

**Ganado Telephone Company and YK Communications, Ltd.**  
**(collectively d/b/a YK Communications)**

**PRIVACY POLICY**  
**Updated February 14, 2020**

Ganado Telephone Company, Inc. and YK Communications, Ltd. (collectively the "Company") is committed to respecting and protecting the privacy of our customers. We have strict policies governing access by employees and others to customer communications and information. We access customer information for business purposes only. This Privacy Policy (the "Policy") includes information about:

- our collection and use of your information;
- protection of your information,
- customer control over access to information;
- circumstances under which third parties may have access to your information, including authorized government access to your information;
- compliance with specific customer information and contact rules;
- protecting young people's information; and
- access to your information for managing our network.

This Policy applies to your use of our products, services, and website and to all family members or other users under your account. You are responsible for making sure they understand and agree to this Policy.

**I. Types of Information We Collect**

Company collects different types of customer information based on your use of our products and services and on our business relationship with you, including account information and technical and usage information.

**a. Account Information**

We collect contact information such as your name, address, telephone number and e-mail address in order to communicate with you. We get this information when you order or register for our services. We also collect billing information related to your financial relationship with us for the services we provide to you, including the telephone numbers you call and your payment history, credit history, credit card numbers, social security number, security codes and service history.

**b. Technical & Usage Information**

We collect information related to the services we provide to you, including information about how you use our networks, services, products or websites. In addition, we collect information about equipment, network performance and usage, and web browsing, including, specifically information:

- that identifies the equipment on our networks, such as type, device IDs, device status,

- serial numbers, settings, configuration and software;
- about the operation of the equipment, services and applications you use on our networks (for example, voice minutes used, calling records, bandwidth used, and resources used when uploading, downloading or streaming data to and from the Internet);
- about transmission rates and delays, data associated with remote monitoring services and security characteristics;
- identifying IP addresses, URLs, data transmission rates and delays (this includes information about the pages you visit, the time you spend, the links or advertisements you see and follow, the search terms you enter, how often you open an application, how long you spend using the app, and other similar information).

## **II. How We Collect Information From You**

Company collects information that you give us when you make a purchase or establish an account with us; from your use of our networks, products, and services (for example, we collect your call records and information about your Internet use with web server logs and other technologies); and from other sources such as credit reports, marketing sources, and other public resources.

## **III. How We Use Your Information**

Company uses your information to improve your service experience and to strengthen our network, services, and business. Your information may be used to:

- provide and manage your services, which includes:
  - sharing the names, addresses, and telephone numbers of our telephone customers with businesses that publish directories and provide directory assistance service, as required by law, subject to your options to opt-out; and
  - providing calling name and number information for Caller ID, and related services, to persons receiving calls from you;
- respond to your questions and address problems;
- deliver customized content or advertising;
- notify you of service updates, offers and promotions;
- protect our network integrity and security so that we may ensure quality, optimize capacity and prevent misuse;
- plan for network enhancement and engineering and technical support;
- conduct research and analysis for maintaining, protecting and developing our networks and our services;
- prevent illegal activities, suspected fraud, and potential threats to our networks;
- investigate violations of our Terms of Service, Acceptable Use Policy, DMCA Policy, or other service conditions or restrictions; and
- protect the safety of any person.

## **IV. How We Protect Your Information**

Company strives to ensure that the information we have about our customers is accurate, secure and confidential and that our employees comply with our Policy. Company requires its

personnel to be aware of and protect the privacy of all customer communications and individual customer records. All employees are trained regarding their responsibilities to safeguard customer privacy. Company makes clear that employees who fail to comply with its Policy will face disciplinary action, which can include dismissal.

We never tamper with, intrude upon or disclose the existence or contents of any communication or transmission, except as required by law or the proper management of our network as described in this Policy. Access to databases containing customer information is limited to employees who need it to perform their jobs, and they follow strict guidelines when handling that information. We use safeguards to increase data accuracy and to identify and authenticate the sources of customer information. We also require that customer records be safeguarded from loss, theft, unauthorized disclosure, and accidental destruction. We use physical and technological security measures to protect the privacy of your information.

