

HUMBOLDT UTILITIES BROADBAND

PRIVACY POLICY

Last Updated: August 21, 2026

INTRODUCTION

Humboldt Utilities Broadband, a division of Humboldt Utilities Authority ("HUA"), recognizes the importance of protecting your personal information and is committed to safeguarding your privacy. Because HUA respects its customers and understands that you may be concerned about privacy, HUA has adopted policies intended to protect your personal information in a safe and responsible manner.

HUA's Privacy Policy is an extension of our mission to provide quality service, excellent support, and advanced technology. This Privacy Policy applies to information we collect when you subscribe to, access, or use HUA's products, services, and websites (collectively, the "Services"). It explains the types of personal information we collect and how we collect, use, maintain, protect, and share that information. It also describes rights and choices you may have regarding your personal information.

We take seriously our responsibility to protect your privacy and the information we collect about you. Our objective is to protect this information to the extent reasonably possible in accordance with this Privacy Policy, applicable law, and normal business practices.

WHAT INFORMATION DO WE COLLECT?

To provide the Services, we may collect:

- Contact information, including a customer's name, service and billing addresses, telephone number, email address, and other information required to provide and bill for Services. When you use HUA Internet Service, HUA may also collect information such as your device's Internet Protocol (IP) address, browser type and version, and the date and time of use.
- Billing information, including account status and payment history. HUA does not collect or store payment-card or bank-account information used for electronic payments. That information is stored and processed by HUA's payment processor.
- Responses to customer surveys conducted by HUA to identify customer needs or improve the Services.
- Additional information about a customer, the customer's property, or other matters obtained in connection with Services offered by HUA.
- For HUA's text-messaging program, mobile telephone numbers, messaging preferences and consent records, including the date, time, and method of opt-in or opt-out, and information concerning messages sent or received and your interactions with those messages.

When you visit our website, you may provide personal information that you knowingly choose to disclose. HUA may also collect website-use information on an aggregate basis as you and others browse our website.

Cookies are a standard feature of web-browser software that allow web servers to recognize the device used to access a website. Cookies are small pieces of data stored by a user's browser. They may store selected information that a user accesses on a webpage to simplify later interactions or streamline related transactions. Cookies help us collect business and technical statistics, such as how users move from one page to another, so that we can improve website navigation. We do not use these technologies to capture your email address or other directly identifying information, although they allow us to aggregate information about website use.

If you correspond with us by email, we may retain your messages, your email address, and our responses. We may also send automated messages about your account, such as invoices and other notices. We provide electronic communications the same protections we use for information received by

mail or telephone. Please do not send confidential information, such as a Social Security number, through unsecured email.

To update or correct account information, such as your mailing address, the primary customer name, or the Services or features to which you subscribe, please call the customer-service number shown on your bill.

HOW IS INFORMATION COLLECTED?

- When a customer creates an account or interacts with HUA regarding an account, Services, or participation in an HUA program.
- When a customer uses HUA's voice, internet, or mobile-messaging services.
- When a customer interacts with HUA through its website.
- When HUA interacts with third parties regarding a customer, such as a credit-reporting agency.

HOW DO WE USE THE INFORMATION WE COLLECT?

HUA collects and maintains customer information for purposes of its operations and management. Customer information will not be used for any improper or unlawful purpose.

HUA uses customer information in defined and responsible ways to manage, provide, and improve its products, Services, and operations. We may use the information we collect to:

- Deliver, maintain, and improve our products, Services, websites, and applications.
- Fulfill requests for new Service or changes to an account or existing Services.
- Provide technical support and high-quality customer service, including through recorded or monitored communications between you and our customer-service representatives.
- Create and administer an HUA account, including activating Service, billing, invoicing, and debt-collection activities.
- Authenticate you or otherwise provide access to HUA products and Services.
- Provide updates, upgrades, repairs, or replacements for service-related devices or software.
- Manage and configure our devices, systems, and networks.
- Understand how Services are used, including through operational and marketing reports based on de-identified or aggregated usage information.
- Protect system security; prevent fraud; detect unauthorized receipt, use, or abuse of an HUA product, Service, website, or application; and enforce HUA policies or applicable terms of service.
- Protect our rights, personnel, property, customers, and others.
- Maintain accounting, tax, and other business records.
- Comply with applicable federal and state laws and regulations and administer our business.

We may use information we collect to deliver and personalize communications. For example, we may use survey responses and account information to recommend HUA products or Services that may interest you, remind you of a service appointment, follow up after a service request, or send important Service-related notices and announcements.

We may send promotional communications about products and Services by mail, telephone, text message, or online, subject to applicable law and your communication preferences. Some communications may relate to Services to which you already subscribe, while others may be based on your general geographic location. For example, if HUA launches a new Service in a specific area, only residents of that area may receive the communication.

Customer internet-usage data may be compiled in aggregate form and used to improve system operations, efficiency, and customer service.

HUA retains customer information for the period required by law or regulation or as reasonably necessary to provide Services and administer its business.

MOBILE MESSAGING PRIVACY

HUA may use your mobile telephone number and messaging-consent information to send messages you have requested or authorized, including account, billing, service, appointment, outage, customer-support, and promotional communications. Message frequency may vary. Message and data rates may apply. Consent to receive marketing or promotional text messages is not a condition of purchasing any HUA product or Service.

