relationship, such as quantity, technical configuration, type, destination, location and amount of use of the telecommunications

services you receive, as well as billing information. The Telecommunications Act refers to this type of information as "customer proprietary network information," or "CPNI." USTC will disclose and/or use CPNI only as permitted by the Telecommunications Act and applicable rules and regulations. In complying with the Telecommunications Act, we may ask for our customers to opt in to our use of certain information for marketing purposes.

CONTACTING YOU

We may periodically contact you regarding promotions, offers, products or services from USTC, its affiliates, and/or third parties via email, SMS text message and regular mail. We may also periodically contact you regarding your USTC account status, phone or other matters relevant to USTC customers or potential customers. You also have the ability to cease receiving promotional communications at any time by contacting us at -support@ustctelecom.com, following the instructions contained within emails you receive, or by sending STOP in reply to a promotional text.

SECURITY

USTC takes precautions to protect your personal information against unauthorized disclosure, theft, and misuse. When you enter sensitive information (such as a credit card number) on our order forms, we encrypt the transmission of that information using a secure connection. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. However, no method of transmission over the internet or method of electronic storage is 100% secure. Therefore, we cannot guarantee absolute security. You play an important role in keeping your information secure. You should not share your username, password, or other security information for your account with anyone. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us by contacting us as detailed in the "Contact Us" section below.

DATA RETENTION

We only store information for as long as is needed to fulfill our contractual or legal obligations or any other permissible purpose for which we have collected it, including to prevent fraud or security incidents. When the applicable retention period has expired, we take measures to permanently delete the information, aggregate it, or anonymize it.

CHILDREN

Our Site and Services are not directed to children, as defined under applicable law. If you believe that a child has provided their information to us through our Site or Services, please contact us as detailed in the "Contact Us" section below, so that we can take steps to delete it.

CHANGES TO PRIVACY POLICY

We may update this Privacy Policy from time to time. If we make material changes to this Privacy Policy, we will notify you in accordance with applicable law. We encourage you to review this Privacy Policy frequently to stay up to date on how USTC processes your personal information when you visit the Site or use the Services.

CONTACT US

If you have any questions or if you would like to discuss the privacy policies and practices of USTC, you may contact us by phone, email, or regular mail at the addresses or toll-free number set forth below:

Email to:
support@ustctelecom.com

Mail to:
PO Box 272
Union Springs, AL 36089
Attn: Customer Care Manager

Contact Us:
334-738-4400