

# Southeast Nebraska Communications

## Privacy Policy

### About Our Privacy Policy

Whenever you do something like buy one of our products, stream a movie or download an app, information is created. Because we know your privacy is important, we have a Privacy Policy to explain how we collect, use and protect that information. There's a quick summary below, and the entire policy is written in an easy FAQ format. We want to simplify this, so you can make informed choices about your privacy, and then spend the rest of your time enjoying our products and services.

**Effective June 1, 2014**

### A Quick Summary of Our Privacy Policy

Our privacy policy applies to your use of our products and services. We will always provide you with notice of material changes to this Policy. In order to do things like constantly improve our services, products and relationship with you, we may collect different types of information that help us learn more about how you use our offerings.

#### Here's some of the information we collect:

- **Account Information** includes your name, address, telephone number, e-mail address, service-related details such as payment data, security codes, service history and other information like that;
- **Network Performance & Usage Information** tells us how you use our network, our products and our services, and how well our equipment and network is performing;
- **Web Browsing & Wireless Application Information** tells us about the websites you visit and the mobile applications you use on our network;
- **Location Information** tells us where your wireless device is located, as well as your ZIP-code and street address;
- **Data Streaming/Video Information** tells us about which programs you watch and record, the games you play, the applications you use and similar information about how you use our services and applications.

#### Here are the three basic ways we collect it:

- We get information from you when you do things like make a purchase from us;
- We collect it from how you use our products and services;
- Other sources, like credit agencies, marketing companies, and other service providers, provide it to us.

#### Here are just some of the ways we use it. To:

- Provide services and improve your customer experience;
- Send you bills for your services;

- Respond to your questions;
- Address network integrity and security issues;
- Do research and analysis to maintain, protect, develop and improve our network;
- Let you know about service updates, offers and promotions;
- Improve entertainment options;
- Deliver Relevant Advertising;
- Create External Marketing & Analytics Reports;
- Assist in the prevention and investigation of illegal activities and violations of our Terms of Service or Acceptable Use Policies.

**Some examples of who we share your Personal Information with:**

- **Across all SNC companies** to give you the best customer experience and to help you get everything we have to offer.
- **With other companies that perform services on our behalf** only as needed for them to perform those services. We require them to protect your information consistent with our Policy.
- **With other companies and entities, to:**
  - Respond to 911 requests and other emergencies or exigencies;
  - Comply with court orders and other legal process;
  - Assist with identity verification, and preventing fraud and identity theft;
  - Enforce our agreements and property rights; and
  - Obtain payment for products and services including the transfer or sale of delinquent accounts to third parties for collection

**Details on Personal and Anonymous & Aggregate Information**

- What is Personal Information? Information that identifies or reasonably can be used to identify you.
- What is Anonymous? This is information that doesn't identify you and can't reasonably be used to identify you specifically.
- What is Aggregate? We take a whole bunch of people's data and combine it into anonymous groups or categories.
- How we use this information? We use and share this information in many ways including research, media analysis and retail marketing and Relevant Advertising. This data is also included in External Marketing & Analytics Reports

**Our privacy commitments**

- We don't sell your Personal Information to anyone for any purpose. Period.
- We keep your personal information in our business records while you are a customer, or until it is no longer needed for business, tax or legal purposes.

- We will keep your information safe using encryption or other appropriate security controls.

### **Our Online Privacy Policy for Children**

- We want you to know that we don't 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.

### **Your Choices & Controls**

- You have choices about which types of advertising you get from us;
- You can control whether your anonymous information is used in our External Marketing & Analytics Reports;
- You can choose whether to receive marketing calls, e-mails or text messages from us;
- You have a choice about how we use your Customer Proprietary Network Information;

We understand that everyone thinks that privacy policies are long, complicated and difficult to understand. So we're going to try to make this as simple as possible.

## **DEFINITIONS**

### **Let's start with what we mean when we say:**

**Aggregate Information:** Information that we combine into anonymous groups of customers or users. One way to think of it is in terms of a survey or opinion poll. Aggregate information would tell you that 80 percent of the people voted for a candidate, but not who actually voted. These groups are large enough to reasonably prevent individuals from being identified.

**Anonymous Information:** Information that doesn't directly identify and can't reasonably be used to identify an individual customer or user.

