# **Privacy Policy Overview**

Like most companies, we have certain information about our customers and use it to provide our services. We also share it only with our subsidiary companies.

# What information does Green Hills Companies have?

When we provide our services, which include Internet access, local and long distance telephone, television (ghTV), we necessarily obtain certain information about you. This information may include your name, address, email address, telephone number, date of birth, social security number, driver's license number, credit information, payment information, and contact information.

**Network management.** We use information generated on our networks to manage those networks, to plan for future development, and to keep our services running reliably and efficiently. For example, we monitor data to check for viruses, to control spam, to prevent attacks that might disable our services, to ensure that your traffic does not violate your subscriber agreement or our acceptable use policies, and to guard against other inappropriate or illegal activity. This may involve looking at the characteristics of our network traffic, such as traffic volumes, beginning and ending points of transmissions, and the types of applications being used to send traffic across our network. In limited circumstances, we need to look into the content of the data (such as the specific websites being visited, files being transmitted, or application being used) for the purposes described above, in circumstances when we are concerned about fraud or harassment, to repair a problem we detect or that a customer contacts us about, or when we are providing the content of broadband traffic to law enforcement which we only do as authorized by law.

## How does Green Hills Companies use customer information?

We may use customer information to provide our services and keep you informed of changes to them, to market our services and sometimes those of others, and to plan improvements to the services we offer and the way we interact with our customers.

#### Does Green Hills Companies share customer information?

Yes, but only to Green Hills Companies affiliates which include local, long distance, internet, voice over internet protocol (VOIP), and video operations of Green Hills Telephone Corporation. Green Hills will not disclose or sell customer information to third parties, unless otherwise required to do so by operation of law.

However, if you so desire, Green Hills will not use or share with other Green Hills affiliates your customer information to offer products or services that are unrelated to the services you currently receive from Green Hills. If you would prefer that Green Hills not use your customer information for this purpose, you may opt-out by calling 644-5411 or 1-800-846-3426. Your decision to opt-out will remain in effect until you affirmatively revoke or limit such approval or denial and will not have any impact on your current Green Hills Services. You may at any time, opt-out or revoke your previous decision to opt-out by calling the number listed in this paragraph.

## What choices do our customers have about the information we gather and how we use it?

You have some choices about what customer information we gather and how we use it.

- You can choose whether to be included in a published directory or directory assistance services. Under federal law, directory publishers and directory assistance providers must honor restrictions requested by our customers, such as that the information not be published or used for marketing.
- If you have elected to have your name, address and telephone number published in white pages directories (which means that it will be public information), we allow that information to be used by others for their own marketing or to create marketing lists.

## What access do customers have to information about themselves?

You may access information about yourself in three ways:

- Through your bill, whether you receive it by mail or electronically.
- If you are a residential customer and have an eBill Account it shows service information and may provide usage information as well.
- You can also call us to discuss your account or to authorize someone else to talk with us about your services or other account details.

#### How long does Green Hills Companies retain customer information?

How long we keep different types of information is determined by business requirements and Missouri and federal laws and regulations.

## How does Green Hills Companies secure customer information?

We take the security of our customer information seriously. We do several things to protect it:

- We have administrative, physical and technical controls to safeguard it; and
- We train our employees on the importance of protecting it.

# **Contacting us:**

If you have questions about this policy or our practices, please email us at comments@ghtc.com or write us at:

Green Hills Companies Legal PO Box 227 Breckenridge, MO 64625

# **Full Privacy Policy**

What information does Green Hills Companies obtain and how do we use customer information?

# General practices - gathering

Signing up and ordering services. When customers sign up for service, we ask for their name, street address, email address, how they want their listing to appear in phone directories and directory assistance, and contact information. We may ask for date of birth, social security or driver's license numbers (to confirm identity or determine creditworthiness), billing information including whether bills should be sent by mail or set up for online access, and bank account or credit card information if a customer elects to pay electronically. We also keep notes of contacts we have with our customers.