We keep your information as long as we need it for business, tax, or legal purposes. After that, we destroy it by making it unreadable or undecipherable. In addition, Company requires any consultants, suppliers and contractors that may come into contact with customer information to observe and abide by Company's provisions for protecting its customers' individual customer information.

## **V. Release of Customer Information When Required By Law**

Company may release customer information in response to requests from governmental agencies, including law enforcement and national security agencies, in accordance with federal statutory requirements or pursuant to court order. Before releasing any customer information, Company will ensure that the underlying governmental request satisfies all procedural and substantive legal requirements and is otherwise proper. Except as required by law or with the approval of the customer, Company will not release any customer information in response to subpoenas or similar requests issued by private parties. Company will be diligent in authenticating the validity of any governmental request to ensure that the request originates from an authorized government agency.

## **VI. How We Comply with Federal Requirements Related to Provision of Voice Services**

### **a. What Is "Customer Proprietary Network Information?"**

"Customer Proprietary Network Information" ("CPNI") is: (i) information relating to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service you subscribe to, which is made available to Company by virtue of your customer relationship with Company; and (ii) information contained in the bills pertaining to telephone exchange service or telephone toll service you receive from Company.

## **b. How We Use CPNI**

Under federal law, you have the right to, and we have the duty to protect, the confidentiality of your CPNI. We may use CPNI without your consent, in a manner consistent with applicable law, to:

- initiate, render, bill, and collect for our services;
- market services among the categories of service to which you already subscribe;
- provide inside wiring installation, maintenance, and repair services;
- provide maintenance and technical support for our services;
- protect our rights and property, and protect users of our services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, these services; and
- provide any inbound telemarketing, referral, or administrative services for the duration of a customer-initiated call.

Also, after providing you with the required notice and opportunity to "opt out," we may use your CPNI, in a manner consistent with applicable law, to market additional communications-related services to you and conduct surveys in order to improve our service offerings. Company will not use your CPNI for purposes other than those described in this Policy unless we first obtain your express "opt in" consent.

## **c. Limits on the disclosure of CPNI outside Company**

As a general rule, Company does not use third-party marketers and will not disclose your CPNI to third party contractors without your explicit "opt in" consent. However, we will release customer information without involving you if disclosure is required by law or necessary to protect the safety of customers, employees or property. For example:

- when you dial 911, information about your location may be transmitted automatically to a public safety agency;
- we are also required by law to give competitive providers of telecommunications services access to customer databases for purposes of serving their customers; to give your long distance call information to your long distance company for billing purposes; to exchange credit information with other carriers; and to provide listings (other than certain non-published and non-listed information) to directory publishers;
- we will disclose information as necessary to comply with law enforcement statutes and to comply with valid, properly issued, and legally enforceable subpoenas, warrants and court orders;
- we may, where permitted by law, share CPNI with third parties where necessary to provide the services to which you subscribe, to protect our rights or property, and to protect users of our services and other carriers from fraudulent, abusive or unlawful use of services; and
- we may, where permitted by law, provide CPNI to third parties such as credit bureaus and collection agencies (for collection of payment for Company-billed products and services).

#### **d. Preventing Unauthorized Access to CPNI**

Company is committed to ensuring that only properly authorized individuals are able to access CPNI for legitimate purposes. This includes ensuring that any request by a customer to access CPNI is valid and properly authenticated in accordance with applicable law and industry best practices.

If a customer calls us to access call detail records, which include the number called, the number from which a call was placed, and the time, location, or duration of any call, we will not release those records unless (i) during the customer's call, the customer provides a pre-established password; (ii) the information is mailed to the customer's address of record; or (iii) after the customer's call, we call the customer's telephone number of record to provide the requested information.

If a customer attempts to access CPNI through our website, we will only provide such access if the customer has first established a password and back-up authentication mechanism for the relevant account in a manner that does not rely on readily-available biographical or account information.

If a customer attempts to access CPNI by visiting a retail location in person, we will only provide such access if the customer presents valid photo identification matching the name of record on the account.

We also will notify you at your address of record if anyone changes the access authorization or authentication information associated with your account.

