

SECOM INC Privacy Policy

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Introduction

Welcome to the SECOM, Inc. website. We are privileged to serve the citizens and communities of southeastern Colorado with the highest quality broadband services, Internet access, and other important and valuable residential and business services. Today's networks are much more powerful and complex than those of the past. With that power comes the responsibility to use it carefully and correctly. We are committed to protecting your privacy. One aspect of this service is to ensure that you understand how and when we collect and use data that is provided to us through our website, that you provide to us or that our broadband services and voice networks provide in the normal course of their operation. This privacy policy explains these concepts.

What does this privacy policy address?

This Privacy Policy sets out our practices regarding personally identifiable information we collect from you or as a result of using our services, that you provide to us, or that our websites collect when you visit them. This policy may also apply in addition to other state or federal regulations, but it does not modify or replace any of those state or federal regulations, such as the Federal Communications Commission regulations that apply to consumers of telephone services (including Voice over Internet Protocol or "VoIP" services) provided by SECOM to its VoIP service customers.

- What is personally identifiable information.
- What information we collect about you.
- How we use your personally identifiable information.
- Choices about how we use and disclose your information.
- How you can update or access any personal information we hold about you.
- Additional privacy-related matters.

Please read this Privacy Policy in conjunction with the SECOM Service terms & conditions that apply to any services we provide to you. When you use any SECOM services or when you access this or any of SECOM's websites, then you agree to terms upon which they are provided, including this Privacy Policy.

What is personally identifiable information?

When we refer to the term 'personally identifiable information', we mean information that can identify you as an individual or is capable of doing so with other information that we may hold about you now or in the future. The term does not include any statistical, aggregated or anonymized information.

What information we collect about you.

We may collect and process the following personally identifiable information about you:

- Information you provide to us in order to obtain SECOM Service such as your name, name, address, telephone number, credit card, banking

details, email address or other information we need in order to process your order and provide service.

- For business customers it may also include information your company has provided – such as your company's name and address, your employee ID, your email address. In addition, for account security, verification or tax purposes, SECOM may also request federal tax ID information, purchase order number, and information about the individual(s) responsible for business account administration.
- If you contact us by phone, email or otherwise, a record of that communication.
- Any surveys you complete that are used for research purposes.
- Details of transactions you carry out with SECOM and the fulfillment of your orders for our services.
- Details of your visits to our websites including, but not limited to, traffic data, location data, weblogs and other communication data.
- Information about the type, quantity, configuration, destination, location and amount of use of telecommunications services you currently purchase, how you use those services, and related billing information and end user information for those services. This information is collected in the normal course of providing telecommunications and certain broadband services to our customers, and is commonly referred to as Customer Proprietary Network Information, or "CPNI". CPNI is discussed in greater detail below.

How we use your personally identifiable information

We use your personally identifiable information in several ways in order to provide services, determine how to improve our services, offer this website and, where required, to comply with our legal obligations:

- To fulfill the purpose for which you provide it. For example, we need your name, address, order, credit and additional information in order to provide SECOM Services.
- To contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- use your IP address and other network information to diagnose any problems and to help resolve them.
- investigate complaints, respond to questions.
- offer you new services or promotions, inform you about any changes to services, outages or any other issues that may affect your service.
- provide on-line or conferencing services.
- Directory Information and Caller ID – We make subscriber name and address information available to telephone directories and display your telephone number via Caller ID where available.

- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To enforce or apply our terms of use (located at www.secom.net/legal/) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of SECOM, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- SECOM may monitor and/or disclose communications of any kind over its networks (i) to satisfy any law, regulation, or government request (e.g. response to private or law enforcement-issued subpoena) or (ii) if such monitoring and/or disclosure is necessary or appropriate to operate SECOM (e.g. recording of Customer Care calls).
- SECOM cooperates fully with state, local, and federal officials in any investigation relating to any content (including personal or private electronic communications transmitted to SECOM) or purported unlawful activities of any user of any SECOM website or SECOM service.
- SECOM also reserves the right to, and will, share information when it believes, in its sole discretion, it is necessary to prevent unlawful use of communications services, when necessary to repair or restore network outages, in emergency situations (e.g. 911 calls; matters of public safety, etc.) or to protect the security or integrity of the SECOM, its website(s) and services.