**Recording, reviewing or monitoring of your interactions with Green Hills Companies.** For quality assurance and training, we sometimes record or listen to calls made to or from our customer service.

**Network recording of service usage.** We record information about usage of our networks or systems. For example, we may log dates and times and the telephone numbers of calls to and from our customers, especially when the information is necessary for toll billing. Generally, we do not retain any call information for local landline calls. If a customer activates a "call trace" feature, we will record the number of the calling party. And when we are your Internet service provider (ISP), we maintain short-term logs of the total volume of data a user transmits and the user's IP address at the time.

## General practices – use

**Routine business uses of personal information.** We use information that we obtain from customers or generate while providing our services to set up and maintain accounts, provide and repair our services and equipment, respond to customers' questions and concerns, bill and collect for our services, plan for future development of our network and services, to market our services, and communicate with our customers and others about our services.

# When Green Hills Companies provides voice service

As a provider of local and long distance, services, we use customer information as outlined above.

# When Green Hills Companies is your Internet service provider

As your ISP, we gather and use information as outlined above.

Information we obtain when Green Hills Companies provides Internet access. We gather and use information generated on our networks to manage them, to plan for future development of our network and services, to market our services, and to keep our services running efficiently. For example, we monitor data to check for viruses, to control spam, to prevent attacks that might disable our services, to ensure that your traffic does not violate your subscriber agreement or our acceptable use policies, and to guard against other inappropriate or illegal activity. This involves looking at the characteristics of our network traffic, such as traffic volumes, beginning and ending points of transmissions, and the types of applications being used to send traffic across our network.

Sometimes we need to look into the content of the data (such as the specific websites being visited, files being transmitted, or application being used) for the purposes described above, in circumstances when we are concerned about fraud or harassment, to repair a problem we detect or that a customer contacts us about, or when we are providing the content of broadband traffic to law enforcement which we only do as authorized by law.

Most of the specific information we obtain that is attributable to a user is kept only for a matter of hours or days. We may retain data for longer if, for example, we see patterns in the traffic that give us concerns about potential harm to our network, or if we are doing a specific study on the impact of certain applications used on our networks. We also retain for longer periods logs of the total amounts of data transmitted, and the date, time, and duration of access to the Internet through our services by a user, including the user's IP address at the time.

**Children's use of Green Hills Companies's Internet services.** We understand that children may use our Internet services. We urge you to pay attention to what your children are doing on the Internet and what sites they are visiting.

**Obtaining information from children under 13.** Unless otherwise indicated, our websites are intended for general audiences and not directed to children. We do not knowingly collect personal information from children under 13. Note that other providers' web pages are accessible through links on many of our websites, and those providers may have different practices on collecting and using information from children under 13. If you are concerned about those sites, please review them and their privacy policies.

## Does Green Hills Companies share customer information?

#### **General practices**

**Sharing information within Green Hills Companies.** Green Hills Companies is made up of a number of affiliate companies and we share information among them as permitted by law or with your consent. You benefit when we better understand your interests and needs. And knowing more about how our customers use our services and sharing that information among our companies helps us improve our networks, the services we provide, and our customer service. It also lets us personalize our interactions with you.

**Providing information when lawfully permitted and necessary.** Like other businesses, we may share customer information: (1) to comply with laws or to respond to lawful demands such as subpoenas or court orders; (2) to assert or defend our legal rights or the rights of our employees, agents, contractors, or customers; (3) to investigate and protect against fraud, harassment, or other types of unlawful activity involving us, other providers we do business with, or our customers; (4) to protect our property, including our networks, or the property or networks of others; or (5) as otherwise permitted by law.

**Caller ID.** We disclose customer information through call-identifying products and services like Caller ID. In some instances, you can block that disclosure.

