

Choptank Fiber, LLC Customer Privacy Notice

This Privacy Notice describes our practices with respect to information Choptank Fiber, LLC (“Choptank Fiber”) collects, uses, shares, and protects as part of the services we provide to our customers. The terms “Choptank Fiber,” “us,” “we,” or “our” refer to the Choptank Fiber entity that provides service to you. This Privacy Notice applies to Choptank Fiber customers and their use of Choptank Fiber’s Internet Service.

Choptank Fiber considers the privacy of our customers to be very important. This Privacy Notice explains the following:

- the limitations imposed by the Cable Act and CPNI regulations upon Choptank Fiber in its collection and disclosure of customers’ personally identifiable information;
- the type of personally identifiable information we collect;
- how we use personally identifiable information;
- under what circumstances we may disclose personally identifiable information and to whom we may disclose it;
- the duration for which we maintain personally identifiable information; and
- how customers may access their personally identifiable information in our possession.

Choptank Fiber collects information about our customers from several sources. This includes personally identifiable information that identifies a specific person, but personally identifiable information does not include any information that has been de-identified or aggregated so that it does not identify individual customers. The types of information we collect, as well as how we use it and how we protect it, are set forth below.

What Information We Collect

- Registration information. When a customer registers with us or signs up for our products or services, we require the customer to provide certain information, including all or some of the following: name, service and billing address, email address, telephone number, social security number, driver’s license number, billing and credit records, and bank account or credit card numbers used to pay for our services.
- Account and technical information. In order to provide service, we collect and maintain some or all of the following: account number, billing, payment and deposit history, services subscription information, maintenance and complaint information, device identifiers and network addresses of equipment associated with the account, the number of routers and other devices connected to our system and other service-related information.
- Communications with us. When a customer contacts us by email, chat or by telephone, we collect information, including the customer’s name, address, email address, telephone number, and billing or account information; we also retain customer correspondence and communication records. Certain customer calls to Choptank Fiber may be recorded.
- Use of our services. When a customer uses our Internet service, we may transmit, collect, and store information for a period of time related to the customer’s use of our service and features. This information may include the customer’s email; instant messaging activity; file transfers and sharing; web browsing; custom settings or preferences; and communications with us for support; or other uses of our services and features.
- Location data. If the device used to access Choptank Fiber’s Internet service supports location-based services, and the customer chooses to enable sharing the device’s location, we may collect your device’s location for certain purposes. A customer who does not want us to collect the device’s location can disable location services on the device using the device settings.

- Data from other sources. We may collect additional data, including demographic and billing or credit history, from other sources. We also use customer surveys, questionnaires, and interviews to gather information about customers' interests and use of our products and services.

How We Collect Information

We may collect data using a number of different technologies. Some of this data the customer provides, such as when he or she signs up for our service, sends us an email, or uses SmartHub to pay a bill. Some of this information we collect when a customer accesses our service, including from the equipment Choptank Fiber provides as well as from equipment the customer may own and use to access those services.

How We Use Information

We use the data we collect primarily to conduct business activities related to providing customers with Internet service.

By using Choptank Fiber's services, the customer agrees that Choptank Fiber may use his or her data, including Customer Proprietary Network Information (CPNI), for the following purposes:¹

- to install, configure, operate, upgrade, support, repair, and maintain our Internet service;
- to provide billing, account maintenance, product and service repair and to provide customer service;
- to monitor and detect against fraud or abuse of our products and services and to protect against harm to us or our subscribers;
- to determine whether there are violations of any applicable policies and terms of service;
- to provide high-quality customer service, authenticate access to customer accounts, and enable technical support;
- to properly deliver services and protect the security of the system;
- to communicate with customers in response to inquiries and customer service requests, and to notify customers about account and subscription information;
- to inform customers of software and security updates;
- to market service offerings among the category of service to which a customer already subscribes;
- to manage the network supporting our services;
- to measure credit and payment risks;
- to enhance and improve our offerings and their functionality, to provide customers with personalized offers and features, and tailor our services to make them more useful and enjoyable;
- to measure Internet service performance, including network and connection performance, device configuration, and other service-related data; and
- to protect our rights, personnel, and property; and to comply with applicable law.

