

# North Atlantic Networks Privacy Policy

## Privacy Statement

This Privacy Statement describes how North Atlantic Networks, LLC (“NAN”) and its affiliates collect information from or about you, either as a customer or visitor to any NAN website, when you order services from us, how we use the information we collect, and the choices you have concerning the collection and use of such information. The goal of this Privacy Statement is to ensure that your NAN experience is secure so that you may use our products and services with complete confidence. Please review this Statement carefully.

This Statement addresses:

- A. Personal Information Collected
- B. Use of Personally Identifiable Information (PII)
- C. Customer Proprietary Network Information (CPNI)
- D. Value-Added Services
- E. Information Disclosed to Third Parties
- F. On-line Information
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### **A. Personal Information Collected**

NAN limits the information collected about you to what is needed for conducting business, including the offering of products and services by us or by third parties that might be of interest to you. You may choose to provide personally identifiable information (PII) to NAN in a number of ways: in person, telephonically or electronically via our websites.

Examples of how you may share PII with us include: ordering a service or equipment from us, sending us e-mail, responding to NAN surveys, entering NAN-sponsored contests or sweepstakes, registering to receive news or public information or applying for a job. We may also obtain PII from third parties (for example, credit agencies) with your permission.

Examples of PII are:

- Name (including company name for business customers)
- E-mail address
- Credit card number
- Financial/bank account number or information, including routing numbers

- Passwords or personal identification codes (PINs)
- Date of birth
- Social Security number
- Driver's license number or government issued identification number
- Company contact information for business customers

The following information is not PII:

- Mailing address, unless unlisted or restricted at your request
- Telephone number, unless unlisted or restricted at your request
- IP Address allowing you to use our internet service
- PII included in aggregate data compiled by NAN

NAN may compile or aggregate PII from numerous customers or Web visitors to collect data about groups of customers or potential customers or categories of service. NAN does not consider this information as PII because the aggregated information does not contain the PII of any individual customer or web visitor.

## **B. Use of Personally Identifiable Information**

NAN uses PII to provide products and services to meet customers' needs, including new products or services. NAN may share PII with any NAN-affiliated company, and these companies are subject to the terms of this Statement. NAN retains PII only as long as is necessary for NAN to comply with business, tax and legal requirements.

NAN does not collect PII from you unless you provide it to us in person, telephonically or electronically by visiting our websites, including information you provide in order to use our services. NAN does not sell the names and addresses of NAN Web visitors to unaffiliated suppliers without your prior approval, nor will it allow third parties to change your service provider or otherwise access your account information, at your request, without complying with our security policies.

## **C. Customer Proprietary Network Information (CPNI)**

CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services purchased by you from NAN. CPNI is available to NAN solely through its relationship with you and information contained in your bill for telecommunication services. CPNI does not include information that is typically classified as PII, such as your name or e-mail address and does not include compiled or aggregated PII. U.S. Federal Law requires NAN to protect the confidentiality of CPNI. Unless you opt-out from the use of CPNI, NAN may use CPNI to market service offerings to you to which you do not already subscribe. NAN may, without prior approval from you, use CPNI to provide or market service offerings to you, if the service offerings are within the same categories of service to which you already subscribe, regardless of your CPNI selection. To opt-out, contact us.

## **D. Value-Added Services**

Because we appreciate the trust you have placed in us, we continually look for ways to enhance your

customer experience. From time to time, we may notify you about a NAN product or service using the information you have provided to us either in person, telephonically or electronically by visiting our websites, including information you provide to use our services. We strive to limit our offers to those we think would benefit from and appreciate receiving. We want every contact you have with us to be a positive experience. If you prefer not to receive these NAN value-added services, offers and opportunities, please contact us.

NAN complies with all applicable laws and regulations regarding Do Not Call Lists. Generally, NAN is allowed to contact its customers, even if the customers are registered with federal or state Do Not Call Lists, because of our relationship with you. NAN will, of course, honor any request to remove your name from our telephone, mail or e-mail solicitation lists and will delete such information from existing files within a reasonable time period.

