

Chariton Valley Privacy Policy

Protecting our customers' privacy has long been an important priority at Chariton Valley. We are committed to maintaining strong and meaningful privacy protections for customers. The privacy of your information is a significant responsibility, and we value the trust you place in us. We have strict policies governing access by employees and others to customer communications and information.

By using or accessing the websites, applications, or services of Chariton Valley Telephone Corp. ("CVTC"), Chariton Valley Communications Corp. ("CVCC"), and Missouri RSA 5 Partnership d/b/a Chariton Valley Wireless Services ("CVW"), collectively referred to herein as "Chariton Valley", you (a Chariton Valley Member or Customer) are accepting the practices outlined in this Privacy Policy ("Policy"). Your usage indicates you have read and accepted our Policy.

This Policy identifies and describes the way Chariton Valley uses and protects the information we collect about our Members/Customers and their end users. Our Services, and our collection, use, and disclosure of your information is governed by U.S. law. Accordingly, our Policy applies to Users who are located in the U.S. when visiting the Website.

All use of Chariton Valley's applications ("apps"), products, and services, as well as visits to our website(s) by you, all family members or other users under your account are subject to this Policy. We access customer information for business purposes only. This 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.

1. THE INFORMATION WE COLLECT, HOW WE COLLECT IT, AND HOW WE USE IT.

We may collect different types of personal and other information, including Customer Proprietary Network Information ("CPNI"), based on your use of our websites, products, mobile applications, and services, or those of our Members/Customers, and our business relationship with you. 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 Chariton Valley 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 Chariton Valley.

Some examples of the information we may collect include:

- *Contact Information* that allows us to communicate with you, including your name, address, telephone number, user's inventory of installed apps, user's screen recording and email address.
- *Billing information* related to your financial relationship with us, or with our Members/Customers, including your payment data, credit history, credit card number, Social Security numbers, security codes and service history.
- *Equipment, performance, Chariton Valley website usage, viewing and other technical information* about your use of our network, apps, products, services, or Website(s), including but not limited to voice minutes used, calling records, bandwidth used, resources used when uploading, downloading or streaming data to and from the Internet, device IDs, device status, serial numbers, settings, configuration, software, transmission rates and delays, data associated with remote monitoring services, security characteristics, identifying IP addresses, URLs, information about the web pages you visit, the time you spend, links to advertisements you see and follow, search terms you enter, how often you open an app, how long you spend using an app, and other similar information. Chariton Valley collects and processes information provided directly by you when you install the apps and register for an account to use the apps.
- *Anonymous & Aggregate Information:* We collect some information on an anonymous basis. We also may redact your personal information to create anonymous data. We obtain aggregate data by combining anonymous data that meet certain criteria into groups. When we employ third parties to create anonymous or aggregate data on our behalf, the requirements for sharing personal information with third parties who provide services apply. We may share aggregate or anonymous information in various formats with trusted third-party entities and may work with those entities to do research and provide products and services.

2. WE COLLECT INFORMATION IN THESE PRIMARY WAYS:

- You give it to us when you purchase or interact with us about a product or service we offer or provide to you or to our Members/Customers, with whom you have a business relationship.
- We collect it automatically when you visit our website(s) or use our products and services, including our mobile application(s).
- Data insights Chariton Valley attains based on correlation and analytics of your information collected in providing the app, which may be used in aggregated and dis-aggregated formats or to obtain trend analytics, to provide the app; and
- Use of the above-described collected information in aggregated and dis-aggregated

formats to enhance our current app or to provide app features.

- We may obtain it from other sources, such as credit agencies, and other public resources.

3. WE MAY USE THE INFORMATION WE COLLECT IN A VARIETY OF WAYS, INCLUDING TO:

- Provide you with the best customer experience possible.
- Provide the services or apps as described in the agreement and to respond to your questions.
- Communicate with you regarding service updates, offers and promotions.
- Deliver customized content and advertising that may be of interest to you with your permission.
- Address network integrity and security issues.
- Investigate, prevent, or take action regarding illegal activities, violations of our Terms of Service or Acceptable Use Policies, or those of our Members/Customers.
- Implement, improve, and/or enhance the apps, including for making future releases available to you.
- Carry out Chariton Valley obligations as described or authorized in the Service Agreement, Acceptable Use Policy, DMCA Policy, this Privacy Policy, and other service conditions and restrictions.
- Enforce Chariton Valley rights arising from the Service Agreement between you and Chariton Valley;
- Protect the safety of any person; and
- Fulfill any other purpose authorized by you and reasonably required for the apps.

