

## **CUSTOMER PRIVACY POLICY**

Bulloch Telephone Cooperative (“Bulloch”) is committed to respecting and protecting the privacy of our customers. As discussed below, we have strict policies governing access by employees and others to customer communications and information. We access customer accounts, records or reports for authorized business purposes only. We educate our employees about their obligation to safeguard customer information and communications, and we hold them accountable for their actions. In short, privacy is a priority for Bulloch in all aspects of our business.

This Customer Privacy Policy is divided into four sections: Section I describes several general principles that express Bulloch’s commitment to assuring strong and meaningful customer privacy protection. Section II describes, more specifically, how Bulloch protects the confidentiality of Customer Proprietary Network Information (CPNI). Section III describes Bulloch’s “Do Not Call” practices, which are designed to protect our customers from unwanted telemarketing. Finally, Section IV provides our contact information should you have any questions about this policy or Bulloch’s privacy practices more generally.

### **GENERAL PRIVACY PRINCIPLES**

The following principles express Bulloch’s commitment to assuring strong and meaningful customer privacy protection, and are intended to guide Bulloch’s efforts to balance customer privacy with customer interest in receiving quality services. These principles apply to our use of “individual” customer information – that is, information about specific customers. “Individual” customer information includes “personal information” – information particular to you, including your address, phone number, fax number and email address – and “non-personal information” that may include information such as your network traffic data, services and features used or call record details. These policies are fully consistent with applicable laws and regulations governing privacy, including the regulations of the Federal Communications Commission (“FCC”). Individual customer information is distinct from “aggregated” customer information, which does not reveal a customer’s identity. Further, the examples provided below are intended to be illustrative, not all-inclusive.

**1)** Bulloch obtains and uses individual customer information for business purposes only. Bulloch obtains and uses customer information that helps us to provide our customers with quality telecommunications services. In addition to supporting the direct provision of service, this information may be used to protect customers, employees and property against fraud, theft or abuse; to conduct industry or consumer surveys; and to maintain good customer relations. Access to databases containing customer information is limited

to employees who need that information to perform their jobs. These employees are required to follow strict rules when handling customer information, and are subject to disciplinary action if they fail to do so.

In order to better serve our customers, we may ask them questions to elicit additional information about their special needs and interests. For example, we may ask whether customers work at home, whether any members of the household have special needs, or whether teenagers reside in the household in order to determine whether customers may be interested in or might benefit from additional lines or services. In all cases, the information we gather is used to facilitate the provision of quality customer service. We do not share this information with third parties to market non-Bulloch services to our customers.

**2) Bulloch collects information from customers in a number of different ways.**

Bulloch may collect information from you through communications such as via the web, or by phone, email or mail delivery, or through the services provided to you as the customer.

You may visit our site without divulging any personal information; however, there are areas of this site that might require personal information in order to contact Bulloch directly, specifically, when registering e-mails, obtaining remote access, and contacting online technical support.

**Information may also be collected in the following ways:**

- **Browsing our site** -IP addresses may be collected for the purposes of system administration, to gather broad demographic information, and to monitor the level of activity on our site. -Information may be collected regarding the referring URL, which browser you used to come to our site, and the pages of our site that you viewed during your visit and any search terms entered on our site. -E-mails may be sent by the customer to Bulloch on this website. Bulloch may retain the information in any e-mail that you send to us, such as your name, e-mail, address, or telephone number.
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- **Broadband Internet Service** -Bulloch may monitor the network and take measurements of network performance and the performance of your Internet connection to improve the customer's, or Bulloch's, overall service levels. -during communications with Bulloch for service support, we may also access information about your customer premise equipment such as computers and wireless modem devices or other device settings to provide customized technical support or to

install specific applications or services for your use. -Bulloch reserves the right to access broadband traffic from individual accounts for the purposes of general maintenance and management of the network, as well as upon request by law enforcement officials.

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- **Provision of Information by Third Parties** -Bulloch may obtain credit information about you from third parties when you purchase products or services from Bulloch.