Choptank Fiber is required to obtain a customer's approval (written, oral, or electronic) to use CPNI for the following purposes:²

- to market communications-related services to the customer, its agents, and its affiliates that provide such services; and
- any other use of customer CPNI not specifically enumerated herein.

Choptank Fiber may not use CPNI to identify or track customers that contact competing service providers.³

¹ 47 CFR § 64.2005

² 47 CFR § 64.2007

How We Share Information

Except as described in this Privacy Notice, we do not share customers' personal data without their consent. We may share or disclose customer information in the following ways:

- as necessary to render or conduct a legitimate business activity related to the service we provide, as described in this Privacy Notice;
- within the Choptank Fiber family of companies, including with affiliates and subsidiaries or to others who work for us;
- to outside auditors, professional advisors, service providers, vendors and regulators, or as part of a corporate transaction, such as a merger or sale of the business' assets;
- with third party service providers, vendors, and partners that help us with various business purposes, such as offering, marketing, providing, billing for, and maintaining or repairing our network, products and services;
- with other outside companies to deliver advertising campaigns and to conduct analytics, as described in this Privacy Notice;
- with law enforcement agencies and other parties as required by law or to respond to lawful requests; these disclosures may be made with or without the subscriber's consent, and with or without notice, in compliance with the terms of legal process, such as subpoenas, court orders or search warrants;
- to protect against fraud, abuse, or harm or to protect our interests; and
- to protect our customers, employees, or property, in emergency situations, to enforce our rights under our terms or service and policies in court or elsewhere, and as otherwise permitted by law.

How We Protect Your Information

We endeavor to follow industry-standard practices to prevent unauthorized access to personally identifiable information. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use or disclose personally identifiable information.

Choptank Fiber employees are trained as to when they are authorized to use CPNI and we have a disciplinary policy in place. Choptank Fiber also has a supervisory review process to ensure compliance with the CPNI rules.

Choptank Fiber takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Choptank Fiber will properly authenticate a customer prior to disclosing CPNI based on customer-initiated telephone contact, online account access, or an in-person visit.

Choptank Fiber will authenticate a customer without the use of readily available biographical information or account information, prior to allowing the customer online access to CPNI related to the customer's Internet service account.

Choptank Fiber may disclose CPNI to an in-person customer who first presents to Choptank Fiber a valid photo ID matching the customer's account information.

To the extent possible, Choptank Fiber will notify customers whenever a password, other means of authentication, online account, or address of record is created or changed.

³ 47 CFR § 64.2005(b)(2)

Choptank Fiber may bind itself contractually to authentication regimes other than those described in this section for services it provides to its business customers that have both a dedicated account representative and a contract that specifically addresses Choptank Fiber's protection of CPNI.

Protecting Children's Privacy

Our websites, products, and services are not directed to children under age 13. We do not knowingly collect personally identifiable information about children under age 18 unless expressly specified.

Third-Party Products & Services

Our products and services may enable customers to access other websites, services, mobile applications, virtual and voice-activated assistants, home automation, or other third-party products or services. Our websites, products, or services may even contain direct links to or permit customers to access other websites and services that are not offered or maintained by Choptank Fiber. The privacy policies of those third parties apply to the access and use of those websites, products and services and to the information they collect. We encourage customers to be aware and read the privacy statements of the websites and services they visit.

How Long We Retain Personally Identifiable Information

Choptank Fiber maintains personally identifiable information in our regular business records while a customer is a subscriber to our Internet service. We also maintain this information for a period of time after a customer is no longer a subscriber if the information is necessary for the purposes for which it was collected or to satisfy legal requirements. These purposes typically include business, legal, or tax purposes.

