

## **INTRODUCTION**

Humboldt Utilities Broadband powered by Humboldt Utilities Authority (“HUA”) recognizes the importance of protecting your personal information, and we are committed to safeguarding your privacy. Because HUA respects its customers, and understands that you may be concerned about privacy, we have instituted 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 the information we collect when you subscribe to, access, or use the HUA products, services, and websites. This Privacy Policy explains the types of personal information we collect, and how we collect, use, maintain, protect, and share this information. This Privacy Policy also tells you about the rights and choices you may have when it comes to your personal information.

We take seriously the responsibility of protecting your privacy and the information we collect about you. The objective is to protect this information to the extent reasonably possible in accordance with this policy and normal business practices.

## **WHAT INFORMATION DO WE COLLECT?**

To provide you with our Services, we may collect:

- Contact information which includes customer’s name, billing address, telephone number, e-mail address as well as other information required to provide service and billing to each customer. The use of internet service from HUA shall give HUA access to collect information such as your computer’s Internet Protocol (“IP”) address, browser type, browser version, as well as the time and date of your use.
- Billing information, including account status and payment history. HUA does not collect or store any Payment Card Industry (“PCI”) information for electronic payments including card number, expiration date, and/or bank routing and account numbers. All electronic payment information is stored with and processed by our payment gateway processor.
- Responses to customer’s survey(s) conducted by HUA to identify needs or to improve service.
- Additional information about a customer or customer’s property and other matters obtained through services offered by HUA.

When you visit our website, you may provide us with two types of information: personal information that you knowingly choose to disclose that is collected on an individualized basis, and website use information collected 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 computer used to access a website. Cookies are small pieces of data that are stored by a user’s web browser on the user’s hard drive. Cookies store select pieces of information that a user accesses on a web page to simplify subsequent interactions with that website by the same user or to use the information to streamline the user’s transactions on related webpages. Cookies help us

collect important business and technical statistics. For instance, we can use cookies to analyze how users move from one page to another; this helps us improve navigation on our website and make it easier for you to find things. We do not use these technologies to capture your individual email addresses or any personally identifying information about you, although they do permit us to aggregate information about your usage of our website.

If you choose to correspond to us through email, we may retain the content of your email messages along with your email address and our responses. We also may send automated messages to you pertaining to your account, such as billing invoices and other notices. We provide the same protections for these electronic communications that we employ in the maintenance of information received by mail or telephone. We ask that you not provide us with confidential information such as social security through unsecured email.

If you need to update or correct your account information (such as your mailing address, primary customer name, which services or features you subscribe to, or other details), please call the customer service number shown on your bill.

#### **HOW IS INFORMATION COLLECTED?**

- When a customer creates an account and interacts with HUA regarding their account or other services or participation in a program available through HUA.
- When a customer uses voice or internet service of HUA.
- 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 THAT IS COLLECTED?**

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

HUA uses the information about customers in defined and responsible ways in order to manage, provide, and improve its products, services and operations for its customers. We use the information we collect to:

- Properly deliver, maintain and improve our products, services, websites and applications;
- Fulfill requests for new service or changes to your account or the products and services you already receive;
- Provide you with technical support and high quality customer service, including through the use of recorded or monitored communications between you and our customer service agents;
- Create and administer a HUA, including activating your service, billing, invoicing, and debt collection activities;
- Authenticate or otherwise provide you access to your HUA products and services;
- Provide updates, upgrades, repairs or replacements for any of our service-related devices or software used in providing or receiving services;
- Manage and configure our device(s), system(s) and network(s);
- Understand how the service is being used, including through the creation of operational and

marketing reports based on de-identified and/or aggregated service usage information;

- Protect the security of the system, prevent fraud, detect unauthorized reception, use, and abuse of any HUA product, service, website or application, and to enforce any HUA policy or applicable terms of service;
- Protect our rights, our personnel, our property, and the safety of others;
- Maintain our accounting, tax and other records; and
- Comply with applicable federal and state laws and regulations, as well as for the general administration of our business.

We may use the information we collect to deliver and personalize our communications with you. For example, if you respond to a survey, we may use that information and information from your account to send you recommendations for additional HUA products or services that may be of interest to you and to provide you with a more personalized experience. We may use the information to remind you of a service appointment, to follow up with you after a service request, and to send you important service-related notices and announcements.

