

# Privacy Policy

Stratford Mutual Telephone Company, and its affiliates, including Complete Communication Services (collectively, SMTC) maintains high standards for the protection of privacy over the internet. The purpose of this statement is to inform subscribers and visitors how the information that is gathered through our website and HomePass App (Powered by Plume) is used.

## How Stratford Telephone collects your information

SMTC collects and processes information provided directly by you when you sign up for SMTC/CCS service or install the Plume HomePass App and register for an account to use the App. Specifically, this information includes:

- Your name, email address, and location
- Certain other technical data, which may include:
  - URL Information
  - Online identifiers including cookie data and IP Addresses
  - Information about types of devices you are using such as unique device ID's, network connection type, provider, network and device performance, browser type, information enabling digital rights management, and operating system
  - Device attributes of devices on your Wi-Fi Network that are available to connect to Plume HomePass
  - Your non-precise location, which may be derived or inferred from certain technical data (e.g., IP address, language setting of your device, or payment currency), to comply with geographic requirements in our licensing agreements, and deliver personalized content and advertising to you
  - Data insights SMTC 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 or dis-aggregated formats to enhance our current HomePass App or to provide App features.
- Contests, Surveys, and Sweepstakes Data: When you complete any forms, respond to a survey or questionnaire, or participate in a contest, we collect the personal data you provide

## Information Use

SMTC uses the information collected as described in this Privacy Policy, including personal information to:

- Provide you with the Plume Homepass App as described in the Agreement;
- Implement, improve and/or enhance the App, including future releases available to you;

- Carry out SMTC obligations as described or authorized in the Agreement and this Privacy Policy, including but not limited to
  - To understand, diagnose, troubleshoot, and fix issues with the service
  - To evaluate and develop new features, technologies, and improvements to the service
- Enforce SMTC rights arising from the Agreement between you and SMTC; and
- Fulfill any other purpose authorized by you and reasonably required for the service or App

The only information SMTC obtains about individual visitors to our website is information supplied voluntarily by the visitor. This means that you can visit our website without telling us who you are or revealing any personal information. To gauge effectiveness of our website, we do collect some generic information about our visitors. Our web servers automatically recognize the web page from which a visitor enters our site, which pages a visitor visits on our site, and how much time a visitor spends on each page. This information does not reveal a visitor's identity. We accumulate this information and use it to evaluate and improve our website. You can choose to provide individual information to SMTC in a number of ways through our website – by requesting information, authorizing service, sending an email, and registering for electronic payments. When visitors supply information about themselves for a specific purpose, SMTC uses the information for that sole purpose. When visitors use our website to authorize or request information about our services, we use the individual information as we would use the same information obtained off-line via telephone or in person.

Information obtained as described above may be used:

- To establish, exercise, or defend legal claims;
- To conduct business planning, reporting, or forecasting;
- To conduct research, contests, surveys, and sweepstakes;
- To process your payment;
- To detect fraud, including fraudulent payments and fraudulent use of services;
- To comply with legal obligations and law enforcement requests; and
- For marketing, promotion, and advertising purposes.

## **Sharing**

We do not sell or share email addresses or individual information obtained online about our visitors. And, we will not disclose the individual information provided to us online to anyone outside of SMTC unless you specifically authorize it, it is required by law, or disclosure is necessary to protect the safety of customers, employees, or property.

Information and recipients we may share to:

### **Law Enforcement and data protection authorities**

- We share your personal data when we in good faith believe it is necessary for us to do so in order to comply with a legal obligation under applicable law, or respond to a valid legal process, such as a search warrant, a court order, or a subpoena. We also share your personal data when we in good faith believe that it is necessary for the purpose of our own, or a third party's legitimate interest relating to national security, law enforcement, litigation, criminal investigation, protecting the safety of any person, or to prevent death or imminent bodily harm, provided that we deem that such interest is not overridden by your interests or fundamental rights and freedoms requiring the protection of your personal data.

### **Service Providers**

- We work with service providers that work on our behalf which may need access to certain personal data in order to provide their services to us. These companies include those we've hired to provide customer service support, operate the technical infrastructure needed to provide service, assist in protecting and securing our systems and services, and help market SMTC's own products and services, as well as partner products and services.

### **Payment Processors**

- We will share your personal data with our payment processors as necessary to enable them to process your payments, and for anti-fraud purposes.

### **Email**

SMTC does not send unsolicited "junk" email (spam). We may use email to communicate with our customers, to respond to visitors' emails, to confirm website activity, and to send information that a visitor has requested. If you receive an unwanted email from us, you can simply reply to ask not to receive future emails.

### **Cookies**

SMTC's website, or co-sponsored websites may use "cookies" to improve our level of service to visitors. Cookies are lines of text that are transmitted to your web browser when you click on a site. Your browser stores the information on your hard drive and when you return to that site, the cookie is transmitted back to the server that originally sent it to you. Cookies provide a way for a server to recall a previous request or previous registration, or to keep track of a

transaction in progress, so that information does not have to be repeated. To be notified when you are about to receive a cookie you can configure your browser to alert you when a site is attempting to send you a cookie and at that time you will have the option of refusing the cookie.

## **Site Security**

SMTC is committed to safeguarding customer privacy on all web pages. We require our employees to protect the privacy of information about our customers and expect our partners and suppliers to do so as well. You can feel confident that your individual information will be protected when you access your account or order services from our website over the internet. All credit card transactions will be conducted on a site protected by SSL (Secure Socket Layer) and are PCI/DSS compliant.

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