Customer Proprietary Network Information (CPNI):

- SECOM may use personally identifiable information and/or CPNI to inform Customers about additional services and products offered by the SECOM and SECOM authorized agents, as well as communications-related services offered by third parties with whom SECOM has relationships and whose offerings might be of interest to Customers. SECOM will not, however, sell or trade a Customer's personally identifiable information or CPNI unless we are authorized by the Customer or do so in compliance with applicable law.

Choices About How We Use and Disclose Your Information

1. CPNI

You may update your information and/or request that SECOM refrain from using your personally identifiable information for marketing purposes by contacting your Customer Care representative. Please be aware that restricting use of CPNI for marketing communications from SECOM will not eliminate all SECOM marketing or other contacts about the Services provided to you. For example, SECOM and its agents may use your information to initiate, render, bill and collect for services, or contact you about service or billing related matters. SECOM may provide information to credit bureaus and/or sell receivables to collection agencies to obtain payment for SECOM products and services to use the information to protect our rights and property and the

rights of others, including CPNI can include other communications-related services offered by third parties SECOM works with.

2. White Pages, Yellow Pages, Caller ID

If you subscribe to SECOM VoIP Service, you are given the opportunity to request that your name, number and address be or not be published in directories, be made available through directory assistance or appear in "Yellow Pages" or other similar business directories for an additional fee.

SECOM VoIP Services will transmit, where available, the customer's name and telephone number to be displayed on a Caller ID device unless the Customer, subject to compliance with Caller ID rules, has elected to block such information. Please note that Caller ID blocking does not prevent the display of a caller's number when dialing certain business numbers, 911, 900 numbers, or toll-free 800, 888, or 877 numbers.

3. Website Cookies

When you use this website it will set cookies on your device. A cookie is a small piece of programming that a website puts on your computer. The purpose of a cookie is to remember the choices you made on the website, personalize the features of the website such as text size, fonts and other parts that you can customize, and to improve your experience. By using the website, you agree that we can place these types of cookies on your device.

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you do not want this website to set cookies on your device then you should not use this site and you should delete any cookies which have been placed on your device. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly. You can find more information about cookies at: <http://www.allaboutcookies.org>.

We do not control the use of third party cookies or third party web beacons and expressly disclaim responsibility for information collected through them. 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: <http://www.networkadvertising.org/>.

Additionally, our website(s) may or may not recognize the do-no-track headers from some or all browsers.

4. Non-US Website Visitors and Customers

SECOM is based in and operates from the United States. If you are located outside of the United States, please be aware that, by visiting our website or using our services either as a retail or corporate customer, you consent to the transfer of your personal information to SECOM in the United States. Moreover, the transfer of your personal information to SECOM in the United States is either necessary to the performance of our contracts with our customers or to respond to an inquiry you may make. The United States and other countries where we operate may not have protections for personal information equivalent to those in your home country.

5. Accessing and Correcting Your Information

You can review and change your personal information by calling SECOM Customer Service to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would interfere with our ability to provide SECOM Services to you, violate any law or legal requirement or cause the information to be incorrect.

Additional Privacy Information

1. Linked Internet Websites

Our websites may provide hyper-text links to other websites over which we have no control and which may contain privacy provisions that are different from those provided herein. We are not responsible for and expressly disclaim any and all liability for the privacy policies or practices of other websites to which you choose to link from our websites. We encourage you to review the privacy policies of those other websites so you can understand how they collect, use and share your information.

2. Data Minimization and Access

We will take reasonable steps to collect the minimum amount of personal information necessary to accomplish the specific purpose for which it is collected and will provide reasonable access to individuals regarding the personal information we hold about them.

3. Security

We take reasonable measures to protect the security of customer and visitor information from accidental loss and from unauthorized access, use, alteration or disclosure. Our websites have security measures in place to protect against the loss, misuse and alteration of information under our control. Because the Internet is an open system that permits any network to connect to any other network and any device to connect to any other device, and we cannot guarantee that unauthorized third parties will never be able to defeat those measures or use your personal information for improper purposes. Certain information may be transmitted to you by electronic mail. Although it may be illegal to intercept or disclose these messages, email transmissions are not secured.

4. Protecting the Privacy of Children

Because SECOM sites are designed for residential and businesses communications, broadband and hosting services, we do not knowingly collect information from children. No one under age 13 may provide any personal information to or on the Website. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at 800-657-7149.

5. Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

6. *Questions About this Policy*

You may contact us with any questions about our Privacy Notice at 800-657-7149 or privacy@secom.net.