

# Griswold Cooperative Telephone Company

## PRIVACY POLICY

**Effective Date:** This Privacy Policy (“**Policy**”) was last updated August 2021, and such updates are effective immediately. If you have any questions concerning this Privacy Policy, please contact using the contact information at the end of this Policy.

**Important Notice:** This Policy applies to voice and data communications services provided by **Griswold Cooperative Telephone Company** (together with any subsidiaries or affiliates providing your communications services, “**we**,” “**us**,” or the “**Company**”). This Policy explains how the Company collects, uses, and discloses information about our subscribers when they subscribe to, access, or use our communications services. Some of the information we may collect is “personally identifiable information” and/or “customer proprietary network information,” each as defined by applicable Federal law. Our use or sharing of such information is governed by applicable Federal law (as described herein) and this Policy. **Your use of any Company services constitutes your acceptance of this Policy.**

This Policy does not apply to the areas of the Company’s websites that are accessible to the general public, which are governed by the Company’s website privacy policy (available via the applicable website). The Company is not responsible for information, content, applications or services provided by others. Before you access, use, link to or download a service or application on your computer or wireless device, you should review the associated terms of service and privacy policy. Personal information you submit in those contexts may be read, collected or used by the service or application provider and others associated with these forums in a manner different from that described here.

This Policy applies across our family of companies and, except as otherwise specified herein, applies to all of the communications services we provide. This Policy explains our practices in the following areas:

1. Our Responsibilities and Your Rights under Federal Law
2. Information We Collect and How We Collect and Use It
3. How We Share Your Information
4. How to Limit the Sharing and Use of Your Information
5. How Long We Keep Your Information
6. How We Protect Your Information
7. How You May Access and Correct Your Information
8. Changes to This Policy
9. Violations of This Policy or Your Rights
10. Availability of This Policy
11. How You May Contact Us

### **1. Our Responsibilities and Your Rights Under Federal Law**

When you communicate with us, we collect information from you that we use to deliver, provide, confirm, change, bill, monitor, maintain and repair your services and service-related devices. Some of this information may be “personally identifiable information” or “customer proprietary network information” (“**CPNI**”) as defined by Federal law. For these purposes, personally identifiable information is information that identifies a particular person or persons, it does not include aggregate data that does not identify a particular person or persons.

Section 702 of the federal Telecommunications Act of 1996, as amended (the “**Telecommunications Act**”) provides special privacy protections for CPNI we may collect about our telecommunications and Voice over Internet Protocol (VoIP) service subscribers. CPNI generally includes information about the quantity, technical configuration, type destination, location and amount of your use of voice services

# **Griswold Cooperative Telephone Company**

## **PRIVACY POLICY**

and information contained on your bill concerning the type of voice services and features you subscribe to or receive. If you subscribe to our voice services, you have the right, and the Company has a duty, to protect the confidentiality of CPNI.

As required by the Telecommunications Act, this Policy describes: what personally identifiable information or CPNI we collect and how we collect it; how we use or share that personally identifiable information or CPNI; how long we keep your personally identifiable information and/or CPNI; how we protect such information in our possession; and your rights and remedies if we violate this Policy or applicable Federal or State law.

In the event we determine there are any conflicts between this Policy and applicable Federal law (for example, the Telecommunications Act), we will comply with the applicable Federal law. In addition to Federal law, we will also comply with any applicable State law.

## **2. Information We Collect and How We Collect and Use It**

### **Information Collected When You Communicate with Us**

When you communicate with us, we collect information from you that we use to deliver, provide, confirm, change, bill, monitor, maintain and repair your services and service-related devices. This information is also used to resolve issues with your order, with our products and services, or with your account. The information we collect may include your name, addresses, and other contact information; the reason for the contact; and your Social Security Number and payment information. We use this information to establish and maintain your customer account and billing records (including establishing credit), provide services to you, authenticate you (i.e., confirming your identify in connection with service or before sharing sensitive personal or account information), and contact you about services that we offer.

When you contact us or we contact you with calls, email, or through a feature on our websites or in our applications, we may monitor or record that communication or keep a record of the transaction to help us train employees and provide high-quality customer service.

### **Information Collected When You Use Our Products and Services**

We collect information about your use of our products, services and sites. Information such as call records, websites visited, wireless location, application and feature usage, network traffic data, product and device-specific information, service options you choose, mobile and device numbers, service usage, and other similar information may be used for billing purposes, to deliver and maintain products and services, or to help you with service-related issues or questions. In addition, subject to any legal restrictions that may apply, this information may be used for other purposes such as providing you with information about service enhancements, determining your eligibility for new services or service packages, and marketing to you based on your use of services. This information may also be used to: (a) manage and protect our networks, services and users from fraudulent, abusive, or unlawful uses; and (b) subject to consent practices described in this policy, help us improve our services, research and develop new services, and offer promotions and other services.