**Customer:** Anyone who purchases or uses our products or services. When a customer purchases retail products or services for use by others, like a family account, those family members also are customers.

**Mobile Application:** A software application that runs on smartphones, tablet computers or other mobile devices and that allows users to access a variety of services and information.

**Personal Information:** Information that directly identifies or reasonably can be used to figure out the identity of a customer or user, such as your name, address, phone number and e-mail address. Personal Information does not include published listing information.

**Relevant Advertising:** Uses aggregate information about groups of people (like age, ethnicity, income range, where those groups live and work, and their interests) to develop advertising that is more likely to be useful to that group. It does not use individual data about what a specific person might like. "Online behavioral advertising" is one type of relevant advertising. It uses interest categories based on the websites visited by groups of people to deliver advertising online.

**User:** Anyone who visits our websites or uses our mobile applications.

**Website:** And other terms like "Internet site," "site" and "web page" all mean the same thing, namely any page or location on the Internet, no matter what device (cell phone, tablet, laptop, PC, etc.) or protocol (http, WAP, ftp or other) is used to access the page or location.

## THE SCOPE OF THIS POLICY

1. What does this Policy cover?

This Privacy Policy covers our practices regarding the information we collect about our customers and users (how we collect it and how we use it). Use of our products and services, as well as visits to our websites, are subject to this Privacy Policy.

2. What about my family members and other users of my SNC account? Does this Policy apply to them?

Yes. You're responsible for making sure all family members or other users under your account understand and agree to this Policy. Get everyone together and talk about it. Or, send it by e-mail to make sure they're on board. Hang it on the fridge. Up to you, just share it!

3. When is information not covered by this Policy?

Any time you give information to companies other than SNC. Some examples are:

- When you use a non-SNC service;
- When you download applications or make purchases from other companies while using our Internet or wireless services;
- When you go to a non-SNC website from one of our websites or applications (by clicking on a link or an advertisement, for example);
- If you use public forums - such as social networking services, Internet bulletin boards, chat rooms, or blogs - the information is publicly available, and we cannot prevent distribution and use of that information by other parties;
- Information about your location, usage and the numbers you dial when you're out and about and roaming on the network of another company;
- When you purchase or use non-SNC products (such as wireless devices, internet browsers and mobile applications) in combination with our services.
- When we license our brand to other companies for their use in marketing and selling certain non-SNC products and services, information you give those companies is not covered by this Policy.

4. Can my information be covered by this policy and other privacy policies at the same time?

Yes, that can happen. For example:

Sometimes we will provide a service with other companies. In that case your information may be subject to this Policy and that of the other companies. For example, if you use SNC High Speed Internet services "powered by" Yahoo! Inc., your information may be covered by both this Policy and the Yahoo Policy.

If you purchase one of our products or services from a retailer like Best Buy or Amazon.com, for example, any information you provide to them may be subject to both their policy and ours.

If you connect to our Wi-Fi service through another network, such as one provided in a hotel, airport or other venue, any information collected from your use of that network could be subject to either the SNC policy or the venue policy, and sometimes both. The same thing applies if you connect to our network through your employer's corporate network, or any network operated by a non-SNC company.

We think it's a great idea to take a look at the privacy policies of any companies you do business with to learn how they use your information.

5. What about business customers?

We have written product or service agreements with our business customers that contain specific provisions about confidentiality, security or handling of information. When one of these agreements differs from or conflicts with this Policy, the terms of those agreements will apply. In all other instances, the terms of this Policy apply.

## **THE INFORMATION WE COLLECT, HOW WE COLLECT IT AND HOW WE USE IT**

1. What information do we collect?

We may collect different types of information based on your use of our products and services and on our business relationship with you.

○ **Account Information:**

- **Contact Information** that allows us to communicate with you. We get this information when you order or register for our services. This would include information like your name, address, telephone number and e-mail address.
- **Billing Information** related to your financial relationship with us, such as the services we provide to you, the telephone numbers you call and text, your payment history, your credit history, your credit card numbers, Social Security number, security codes and your service history.

