

Whiskey City Fiber & Data Customer Privacy Policy

Effective: January 01, 2018

Your privacy is important to Whiskey City Fiber & Data (WCFD). We value the trust you place in us when you subscribe to Whiskey City Fiber & Data Internet. We take seriously the responsibility of protecting your privacy and the information we collect about you.

This Customer Privacy Policy describes the types of information we collect; how we use and share that information; and the choices you have regarding such use and sharing. It also describes the legal limitations imposed on our collection, use and sharing of information that personally identifies you; how long we maintain that information; how you may access, review and correct that information; and your rights under federal law and this Customer Privacy Policy concerning such information.

The commitments in this Customer Privacy Policy reflect our core business objective of providing you with the most innovative and superior products and services as possible while, at the same time, offering you choices about how we use information about you to achieve that objective.

We commit to:

- Communicate our privacy practices in a manner that is easily accessible and clearly describes your choices;
- Offer you choices about how we may use your information for our own marketing purposes;
- Not sell your personally identifiable information to anyone for any purpose - this includes our customers' web browsing history, call detail records, and viewing activity;
- Secure your information through the use of reasonable security measures; and
- Give you advance notice of any changes to our privacy commitments and to always post our most current version of the WCFD Privacy Policy at www.whiskeycity.com/privacy.
- We encourage you to contact us if you have any questions.

**Whiskey City Fiber & Data
Customer Privacy Policy**

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When the Customer Privacy Policy Applies

The Customer Privacy Policy only applies to subscribers of Lawrenceburg Municipal Utilities Data Services provided by Whiskey City Fiber & Data. If you have questions, please contact us.

Sometimes you may access websites (e.g., news websites, shopping websites, Internet search engine, etc.) or services (e.g., non-WCFD email and instant messaging services or video streaming services, gaming services, data storage services, etc.) that we do not own or control through the WCFD Services. We urge our customers to be careful and aware of the privacy practices of these third parties, because this Privacy Policy does not extend to the parties that collect information outside of our control and does not cover information that may be collected:

- when you download applications or make purchases from other companies while using our Internet or wireless services;
- when you log-in and access video content provided by a third party through your WCFD-issued device;
- through any other products, services, websites, or applications, including your interactions with online video and other third-party content services, even if you access them through the WCFD Platform; and
- by devices that are not WCFD devices, e.g., a tablet, smartphone, or other device that enables you to access the WCFD products or services, or through a smart television where the manufacturer has directly enabled information gathering capabilities.

You should read the privacy policies for these other products, services, websites, applications and devices to understand their privacy practices; those privacy policies will apply to those third parties' collection of your information, even if access to such content or use of such products or devices requires you to be a WCFD subscriber; for example, some of the premium streaming services available online that require you to authenticate your subscription.

How We Collect Information

In order to provide you with our products and services and to keep you informed, we collect a variety of information about you when you interact with us or use our products, services, websites and applications. This information is needed for us to efficiently provide our services to you on a cost-effective basis and to tailor our products and services to best meet your needs and interests. For example, in order to provide timely and effective customer service, we keep track of when you called, what the issue was and what is the best way to get in contact with you.

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If you are a LMU or WCFD customer and you allow others to access and/or use your accounts, products or services, we will collect information about those users, as well. We may also collect information about you from third parties.

Information You Provide to Us Directly or When You Create an Account

We collect information you provide to us when you establish a customer account and when you contact us or otherwise communicate with us, such as:

- contact information (e.g., name, address, email address, and phone number) usernames, passwords, images, voiceprints, and other authenticating information, including other biometric information, associated with a WCFD account;
- information about the types of services to which you subscribe, orders you place or downloads you make through a WCFD product or service, the service options you have chosen, and any customized setting you have created;
- information about your payment methods, such as your payment card number or bank account information;
- information related to a credit application for a product or service or to protect against fraud, which may include your Social Security number, driver's license number, or other government issued identifier;
- information you provide when you enter contests or respond to customer surveys; and
- information we keep in our records when you correspond or otherwise communicate with us, including through our call centers, online chat sessions, and through social media.

Information We Collect Automatically and Through Your Use of the Products, Services, Websites and Apps

When you use the WCFD Services, we automatically collect information, such as:

- information from any device you use when you interact with us, including but not limited to the device identifiers, the number, types, and status of devices connected to our network, network addresses, operating system, and technical configurations of the equipment used with our services, products, websites and applications;
- network traffic data;
- performance and support data; and

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The information we collect will depend upon the WCFD Services to which you subscribe. We limit the use and sharing of such information as described in this Customer Privacy Policy and as required by law. For example, we may collect usage information about:

- the websites you visit when you are using the WCFD Internet, Mobile or WiFi services, in order to provide the service and connect you to the other sites and services you request ("Internet Usage Information");
- We collect device information, including your IP address and information about your browser, operating system, and platform type. The collection of this information, including IP addresses and the referring websites, is required in order for us to provide Internet service and for users to communicate with each other and with websites on the Internet.

