# PROJECT MUTUAL TELEPHONE'S PRIVACY POLICY

Your privacy is very important to us. We have created this Privacy Policy to demonstrate our firm commitment to privacy and security, as well as to inform you of the type of information we may gather about you, how we use it, and how you can help us make sure it is correct. In this Privacy Notice, the terms "subscriber" or "you" refer to members and customers of our Video, Internet, Wireless, Long Distance, Security, Phone, or Mobile Application services. The terms "Project Mutual Telephone," "PMT," "we," "our," or "us" refer to:

- Project Mutual Telephone Cooperative, Inc.
- PMT Tech Force
- PMT TV
- PMT Mobile
- PMT MiHome
- PMT SmartHome App

This policy may apply to you either as a visitor to PMT's website, as someone who uses PMT services, or who has ordered a PMT product, either online or through contact with a PMT Sales Agent or Customer Service Representative, or uses our mobile application. Since this policy explains how PMT may use your information, whether we disclose it to anyone, and your ability to control the use of that information, we request that you read this Privacy Policy carefully.

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

In order to provide you with the best PMT services, including digital video services, Internet services, and communication services, we collect and keep on file certain information about our subscribers. The types of information that may be considered personally identifiable information include: name; home, email and alternate billing addresses; telephone, social security or driver's license numbers; credit or bank account data; services you ask to receive; service connection and device information; service preferences or transactions you initiate through your voluntary interaction with the service; our correspondence with you, accounting, maintenance and repair records; service complaints; home ownership or rental information; and other information that you provide to us or that we may request to provide our services to you and/or to maintain regular business records.

We may also have a record of the devices that you use to connect to our services in your home, including the location and configuration of these devices and a list of the equipment we installed in your home. We may also collect additional information from you during voluntary interviews or surveys. When Internet subscribers access the PMT Internet portal page or other PMT websites, PMT, its partners and its advertisers may use various software devices to collect information to allow participation in certain online activities or to facilitate online access. When Internet subscribers utilize the PMT SmartHome mobile app, user's name, email, location, phone or contact book data, inventory of apps installed and screen recording information will be collected as well so participants can manage their home network from the application.

To protect the security of our services, we may also operate network protection features that automatically scan proper subscriber use of the PMT services and that scan certain electronic addresses, identifiers or communications to protect against spam, viruses, etc. Other than monitoring bandwidth usage, we do not collect additional personally identifiable information, such as browsing history, while utilizing these protection features. While providing you with communication services, PMT may accumulate information that relates to the number of calls, technical configuration, type, destination, and location of communications services used by you as a PMT member or customer.

## **Use of Collected Information**

We use the information we collect to make sure you receive the services you signed up for; to send your bills to you and credit you for payments; to send you program or service listings, new product or service offerings, special announcements, and other information we think you may want; to provide and enhance our services; to respond promptly to your questions, complaints, and requests for changes in service; for our own tax and accounting purposes; to help anticipate, identify and resolve any service or maintenance problems; to protect the security of our equipment and services; to ensure compliance with applicable laws and compliance with applicable subscriber agreements, policies and terms of service; and to prevent the unauthorized reception of service.

Under federal law, we may not use our cable system to collect personally identifiable information about you without your consent, except as may be necessary to provide you with cable or other services and/or to help us detect unauthorized reception of

communications over the cable system. For example, when you interact with certain PMT services, the cable system may automatically collect certain information on your use of that service. Most of this information is not personally identifiable, and such information is generally used to carry out your particular request. This may include your choice of a designated channel, menu selections or service offerings, such as pay per view programming. These selections may be linked to your personally identifiable information already stored on our system so we can confirm your entry or transaction and/or confirm proper billing for the selection.

## **Disclosure of Personally Identifiable Information**

We may share personally identifiable information maintained in our business records only if (a) you provide written or electronic consent in advance; (b) it is necessary in order to provide our services to you or to carry out our business activities; or (c) it is otherwise authorized by federal law. These disclosures generally occur for account management, billing and collection services, surveys, marketing, service delivery, administration and customization, service maintenance and operations, fraud detection and prevention, etc. Persons who have authorized access to your personally identifiable information include, but are not limited to, PMT employees; program and program guide providers; accountants, outside auditors, billing, collection and legal services; repair and subscriber assistance providers; marketers of our products and services; purchasing entities if we sell or transfer ownership; authorized representatives of government; and entities affiliated with us through common ownership or control. The frequency of disclosures to these parties varies according to business or legal purposes or service needs. PMT values your privacy and does not provide your personally identifiable information to third parties except as described below in this policy.

Sometimes federal law requires that we release personally identifiable information to representatives of government or other lawfully authorized persons. This could include lawyers or other parties in connection with litigation. We will share this information only when required by a warrant, court order, administrative subpoena, or lawful process. We may release your information voluntarily if we reasonably believe that an emergency involving danger of death or serious injury justifies releasing your information to a governmental entity.