**3)** Bulloch informs customers how information Bulloch obtains about them is used, as well as their options regarding its use.

Bulloch uses customer information in a transparent fashion, and discloses to customers the types of information Bulloch obtains about them how and when that information is used, when that information might be disclosed, the stringent measures we employ to protect that information, and ways that customers can restrict the use or disclosure of that information. This Privacy Policy is available on our website at <http://www.bulloch.net> and from Bulloch service representatives.

**4)** Bulloch gives customers opportunities to control access by others to customer information and how Bulloch uses individual information about them.

Bulloch is committed to providing customers with opportunities to control how Bulloch uses customer information about them. For example, customers may inform us of which telephone listings they want to include in our directories and in directory assistance and may also choose to have a non-published number, or a non-listed number, or to exclude your address from your listing. Customers in areas where Caller ID services are available have the ability to block the display of their phone numbers and names. (Note that Caller ID blocking does not prevent the transmission of your phone number when you dial certain business numbers, including 911, or 800, 888, 877, and 900 numbers.) Further, customers can express a preference not to be called for marketing purposes (please see Section III, below, for more information on Bulloch's "Do Not Call" policy). Customers may also opt out of our direct mailings and other service marketing programs. (Please see Section II, below, for information on Bulloch's policy on the use of "Customer Proprietary Network Information"). A customer may indicate a change in such preferences at any time by contacting Bulloch customer service.

We do use individual customer information internally for planning purposes – so that we can, for example, develop, test and market new products and services that meet the needs of our customers. Ordinarily, such information is combined into aggregations that do not include individual customer identities. Under certain circumstances, we are required by

law to disclose the aggregated information to other companies, but in such cases customer identities are not included.

**5)** Bulloch enables customers to control how Bulloch discloses individual information about them to other persons or entities, except as required by law or to protect the safety of customers, employees or property.

Ordinarily, Bulloch will only share individual customer information with persons or entities outside the company to assist us in the provision of services to which the customer subscribes. We do not use third-party marketers, nor do we share access to individual customer information derived from the provision of Bulloch telecommunications services with other companies interested in marketing other services to our customers – and we would not do so without the consent of the customer. Bulloch is committed to ensuring that customer information is not used without the knowledge and permission of our customers.

However, there are exceptions to our general practice. For example, unless you request otherwise, we may share certain personal or non-personal information with our affiliated companies with whom we have established business relationships. In addition, if Bulloch enters into a merger, acquisition, or sale of all or a portion of its assets, a customer's personally identifiable information will, in most instances, be transferred as a part of the transaction, subject to required notices to affected customers. In addition, we may, where permitted by law, provide information to credit bureaus, or provide information and/or sell receivables to collection agencies, to obtain payment for Bulloch billed products and services. We are also required by law to provide billing name and address information to a customer's long distance carrier and other telephone companies to allow them to bill for telecommunications services. (By law, customers with non-published or unlisted service have the right not to have their billing name and address disclosed when they make a calling card call or accept a collect or third party call. However, if they do restrict disclosure, they will be unable to make calling card calls or accept collect and third party calls.) Similarly, we are required to provide directory publishers with subscriber listing information – name, address and phone number, and for yellow page advertisers, primary advertising classification – for purposes of publishing and delivering directories. In addition, under certain circumstances, we may share customer information with other carriers or with law enforcement, for example, to prevent and investigate fraud or other unlawful use of communications services.

**6)** Bulloch strives to ensure that the information we obtain and use about customers is accurate.

Bulloch is committed to ensuring that the information we obtain and use about customers is accurate. To that end, we strive to verify that our customer records are correct.

Customers who find an error in their Bulloch bills are encouraged to notify Bulloch.

Bulloch's service representatives are trained to answer customer questions about, and to give customers reasonable access to, the information we have about them. Our service representatives will also provide explanations of how such information is used and how to correct any inaccuracies if they occur.