We may send you promotional communications for products and services that may be of interest to you through the mail, by phone or text messages, or online. Some of these communications may be directed to you because of the HUA services to which you already subscribe, and some may be directed to you because of your general geographic location. For example, if we are launching a new service in a specific area, only residents of that particular area will receive that promotional communication.

Data about customers' internet usage may be compiled in aggregate form, and such data may be used by HUA to improve system operations, efficiency and overall customer service.

HUA retains customer information for such periods of time as required by law or regulation or as reasonably necessary to provide services.

## **HOW DO WE PROTECT YOUR INFORMATION?**

- HUA maintains customer information with reasonable and appropriate technical, administrative, physical, and cyber safeguards to protect against loss, unauthorized access, destruction, misuse, modification, and improper disclosure of customer information. We strive to use commercially acceptable means to protect your personal information. **HOWEVER, UNDER NO CIRCUMSTANCES CAN HUA GUARANTEE ITS ABSOLUTE SECURITY AS NO SYSTEM CAN EVER BE FULLY PROTECTED AGAINST EVERY POSSIBLE HAZARD.**

- HUA does not house or maintain any personal credit card data; such information is handled by our payment processor. We periodically confirm that our payment gateway provider remains in compliance with the PCI Data Security Standard governing the security and confidentiality of your personally identifiable information.

- Our corporate values, ethical standards, policies and practices are committed to the protection of customer information as described in this policy. In general, our business practices limit employee access to confidential information, and limit the use and disclosure of such information

to authorized persons, processes, and transactions.

- HUA requires its employees, affiliates, and contractors who have access to customer information to comply with this privacy and confidentiality policy.
- Customer information that customers may access through HUA's online account system is protected using cyber security protocols designed to prevent unauthorized third parties from accessing such information.

#### **DOES 4CFASTnet DISCLOSE OR SHARE CUSTOMER INFORMATION WITH THIRD PARTIES?**

- HUA does not share customer information (e.g., a customer's internet usage data and information that can reasonably be used to identify an individual) with third parties, except at the customer's request, with the customer's consent, or as described below.
- Information may be disclosed to affiliates or contractors hired by HUA to assist in carrying out operations, such as service, maintenance, billing and management functions including legal, audit and collection services. Information may also be shared with other suppliers under shared service agreements or to meet operational requirements. Information will only be disclosed to such persons to the extent necessary to render the services, and only to those who agree to maintain the confidentiality and security of the information.
- HUA may disclose to and share information with commercial and consumer credit reporting agencies for credit-related activities (e.g., the reporting of bad debts).
- Aggregated information may be disclosed to third parties where necessary or beneficial for HUA operations (for example, to improve efficiency and overall customer service).
- We may disclose information when authorized or required by law, including a response to a search warrant, subpoena or court or law enforcement order. For example, HUA may be required by law to disclose information about you, including information that personally identifies you, your use of our services, and the content of your communications, to governmental entities upon receipt of valid legal process. These disclosures may be made with or without your consent and with or without notice, in compliance with the law, including the terms of process.
- HUA may also disclose personally identifiable information about you, without your consent, when we believe in good faith that it is necessary to protect our customers, employees, or property; in emergency situations; to enforce our rights in court or elsewhere, or directly with you, for violations of service terms, conditions or policies; and/or as otherwise required by law.
- Information may be shared with affiliates and partners of HUA, to the extent permitted by law and applicable regulations. However, HUA does not sell, rent, loan, exchange or otherwise release customer information to non-affiliated third parties or partners for their marketing purposes. While HUA has no plans to do so, if HUA ever changes this business practice, HUA will provide customers

with advance notice and obtain their express consent.

- HUA may partner with another party to provide specific services or goods. When the user signs up for these services or goods, we will share names, or other contact information that is necessary for the third party to provide these services or goods. These parties are not allowed to use personally identifiable information except for the purpose of providing these services or goods.

### **CHANGES TO THIS PRIVACY POLICY**

The most current version of our Privacy Policy is published and maintained on this site. The needs of our customers and the business may change from time to time and, when that happens, we may need to modify this Privacy Policy. If we change our privacy policies and procedures, we will post those changes on our website to keep you aware of what information we collect, how we use it, and under what circumstances we may disclose it.

### **CONTACT 4CFASNet**

If you have questions about this Privacy Policy, the practices of this website, or use of customer information by HUA, please contact customer service, which can be reached by phone at 731-784-9212 or by email at [support@humboldtutilities.com](mailto:support@humboldtutilities.com).