In some situations, federal law may allow you the opportunity to challenge a governmental agency's request for a court order to release your personally identifiable information. Federal law also authorizes us to release subscriber content or other communications to local, state, and federal authorities if we become aware of evidence of child pornography, if we unintentionally obtain content or communications that appears related to criminal activity, or if we believe there is an emergency involving death or serious injury.

We are also allowed to release content and communications, such as email account content, to its intended recipient; when it's necessary to provide our service or to protect our rights or property; or to others with your permission or the consent of the intended recipient of the communications. We may also use or share personally identifiable information about you to protect our employees, services, property and customers and/or to enforce our rights under our service agreements, terms and policies, in court or elsewhere if necessary. Except as indicated in this notice, we may not and do not share personally identifiable information to other third parties, unless we are authorized to do so by court order or federal law otherwise permits. If federal law requires, we will notify you of a disclosure.

PMT will not sell, trade, or disclose to unaffiliated third parties any individually identifiable customer information. As used in this Privacy Policy, "unaffiliated third parties" do not include PMT's agents or affiliates that provide communications-related services, its joint venture partners, or independent contractors.

# **Collection and Use of Aggregate Customer Information**

PMT also gathers a variety of aggregate customer information. Aggregate information comes from combining information from many customers so that the information can no longer be used to identify individual subscribers. It includes, but is not limited to, the number and frequency of calls into our Customer Service Department, visits to PMT's Web site and its different pages, technical service and equipment data, and information about aggregate service and equipment usage for analysis.

We may combine this aggregate data with our subscriber records. This process generally does not involve the collection of additional personally identifiable information about you. For example, web visits are monitored through the use of "cookies." A cookie is a small data file that can be placed on your hard drive when you visit certain Websites. PMT may use cookies to collect, store, and sometimes track information for statistical purposes to improve the products and service we provide and to manage our telecommunications networks.

As explained in more detail below, PMT may share with unaffiliated third parties such aggregated statistical information in order to sell advertisements on its services. PMT does not share your individually identifiable information concerning either our contact with you or any of the services that you purchase from us with unaffiliated third parties.

#### **Length of Information Retention**

We will maintain personally identifiable information about you only as long as it is necessary or to comply with laws governing our business. This period of time lasts for as long as you remain a customer and usually continues for up to 10 years thereafter. This allows us to maintain legally required tax and accounting documentation and/or information consistent with our record retention practices. When no longer needed, such information will be destroyed unless there are legitimate pending requests for access to such information.

#### Voluntary Customer Surveys

We may periodically conduct customer surveys. We encourage our customers to participate in these surveys because they provide us with important information that helps us to improve the types of services we offer and how we provide them to you. Your personal information and responses will remain strictly confidential, even if an unaffiliated third party conducts the survey.

Participation in our customer surveys is voluntary. We take the information we receive from individuals responding to our customer surveys and combine it with the responses of other PMT customers to create broader, generic responses to the survey questions (such as gender, age, residence, hobbies, education, employment, industry sector, or other demographic information). We then use the aggregated information to improve the quality of our services to you, and to develop new services and products. This aggregated, non-individually identifying information may be shared with unaffiliated third parties.

#### **Online Shopping**

At some websites, you can purchase products and services or register to receive materials, such as a catalog or new product and service updates. In many cases, you may be asked to provide contact information, such as your name, address, email address, phone number, and credit/debit card information. If you complete an order for someone else, such as an online gift order sent directly to a recipient, you may be asked to provide information about the recipient, such as the recipient's name, address, and phone number. Though PMT may provide Internet services to an unaffiliated third party, PMT has no control over the unaffiliated third party's use of any personal information you provide when placing such an order with the unaffiliated third party. Please exercise care when doing so.

# **Online Advertisements**

PMT displays online advertisements. We only share aggregated, non-individually identifiable information about our visitors and customers. Additionally, in some instances, we use this aggregated, non-individually identifiable information to deliver tailored advertisements. PMT does not share personal information about its visitors or customers with these advertisers.

# **Public Forums**

Please remember that any information you may disclose in public areas of our websites, on any social media sites, or on the Internet, becomes public information. You should exercise caution when deciding to disclose personal information in these public areas.

### PMT's Commitment to Children's Privacy

Protecting children's privacy is especially important to us. It is our policy to fully comply with the Children's Online Privacy Protection Act of 1998 and all other applicable laws. Websites can be fun for our younger audience; however, we believe that there is no substitute for proper parental supervision. For further information about tips, tools, age-appropriate or kid-friendly websites and how to report online trouble, please visit www.getnetwise.org. Finally, PMT does not actively collect personally identifiable information from children under 13 years of age without the consent of a parent. We recommend that children ask a parent for permission before sending personal information to anyone online.