In addition to reviewing their bills, customers can access their customer information by contacting Bulloch customer service. However, Bulloch will only provide customer information after properly authenticating the identity of the requesting "customer" in accordance with applicable law and industry best practices. In this way, Bulloch can maximize the ability of its customers to review their customer information for accuracy while minimizing the risk that this information falls into the wrong hands. Bulloch service representatives can explain how customers may be authenticated to obtain access to their own customer information.

**7) All Bulloch employees are responsible for safeguarding individual customer communications and information.**

Bulloch takes reasonable precautions to protect your personal information against unauthorized access. Bulloch requires Bulloch personnel to be aware of and protect the privacy of all forms of customer communications as well as individual customer records. Bulloch makes clear that employees who fail to comply with its privacy policies will face disciplinary action, which can include dismissal. All employees are trained regarding their responsibilities to safeguard customer privacy. We strive to ensure that information we have about our customers is accurate, secure and confidential, and to ensure that our employees comply with our privacy policy.

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. 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 use locks and physical security measures, sign-on and password control procedures, and internal auditing techniques to protect against unauthorized use of terminals and entry into our data systems. Bulloch requires that records be safeguarded from loss, theft, unauthorized disclosure, and accidental destruction.

In addition, sensitive, confidential, or proprietary records are protected and maintained in a secure environment. It is our policy to destroy records containing sensitive, confidential, or proprietary information in a secure manner. Hard copy confidential, proprietary, or sensitive documents are made unreadable before disposition or recycling, and electronic media must be destroyed using methods that prevent access to information stored in that type of media. Just as employees would report stolen property, missing records and suspicious incidents involving records are referred to Bulloch Management. We encourage our employees to be proactive in implementing and enforcing Bulloch's privacy policies. If employees become aware of practices that raise privacy or security concerns, they are required to report them to their supervisors.

Bulloch's regulatory department is responsible for ensuring that all Bulloch business units and their employees comply with privacy laws and regulations. Bulloch also requires any consultants, suppliers and contractors that may come into contact with CPNI to observe these privacy rules with respect to any of our customers' individual customer information. They must abide by these principles when conducting work for us, and they will be held accountable for their actions.

Bulloch also takes special care to protect the safety and privacy of young people using its services. Bulloch does not knowingly collect information about children. Bulloch believes that children should get their parents' consent before giving out any personal information. Bulloch encourages parents and legal guardians to participate in their child's experience using Bulloch's services. Children should always ask a parent for permission before sending personal information to Bulloch.

While we have made significant efforts to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure and we will not be held liable should a third party illegally obtain your personal information via Internet transmission.

**8)** Bulloch participates in and supports consumer, government and industry efforts to identify and resolve privacy issues.

We participate in legislative and regulatory proceedings, industry association efforts, consumer group efforts, and general business group activities relating to telecommunications privacy issues. Our Industry Affairs personnel are responsible for the coordination of Bulloch's public policy participation.

**9)** Bulloch complies with all applicable privacy laws and regulations wherever Bulloch does business.

Customer and policymaker perceptions of privacy have changed over time and will continue to do so. Changes in technology can also alter what is appropriate in protecting privacy. Laws may change accordingly. We regularly examine – and update as necessary – Bulloch’s privacy policies and internal procedures to ensure compliance with applicable law and evolving technology. Bulloch also will monitor customer needs and expectations. Bulloch will work with policymakers and consumers to ensure that we continue to safeguard privacy, giving customers choices, flexibility and control. Bulloch considers privacy laws and regulations to be the minimum standards to which we will adhere in protecting privacy. In addition to complying with the law, Bulloch will adhere to its internal privacy policies and procedures wherever we do business.

**10)** Bulloch complies only with valid, properly issued, and legally enforceable third-party requests for access to customer information.