If you subscribe to our high speed data services, we may automatically measure and monitor network performance and the performance of your Internet connection to improve your, or our, service levels and products. If you contact us for service support, we also may access information about your

# **Griswold Cooperative Telephone Company**

## **PRIVACY POLICY**

computer, wireless device or other device settings to provide customized technical support or to install specific applications or services that you use or that are necessary to the applications or services you use.

In certain geographic service areas where we receive certain types of federal high-cost universal service support, we may be required by the FCC to measure and collect information concerning the speed and latency of broadband services provided to randomly-selected subscribers. The FCC has adopted requirements regarding when tests would begin, when exactly we may perform the tests, and the number of active subscriber locations we would be required to test. Once testing begins, test results must be reported and certified to the Universal Service Administrative Company (USAC) and Iowa Utilities Board (IUB) on an annual basis. No personally identifiable information is included in the test results reported to the USAC or IUB. If you are randomly-selected for testing, the FCC-required performance testing is in addition to the automatic testing we may do to measure or monitor performance and improve our service levels generally.

### **Information Provided to Us by Third Parties**

When you apply for or purchase service from us, we may obtain credit information about you from outside credit reporting agencies to help us with customer authentication and credit-related decisions.

### **Information Collected on Our Websites**

When you establish an online account with us, we maintain information about your user identification and password. This information is used to identify you when you sign into your account.

### **Information You Provide**

When you contact us online or by other means for information about services, we will respond to your request and may use the information you supply us to provide you with additional information about service offerings either at that time or in the future. Information you provide on our websites about your preferred location and other preferences may be used to provide you with more relevant service recommendations, services and special offers.

We may also collect information from you when you agree to participate in surveys or provide other feedback to us regarding our services, when you register to receive newsletters or similar updates, or when you apply for a job with the Company. We use this information only for the purpose for which you provide it.

We may send you emails that communicate information about your account or about services, marketing offers, or promotions that may be of interest to you. When you open an email or click on links within these emails, we may collect and retain information to provide you with future communications that may be more interesting to you. Please note that we will not ask you to send us, via email, sensitive personal or account information.

## **3. How We Share Your Information**

### **Information Shared Within Our Family of Companies**

We share customer information within our family of companies for operational purposes. We also share certain types of customer information within our family of companies for our own marketing purposes

# Griswold Cooperative Telephone Company

## PRIVACY POLICY

unless you advise us not to share. Sharing this information allows us to provide you with the latest information about our products and services and to offer you our latest promotions.

Specific laws govern our sharing and use of CPNI. Our voice customers receive a privacy notice regarding CPNI when they first contract for or order service and every two years thereafter. For more information, please read our applicable CPNI notices. You may choose to opt out of the sharing of your CPNI within our family of companies for certain marketing purposes as described below.

When you are speaking with a customer service representative, we may ask your permission to review your records, including your CPNI, to provide you with information about the full array of services provided by our family of companies.

### Information Shared with Third Parties

Except as explained in this Policy, we do not sell, license or share information that individually identifies our customers, people using our networks, or website visitors with others outside our family of companies.

We may use vendors and partners for a variety of business purposes such as to help us offer, provide, repair and bill for services we deliver to you. We share information with those vendors and partners to the extent reasonably necessary for them to perform work on our behalf. For example, we may provide your credit card information and billing address to our payment processing company solely for the purpose of processing payment for a transaction you have requested. We require that these vendors and partners protect the customer information we may provide to them and limit their use of our customer data to the purposes for which it was provided. We do not permit these types of vendors and partners to use this information for their own marketing purposes.

We provide the names, addresses and telephone numbers of wireline telephone subscribers to directory publishers and directory assistance services unless a non-published or non-listed phone number has been requested.

Unless otherwise restricted or prohibited by the Telecommunications Act, we may disclose information that individually identifies our customers or identifies customer devices to third parties in certain circumstances, such as:

- to comply with valid legal process including subpoenas, court orders or search warrants, and as otherwise authorized by law;
- in cases involving danger of death or serious physical injury to any person or other emergencies;
- to protect our rights or property, or the safety of our customers or employees;
- to protect against fraudulent, malicious, abusive, unauthorized or unlawful use of or subscription to our services and to protect our network, services, devices and users from such use;
- to advance or defend against complaints or legal claims in court, administrative proceedings and elsewhere;
- to credit bureaus or collection agencies for reporting purposes or to obtain payment for Company-billed services;
- to a third-party that you have authorized to verify your account information;
- to outside auditors;

# Griswold Cooperative Telephone Company

## PRIVACY POLICY

- to the FCC, Iowa Utilities Board other federal, state, local or other governmental or quasi-governmental authority with jurisdiction over any Service; or
- with your consent.

If we enter into a merger, acquisition or sale of all or a portion of our assets or business, customer information will also be transferred as part of or in connection with the transaction.

### **4. How to Limit the Sharing and Use of Your Information**

You have choices about how we share and use information.