Location Information

When you access our network, we may collect general location information, such as the city or zip code that correlates with the license of your device IP address, or more precise geolocation data that indicates where you are at a specific point in time.

When you first visit or use any WCFD mobile application that collects precise geolocation information to access a WCFD Service to which you subscribe, we will request permission to collect and use such information. You can prohibit the collection of this information through your device's settings, but it may limit certain functions and features of the application.

Information Obtained from Third Parties

We may collect information from third parties for purposes related to delivering the WCFD Services to you. This includes information to verify information you have provided and from credit reporting agencies to determine your creditworthiness, credit score, and credit usage.

If you rent your residence, we may have a record of whether landlord permission was required prior to installing our cable facilities as well as your landlord's name and address.

How and When We Use Information, including for Advertising

First and foremost, we use the information we collect to provide you with reliable, high quality products and services. We also use the information we collect to communicate with you, make improvements to our products and services, investigate theft and other illegal activities, and personalize your experience, as described below. This may involve linking and combining information about you from across the WCFD platform of products and services, as well as from third parties ("Combined Information").

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To Provide and Improve our Services, we use the information we collect to:

- properly deliver, maintain and improve our services, websites and applications;
- fulfill requests for new service or changes to your account or the products and services you already receive;
- provide you with technical support and high-quality customer service, including through the use of recorded or monitored communications between you and our customer service agents;
- create and administer a WCFD account, including activating your service, billing, invoicing, and debt collection activities;
- authenticate or otherwise provide you access to your WCFD products and services;
- provide updates, upgrades, repairs or replacements for any of our service-related devices or software used in providing or receiving services;
- manage and configure our device(s), system(s) and network(s);
- understand how the service is being used, including through the creation of operational and marketing reports based on de-identified and/or aggregated service usage information;
- inform you of additional products and services that may be of interest to you;
- protect the security of the system, prevent fraud, detect unauthorized reception, use, and abuse of any WCFD service, website or application, and to enforce any WCFD policy or applicable terms of service;
- protect our rights, our personnel, our property, and the safety of others;
- maintain our accounting, tax and other records; and
- comply with applicable federal and state laws and regulations, as well as for the general administration of our business.

To Communicate with You

We use the information we collect to deliver and personalize our communications with you. We may use the information to remind you of a service appointment, to follow up with you after a service request, and to send you important service-related notices and announcements.

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To Create Business and Marketing Reports

We use the information we collect to create business and marketing reports (the "Reports") to provide insights into what services our customers are using, how long they are using our products and services, how some of our services are accessed, and what additional services may be of interest to our customers.

We may create reports in the broadband contexts that measure and analyze service usage information, such as the peak times of usage, the amount of bandwidth used, and the amount - but not the content - of data stored on our systems.

We use these Reports for our own internal purposes, such as improving our products and services, determining what content to provide our customers, measuring the effectiveness of our research and analytics. We may also share these Reports with third parties. Any Reports shared with a third party for the third party's own use will only contain de-identified and/or aggregated information; they will not contain information that personally identifies you unless we have your express consent.

Advertising Generally

Many of our marketing and advertising activities use information that does not personally identify you, such as your ZIP Code, your IP address, advertiser IDs and other persistent identifiers that are not directly linked to any identifiable information. Some of our marketing and advertising activities, however, do include the use of information that personally identifies you.

Online Advertising and Customization

We may place "cookies" in your browser that contain information about you or your account. Cookies enable us to help diagnose problems with our services, control display, track usage patterns, gather demographic information, analyze trends, conduct research, and otherwise administer the WCFD services. We do not store sensitive information such as your password, e-mail address or credit card number in cookies.

When and with Whom We Share Information

We share information with others when it is necessary to provide you with WCFD Services to which you subscribe, and others in the limited circumstances described below. We do not sell or otherwise share information that personally identifies our customers, including their Internet Usage Information, to third parties for those third parties' own use, such as marketing or advertising of their own products and services. While we have no plans to do so, if we ever changed this business practice, we would provide customers with advance notice and obtain their express consent.

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Account Holders and Other Authorized Users

We may disclose any information about a customer's account and use of a service or feature to the primary account owner after appropriate authentication. The primary account owner may also authorize other users to access information on the account, which may include information about the primary account owner's use of the relevant service.