# PMT's Commitment to Data Security

We follow industry-standard practices and have security measures in place to protect the loss, misuse, and alteration of the information under our control, as well as to prevent unauthorized access to your personally identifiable information. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. If we determine that your personally identifiable information has been accessed by an unauthorized third party, we will notify you in accordance with federal and local laws.

#### **Customer Proprietary Network Information**

If you are a subscriber to PMT's Local Phone, Wireless, or Long Distance services, we have access to data known as customer proprietary network information ("CPNI") which comes from providing this service to you. CPNI includes information such as the telephone numbers you called; the number of calls made or received, the length of calls, and the timing of such calls; and any services you've purchased, such as call waiting. We will not use, share, or permit access to your CPNI, except in connection with providing your phone, wireless, long distance, and related services unless required by law or with your approval. Please note that we are permitted to use your CPNI to initiate, render, bill, and collect for our service; to protect against fraudulent, abusive, or unlawful use of our service; and to provide inbound telemarketing, referral, or administrative services. Additionally, we are also required to cooperate with law enforcement officials under the terms of the Communications Assistance for Law Enforcement Act.

Also, PMT and its affiliates reserve the right, afforded by law, to use your CPNI to market additional local, long distance and wireless services to you in the future, if we already provide those services to you.

In instances where PMT and an affiliate jointly promote service, PMT may provide the affiliate with certain personal information (such as the name, address, and username of persons who subscribed to the service as a result of the joint promotion) for the exclusive purpose of implementing the promotion and allowing PMT and its affiliate to assess the results of the promotion. In this instance, personal information may not be used by the affiliate for any other purpose.

If you would no longer like us to use your CPNI to tailor our telecommunication service offerings to your needs, you may opt out of the use of your CPNI for these purposes at any time, by writing to us at PO Box 366, Rupert, ID 83350, or visiting your local retail location during normal business hours.

Whatever your decision, we'll honor it until you inform us otherwise. Your choice won't affect the quality of service we provide you or impact the products and services to which you currently subscribe. However, restricting your CPNI may prevent us from informing you about new services and future money saving opportunities. Please note that, for business accounts, the authorized account holder is responsible for informing its users about its privacy practices.

# Your Rights Under Federal Law

If you believe that we have collected, used, or shared your personally identifiable information in any way that violates these federal limitations on the collection and release of personally identifiable information, you have the right to bring suit in a federal district court.

#### **Changes to Our Privacy Policy**

We may modify or update our services from time to time, and if necessary, the provisions of this Privacy Policy. We will provide either written or electronic notice to subscribers of changes to our privacy provisions. We will provide a current summary of our privacy policy of each year included with your PMT bill. We also encourage you to review this Policy online from time to time.

If you do not agree with the changes, you have a right to cancel your services. Please remember that you will still be subject to the terms that of any contract you have with PMT. If you continue to use our services following notice of privacy changes, such usage will constitute your acceptance of and consent to the changes.

#### Where to Direct Questions about PMT's Privacy Policy

If you have any questions about this Privacy Policy, the practices described herein, or wish to modify the status of your CPNI, you may contact our Customer Service Department or visit your local PMT office.

Service Area	Residential Customers	<b>Business Customers</b>	By Mail

Rupert, Paul, Heyburn	(208) 436-7151	(208) 434-1847	PO Box 366 Rupert, ID 83350
Burley or Oakley	(208) 878-7151	(208) 878-1847	1458 Overland Ave. Burley, ID 83318
Twin Falls, Jerome or Kimberly	(208) 933-7151	(208) 933-1847	308 Shoshone St. E. Twin Falls, ID 83301

# Right to Review Personally Identifiable Information

You may inspect your personally identifiable information by sending a written request for specific information to us at the following address:

**PMT** 

Attn: External Affairs

PO Box 366, Rupert, ID 83350

(please include your name, address and telephone number).

Following your request, we will need a reasonable period of time to arrange, locate and, if necessary, prepare the information for review. In reply, we may arrange an appointment or ask that you to come to our business office during regular business hours to review your personally identifiable information we have on file. When you come, you must bring your driver's license or some other form of photo ID. PMT reserves the right to charge you for the cost of retrieving and photocopying any documents that you request.

Be sure to tell us if you think personally identifiable information about you in our file is wrong – we will be glad to make appropriate corrections. Depending on the nature of the information, however, we may ask you for documents or other proof that the personally identifiable information we have on file is incorrect.

# **Limitation of Liability**

PMT assumes no liability, whether in contract or tort, for any direct, indirect, special, consequential or punitive damages, including (without limitation) damages for loss of anticipated profits or revenue or other economic loss in connection with or arising from any act or omission by PMT, its agents, affiliates, joint venture partners, independent contractors, or unaffiliated third parties as a result of any act or omission in fulfillment of or in breach of this Policy.

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