#### **Customer Proprietary Network Information (CPNI)**

Under the Telecommunications Act, you may choose whether to allow us to share your CPNI within our family of companies for certain marketing purposes. You may choose to opt out of the sharing of your CPNI within our family of companies for these marketing purposes by following the instructions on our CPNI notices.

#### **Telemarketing**

Federal “Do Not Call” laws allow you to place residential wireline 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 visiting [www.donotcall.gov](http://www.donotcall.gov). You should be aware that even if you add your number(s) to the federal or a state Do Not Call list, most telemarketing laws allow companies to contact their own customers. It is the Company’s practice not to engage in telemarketing to our own customers. In order to keep you informed concerning our services and your account, we may use an automatic telephone dialing system, artificial or prerecorded voice, text message, or other form of written or audible communication to your designated contact number(s). For example, these informational contacts may include reminders of payment due dates, maintenance alerts and service cutovers.

#### **Marketing Email, Text Messages, Postal Mail and Door-to-Door Calls**

Marketing emails you receive from the Company include an unsubscribe instruction (usually found at the bottom of the email) that you may use to opt out of receiving future marketing-related emails. You may also opt out of receiving marketing related emails from the Company by contacting the Company via phone at 712-778-2121 or using the “Contact” link on our website at [griswolcommunications.com](http://griswolcommunications.com).

You may opt out of receiving marketing-related postal mailings or prevent text message marketing from the Company by contacting the Company via phone at 712-778-2121 or using the “Contact” link on our website at [griswoldcommunications.com](http://griswoldcommunications.com). Please note that the Company may use bulk mail service for some marketing mailings. These services deliver offers to all homes in a neighborhood or zip code. This type of mailing will continue even if you opt-out of receiving marketing-related postal mailings from the Company.

### **5. How Long We Keep Your Information**

Under our practices and policies, sensitive records are retained only as long as reasonably necessary for business or legal purposes. We will maintain personally identifiable information about you no longer than necessary for the purpose for which it was collected. This means we may also maintain this

# **Griswold Cooperative Telephone Company**

## **PRIVACY POLICY**

information for a period of time after you are no longer a subscriber if it is necessary for business or legal purposes. We will destroy the information if we have no pending requests, orders or court orders for access to this information, after we determine that it is no longer necessary for the purposes for which it was collected and in compliance with any applicable federal, state or local laws or requirements.

### **6. How Long We Protect Your Information**

The Company has technical, administrative and physical safeguards in place to help protect against unauthorized access to, use or disclosure of customer information we collect or store, including Social Security Numbers. Employees are trained on the importance of protecting privacy and on the proper access to, use and disclosure of customer information. Under our practices and policies, access to sensitive personally identifiable information is authorized only for those who have a business need for such access, and sensitive records are retained only as long as reasonably necessary for business or legal purposes. Although we work hard to protect personal information that we collect and store, no program is 100% secure and we cannot guarantee that our safeguards will prevent every unauthorized attempt to access, use or disclose personal information. The Company maintains security and incident response plans to handle incidents involving unauthorized access to private information we collect or store.

### **7. How You May Access and Correct Your Information**

We strive to keep our customer records as accurate as possible. You may correct or update your customer or account information by contacting the Company via phone at 712-778-2121 or using the "Contact" link on our website at [griswoldcommunications.com](http://griswoldcommunications.com).

### **8. Changes to This Policy**

We may revise and update this Privacy Policy from time to time in our sole discretion, so please check back periodically for changes. You will be able to see that changes have been made by checking to see if the effective date posted at the beginning the policy. If we elect to use or disclose information that identifies you as an individual in a manner that is materially different from that stated in our policy at the time we collected that information from you, we will give you a choice regarding such use or disclosure by appropriate means, which may include use of an opt-out mechanism.

### **9. Violations of This Policy or Your Rights.**

If you believe that your privacy rights have been violated, please contact us immediately. We will take immediate steps to address your concerns. If you believe that you have been aggrieved as a result of our violation of applicable provisions of the Telecommunications Act, you may enforce the limitations imposed on us through a formal complaint to the FCC and/or a civil lawsuit seeking damages, attorneys' fees and litigation costs. Other rights and remedies may be available to you under federal, state or local laws.

### **10. Annual Notice and Availability of This Policy**

It is our practice to provide a copy of this Policy to all customers at the time you first contract for or subscribe to service and to provide a summary of our privacy practices or a copy of this Policy at least annually thereafter. To the extent required by applicable laws or regulations, this policy may be supplemented by service-specific privacy policies or privacy notices (i.e., our CPNI policies for telephone

# **Griswold Cooperative Telephone Company**

## PRIVACY POLICY

and broadband subscribers). Subscribers may obtain a copy of this Policy by request (using the contact information and methods described herein) at any time.

### **11. How You May Contact Us**

If you have questions, concerns or suggestions related to our Privacy Policy or our privacy practices you may contact us at:

Email: [gctc@netins.net](mailto:gctc@netins.net)

Phone: 712-778-2121

Web: [griswoldcommunications.com](http://griswoldcommunications.com)