HUA does not share, sell, rent, or provide your mobile telephone number, mobile information, text-messaging opt-in data, or messaging-consent information to third parties or affiliates for marketing or promotional purposes. This restriction applies notwithstanding any other provision of this Privacy Policy.

HUA may use service providers that process mobile information solely on HUA's behalf as necessary to operate and support HUA's messaging program, deliver messages, maintain consent and opt-out records, prevent fraud or abuse, and comply with law. Those providers are not authorized to use mobile information or messaging-consent data for their own marketing or promotional purposes.

You may opt out of HUA text messages at any time by replying STOP. You may reply HELP for assistance. Opting out of text messages does not prevent HUA from contacting you through other lawful means or from sending communications that cannot legally be waived.

WHAT ARE YOUR RIGHTS AND OUR LIMITATIONS UNDER FEDERAL LAW?

Section 222 of the Federal Communications Act of 1934 (the "Communications Act") imposes limitations on HUA's collection, use, and sharing of information that personally identifies you when you subscribe to telecommunications services, including voice telephony. This Privacy Policy is designed to comply with those requirements.

Section 222 provides privacy protections for information about the quantity, technical configuration, type, destination, location, and amount of your use of telecommunications services, including HUA Voice Services, and information about those Services contained on your bills. This information is known as customer proprietary network information or "CPNI." CPNI does not include your name, address, or telephone number, which the Communications Act defines as "subscriber list information." That information is, however, otherwise considered personally identifiable information.

If you are a customer of HUA Voice Service or another Service subject to these requirements, you have the right, and HUA has a duty, under the Communications Act to protect the confidentiality of your CPNI. The Federal Communications Commission's rules provide additional privacy protections and choices regarding the use and sharing of that information.

HOW DO WE PROTECT YOUR INFORMATION?

- HUA maintains reasonable and appropriate technical, administrative, physical, and cybersecurity safeguards designed to protect customer information against loss, unauthorized access, destruction, misuse, modification, and improper disclosure. We strive to use commercially acceptable means to protect personal information. However, no system can be guaranteed to be secure against every possible hazard.
- HUA does not maintain payment-card or bank-account information used for electronic payments; that information is handled by our payment processor. We periodically confirm that our payment processor remains compliant with applicable Payment Card Industry Data Security Standards.
- Our corporate values, ethical standards, policies, and practices reflect a commitment to protecting customer information. Our business practices generally limit employee access to confidential information and limit its use and disclosure to authorized persons, processes, and transactions.
- HUA requires employees, affiliates, contractors, and service providers that have access to customer information to comply with applicable privacy, security, and confidentiality requirements.

- Customer information accessible through HUA's online account system is protected using cybersecurity measures designed to prevent unauthorized access.

DOES HUA DISCLOSE OR SHARE CUSTOMER INFORMATION WITH THIRD PARTIES?

- HUA does not share customer information, such as internet-usage data and information that can reasonably identify an individual, with third parties except at the customer's request, with the customer's consent, or as described below. Mobile information and messaging-consent data are subject to the additional restrictions stated in the Mobile Messaging Privacy section above.
- Information may be disclosed to affiliates, contractors, or service providers retained by HUA to perform operational functions, such as service delivery, maintenance, billing, payment processing, customer support, network management, legal, audit, and collection services. Information will be disclosed only to the extent reasonably necessary to perform those functions and only to recipients required to maintain appropriate confidentiality and security. Mobile information and messaging-consent data will not be disclosed to any third party or affiliate for marketing or promotional purposes.
- HUA may disclose information to commercial and consumer credit-reporting agencies for credit-related activities, such as reporting bad debts.
- Aggregated or de-identified information may be disclosed where reasonably necessary or beneficial to HUA's operations, such as improving efficiency and customer service.
- HUA may disclose information when authorized or required by law, including in response to a search warrant, subpoena, court order, or law-enforcement request. HUA may be required to disclose information that identifies you, information about your use of the Services, or the content of communications upon receipt of valid legal process. These disclosures may be made with or without your consent or notice, as permitted by law.
- HUA may disclose personally identifiable information without your consent when HUA reasonably and in good faith believes disclosure is necessary to protect customers, employees, other persons, or property; respond to an emergency; enforce HUA's rights or applicable service terms and policies; or comply with law.
- Information may be shared with HUA affiliates and partners to the extent permitted by law and applicable regulations. HUA does not sell, rent, loan, exchange, or otherwise release customer information to non-affiliated third parties or partners for their marketing purposes. HUA does not share mobile information or messaging-consent data with third parties or affiliates for marketing or promotional purposes. If HUA changes any other applicable sharing practice, HUA will provide notice and obtain consent when required by law.
- HUA may partner with another party to provide specific Services or goods. When a customer requests those Services or goods, HUA may share the contact or account information reasonably necessary for that party to provide them. Those parties may use personally identifiable information only to provide the requested Services or goods and may not use mobile information or messaging-consent data for marketing or promotional purposes.

CHANGES TO THIS PRIVACY POLICY

The most current version of this Privacy Policy will be published and maintained on HUA's website. The needs of our customers and business may change, and HUA may modify this Privacy Policy when appropriate. If HUA changes its privacy policies or procedures, HUA will post the updated Privacy Policy on its website so that you remain informed about the information HUA collects, how it is used, and the circumstances under which it may be disclosed.

CONTACT HUA

If you have questions about this Privacy Policy, HUA's website practices, or HUA's use of customer information, please contact HUA Customer Service at 731-784-9212 or support@humboldtutilities.com.