**Sharing of Customer Proprietary Network Information (CPNI).** CPNI is a subcategory of protected customer information defined by federal law as information about a consumer's account, including usage and billing of telecommunications services. Those services are offered by providers of traditional local, long distance, and wireless services, as well as providers of Voice over Internet Protocol (VoIP)

services to consumers. CPNI includes what services you subscribe to, how you use them, and what you are charged for them. It does not include your name, address, telephone number, or other types of information such as information about your telephone equipment or Internet access services. Communications companies are required to treat CPNI confidentially, and we do. The FCC regulates when and how CPNI can be shared and used. To find out more about the FCC's CPNI rules go to http://www.fcc.gov/guides/protecting-your-telephone-calling-records

**Directory publishers.** By law, when Green Hills Companies accepts a directory listing for publication, we must provide that listing information to all directory publishers - both our official publisher as well as third-party publishers. When we receive listings from other carriers, they tell us what directories (if any) they want their customer information published in. Once publishers have the listing information, they can use, sort, organize or package the information in any manner they wish: arranged by name or by telephone number, for example, or published in paper directories, electronic directories over the Internet, on CDs, or in any future directory format that may be developed.

We are also required to give directory publishers the names and addresses of customers with non-listed and non-published information. These publishers can use this information *only* to deliver their directories and for no other purpose.

**Directory assistance providers.** The Federal Communications Commission requires carriers to share customer names, addresses, and telephone numbers with directory assistance providers (including names but not telephone numbers of non-published customers). Some of these providers offer Internet or online directory assistance services. The FCC does not allow us to restrict how these providers use the customer information we give them. But we do require companies that buy our directory assistance information to sign a contract agreeing to honor restrictions you have asked for, such as that it not be published, when they use the information for purposes other than directory assistance.

**Emergency service providers.** Federal law requires us to provide customer names, addresses, and telephone numbers - including information on non-published and non-listed customers - to emergency services providers, including 911 and reverse-911 providers (who notify the public of emergencies). This information is also provided to those responsible for answering 911 calls when they receive such calls.

#### Disclosure of information through links from Green Hills Companies websites

Our websites contain links to websites of other businesses. We are not responsible for information those sites collect. If you are concerned about the information collected by these other sites, please review their privacy policies.

# Sharing of customer information with the government

Responding to lawful process. We may provide customer information to the government in response to a subpoena, warrant or court order. Among the information we might be asked to provide are a customer's name, address, telephone number, account number, any Internet Protocol or network address that we assigned to the customer, records of service usage (including interactive session times and durations), how long the customer has subscribed to our services (including start date and the types of services used), and the means and source of customer payment (including any credit card or bank account number used to pay for our services). In response to a search warrant or court order, we may be required to disclose to law enforcement agencies the content of and records relating to telephone

calls, and Internet usage. We do not provide notice to our customers of law enforcement demands for information.

**Voluntary release of information in an emergency.** We may provide customer information to the government if we believe in good faith that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure without delay.

**Other voluntary releases of information.** Under certain conditions, we voluntarily share information with governmental agencies:

- If we encounter situations where we think our customers or others that we might be in contact with are violating the law, we may contact law enforcement and provide them with the information that led to our belief.
- When customers complain about us to federal and state regulatory authorities, we provide pertinent information (including customer information) in response to those complaints, and may provide pertinent information to other governmental bodies inquiring about such complaints, such as state or federal legislative committees.
- · We may share information with the government to protect our rights or property, including information indicating that some portion of our network or the network of another provider is or has been subject to a cyber attack.
- Periodically, we compare our customers' name and address information with the information possessed by the U.S. Postal Service. This lets us mail at reduced rates and helps ensure that our customers get their bills and other information from us more economically and reliably.
- We also share information with federal and state agencies in connection with their programs to fund universal service and other communications assistance programs for low-income or otherwise eligible persons, including persons with disabilities.
  - **Reporting of child pornography.** Like other service providers, we are required to report apparent violations of laws concerning child pornography when we have a reasonable belief of facts or circumstances that warrant a report. In those cases, we contact the National Center for Missing and Exploited Children and may also contact law enforcement directly.