Whiskey City Fiber & Data/Related Businesses

Service Providers

We may disclose your information to third-party service providers who perform business activities and functions on our behalf to support our interactions with you such as billing and collections, payment processing, analytics and research, marketing, service delivery and customization, maintenance and operations, and fraud prevention. These third-party service providers are authorized to use your personal information only as necessary to provide these services on our behalf.

Governmental Entities or Pursuant to Valid Legal Process

If you subscribe to any WCFD Services, we may be required by law to disclose information about you, including information that personally identifies you, your use of our services, and the content of your communications, to governmental entities upon receipt of valid legal process. These disclosures may be made with or without your consent and with or without notice, in compliance with the law, including the terms of process.

If you subscribe to WCFD data service and a governmental entity is seeking information about browser data and the governmental entity presents a court order. In the proceeding relevant to the issuance of the court order, the government must provide clear and convincing evidence that you are reasonably suspected of engaging in criminal activity and that the data records sought would be material evidence in the prosecution of the case. You are to be afforded the opportunity to appear and contest the governmental entity's claims in such proceeding.

We may also disclose personally identifiable information about you, without your consent, to protect our Customers, employees, or property; in emergency situations; to enforce our rights in court or elsewhere, or directly with you, for violations of service terms, conditions or policies; and/or as otherwise required by law.

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Third Parties

We do not sell or share information that personally identifies our customers with third parties for their own marketing or advertising purposes.

Location

When you first visit or use a WCFD application on your mobile device, we will request permission to collect and use your device's precise geolocation. You can choose not to permit the collection of this information, but it may limit certain functions or features of an application. You can manage the collection of your location information through your device's settings.

How We Protect Your Information

We take our responsibility to secure the information we collect and maintain seriously. We use reasonable security, including technical, physical and administrative controls, to secure the information we collect and maintain. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose WCFD information.

You can help protect the privacy of your own information by using encryption and other techniques to prevent unauthorized interception of your personal information. You are responsible for the security of your information that you transmit to us or view, download, or otherwise access when using unencrypted, public or otherwise unsecured networks. For more information on things you can do to help protect the privacy of your own information, visit - www.OnGuardOnline.gov.

What Your Rights and our Limitations are under Federal Law

The Communications Act and CPNI

Section 222 of the Communications Act provides privacy protections for information about the quantity, technical configuration, type, destination, location, and amount of your use of the WCFD telecommunications services, and information about your WCFD phone service that is contained on your bill. This information, when linked to an identifiable customer of such service, is known as customer proprietary network information or "CPNI." CPNI does not include a customer's name, address, and telephone number, which is defined by the Communications Act as "subscriber list information" and is not subject to the CPNI protections. However, that information is considered "personally identifiable information," and is subject to the Cable Act protections described above.

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If you are a customer of a telecommunications service, you have the right, and we have a duty under federal law to protect the confidentiality of CPNI and to provide you with information about how we use your CPNI and explain the choices you have. Those additional protections and the choices you have regarding the use and sharing of such information are reflected in this Privacy Policy.

How to Access and Correct the Information in our Records

We strive to keep our records accurate. If any of your information changes, please notify us immediately so we can update our records.

If you subscribe to a service and you would like to see the personally identifiable information we maintain in our business records, please send a written request to your local office or call us at the number provided on your monthly billing statement and we will make an appointment for you to visit during normal business hours. You will only be permitted to examine records that contain personally identifiable information about your account and no other account. If your review reveals an error in our records, we will correct it. We reserve the right to charge you for the cost of retrieving and photocopying any documents that you request. You may also be able to access certain information about you or your account by contacting one of our customer service representatives at 230 Walnut Street, Lawrenceburg, Indiana, or by logging in to your online account.

If you make a written request for a copy of your CPNI, we will disclose the relevant information we have to you at the address we have for your account, or to any person authorized by you, if we reasonably believe the request is valid. We generally do not provide our customers with web-browsing history, IP address logs or any other information that we do not create or maintain in the ordinary course of business unless there is a court order or similar legal process. If there are errors in names, addresses, or telephone numbers in our vendors' directory lists, or if you have been omitted from the directory, the correction cannot be made until the next available publication.

What Happens If We Change our Privacy Policy

The most current version of our Privacy Policy is published and maintained at www.whiskeycity.com. The needs of our customers and the business may change from time to time and, when that happens, we may need to modify this Privacy Policy. Any changes will be posted at this website. If we make any changes that materially affect your rights or the ways in which we use or disclose information, we will notify you in advance through written, electronic or other means, as permitted by law, so that you can make any necessary decisions about your ongoing use of the WCFD Platform.

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