

McDonough Telephone Cooperative Customer Privacy Policy



Privacy Statement. McDonough Telephone Cooperative and its subsidiary, MTC Communications, Inc. (herein MTC) respect the privacy of our subscribers and recognize the importance of maintaining the confidentiality of every subscriber's personal information. This privacy statement describes how MTC protects the personal privacy of our subscribers.

Personally Identifiable Information. Personally identifiable information ("PII") is information that identifies a particular subscriber and includes information subscribers provide when signing up for our services, information collected as a result of a subscriber's use of our services, and information contained in our bills for service. Examples include a subscriber's name, address, email address, telephone number, billing, payment, usage, credit and transaction information, including credit card numbers, account numbers, social security numbers and demographic information. We also collect PII that our web visitors choose to provide to us when registering on our website, ordering products or services from MTC, sending us email, or conducting online ordering or billing. We use the PII of a subscriber to provide, confirm, change, bill, monitor and resolve problems with the quality of our products and services. We may also use the PII of a subscriber or web visitor to develop, market and sell our products and services.

Who Sees the Information We Collect. We consider subscribers' PII confidential and only disclose such information to our employees, contractors and agents, as well as outside auditors, professional advisors, service providers and regulators, either with your written consent or as authorized by law, if necessary to render our service or conduct a legitimate business activity related to a service provided to you by us. We may also disclose PII to our affiliated companies, such as Infobahn Outfitters, Inc. and MTC Communications, Inc. We do not provide PII, other than information included in our directories and directory assistance service, to third parties unless necessary to obtain payment for services we provide to you or as required by law, such as pursuant to court orders or duly authorized subpoenas.

Customer Proprietary Network Information (CPNI). In the normal course of providing telecommunications services to our subscribers, the information that we have (1) relating to the quantity, technical configuration, type, destination, location and amount of your use of telephone service, or (2) contained in your telephone bill concerning the telephone services that you receive is subject to additional privacy protections. That information, when matched to your name, address and telephone number is known as "customer proprietary network information" or CPNI. Examples of CPNI include information typically available from details on subscribers' monthly telephone bills, such as a type of line, technical characteristics, class of service, current telephone charges, long distance and local service billing records, directory services charges, usage data and calling patterns. Protecting the confidentiality of your CPNI is your right and our duty under Federal law. We do not sell, trade or share your CPNI except as required by law or authorized by you. As a general rule, we are permitted to use CPNI in our provision of telecommunication services you purchase, including billing and collection for those services. We may also use or disclose your CPNI for legal or regulatory reasons, such as a court order, and to protect against the unlawful use of our telecommunications network and services. We do not use, disclose, or permit access to your CPNI to identify or to track customers who call competing service providers. Furthermore, before disclosing your CPNI to someone claiming to be the customer or an authorized person on the account who is requesting access to CPNI, we will confirm the identity of the requesting person.

Company Policy Regarding CPNI. Customer Proprietary Network Information (CPNI) is information that MTC obtains when providing telecommunications services to our customers, including services provided by our affiliates. Under federal law, customers have the right and MTC has the duty to protect the confidentiality of information regarding the telecommunication services to which customers subscribe. This confidential information includes such things as, specific services the customer purchases, the number of services purchased, who the provider is



for a service, call detail records, and charges related to services purchased. MTC takes our responsibility to protect our customers' CPNI very seriously and we do not use, disclose, or allow access to our customers' CPNI except as allowed by law. MTC authorized employees are allowed to use CPNI as necessary to (1) Initiate, render, bill and collect for telecommunications services MTC provides; (2) Protect the rights or property of MTC, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services; or (3) Provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if such call was initiated by the customer and the customer approves of the use of such information to provide such service. MTC shall also disclose CPNI upon affirmative written request by the customer, to anyone designated by the customer. Other use, disclosure, or permitting access to CPNI for marketing purposes must be conducted within the FCC defined rules. In this effort, MTC must follow all applicable FCC rules as contained in Subpart U – Customer Proprietary Network Information – of Part 64 of Title 47 of the Code of Federal Regulations. This CPNI Policies and Procedures Manual does not supersede any statute, regulation, order, or interpretation is inconsistent with the provisions of this Manual, and then only to the extent of the inconsistency. Additional information can be found on our Regulatory page: www.mdte.net/resources/regulatory/

Other Services. MTC also offers various other services, through our subsidiary company, MTC Communications, Inc. These other services may not be related to the communication services we provide to you. Under CPNI rules, some of those services, such as video, high speed Internet and web hosting services, are considered to be non-communication related services. We may use web usage information to facilitate and enable the functioning of our website and to expand and improve our web visitors' online experience. When you pay your bill online, our registration forms will collect personal contact and financial information from you. Our website only collects personal information that you provide directly about yourself. We may contact you when we deem necessary in connection with the services offered to you. In addition, upon your request, we may email service related information to you, but you may decide to stop receiving these emails at any time. When you pay your bill, we record detailed information about the payment history and the methods utilized to help identify fraudulent credit card use. We may share this information with the financial institution that issued the credit card with which the bill was paid, or with law enforcement authorities, if they determine the use of the credit card was fraudulent. We do not store personal information in cookies. Your personal information is protected with a user ID and password that you and MTC manage. We do not provide your email address to third parties except as required by law or as necessary for the proper functioning of our services.

Contacting MTC. If you believe that MTC has violated its obligation to protect your CPNI or other PII, you should contact MTC as soon as possible. Our contact information is as follows:

McDonough Telephone Cooperative
Attn: Customer Privacy Notice
PO Box 359
Colchester IL 62326
309-776-3211