

## **CVFiber Privacy Policy**

This CVFiber Privacy Policy addresses how we protect the privacy of personal information that our customers are asked to provide. We collect and use individual customer information, including personally identifiable information, to perform our daily business of providing Internet and related services (such as phone service). We also collect and use website, network, and other service usage statistics that are critical to our operating the CVFiber network today and improving it for tomorrow.

CVFiber is a nonprofit municipal entity, and as such we work continuously to respect our customers' desire for privacy. Any information we collect is used for the purpose of providing our customers with the best service possible. We may also use customer information to protect customers, employees, and property against fraud, theft, or abuse, and to maintain good customer relations.

We do not sell customer information or usage statistics to anyone. All information obtained through customer registration or the use of our website is used for CVFiber's purposes only.

We do not release customer information to third parties except when needed to operate or improve our network, website, and other services, or when required by law, or to protect the safety of customers, employees, or property. Some examples include:

- We must share information with contracted vendors in order to operate our network, contingent on their upholding customer privacy as we would.
- We are required to release the information if served with valid legal process.

Everyone at CVFiber, including employees, vendors, and other representatives, is responsible for safeguarding our customers' information and all communications between you and us. We strive to ensure that the information we obtain and use is accurate. We encourage our customers to notify us if there are any errors in obtained information or concerns regarding this privacy commitment.

We strive at all times to respect a customer's desire for privacy and we obtain and use individual customer information, and the collective information about our customers, for business purposes only including but not limited to, network monitoring, billing, marketing, and maintenance purposes, including trouble shooting. We do not sell your information to third parties, and release of your information to entities outside of CVFiber is only to protect customers, employees and property against fraud, theft, or abuse, or as required by law. In some instances, you may subscribe to services that require us to disclose information to third parties to ensure your and our ongoing compliance with regulations that may govern the service and the disclosure of which is a condition of ongoing receipt of the service.

This privacy policy applies to services provided to you ("you," "your," or "Customer") by CVFiber and its service partners ("CVFiber," "we," "us," or "our") that own and/or operate the broadband or phone services that you may purchase from us. Services may include but are not limited to High-Speed Internet service ("Broadband"), CVFiber voice services including Hosted IP Voice service and those that may that operate over a broadband connection or other local facility, and apps and other software we may provide (each a "Service" and collectively, "Services"). All Services we provide are subject to our Terms of Service found at <https://cvfiber.net/terms-of-service/>

By subscribing to and/or using our Services, we may collect personal information about you including but not limited to the following:

1. Information you provide to us, such as:
  - a. Contact information, which may include your name, mailing address, email address, or telephone number
  - b. Login credentials for our Services, such as your username and password
  - c. Payment information, such as your credit/debit card or other financial account information
  - d. Your Social Security number
  - e. Your driver's license, state identification cards, or other forms of identification

- f. Legal documents, such as documentation of the authority to act on behalf of another person
2. Information we collect when you use our services, such as:
  - a. Household and device video selection and viewing activity
  - b. Geolocation information on where you are at a specific point in time based on your service address to help us authenticate you for certain services on our platform
  - c. IP addresses, device identifiers, and network equipment addresses when devices connect to our Services, and other device information, including information about Devices provided by other companies from which you use our Services
  - d. User activity information, including what you search and how long you use our websites and applications, using cookies and other technologies, and information provided by other companies when you integrate their services with our Services
  - e. Domain Name Server or “DNS” searches and network traffic activity when you use our Services
  - f. General location information, such as the city or ZIP Code that correlates with the location of a WiFi service access point or with the license of your device IP address
  - g. The quantity, technical configuration, type, features, call history, and amount of your use of voice services (known as Customer Proprietary Network Information or “CPNI”) Information provided by third parties such as:
    - h. Credit reporting agencies and other entities that provide credit scoring, identity verification, fraud prevention, and similar services
    - i. Landlords and property owners that provide contact and other information
    - j. Government entities that may be required to provide us information to confirm your qualification to receive certain Services that we may make available to you
  - k. Providers of third-party apps that you use on devices governed by this privacy policy

Some of the information we collect may be aggregated across multiple customers, with no individual personal data identified, so that we may report to state, federal, and other authorities regarding the services we provide.

### **Your rights and our limitations under federal laws**

The Communications Act and CPNI Section 222 of the Communications Act of 1934, as amended (the “Communications Act”), provides additional privacy protections for information about the quantity, technical configuration, type, destination, location, and amount of your use of telecommunications services, including VOIP, Hosted IP, and traditional phone service, and the information about those services contained on your bills for those Services. This information is known as customer proprietary network information or “CPNI.” CPNI does not include your name, address, or telephone number, which is defined by the Communications Act as “subscriber list information.” If you are a customer of a telecommunications service, you have the right, and we have a duty, under the Communications Act and other applicable laws, to protect the confidentiality of your CPNI. If you have any questions about this policy or believe that it has not been followed, please contact us at [802-583-4628](tel:802-583-4628).

### **Security**

CVFiber has security measures in place in the design, implementation and operation of the site and in its underlying servers and networks. Furthermore, CVFiber maintains ongoing efforts to identify and/or block unauthorized intrusions into the site. Unauthorized attempts to upload to or change information on or otherwise cause damage to the site are prohibited.

By using this site, you consent to CVFiber’s monitoring of your uses of the system. If such monitoring reveals possible evidence of criminal activity or other unauthorized use, CVFiber personnel may provide your information to law enforcement or other officials, as authorized or required by law.

## **Vermont Public Records Act**

CVFiber may already have, or may acquire, personally identifiable information through the normal functions of our operation. The Vermont Public Records Act governs the use of any information maintained or acquired by a public agency. If state or federal law treats information as public and not confidential, CVFiber may make the record available, according to law.

## **Cookies**

A cookie is a small text file that a website can place on your computer's hard drive, for example to collect information about your activities on the site. The cookie transmits this information back to the website's computer, which, generally speaking, is the only computer that can read it. Cookies may be used on CVFiber's website for purposes such as to distinguish between visitors, track information about site usage, or to enhance user experience.

Most consumers do not know that cookies are being placed on their computers when they visit websites. If you want to know when this happens, or to prevent it from happening, you can set your browser to warn you when a website attempts to place a cookie on your computer.

If you have any questions about this policy or believe that it has not been followed, please contact us at [802-583-4628](tel:802-583-4628).

CVFiber may change this policy from time to time and reserves its right to do so without notice. Please also refer to Waitsfield and Champlain Valley Telecom's privacy policy, as it applies to your rights as well. WCVT is contracted to conduct CVFiber customer service and has access to certain private information of CVFiber's customers. Waitsfield and Champlain Valley Telecom's privacy policy can be found on WCVT's website here:

<https://www.wcvt.com/company/policies>

*This CVFiber Privacy Policy supersedes the CVFiber Privacy Policy Overview adopted Jan. 10, 2023.*