

## **Citizens Privacy Policy**

### **Terms & Conditions**

This privacy policy covers Citizens Communications Corporation and its affiliated companies Citizens Telephone Company of Higginsville, Missouri, Citizens Long Distance Company, Citizens Cablevision, Inc., and Citizens Spectrum Holdings, LLC (hereinafter collectively referred to as “Citizens” or “Company”).

### **Privacy Statement**

Citizens understands how important privacy and confidentiality are to you, our customer. We place great emphasis on ensuring the information you entrust to us remains protected, regardless of how we receive your personal information – whether by telephone, online, or at our facilities.

### **Your Expectation of Privacy**

We recognize that you expect privacy. For this reason we have established specific guidelines and procedures for how your information is collected and maintained to protect against misuse or unauthorized release.

### **Use, Collection, and Retention of Information about You**

We obtain, retain, and use your personal information only as required to effectively and efficiently administer the products and services you have come to expect from Citizens. We do not release your personal information to other people, companies or agencies without a signed consent form from you, except as required by law or subpoena by a court of competent jurisdiction.

### **What information does Citizens have?**

When we provide our services, which include broadband Internet access, local and long distance voice service, and television and video services, we 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. We may also gather information about how you use our services.

### **How does Citizens use customer information?**

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

### **What information does Citizens obtain and how do we use customer information?**

**Signing up for services.** When a customer signs 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 may also keep notes of contacts we have with our customers.

**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 for purposes of toll billing. Likewise, we may maintain logs of the total volume of data a user transmits, and the date, time and length of time that a user accessed the Internet through our services, including the user's IP address at the time.

**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. We also use our customer information, and information we may obtain from third parties, to determine our customers' creditworthiness and predict what new services our customers may want.

**Information we obtain when Citizens 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.

### **Does Citizens share customer information?**

**Sharing information within Citizens.** Citizens is made up of a number of companies and we share information among them as permitted by law or with your consent. This helps us improve our networks, the services we provide, and our customer service.

**Sharing information with companies who support our services.** We share customer information as needed with companies that help us market, sell, provide, plan, bill and collect for, and otherwise support our services. We also share limited customer information with companies that provide our customers with telephone equipment, Internet services, and

television offerings that we may sell as part of our service packages. We require these companies to use our information only for the purposes we specify and to keep it safe and confidential.

**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.

**Providing information when customers ask.** We will disclose information about a customer's account to others when the customer asks us to do so in writing.

**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 and long distance services. 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.

**Changes to this Privacy Policy.** Citizens may update this Privacy Policy from time to time to reflect evolving technology and other service, process, and policy changes. Citizens will notify customers of any material changes by posting a notice on its website for 30 days before making the change.

**Effective Date of this Privacy Policy.** This Privacy Policy is effective as of September 20, 2011.