○ **Technical & Usage Information** related to the services we provide to you, including information about how you use our network, services, products or websites. Some examples include:

- **Equipment Information** that identifies your equipment on our network, such as equipment type, device IDs, device status, serial numbers, settings, configuration and software.
- **Network Performance & Usage Information** about the operation of the equipment, services and applications you use on our network. Examples of this might include wireless device location, the number of text messages sent and received, voice minutes used, bandwidth used, and resources you use when uploading, downloading or streaming data to and from the Internet. We also collect information like transmission rates and delays, data associated with remote monitoring services and security characteristics.

- Some Network Performance & Usage Information and some Billing Information is **Customer Proprietary Network Information or "CPNI."** Unique rules apply to CPNI.
  - **Web Browsing & Mobile Application Information** such as IP addresses, URLs, data transmission rates and delays. We also learn 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.
  - **Location Information** includes your ZIP-code and street address, as well as the whereabouts of your wireless device. Location information is generated when your device communicates with cell towers, Wi-Fi routers or access points and/or with other technologies, including the satellites that comprise the Global Positioning System.
  - **Data streaming/video Information** is generated when you use our suite of services including TV, On Demand, High Speed Internet Service and products, including the programs and channels you and those in your household watch and record, the times you watch and how long you watch. It also includes information like the games you play and the applications you use.

## 2. How Do You Collect Information?

In three basic ways:

- **You Give It To Us** when you make a purchase or set up an account with us;
- **We Automatically Collect Information** when you use our network, products and services. For example, we use network tools to collect your call records; we collect wireless device location from our network and from your device; and we also use cookies, web server logs and other technologies.
- **We Obtain Information from Outside Sources** like credit reports, marketing mailing lists, and commercially available geographic and demographic information.

## 3. How Do You Use My Information?

We use your information to improve your experience and to make our business stronger. Some examples include:

- Providing and managing your services, responding to your questions and addressing problems;
- Delivering customized content, Relevant Advertising and personalized offers for products and services that may be of interest to you;
- Communicating service updates, offers and promotions;
- Protecting network integrity and security, ensuring quality control, optimizing capacity and preventing misuse;
- Network enhancement planning, engineering and technical support;

- Conducting research and analysis for maintaining, protecting and developing our network and our services;
  - Preventing illegal activities, suspected fraud, and potential threats to our network and our customers' networks;
  - Investigating violations of our Terms of Service, Acceptable Use Policies, or other service conditions or restrictions; and
  - Protecting the safety of any person.
4. Do you use the information I store using one of your cloud services?
- We only use it to provide you with that service, unless we first get your permission to use it for something different.

## **INFORMATION SHARING**

1. Do you provide information for phone books and Caller ID?

Yes and No.

Yes, we share the names, addresses and telephone numbers of our wireline telephone customers with businesses that publish directories and provide directory assistance services. We are required by law to do that. We honor your request for non-published or non-listed phone numbers. Once we provide published listing information to those businesses, they may use, sort, package, repackage and make it available again in different formats to anyone. We also provide calling name and number information for Caller ID.

No, we do not give listing information for wireless numbers to phone book publishers or directory assistance services without your permission.

2. Do you share my Personal Information internally?

Yes. Sharing this information internally helps us offer you the high quality, seamless and innovative range of products you have come to expect from us. Some of these include:

- The SNC suite of TV, Voice and High Speed Internet Access services offered by us or our sister companies.

If one of our subsidiaries does not operate under the SNC brand, information sharing with that subsidiary is handled as though it is a non-SNC company.

3. Do you share my Personal Information with other companies for them to market to me?

We will only share your Personal Information with other companies for them to use for the marketing of their own products and services when we have your consent.

4. Are there any other times when you might provide my Personal Information to other companies or entities?

Yes. We share your Personal Information with companies that perform services for us, like processing your bill. Because we take our responsibility to safeguard your Personal Information seriously, we do not allow those companies to use it for any purpose other than to perform those services, and we require them to protect it in a way consistent with this Policy.

Companies that perform these services may be located outside the United States or the jurisdiction where you reside. If your Personal Information is shared with these companies, it could be accessible to government authorities according to the laws that govern those jurisdictions.

