

Valley TeleCom Group Privacy Policy

Valley TeleCom Group (which includes Valley Telephone Cooperative, Inc., Copper Valley Telephone, Inc. and Valley Connections, L.L.C.) strives to respect a customer's desire for privacy. When you visit our website <http://www.vtc.net>, mobile application, Facebook application, and use our services, you trust us with your personal information. We are committed to protecting your personal information and your right to privacy. We obtain and use individual customer information for business purposes only. The information is used to enable us to provide our customers with the best service and support possible. Our employees are responsible for safeguarding individual customer information and communications. All personnel are aware of and protect the privacy of all forms of customer communications and information. Employees who fail to follow safeguards face disciplinary action.

This privacy policy explains what information we collect and how we use it. This privacy policy applies to all information collected through our website (<http://www.vtc.net> and other owned domains), mobile application, Facebook application, ("**Apps**"), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "**Services**").

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

1. WHAT INFORMATION DO WE COLLECT?

We collect personal information that you voluntarily provide to us when registering at the Services or Apps, expressing an interest in obtaining information about us or our products and services, when participating in activities on the Services or Apps or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Services or Apps, the choices you make and the products and features you use. The personal information we collect can include publicly available information such as first and last name, phone number and e-mail address, etc.

We automatically collect certain information when you visit, use or navigate the Services or Apps. This information may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services or Apps and other technical information. This information is primarily needed to maintain the security and operation of our Services or Apps, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies, such as devices; applications; tools and protocols, such as IP (Internet Protocol) addresses; cookie identifiers, or others such as the ones used for analytics and marketing; Radio Frequency Identification (RFID) tags; device's geolocation; and other similar data.

If you use our Apps, we may also collect the following information:

- *Mobile Device Data.* We may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.
- *Push Notifications.* We may request to send you push notifications regarding your account or the mobile application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

2. HOW DO WE USE YOUR INFORMATION?

We use personal information collected via our Services or Apps for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and logon process.** If you choose to link your account with us to a third party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.

- **To send you marketing and promotional communications.** We and/or our third party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS" below).
- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We may process or share data based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service, technical support and marketing efforts. We may allow selected third parties to use tracking technology on the Services or Apps, which will enable them to collect data about how you interact with the Services or Apps over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- **Directory.** We are required to provide directory publishers and directory assistance providers with listing information including name, address, and phone number for purposes of publishing and delivering directories and providing directory assistance. Some of these requirements may not apply for Non-Listed or Non-Published numbers.
- **Long Distance Carrier.** We are required to provide billing name and address information to a customer's long-distance carrier and other telephone companies to allow them to bill for telecommunications services.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Third-Party Advertisers.** We may use third-party advertising companies to serve ads when you visit the Services or Apps. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to

remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services or Apps.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services or Apps is at your own risk. You should only access the services within a secure environment.

7. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services or Apps, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services or Apps.

8. CUSTOMER PROPRIETARY NETWORK INFORMATION

Valley TeleCom Group uses security measures in place to protect your account information. The below is meant to educate you on our practices and how we use your account information.

Why?

We are responsible under federal law to protect your account information and the confidentiality of data generated when you use Valley Telecom Group's network. You will be required to provide an account password or answer privacy questions to access your account information.

You have the option to opt-in or out of receiving information about Valley TeleCom Group's other services and those of its affiliates. If you choose to opt-in, you are giving us permission to make recommendations for additional services and send you information about our other services. If you opt-out, we will not talk to you about unrelated services without asking permission. We take your privacy seriously and regardless of whether you opt in or out, we do not practice excessive email, mail or telemarketing.

What?

Customer Proprietary Network Information (CPNI) is any non-public data we have on record about your use of our network and services, such as the types of subscribed services, the number of telephone lines you have and how much you use your services. We do not share with, rent or sell to others this information.

How?

As a Valley TeleCom Group customer, you always retain right to restrict use of your information. If you opt-in or opt-out, this remains valid until you contact us in writing or for two years, whichever comes first. If you decide to opt-out, this choice will not affect the services to which you currently subscribe. If you have not provided Valley TeleCom Group with a security password and a privacy question, you will be asked to do so the next time you contact us to access your account. Contact us to set up your account password or change your opt-in/out status. After 30 days Valley TeleCom Group will assume customer opt-in.

You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account.

9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online

tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

10. DO WE MAKE UPDATES TO THIS POLICY?

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

11. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may email us at webmaster@teamvtg.net or by mail to:

Valley TeleCom Group
PO Box 970
Willcox, AZ 85643