#### **e. Notice of unauthorized access to CPNI**

We are vigilant in our efforts to protect your CPNI, but if we discover that your CPNI has been accessed without proper authority, we will take swift action to fully document and address such unauthorized access and provide appropriate notice. We will (i) notify law enforcement, including the United States Secret Service and the Federal Bureau of Investigation, within seven business days; and (ii) notify you and any other affected customers within seven business days thereafter, unless earlier notification is necessary to avoid immediate and irreparable harm, or we are instructed by law enforcement personnel to refrain from providing such notice.

#### **f. Customer options for controlling access to information**

Company is committed to providing customers with opportunities to control how Company uses customer information about them.

i. Opt Out

Customers may determine which telephone listings they want included in our directories and directory assistance. They may choose to have a non-published number or a non-listed number or to exclude their address from our listing. Customers may also opt out of our direct mailings and other service marketing programs.

Where Caller ID services are available, customers have the ability to block the display of their phone numbers and names. Caller ID blocking does not prevent the transmission of your phone number when you dial 911 or certain business numbers, including 800, 888, 877, and 900 numbers.

ii. "Do Not Call"

Company's residential customers may choose not to be called by us for marketing purposes, and Company will respect that choice. Customers not wishing to receive sales calls from Company may ask to be placed on our company-specific "Do Not Call" list. We will note the request immediately, but it may take up to 30 days for a customer's telephone number to be removed from any active lists or sales programs. Residential customers can ask to be put on our "Do Not Call" list by contacting Company's customer service department at 1-361-771-3334. Residential customers will remain on our "Do Not Call" list for five years, unless they ask to be removed from the list by contacting our customer service department. If a customer is on our "Do Not Call" list and their telephone number ever changes, the customer must give us updated information in order for the "Do Not Call" status to remain in effect.

Even though a customer's telephone number is on our "Do Not Call" list, we may still contact that customer with respect to surveys, billing, and other service-related matters. Further, customers should understand that being on our "Do Not Call" list will not prevent calls from other companies unaffiliated with Company.

## **VII. Protection of Young People**

Company does not knowingly collect personally identifying information from anyone under the age of 13 unless we first obtain permission from the child's parent or legal guardian. The Internet and services purchased for family use may be used by children without our knowledge. When that happens, information collected may appear to us to be associated with the adult customer who subscribes to our services and will be treated as the adult's information under this Policy.

## **VIII. Sale or Merger of Company**

Information about our customers and users, including personal information, may be shared and transferred as part of any merger, acquisition, sale of company assets or transition of service to another provider. This also applies in the unlikely event of an insolvency, bankruptcy or receivership in which customer and user records would be transferred to another entity as a result of such a proceeding.

## **IX. Network Management Practices**

Company collects information about your use of our products and services. Information such as call records, websites visited, application and feature usage, network traffic data, service options you choose, device number, and other similar information may be used for billing purposes, to deliver and maintain products and services, provide E-911 assistance 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 product or service enhancements, determining your eligibility for new products and services, and marketing to you based on your use of your products and services. This information may also be used to: (1) manage and protect our networks, services and users from fraudulent, abusive, or unlawful uses; and (2) subject to consent practices described in this policy, help us improve our services, research and develop new products, and offer promotions and other services. This type of information may be aggregated for business and marketing uses by us or by third parties.

If you subscribe to Company's Internet access services, we may automatically measure and monitor network performance and the performance of your Internet connection to improve your, or our, overall service levels. If you contact us for service support, we also may access information about your computer, devices or 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. Company will not gather information from your use of our Internet access services to direct customized advertising specifically to you based on your visits over time and across different non-Company websites, unless we first provide you with notice of our plan and obtain your affirmative consent.

Please note that 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, you should review the associated terms of service and privacy policy, including those for location-based services. 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.

## **X. Updates to Privacy Policy**

We may update this Policy as necessary to reflect changes we make and to satisfy legal requirements. Notice of revisions will be provided on Company's website. By using Company's services, you agree to visit Company's website periodically to review any such revisions. Please contact 361-771-3334 if you have any questions about this Policy.