There are also occasions when we provide Personal Information to other companies or other entities, such as government agencies, credit bureaus and collection agencies, without your consent. Some examples include sharing to:

- Comply with court orders, subpoenas, lawful discovery requests and other legal or regulatory requirements, and to enforce our legal rights or defend against legal claims;
  - Obtain payment or make refunds for products and services that appear on your SNC billing statements, including the transfer or sale of delinquent accounts or refund obligations to third parties for collection or payment;
  - Enforce our agreements and protect our rights or property,
  - Assist with identity verification and e-mail address validation;
  - Notify, respond or provide information (including location information) to a responsible governmental entity in emergency or exigent circumstances or in situations involving immediate danger of death or serious physical injury; and
  - Notify the National Center for Missing and Exploited Children of information concerning child pornography of which we become aware through the provision of our services.
5. Do you share my personally identifiable TV viewing information with other companies?

We don't share your personally identifiable TV information with other companies for them to use for the marketing of their own products and services without your consent. We are required to notify you about the special requirements we must follow when it comes to sharing your personally identifiable TV information in response to a Court Order.

## **MY INFORMATION & ADVERTISING**

1. Do you use my information to send me advertising?

Yes. We may use information like the preferences you have expressed and interests you have demonstrated on our websites, in our stores and through use of our products and services, to provide you with marketing information and advertisements for SNC products and services. Those ads may be delivered on our websites and mobile applications. This is called "first party" advertising. It is part of our service relationship and you are not able to opt-out from this type of advertising.

Our advertising affiliate and advertising partners may also use [anonymous information gathered through cookies and similar technologies](#), as well as other anonymous and aggregate information that either of us may have to help us tailor the ads you see on non-SNC sites. For example, if you see an ad from us on a non-SNC sports-related website, you may later receive an ad for sporting equipment delivered by us on a different website. This is called "online behavioral advertising," which is a type of Relevant Advertising.

2. Do you use my information for other types of Relevant Advertising?

Yes. We also uses information we get through your use of our products and services, from our advertising partners, and information like your age and gender to deliver Relevant Advertising that is not online behavioral advertising. We combine your anonymous information with that of other users into aggregate "audience segments." These segments are based on particular interests and/or factual characteristics that everyone in that audience segment is likely to share. We might use that information to send you advertisements that are relevant to those interests or characteristics.

We are careful to create Relevant Advertising with aggregate audience segments that are large enough that you can't be identified individually.

3. Do you use the location of my device for advertising purposes?

Yes. We use information about the locations you visit in order to create combined wireless location interest characteristics that can be used to provide Relevant Advertising to you and others like you.

Location characteristics are types of locations - like "movie theaters." People who live in a particular geographic area (a city, ZIP-code or ZIP+ 4 code, for example) might appear to have a high interest in movies, thanks to collective information that shows wireless devices from that area are often located in the vicinity of movie theaters. We might create a "movies characteristic" for that area, and deliver movie ads to the people who live there.

We may associate your wireless device with a particular geographic area, such as a city, ZIP-code, or ZIP + 4 code, based on your billing address or the cell towers you connect with most frequently. We do not keep a record of the places you have visited.

In addition to other privacy protections, the process we use to create our audience segment includes a requirement that the ZIP + 4 or other geographic area to which a wireless location is assigned must contain a minimum of 25 households. ZIP + 4 codes with less than 25 households are combined with other ZIP + 4 codes to satisfy this requirement.

4. What's in it for me?

Just like the name says, you get advertising that's more relevant to your interests. For example, if a particular audience segment, like adults between the ages of 21 and 25 with a certain income range, has demonstrated a greater interest in movies than other segments, we might send them a movie ad for a movie geared toward young adults. This is just one way we deliver content that's more relevant.

5. How do you use information about the programs I watch on SNC TV to advertise to me?

We combine information about the shows that our customers are watching with their common interests to help us figure out what types of advertising they might be interested in seeing.

It sometimes works like this: We look at the group of people watching a particular show. We identify common characteristics within that group. We use those characteristics to identify and deliver advertising that might be most relevant to watchers of that TV show. We might also deliver that same advertising during shows that appear to have similar audiences.