4. SAFEGUARDING YOUR INFORMATION: OUR POLICY ON DATA PROTECTION AND SECURITY AND PREVENTING UNAUTHORIZED ACCESS TO CPNI

Chariton Valley is committed to ensuring that only properly authorized individuals are able to access your information and your 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.

Generally: We do not sell your Personal Information to anyone for any purpose. Period. We maintain information about you in our business records while you are a customer, or until it is no longer needed for business, tax, or legal purposes. We have implemented encryption or other appropriate security controls to protect personal information when stored or transmitted by Chariton Valley or our Members/Customers. We require third parties acting on our behalf to protect any personal information they may receive in a manner consistent with this Policy. We do not allow them to use such information for any other purpose.

Regarding CPNI: 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.

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.

5. INFORMATION SHARING

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.

Government Requests for Information: Chariton Valley 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, Chariton Valley 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,

Chariton Valley will not release any customer information in response to subpoenas or similar requests issued by private parties. Chariton Valley will be diligent in authenticating the validity of any governmental request to ensure that the request originates from an authorized government agency.

Opt-Out and Opt-In Use of CPNI: 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. Chariton Valley will not use your CPNI for purposes other than those described in this Policy unless we first obtain your express "opt in" consent.

- Chariton Valley respects your privacy and observes the privacy rules established by the Federal Communications Commission, the Missouri Public Service Commission, and other telecom oversight agencies. Chariton Valley never will sell your account information or provide details of your telephone services to other parties, unless required by law enforcement to do so.
- From time to time, we would like to notify you of additional products and services available from us outside the existing business relationship we have with you. For example, if you have our local voice service, you may be interested to learn about specials on our long distance, Internet, or video services. You have the right, however, to be excluded from these marketing campaigns. This exclusion is known as "opting out".
- If it is acceptable to receive information about additional products and services, you do not need to take any action. If you prefer to be excluded from these marketing efforts, please call our voice notification system at 660.695.8088 (toll free 1.877.695.8088) and respond to the voice prompts. This line is available 24 hours a day 7 days a week.
- To further protect your privacy, when you request certain information, we may ask you to authenticate your identity by providing a valid photo ID that matches the name on your account or asking you for a password and/or the answers to two qualifying questions which you have established.

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.

Disclosure Required By Law or Safety or For Services: 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;
 - to the extent we share CPNI with third parties, we require them to protect any personal information they may receive in a manner consistent with this Policy;
 - we do not provide personal information to third parties for the marketing of their own products and services without your consent; 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).

6. LINKS TO OTHER WEBSITES

Our websites, products, and services may contain links to other websites. When you click on such links the privacy policies of the websites to which you are linked and/or their service provider (as applicable) will govern the use of your information collected on such sites. Chariton Valley does not have access to or control over any technologies or practices that may be used by third parties.

This Policy applies solely to information collected by Chariton Valley via its website, products, and services. We are not responsible for the privacy practices of other web sites. We encourage you to read the privacy statements of each website visited after leaving our website through such a link to learn how such third parties may treat your information.

7. CHILDREN

Our websites, products, and services are not intended for children under the age of 13 years. Chariton Valley does not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register for use of any of our products or services. In the event Chariton Valley learns that we have collected personal information from a child under age 13 without verification of parental consent, we will delete such information as quickly as possible.

8. CUSTOMER PRIVACY CONTROLS AND CHOICES

You can review and correct your personal information collected by us. You can limit certain types of solicitation communications from Chariton Valley, including marketing contacts made via telephone, email, and text messaging.

Opt-Out Directory Listings, Direct Marketing, and Caller ID: 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.

Do Not Call: Chariton Valley's residential customers may choose not to be called by us for marketing purposes, and Chariton Valley will respect that choice. Customers not wishing to receive sales calls from Chariton Valley 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 1-660-695-8088. Residential customers will remain on our "Do Not Call" list, 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 Chariton Valley.

9. CHANGES TO THIS PRIVACY POLICY

We reserve the right to make changes to this privacy policy, so please check back periodically for changes. You will be able to see that changes have been made by checking to see if the effective date posted at the end of the policy has changed. We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Policy. You are advised to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page.

10. 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.

11. CONTACT US

If you have any questions about this Policy, the practices of the website(s) and or app, or your use of the website(s), please contact us at:

Chariton Valley
1213 E. Briggs Drive
Macon, MO 63552
660-395-9000

Email: customercare@cvalley.net

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