



## **CORCOM COMMUNICATIONS' CUSTOMER PROPRIETARY NETWORK INFORMATION POLICY**

Corcom Communications is committed to maintaining the privacy of its customers. In addition to protecting your personal information, we are obligated to provide additional protections to certain information about how you use your services. However, that information can help us customize and improve services we offer you.

### **CPNI PROTECTIONS**

As a customer of our services, you have the right, and Corcom Communications has a duty, under federal law, to protect the confidentiality of certain types of services, including: (1) information about the quantity, technical configuration, type, destination, location, and amount of your use of your services, and (2) information contained on your telephone bill concerning the services that you receive. That information, when matched to your name, address, and telephone number is known as "Customer Proprietary Network Information" or "CPNI" for short. Examples of CPNI include information typically available from telephone-related details on your monthly bill, technical information, type of service, current telephone charges, long distance and local service billing records, directory assistance charges, usage data and calling patterns.

Customer proprietary network information ("CPNI") is information related to the quantity, technical configuration, type, destination, location, and the amount of telecommunications a customer uses that Corcom Communications has access to by virtue of the customer-provider relationship. CPNI does not include the Customer name, address and telephone number, nor does it include Internet access services.

### **APPROVAL**

From time to time, Corcom Communications would like to use the CPNI information it has on file to provide you with information about Corcom Communications' communications-related products and services or special promotions. Corcom Communications' use of CPNI may also enhance its ability to offer products and services tailored to your specific needs. Accordingly, Corcom Communications would like your approval so that Corcom Communications may use this CPNI to let you know about communications-related services other than those to which you currently subscribe and that Corcom Communications believes may be of interest to you. **IF YOU APPROVE, YOU DO NOT HAVE TO TAKE ANY ACTION.**

However, you do have the right to restrict our use of your CPNI. **YOU MAY DENY OR WITHDRAW CORCOM COMMUNICATIONS' RIGHT TO USE YOUR CPNI AT ANY TIME BY CALLING 877-710-3442.** If you deny or restrict your

approval for Corcom Communications to use your CPNI, you will suffer no effect, now or in the future, on how Corcom Communications provides any services to which you subscribe. Any denial or restriction of your approval remains valid until your services are discontinued or you affirmatively revoke or limit such approval or denial.

In some instances, Corcom Communications will want to share your CPNI with its independent contractors and joint venture partners in order to provide you with information about Corcom Communications' communications-related products and services or special promotions. Prior to sharing your CPNI with its independent contractors or joint venture partners, Corcom Communications will obtain written permission from you to do so.

## **CUSTOMER AUTHENTICATION**

Federal privacy rules require Corcom Communications to authenticate the identity of its customer prior to disclosing CPNI. Customers calling Corcom Communications' customer service center can discuss their services and billings with a Corcom Communications representative once that representative has verified the caller's identity. There are three methods by which Corcom Communications will conduct customer authentication:

- 1) By having the Customer provide a pre-established password and/or PIN to a customer service representative.
- 2) By calling the Customer back at the telephone number associated with the services purchased if a password/or PIN has been forgotten.
- 3) By mailing any requested documents only to the Customer's address of record. Any other electronic means of providing this information (ie: email, text, facsimile, etc.) is not permitted. This is for records request only and not as an alternative for obtaining lost or forgotten password/or PIN information

Passwords and/or PINs may not be any portion of the Customer's social security number, mother's maiden name, amount or telephone number associated with the Customer's account or any pet name. In the event the Customer fails to remember their password and/or PIN, Corcom Communications will ask the Customer a series of questions known only to the Customer and Corcom Communications in order to authenticate the Customer. In such an instance, the Customer will then establish a new password/PIN associated with their account.

## **NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES**

Corcom Communications will be notifying customers of certain account changes. For example, whenever an online account is created or changed, or a password or other form of authentication (such as a "secret question and answer") is created or changed, Corcom Communications will notify the account holder by either the email address that they provided or by mailing the notification to their address of record. Additionally, after an account has been established, when a customer's address (whether postal or e-mail) changes or is added to an account, Corcom Communications will also send a notification.

## **DISCLOSURE OF CPNI**

Corcom Communications may disclose CPNI in the following circumstances:

- When the Customer has approved the use of their CPNI for Corcom Communications or Corcom Communication's joint venture partners and independent contractors (as the case may be) sales or marketing purposes.
- When disclosure is required by law or court order.
- To protect the rights and property of Corcom Communications or to protect Customers and other carriers from fraudulent, abusive, or unlawful use of services.
- When a carrier requests to know whether a Customer has a preferred interexchange carrier (PIC) freeze on their account.
- For directory listing service.
- To provide the services to the Customer, including assisting the Customer with troubles associated with their services.
- To bill the Customer for services.

## **PROTECTING CPNI**

Corcom Communications uses numerous methods to protect your CPNI. This includes software enhancements that identify whether a Customer has approved use of its CPNI. Further, all Corcom Communications employees are trained on the how CPNI is to be protected and when it may or may not be disclosed. All marketing campaigns are reviewed by a Corcom Communications supervisory committee to ensure that all such campaigns comply with applicable CPNI rules.

Corcom Communications maintains records of its own and its joint venture partners and/or independent contractors (if applicable) sales and marketing campaigns that utilize Customer CPNI. Included in this, is a description of the specific CPNI that was used in such sales or marketing campaigns. Corcom Communications also keeps records of all instances in which CPNI is disclosed to third parties or where third parties were allowed access to Customer CPNI.

Corcom Communications will not release CPNI during customer-initiated telephone contact without first authenticating the Customer's identity in the manner set-forth herein. Violation of this CPNI policy by any Corcom Communications employee will result in disciplinary action against that employee as set-forth in Corcom Communications' Employee Manual.

## **BREACH OF CPNI PRIVACY**

In the event Corcom Communications experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require Corcom Communications to report such breaches to law enforcement. Specifically, Corcom Communications will notify law enforcement no later than seven (7) business days after a reasonable determination that such breach has occurred by sending electronic notification through a central reporting facility to the United States Secret Service and the FBI. A link to the reporting facility can be found at: <https://www.cpnireporting.gov> . Corcom Communications cannot inform its Customers of the CPNI breach until at least seven (7) days after notification has been sent to law enforcement, unless the law enforcement agent tells

the carrier to postpone disclosure pending investigation. Additionally, Corcom Communications is required to maintain records of any discovered breaches, the date that Corcom Communications discovered the breach, the date carriers notified law enforcement and copies of the notifications to law enforcement, a detailed description of the CPNI breach, including the circumstances of the breach, and law enforcement's response (if any) to the reported breach. Corcom Communications will retain these records for a period of no less than two (2) years.

#### **NOTIFICATION OF CHANGES TO THIS POLICY**

If we change this CPNI Policy, we will post those changes on <http://www.LUS Fiber.com> or in other places that we deem appropriate, so that you can be aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If you decide to continue receiving your services after we make any changes to this the CPNI Policy, you shall be deemed to have given your consent to the changes in the revised policy.