



# PRIVACY POLICY

Effective April 19, 2019

# **Our Commitment to Privacy**

Waldron Telephone Company, Waldron Communication Company (hereinafter referred to as "we", "our", "us", or "Waldron") are committed to providing high quality service along with the highest level of integrity in dealing with our customers (hereafter referred to as "you", "your", or "customer"). As providers of telecommunications and related services and products, we recognize and are committed to protecting the privacy of our customers. As an extension of this commitment, this Privacy Policy is designed to assist you in understanding how we collect, use and safeguard the personal information we collect and to assist you in making informed decisions when using our services.

Waldron also has an obligation to assist law enforcement and other government agencies responsible for protecting the public welfare. If Waldron is requested to assist a law enforcement or governmental agency, we do so in strict compliance with the law. This Privacy Policy may be assessed against new technologies, business practices and our customers' needs and legal developments, and may be revised accordingly.

## **Personal Identifying Information**

We collect personal identifying information regarding our customers, including information customers give us, information collected as a result of the customer's relationship with us and information we obtain from other sources, such as name; address; e-mail address; telephone number; user IDs; passwords and demographic information. Some of this information is not available to the public, such as your passwords, unpublished numbers etc. and we take commercially reasonable steps to protect the privacy of this information. We also maintain customer information concerning credit, billing and payment, security deposits, maintenance and repair, equipment and services provided.

We use the public and private personal identifying information of a customer to provide, confirm, change, bill, monitor and resolve problems with your Waldron products and services. We limit access to private personal identifying information to those employees, contractors, and agents who need access to such information to operate, develop, or improve our services and products. We may aggregate the personal identifying information of different customers to produce data about a group or category of services or customers, however, such aggregate data will not reflect any personal identifying information of any specific customer.

#### **How We Share Information We Collect**

We consider your private personally identifying information personal and use it only in providing our telephone, wireless, Internet, digital television and other Waldron services for sales, installation, operations, administration, marketing, support, network management, maintenance, customer care, customer communications, billing, collection, and accounting. Other than public information included in directories and directory assistance service, we do not provide personal identifying information to third parties for the marketing of their products and services without your consent. We may also provide personal identifying information to third parties who perform functions or services on our behalf. When we provide such personal identifying information to third parties to perform such functions or services on our behalf, we require that they protect personal identifying information with at least the same level of confidentiality that we maintain and do not allow them to use such information for other purposes.

We may, where permitted or required by law, provide personal identifying information to third parties without your consent, such as:

- To obtain payment for Waldron products and services;
- To enforce our customer agreements;
- To protect our rights or property;
- To comply with court orders, subpoenas, or other legal or regulatory requirements;
- To prevent unlawful use of communications or other services, to assist in repairing network outages, and when a call is made to 911 from a customer phone and information regarding the caller's location is transmitted to a public safety agency;
- To notify a responsible government entity if we discover any violations of laws relating to child pornography or child abuse; or
- To notify a responsible governmental entity if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires or justifies disclosure without delay.

## Information Included In Our Directories and Directory Assistance Service

We publish and distribute directories that include limited personal identifying information about our customers such as names, addresses and telephone numbers. We also make that information available through directory assistance operators and through the Internet. We are required by law to provide published customer names, addresses and telephone numbers to unaffiliated directory publishers and directory assistance providers, over whom Waldron has no control, for their use in creating directories and offering directory assistance services.

Waldron customers may request that their name, number, and address not be published in our directories or made available through our directory assistance. The names, numbers and addresses of customers who request an unpublished number will not be available in Waldron directories or through our directory assistance.

#### **Do Not Call Lists**

We comply with all applicable laws and regulations regarding Do Not Call lists.

Customers may register their telephone numbers with the Federal Communications Commission's ("FCC") National Do Not Call Registry by contacting the FCC at 1-888-382-1222 or at their website www.donotcall.gov. The FCC rules contain an established business relationship that permits a company that has a relationship with you to call you even if the number is on the national Do Not Call list.

# **Online Activity Tracking and Advertising**

We collect information about your activity on Waldron websites and viewing preferences on Waldron DTV for a number of purposes using technologies such as cookies, Flash cookies, Web beacons, widgets, set-top boxes, and server log files. Waldron and our advertising partners use that information, as well as other information they have or we may have, to help tailor the ads you see on our sites and to help make decisions about ads you see on other sites.

## **Privacy Policy Updates**

This Privacy Policy supersedes and replaces all previously posted privacy policies. We reserve the right to update this Privacy Policy to reflect any changes we make in order to continue to serve the best interests of our customers without notice to you. You are responsible for keeping up to date with revisions to the policy, which may be found here: www.goWaldron.com.

If we intend, however, to use personal identifying information in a manner materially different from that stated at the time of collection, we will attempt to notify you at least thirty (30) days in advance using your billing address, or email address if you have provided one, and you will be given a choice as to whether or not we use your information in this different manner.

#### **Customer Access to Information**

You may check the accuracy of personal information in your account by contacting a Customer Care representative. You may examine the information and advise us of any errors you believe we should correct.