6. Do I ever have a chance to tell you what I'm personally interested in?

When we add new offers or alerts we'll let you know, so you can decide if you'd like to participate. For example, we may offer you free or discounted services in exchange for the use of your Personal Information for advertising and other similar purposes. We promise, before we use any of your Personal Information (including information we gather as an Internet service provider) for such purposes, we will always give you the opportunity to make an informed choice about whether to participate

7. What information do you provide to advertisers?

We may provide reports to advertisers and other business customers about the success of its advertising campaigns. Those reports contain aggregate information about the number of times a particular ad was viewed, when it was viewed, whether it was viewed on a TV, a mobile device or a computer, demographics associated with the viewing audience and other similar information. Your anonymous information will not be included in aggregate reports about the success of Relevant Advertising campaigns if you have opted-out of Relevant Advertising delivered by us.

## LOCATION INFORMATION

1. What is location information?

Exactly what it sounds like! It includes your ZIP-code and street address, as well as the whereabouts of your wireless device.

2. How is it used?

We use it in all kinds of ways, here are some examples:

- **We Provide Wireless Voice and Data Services:** We monitor, collect and use wireless location information, together with other information we get from our network and your wireless device, to maintain and improve our network. We also might use location information with your consent to provide you with a customized experience. For example, when you dial 411 Directory Assistance for a business telephone number, we might use your wireless location information to return the number of the business location closest to you.
- **Location Based Services (LBS):** Your device can be used to access a ton of services based on location. We offer these services via applications that have been pre-loaded or downloaded by you on your device. LBS also may be provided via text message or other functionality. We'll give you prior notice and ask for your consent when your location is used or shared. The form of consent may vary, but will be appropriate for the type of LBS you use.

- **LBS from other providers:** With your consent (to us or the other company) we also may enable LBS from other companies by providing location information to their developers or location service providers.
  - We use it for [Advertising](#).
3. How accurate is wireless location information?

It depends on the technology we're using. For example, we can locate your device based on the cell tower that's serving you. The range could be up to 1,000 meters in any direction from the tower in urban areas, and up to 10,000 meters in rural areas. Wi-Fi networks provide more accurate location information, associating you with the place where the network is located - like a coffee shop - or to an area within or around that place.

Services such as 411, 911, a "friend locator" application or a navigation/mapping application, require more precise information. So for those we develop a more precise estimate of location by associating the serving cell tower ID with other information, like the latitude and longitude of the tower, radio frequency parameters, GPS information and timing differences in radio signals. Depending on a variety of factors, those methods may estimate the location of your device to within 30 to 1000 meters.

4. Are you the only ones who can locate my wireless device?

Other companies may also be able to locate your device. For example, your handset manufacturer and your operating system provider may be able to locate your device. If you download mobile applications, those apps may be able to obtain your location directly from your handset or the operating system. Mobile applications that give you access to your employer's network may also give your employer the ability to locate your device.

We urge you to review Policies of all providers.

## **AGGREGATE AND ANONYMOUS INFORMATION**

1. Where do you get anonymous information?

Sometimes we'll collect information about how you use our products [using cookies and other similar technologies](#). This information doesn't include your Personal Information and is considered anonymous.

When we collect information that identifies you personally, we may anonymize it for certain purposes. We remove data fields (such as name, address and telephone number) that can reasonably be used to identify you. We also use a variety of statistical techniques and operational controls to anonymize data. Anonymizing information is one of the tools we use to protect your privacy.

2. Tell me more about aggregate information.

Aggregate information is a form of anonymous information. We combine data that meet certain criteria into anonymous groups. For example, we might want to compare how customers in Beverly Hills, CA (or any city, county or ZIP-code) use their cell phones to how customers in Boulder, CO use their cell phones. In order to do that, we would

combine customer data in each of the geographies into anonymous groups and look at all that aggregate data to understand how the two groups are different or similar.

3. Do you share anonymous or aggregate information?

Yes, we may share this information with other companies and entities for specific uses, which may include:

- Universities, laboratories, think tanks and other entities that conduct networking, social, behavioral, environmental and other types of scientific research, for the purpose of creating fundamental new knowledge;
- Municipalities, government or other entities that may use this data for purposes such as municipal and transportation planning, and emergency and disaster response coordination.

We share this information in external reports like our External Marketing & Analytics Reports and Metric Reports.

## **EXTERNAL MARKETING AND ANALYTICS REPORTS**

1. Tell me more about the External Marketing & Analytics Program.

We use aggregate information to create External Marketing & Analytics Reports that we may sell to other companies for their own marketing, advertising or other similar uses.