Bulloch 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, Bulloch will ensure that the underlying governmental request satisfies all procedural and substantive legal requirements and is otherwise proper. For example, Bulloch will ensure that any court orders are valid, properly issued, and legally enforceable. Except as required by law or with the approval of the customer, Bulloch will not release any customer information in response to subpoenas or similar requests issued by private parties. Further, Bulloch will be diligent in authenticating the validity of any “governmental” request to ensure that the request actually originates from an authorized government agency.

## **USE OF CUSTOMER PROPRIETARY NETWORK INFORMATION**

Customers count on Bulloch to respect and protect the privacy of information we obtain in the normal course of providing telecommunications services to our customers. Bulloch is committed to protecting the privacy of all customer information, and in particular the privacy of customer proprietary network information (or CPNI).

### **1) Definition of “Customer Proprietary Network Information.”**

The term “customer proprietary network information” is defined by federal statute to mean: (i) information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (ii) information

contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier.

## **2) Use of Customer Proprietary Network Information.**

Under federal law, you have the right to, and we have the duty to protect, the confidentiality of your CPNI. However, we may use CPNI without your consent, in a manner consistent with applicable law, to: (i) initiate, render, bill, and collect for our services; (ii) market services among the categories of service to which you already subscribe; (iii) provide inside wiring installation, maintenance, and repair services; (iv) provide maintenance and technical support for our services; (v) 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 (vi) provide any inbound telemarketing, referral, or administrative services for the duration of a customer-initiated call.

Further, 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.

Bulloch will not use your CPNI for purposes other than those described above unless we first obtain your express “opt in” consent. For example, without such consent we will not use CPNI to market services not provided by Bulloch, and will not share your CPNI with third parties (subject to the limitations discussed below).

## **3) Limits on the disclosure of CPNI outside Bulloch.**

As a general rule, Bulloch does not use third-party marketers and will not disclose your CPNI to third party contractors without your explicit “opt in” consent. This means that our records of the services you buy and the calls you make generally will remain private if you choose to keep them so, since we will not ordinarily disclose this information to outside parties without your permission. 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.

Certain information about your long distance calls may be transmitted to your long distance company for billing purposes. We are also required by law to give competitive local exchange carriers access to customer databases for purposes of serving their customers, 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, such as 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.

We may, where permitted by law, provide CPNI to third parties such as credit bureaus, or sell receivables to collection agencies, to obtain payment for Bulloch billed products and services.

#### **4. Authentication to prevent unauthorized access to CPNI.**

Bulloch 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. In general, our internal policies and procedures are designed to ensure that CPNI is not released to unauthorized individuals.

Further, 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 call, the customer provides a pre-established password; (ii) the information is sent to the customer’s address of record; or (iii) after the 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. (Note that different procedures may apply to certain business customers served by a dedicated account representative where the underlying service agreement addresses CPNI protection and authentication.) We also will notify you at your address of record if anyone changes the access authorization or authentication information associated with your account.

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

As a company, we are vigilant in our efforts to protect your CPNI. However, should we become aware 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. In particular, 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.

#### Bulloch'S "DO NOT CALL" LIST

Any Bulloch customer can express a preference not to be called by us for marketing purposes, and Bulloch will respect such preference. A customer that does not wish to receive sales calls from Bulloch specifically may ask to be placed on our company-specific "Do Not Call" list. We will note the customer's request immediately, although it may take up to 30 days for the customer's telephone number to be removed from any active lists or sales programs that are currently underway.

Any customer can ask to be put on our "Do Not Call" list by contacting Bulloch's customer service department. All customers should call 336-886-3600. The requesting customer should provide, at a minimum, the telephone number that is the subject of the request, although inclusion of the customer's name and address is also useful. If a customer is served by multiple telephone numbers, the customer should tell us all numbers that should be placed on the "Do Not Call" list.

A residential customer will remain on our "Do Not Call" list for five years, and a business customer will remain on our "Do Not Call" list for one year, unless the customer asks to be removed from the list by contacting our customer service department. If a customer's telephone number ever changes, the customer must give us updated information in order for the "Do Not Call" status to remain in effect.

