

# FirstLight's Privacy Policy

FirstLight is committed to protecting its customers' privacy. Please review this Privacy Policy to better understand how FirstLight collects information, how that information is used, and your options as to the collection and use of information. This Privacy Policy is applicable to FirstLight customers and to visitors of FirstLight's website and is intended to provide information regarding methods for collection and use of information.

## What types of information does FirstLight collect?

Whether you are communicating with FirstLight or using a FirstLight service, FirstLight may collect two types of information: personal information and non-personal information. "Personal information" refers to information that is particular to you, such as your name, address, phone number, fax number, and e-mail address. "Non-personal information" refers to information that does not by itself identify a specific individual. This information includes websites visited, network traffic data, services and features used or call record details.

## How do we collect information from you?

FirstLight 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 FirstLight directly, specifically, when registering e-mails, obtaining remote access, and contacting online technical support.

Information may 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 FirstLight on this website. FirstLight may retain the information in any e-mail that you send to us, such as your name, e-mail, address, or telephone number.
- Broadband Internet Service
  - FirstLight may monitor the network and take measurements of network performance and the performance of your Internet connection to improve the customer's or FirstLight's overall service levels.
  - During communications with FirstLight 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.
  - FirstLight 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.

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

### **How is your personal information used?**

FirstLight uses your information in connection with delivering its products and services to you. FirstLight may also use the information supplied in order to personalize portions of your service. Some of these personalized services are made available directly by FirstLight, while others may be offered by its content partners. In addition, FirstLight analyzes and evaluates customer preferences, comments, and criticisms of its offerings in order to make improvements to the present and future versions of the individual service.

FirstLight may use personal information it collects to provide you with information or samples that you have requested. In addition, we may use the non-personal information we collect to provide you with a better service experience in the future. FirstLight does not rent, sell or trade your private information to any non-affiliated third party.

### **With whom do we share your information?**

Unless you request otherwise, we may share certain personal or non-personal information with our affiliated companies with whom we have established business relationships. FirstLight will never willfully disclose individually identifiable information about its customers to a third party without first receiving that customer's permission unless FirstLight believes in good faith that the law requires it, or to protect the rights or property of FirstLight.

### **How does FirstLight protect your personal information?**

FirstLight takes reasonable precautions to protect your personal information against unauthorized access by requiring employees to use secured access authentication and passwords to obtain customer information and by storing electronic file information on a secure server, which is accessible only by authorized personnel.

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. 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.

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

### **How does the customer provide consent?**

By using FirstLight's services, you agree with our Privacy Policy and our practices and procedures contained herein regarding the collection and sharing of your information. To opt out of the sharing

of your information for marketing purposes, please contact FirstLight.

### **How often are changes made to the Privacy Policy and how will you learn of the changes?**

FirstLight 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.

### **What about CPNI?**

FirstLight cares about protecting the privacy of your telephone records. Telephone records, sometimes called Customer Proprietary Network Information, or "CPNI", contain information about your accounts with us.

This notice outlines your Customer Proprietary Network Information Rights. In the normal course of providing your telephone service, FirstLight maintains certain information about your account with us. This information, when matched to your name, address and calling or originating billing telephone number, is known as your CPNI data. Examples include the type of line you have, service features like Touch tone and Caller ID, class of service, telephone charges, long-distance and local service billing records, directory assistance charges, and historical call records and patterns. FirstLight may also maintain information regarding information services we provide to you, such as Internet and voice mail. All such information is made available to us solely by virtue of our relationship to you as your telephone carrier, and is necessary for providing service and billing for service.

In addition to FirstLight, your phone service may be supplemented by other providers, selected by you, that offer additional telecommunication services, such as intrastate or interstate long-distance calling. These providers may also maintain calling information and historic usage pattern information. Every provider maintains their own CPNI policy, which you can reference for information on their use, privacy, and your rights, of your CPNI.

Currently, FirstLight does not market additional services using CPNI, nor do we sell customer information to any third party. However, we reserve the right, as accorded to us by federal law, to use your CPNI to market additional local telephone services to you in the future, as well as enhanced features and long distance services, and data services if we already provide that type of service to you.

The Federal Communications Commission ("FCC") has adopted rules stating that FirstLight may not use your CPNI to market certain telecommunications-related services or features to you if you have requested that the CPNI be considered "restricted" or if you "opt-out" for this purpose. If you wish to have your CPNI marked as "restricted/opt-out," please notify us by sending an email to CPNI@FirstLight.net. Tell us that you wish to restrict our use of your customer information. The restriction will remain in effect until you notify us otherwise.

Please note that restricting your CPNI will not eliminate all of our marketing contacts with you. You could still receive marketing contacts from us that are not based on your CPNI. Also, we are permitted to use your CPNI to contact you about additional local telephone and other services when we already provide you that same type of service. Finally, even if your CPNI is restricted, we may still use it to market any other telecommunications services or features with your permission if you contact us and ask about them.