These reports may be a combination of information from wireless and Wi-Fi locations, website browsing and mobile application usage and other information we have about you and other customers. You have a choice about whether your anonymous information is included in these reports.

Some examples of External Marketing & Analytics Reports include:

- Reports for retail businesses that show the number of wireless devices in or near their store locations by time of day and day of the week, together with demographic characteristics of the users (such as age and gender) in those groups.
- Reports that combine anonymous TV viewing behaviors with other aggregate information we may have about our subscribers to create reports that would help a TV network better understand the audiences that are viewing their programs, those that are not, how frequently they watch, when they watch and other similar information; and
- Reports for device manufacturers that combine information such as device type, make and model with demographic and regional location information to reflect the popularity of particular device types with various customer segments.

2. Do you provide companies with individual anonymous data as part of your External Marketing & Analytics Program?

Yes. For example, we might share anonymous TV viewing information with media research companies that combine this data with other information to provide audience analysis services about what shows certain audience segments are watching. When we provide individual anonymous information to businesses, we require that they only use it to provide aggregate reports, and for no other purpose. We also require businesses to

agree they will not attempt to identify any person using this information, and that they will handle it in a secure manner, consistent with this Policy.

3. Do you use my anonymous information in other types of external reports?

Yes, we may use your anonymous information to provide Metrics Reports to our business customers and service suppliers. These reports are considered part of the underlying service and we do not sell them to other customers or suppliers.

For example, if you connect to our Wi-Fi service in a hotel, airport or other venue you should know the operator of that venue is our business customer, and that we will provide that operator with Metrics Reports about usage of and communications with the Wi-Fi network in their location. Those reports contain statistical information like:

- The number of devices connecting to the Wi-Fi network, duration of Wi-Fi sessions and the amount of bandwidth used during those sessions; and
- Foot-traffic data, including the numbers of devices inside and outside the store at a given time; the number of new and frequent visitors; where visitors are located within the store (e.g., specific departments or other locations within the venue) and frequency of visits and time spent within the store.
- **NOTE:** When your wireless device is turned on, it regularly sends out signals that enable it to connect to cell towers, Wi-Fi access points or other technologies so that we (and others) are able to provide you with services. These signals can be used to determine your device location. You can turn Wi-Fi to the "off" position on the "settings" feature of your device to prevent the collection of these signals by Wi-Fi equipment in retail stores and other public places.

Another example, we also license video programming from content providers. As part of our agreement, we provide them with Metrics Reports. These reports contain combined measurements and statistical information related to the number of TV subscribers who watched or accessed a particular program at a particular time and other similar measurements.

## **ONLINE PRIVACY POLICY FOR CHILDREN**

1. Do you collect information about my children's use?

We do 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.

2. What happens when my child is using an account not registered to them?

Internet and wireless devices 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.

3. What can I do to help better protect my child's information?

We encourage you to spend time online with your children, and to participate in and monitor their online activity. We have developed a website that offers safety and control tools, expert resources and tips designed to help you manage technology choices and address safety concerns. Please visit [www.sentco.net](http://www.sentco.net) for more information.

4. What if my child has an SNC e-mail sub-account?

If you create a sub-account for a child under the age of 13:

- With your permission we collect your child's name, nicknames and aliases, alternative e-mail address, birth date, gender and ZIP-code.
- We use the information collected on sub-accounts to create and maintain those accounts, for research, to customize the advertising and content seen on our pages and for other marketing purposes. Your child can use their e-mail address and password to log onto websites and online services provided by us or others. We and our advertising partners may collect and use information about customers who log onto those sites. A list of the advertising partners who collect information on our sites and the ability to opt-out of advertising provided by those partners is available [www.sentco.net](http://www.sentco.net).
- We will not contact a child under the age of 13 about special offers or for marketing purposes without parental consent.
- You or your child can review, edit, update, and delete information relating to your child's sub-account and, if you no longer wish your child to have such an account, you can revoke your consent at any time, by logging on to manage your account [www.sentco.net](http://www.sentco.net).

You may e-mail us at [snc@sentco.net](mailto:snc@sentco.net), call us at 402-245-4451 or write to us at SNC, 110 West 17<sup>th</sup> Street, Falls City, NE 68355 with any questions or concerns you may have about our Children's Online Privacy Policy.