Accessing Personal Information

A customer is entitled to see the information that we collect about him or her. A customer can access and update some of the personal information we collect by logging into his or her account. A customer may also schedule an appointment at our local business office to see his or her personally identifiable information. Please send us a written request at the address below or to the business office address listed on your monthly bill, and we will set up an appointment. If the review reveals an error in our records, we will correct it, to the extent within our control.

Customer Proprietary Network Information (CPNI)⁴

Federal law and FCC rules provide protections for CPNI, which includes the quantity, technical configuration, type, destination, location, and information regarding the use of telecommunications services. CPNI does not include a customer's name, address, and telephone number.

Record Keeping. Choptank Fiber shall maintain, for at least one year, records of a customer's notice and approval to use CPNI. Choptank Fiber will implement a system to establish and track the status of a customer's CPNI approval. An officer of Choptank Fiber shall file the required annual CPNI certificate. Choptank Fiber will maintain a record of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. Choptank Fiber will maintain a record, containing the items specified in 47 CFR § 64.2009(c), of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

⁴ 47 CFR Subpart U.

Notice Required.⁵ Prior to soliciting customer approval, Choptank Fiber must provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI. Individual notice to customers is required when soliciting approval. Notice must be sufficient to enable the customer to make an informed decision and must contain the items specified in 47 CFR § 64.2008(c). Occasionally, you may be asked during a phone call with one of our representatives for your oral consent to Choptank Fiber's use of your CPNI for the purpose of providing you with an offer of products or services. If you provide your oral consent for Choptank Fiber to do so, Choptank Fiber may use your CPNI for the duration of such phone call in order to offer you additional services. Any action that you take to deny or restrict approval to use your CPNI will not affect our provision to you, now or in the future, of any service to which you subscribe.

Opt-out. Choptank Fiber does not use the opt-out provisions in 47 CFR Subpart U to obtain customer approval.

Notification of Security Breaches.⁶ Under the CPNI regulations, a breach has occurred when a person without authorization or exceeding his/her authorization has intentionally gained access to, used, or disclosed CPNI. In case of a breach, Choptank Fiber will make all necessary disclosures to the state, United States Secret Service, the Federal Bureau of Investigation, and customers as required by law and specified in 47 CFR § 64.2011.

Communication Preferences

A customer may opt out of receiving marketing communications from Choptank Fiber at any time. To opt out of marketing communications sent by email, use the "unsubscribe" link at the bottom of any such email, or send the request in writing. A customer may opt out of receiving marketing communications by telephone by notifying the calling party or by following the automatic opt-out instructions on such a call. A customer may also opt out of such calls by sending a request in writing to the address below.

What Other E-Mail Communications Will Choptank Fiber Send Me?

We may send a welcome e-mail and sometimes other information to new subscribers to our Internet service. We may also send service-related announcements to our subscribers from time to time. We may send an e-mail announcement of pricing changes, changes in operating policies, a service appointment, or new features of our service. Customers may not opt out of these service-related communications. If a customer fails to check the e-mail address provided to us, the customer may miss important information about our services, including legal notices. We reserve the right to send promotional or commercial e-mail as permitted by applicable law.

Changes to Privacy Notice

We may update this Privacy Notice from time to time. We will notify customers of any changes by posting the updated Privacy Notice online. Customers who object to the change may cancel their service. Customers who continue to use the service following notice of the changes are deemed to have accepted and consented to the changes in the revised privacy notice. This includes consent for any personally identifiable information that we may collect and use starting on the effective date of the revised notice, as well as for any personally identifiable information that we have collected prior to the effective date of the

⁵ 47 CFR § 64.2008

⁶ 47 CFR § 64.2011

revised notice. We will provide a current copy of this Privacy Notice at the time a customer subscribes to our service.

How to Contact Choptank Fiber

If a customer has any questions regarding this Privacy Notice, or if a customer believes that his or her privacy rights have been violated in any way, please contact us directly at the address below. If a customer believes that his or her rights under federal law have been violated, the customer may bring a private civil action in U.S. District Court to recover damages, costs, and attorneys' fees.

Choptank Fiber, LLC
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