What choices do our customers have about information we obtain and how we use it?

# **General practices**

**Telephone directory treatment.** You can choose whether and how your entry appears in Green Hills Companies directories and through Green Hills Companies directory assistance. You can choose not to have your name and address in these directory services at all or opt for full names or initials, or full or partial addresses.

**Opting out of marketing communications.** You can ask not to receive our marketing calls, mail and email. You will still receive bills, service related contacts and notices from us even if you choose not to receive marketing contacts.

# **Choices regarding directory listings**

You can choose not to be published in our directories or listed in our directory assistance service. A non-published status means that a number is unavailable in both places, while a non-listed status means that name and number are not printed in directories but are available through directory assistance. To make

one of these choices (for which there may be a fee), please call us at one of the numbers on the top of this page.

If you choose to be listed in a directory, you can limit the information provided. For example, you can decide to list only your last name and first initial, or you may use either a community address (such as "Breckenridge," or "Dawn") or no address at all.

**Please note** that we are required to give non-published and non-listed customer names and addresses to directory publishers for directory deliveries and to directory assistance providers. But we mark the information so that they know our customers' privacy choices and by contract we require them to follow those preferences.

## **Choices regarding marketing contacts**

**Telephone.** Federal Do Not Call laws allow you to place residential landline and wireless phone numbers on the National Do Not Call Registry to prevent telemarketing calls to those numbers. If you would like to add your numbers to this list, you may do so by calling 1-888-382-1222, or by visiting www.donotcall.gov.

**Please note** that being on a federal or state Do Not Call list will not keep customers from getting our marketing calls because we have an established business relationship with our customers.

Residential customers who don't want to receive our marketing telephone calls or marketing materials may ask to "opt-out" by calling us at 1-800-846-3426.

**Please note** that it may take up to thirty days for your choices regarding marketing contacts from us to become effective. If you are our customer, you will still receive bills, service related contacts and notices from us even if you choose not to receive marketing contacts.

## What access do customers have to information about themselves?

Access through billing statements. Your monthly billing statement contains the primary name on your account, the services you subscribe to or use, and the amount billed. A paper billing statement may contain less detailed information about specific services or usage than information available online. Both may contain other information, such as regulatory notices and charges passed on to you from other service providers. If you find a mistake in the information we have or if you have any questions about your account, please call us at 644-5411 or 1-800-846-3426.

**Telephone and online access.** We will discuss your account with you or with someone you authorize (once the caller is properly authenticated). Information may also be available to an authorized user through your online account profile. If you want to authorize someone to talk about your services or other account details, call us at 644-5411 or 1-800-846-3426.

#### How does Green Hills Companies secure customer information?

**Restricted access to information.** Only Green Hills Companies employees, agents, service providers and other businesses we work and share information with and who have a legitimate business purpose are authorized to access customer information. This access is strictly defined (often involving password

controlled access and other security controls) and subject to policies and contracts requiring confidential treatment of the information.

**Securing sensitive information.** We use secure technologies to transfer sensitive information and comply with a variety of industry standards, and federal and state laws regarding the protection of customer information.

**Employee and vendor training.** We require employees to protect customers' information. We train our employees on those policies when they are hired, and we update that training periodically.

**Proactively protecting your own information.** We encourage our customers to actively protect their personal information. Don't give identifying information to strangers or others unless you're certain they have a right to or a need for the information. Also, protect the security of personal information you transmit over home networks, wireless routers, WiFi networks, and similar devices by using encryption and other techniques to prevent unauthorized interception.

# **Changes to this Privacy Policy**

We update this privacy policy from time to time to reflect evolving technology and other service, process and policy changes.

#### **Contacting us**

For questions about this policy or our practices, please email us at comments@ghtc.com or write us at:

Green Hills Companies Legal Privacy Group PO Box 227 Breckenridge, MO 64625