## **QUESTIONS ABOUT DATA PROTECTION AND SECURITY**

1. Do we sell your Personal Information?

No. We do not sell your [Personal Information](#) to anyone, for any purpose. Period.

2. How long do we keep your Personal Information?

We keep your [Personal Information](#) as long as we need for business, tax or legal purposes. After that, we destroy it by making it unreadable or undecipherable.

3. What safeguards does SNC have in place?

We've worked hard to protect your information. And we've established electronic and administrative safeguards designed to make the information we collect secure. Some examples of those safeguards include:

- All of our employees are subject to the SNC code of conduct and certain state-mandated codes of conduct. Under the COBC, all employees must follow the laws, rules, regulations, court and/or administrative orders that apply to our business - including, specifically, the legal requirements and company policies surrounding the privacy of communications and the security and privacy of your records. We take this seriously, and any of our employees who fail to meet the standards we've set in the COBC are subject to disciplinary action. That includes dismissal.
- We've implemented technology and security features and strict policy guidelines to safeguard the privacy of your Personal Information. Some examples are:

- Maintaining and protecting the security of computer storage and network equipment, and our security procedures require employee user names and passwords to access sensitive data;
  - Applying encryption or other appropriate security controls to protect Personal Information when stored or transmitted by us;
  - Limiting access to Personal Information to only those with jobs requiring such access; and
  - Requiring caller/online authentication before providing Account Information so that only you or someone who knows your Account Information will be able to access or change the information.
  - Although we strive to keep your Personal Information secure, no security measures are perfect, and we cannot guarantee that your Personal Information will never be disclosed in a manner inconsistent with this Policy (for example, as the result of unauthorized acts by third parties that violate the law or this Policy).
4. Will you notify me in case of a security breach?
- Yes. We will make reasonable attempts to notify you if we determine that we have experienced a security breach and there is a reasonably likely risk of identity theft, or where otherwise required by law.
5. Can I review and correct my Personal Information?
- Yes. We are happy to help you review and correct the Personal Information we have associated with your account and billing records. Please contact us.

## **QUESTIONS ABOUT FUTURE CHANGES**

1. What happens if there is a change in corporate ownership?
- 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.
2. Will I be notified if there are changes to this policy?
- We may update this Privacy Policy as necessary to reflect changes we make and to satisfy legal requirements. We will post a prominent notice of the change on our websites. We will provide you with other appropriate notice of important changes at least 30 days before the effective date.

## **YOUR CHOICES & CONTROLS**

1. You can choose not to receive some types of advertising online or on your wireless device.
- Opt-out of all Relevant Advertising delivered by SNC online [www.sentco.net](http://www.sentco.net), and on your mobile device [www.sentco.net](http://www.sentco.net). You'll need to opt-out on each computer browser and mobile device you want to exclude.

- Opt-out of online behavioral advertising provided by us and other advertisers by clicking the link at the bottom of our web pages.
  - Opt-out of interest-based advertising on the web. [www.sentco.net](http://www.sentco.net).
  - Opt-out of online behavioral advertising from many other ad networks [at the Network Advertising Initiative \(NAI\) site](#).
  - To limit collection of data on web sites that may be used for advertising, go manage your account on our web site ([link to web site here](#)) for information on how to manage cookies and other similar technologies on your computer.
2. Do I have choices about receiving first party advertisements from SNC?

Because first party advertising is part of the service you receive when you visit our websites and use our mobile applications, we don't offer an opt-out for first party advertising.

3. You can also choose not to receive other types of marketing from SNC.

We realize that unwanted marketing contacts can be a hassle and we've worked hard to meet the expectations of customers and potential customers who have expressed a desire to limit certain types of solicitation communications from us.

**E-Mail:** Every marketing e-mail we send contains instructions and a link that will allow you to stop additional marketing e-mails for that product or service type. You also can unsubscribe from SNC marketing e-mails [www.sentco.net](http://www.sentco.net).

**Consumer Telemarketing:** Ask to be removed from our consumer telemarketing lists by contacting us at 402-245-4451. You also can ask the SNC representative to remove you from our telemarketing lists when you receive a marketing or promotional call from us.

**Business Telemarketing:** Where required by state laws and/or regulations, we honor requests to be removed from our telemarketing lists from business customers.