Notwithstanding the fact that 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, the customer should understand that being on our "Do Not Call" list will not prevent calls from other companies unaffiliated with Bulloch.

#### FURTHER INFORMATION

Bulloch reserves the right to change, modify or update this Privacy Policy at any time without notice. In the event of any modification, we will post the changes in this Privacy Policy so that you will always know what information we are gathering and how we might use that information. However if such changes are material, we will either announce the change on the home page of the site or take such other action as we deem appropriate under the circumstances. Accordingly, you should periodically visit this page to determine the current Privacy Policy to which you are bound.

If you have any questions or comments concerning this Customer Privacy Policy, or if you believe that the Company has not adhered to its privacy policy, please contact Bulloch's customer service department. You may contact Bulloch via regular mail at:

Bulloch 2903 Northside Drive West Statesboro, GA 30458-5305

By phone: (912) 865-1100

By email: [bullnet@bulloch.net](mailto:bullnet@bulloch.net)

### **Indirect End User Phone Contact Information (Personal Identifiable Information)**

TolyDigital acts as a data processor with regard to indirect end user personal identifiable information and our Clients act as the data controller of such data. In the course of TolyDigital's processing and protection of such data, all use will be in conformity with the data controller's instructions.

Specifically, only when enabled via system permission on VoIPiTalk Android and VoIPiTalk iOS, TolyDigital shows personal contacts within the respective application. When the user sends an SMS message to one of his/her phone contacts, or when the user initiates a call to one of his/her phone contacts, the phone number is sent securely through TolyDigital's API. TolyDigital does not store this number with any other PII, and it cannot be directly or indirectly attributed to any person or persons; TolyDigital stores only the phone number and pertinent metadata so as to be compliant with all applicable state and federal laws, and TolyDigital does not share this data with any advertisers or third parties under any circumstances. A user can revoke phone contact access on his/her mobile device at any time, and his/her app experience is not hindered or interrupted.

VoIPiTalk Android and iOS also uses Gravatar, only when enabled via Settings and UIConfigs, which is a service that provides avatar images linked to the MD5 hash of the user's email address. This means that, only when Gravatar use is enabled, we hash each contact's email address and send it to Gravatar to try and retrieve an avatar image. MD5 hashes cannot be directly or indirectly attributed to any person or persons, and we only send the MD5 hash to Gravatar, never the email address in plain text. As with phone contacts, a user can revoke Gravatar access at any time in Settings or via UIConfig, and his/her app experience is not hindered or interrupted.

### **DATA RETENTION AND DELETION POLICY**

## **Introduction**

This Data Retention and Deletion Policy outlines the principles and procedures followed by Bulloch Solution for managing the data of our customers, specifically focusing on email, password, and app usage data.

## **Data Elements and Retention Periods**

### **Email and Password:**

- Retention Period: Indefinitely, as long as the account is active.
- Purpose: For account management, authentication, and communication.
- Inactive Subscribers (Email and Password):
- Retention Period: 3 months post account inactivity.
- Purpose: To allow easy account reactivation and maintain user preferences.

### ● App Usage Data:

- Retention Period: 30 days.
- Purpose: To enhance user experience and app functionality.

## **Data Deletion**

### **Inactive Subscriber Data:**

- After 3 months of inactivity, all personal data associated with the inactive account, including email and password, will be permanently deleted from our systems.
- App Usage Data:
- Automatically deleted after 30 days.

## **Data Security and Privacy**

- All data, including email, password, and app usage data, is encrypted and stored securely.
- Access to data is strictly limited to authorized personnel.

## **User Rights**

- Users have the right to access, correct, or delete their personal data at any time.
- Requests for data deletion prior to the standard retention period will be honored within 30 days of the request.

### **Policy Changes**

- This policy is subject to change. Users will be notified of any significant changes.

### **Contact Information**

- For any inquiries regarding this policy, please contact [itsupport@bulloch.solution].

**This policy ensures that Bulloch Solution manages user data responsibly, balancing the need for data to provide services with the privacy rights of our users.**