**Federal Do Not Call:** The FTC maintains a National Do Not Call Registry at [donotcall.gov](http://donotcall.gov), and your state may maintain its own Do Not Call Registry. Putting your number on these Registries also may limit our telemarketing calls to that number.

**Postal Mail:** To review our Residential Do Not Mail Policy Statement and to limit postal mail solicitations, click [www.sentco.net](http://www.sentco.net). You will still receive billing statements, legal notices, product updates and other similar correspondence, and you may still receive some promotional mailings.

All of our practices are designed to satisfy state and federal legal requirements limiting marketing contacts. Those laws and regulations - such as the requirements governing the state and federal "Do Not Call" lists - generally permit companies to contact their own current and, in some cases, former customers, even when those customers are listed on the federal and state "Do Not Call" lists.

Restricting our use of your CPNI will not eliminate all types of our marketing contacts.

4. Can I choose to exclude my anonymous information from your External Marketing & Analytics and other similar reports?

Yes. Click [www.sentco.net](http://www.sentco.net) to opt-out. This opt-out also applies to the sharing of your anonymous information with other companies for their use in creating marketing and analytics reports. Although this opt out does not apply to Metrics Reports, it will apply if we combine Metrics Report information with other customer information (like demographics) to create reports that we provide to our business customers or service suppliers.

5. Are there any other opt-out choices I should know about?

We may use services provided by analytics companies to obtain information about website performance and how you use our mobile applications and other products and services. Go to [www.sentco.net](http://www.sentco.net) for more information about the opt-outs made available by some of those vendors, and to make choices about participation.

6. These Choices and Controls also are available at [www.sentco.net](http://www.sentco.net).

## **HOW TO CONTACT US ABOUT THIS POLICY**

- We encourage you to contact us directly at either of these addresses below for any questions about this Privacy Policy.
  - E-mail us at [snc@sentco.net](mailto:snc@sentco.net)
  - Write to us at SNC, 110 West 17<sup>th</sup> Street, Falls City, NE 68355
- For questions not related to privacy click on the "Contact Us" link at the upper right hand corner of [www.sentco.net](http://www.sentco.net). You also can access your online account from our home page at [www.sentco.net](http://www.sentco.net) for additional service options.
- If you do not receive acknowledgment of your privacy inquiry or your inquiry is not addressed to your satisfaction, you may contact the FTC Bureau of Consumer Protection, using an (FTC web address here) or by calling toll-free 877.FTC.HELP (877.328.4357; TTY: 866.653.4261). Other rights and remedies also may be available to you under federal or other applicable laws.

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

## **What is CPNI?**

Customer Proprietary Network Information (CPNI) is information that SNC and other telecommunications carriers obtain when providing your telecommunications services to you. CPNI includes the types of telecommunications services you currently purchase, how you use them, and the billing information related to those services, including items such as the types of local, long distance and wireless telecommunications services that you have purchased and your calling details. Your telephone number, name and address are not considered CPNI.

## **Use and Disclosure of CPNI**

We use your CPNI to offer you additional services of the type you already purchase from SNC. We also may use your CPNI to offer you products and services, packages, discounts and

promotions from our subsidiaries and business partners such as High Speed DSL Internet access, wireless service and TV services, which may be different from the types of services you already purchase.

SNC uses technology and security features and strict policy guidelines to safeguard the privacy of CPNI and protect it from unauthorized access or improper use. SNC does not disclose CPNI outside of the SNC companies or their agents without customer consent except as required or allowed by law. When SNC uses third parties to perform services on its behalf that require the use of CPNI, SNC requires that they protect CPNI consistent with this privacy policy. SNC *does not sell CPNI to unaffiliated third parties.*

### **Restricting our use of your CPNI**

If you wish to restrict our use of your CPNI for marketing purposes, you may contact a customer service representative at the customer service phone number located on your SNC telephone bill or one of the following numbers:

Business – 402-245-4451

Restricting our use of your CPNI for marketing purposes will not affect the provision of any SNC products or services to which you subscribe, nor will it eliminate all types of SNC marketing contacts.

### **Customer Service Contact Numbers**

**Business** – 402-245-4451

**Residential** — 402-245-4451

[www.sentco.net](http://www.sentco.net)