### **E. Information Disclosed to Third Parties**

NAN does not sell PII of its customers to third parties. In limited circumstances, NAN may provide PII to third parties:

- To assist us in developing, promoting, establishing, maintaining and/or providing NAN-related products and services to you, including joint marketing efforts or promotions, but PII may not be used by the third parties for any other purpose;
- To assist us in establishing accounts, billing, collecting payment (i.e. credit bureaus and collection agencies), enforcing the Terms and Conditions or the Acceptable Use Policy of our NAN services where permitted by law, and protecting or enforcing our rights or property or the services of our other customers from fraudulent, abusive, or unlawful use by you of our services;
- To comply, when required by law, with court or administrative orders, civil or criminal subpoenas, warrants from law enforcement agencies, federal or state regulatory requirements, mandatory governmental audits, E911 reporting requirements, grand jury investigations, civil or criminal governmental investigations or reporting required by the National Center for Missing and Exploited Children, designated by federal law as a reporting mechanism for child pornography; and,
- To appropriate law enforcement, 911 centers or emergency services when NAN, in good faith, believes the disclosure is necessary to protect a person, NAN property or the public from an immediate threat of serious harm.

### **F. On-line Information**

In addition to PII identified in Section A of this Statement, we, or our third party partners, may collect non-personal information automatically when you enter NAN websites, such as domain name, browser type, your computer operating system, information about the Web page from which you linked to the site, IP address, and time spent on different pages within the site. We or our partners may use this information to evaluate and improve our site, and may share the information with third parties on an aggregated basis to enhance our products and services offered. This on-line information is typically collected via cookies or web beacons (see definitions section). Like virtually all other web sites that you

visit, we use cookies to deliver Web content specific to your interests and to control access to your personal shopping cart after your initial entry. The cookie permits the server to recall information from your previous shopping trip, should you decide to think about your purchase. A cookie is not used to access or otherwise compromise the data on your hard drive. With most browsers, you can choose to change your browser settings to disable cookies. Please be aware that cookies may be required to complete certain functions on NAN websites and other websites you may link to from NAN websites, including making purchases or payments on your NAN account.

## **G. Security Measures**

NAN uses security techniques designed to protect your information from unauthorized access, including firewalls and access control procedures. We have security measures in place to protect against the loss, misuse and alteration of information under our control. For example, when you place an order on a NAN website, the information you submit is encrypted using the Secure Sockets Layer (SSL) protocol.

NAN employees are bound by non-disclosure agreements designed to prevent them from disclosing any PII or CPNI. Further, NAN's security training and integrity guidelines state that NAN employees must abide by all state and federal laws and regulations in the performance of their job duties.

Our policies also limit access to PII to only those employees, contractors, agents, representatives or partners that require the information to perform their jobs or to assist NAN with providing products and services to you.

## **H. Children**

Children below the age of majority should consult with their parents or guardians before furnishing any data to us. Parents should consider using one of a number of available parental control tools that provide a child-friendly, on-line environment and can prevent children from disclosing PII without parental consent. If a child has provided personal information without the consent of a parent or guardian, that parent or guardian should contact us to request that the information be deleted from our records. More information about parental controls may be found by contacting a NAN customer care representative.

NAN does not knowingly collect PII from children under the age of 13 in connection with providing products and services, and it strives to comply with all provisions of the Children's Online Privacy Protection Act (COPPA). If NAN inadvertently collects information from minors below the age of 13, the information will be treated as PII of the adult customer.

## **I. Links**

NAN is not responsible for the content or privacy policies of other non-NAN websites. You should keep this in mind when accessing sites through links on NAN websites or through third party advertisements appearing on NAN websites. Further, NAN may advertise on other websites. The advertising companies placing our ads may use cookies or web beacons to track the effectiveness of our ads. The use of such technology is subject to the privacy policies of the advertising companies, and not this Statement.

## **J. Statement Updates**

We may update this Privacy Statement at any time in connection with our constant efforts to improve our products and services. We strongly encourage you to periodically review this Statement. We reserve the right to expand our capabilities for information collection and use and change this Statement in this regard. If any change constitutes a material change to this Statement, we will post a notice on our websites in a prominent position. If NAN decides to use PII in a manner that is materially different from what is contained herein, we will post the change on this page for thirty days before making the change.

## **K. Security Breaches**

While our goal is to prevent any unauthorized disclosure of PII, NAN cannot guarantee that an unauthorized disclosure will not occur. We will make reasonable efforts to contact you if we determine that security breach has occurred and that there is a reasonable risk of identity theft or as otherwise required by law.

## **L. Contact Us**

If you have questions, concerns, or complaints about this Statement or NAN's privacy practices, please contact a NAN customer care representative, email us at [security@nan.com](mailto:security@nan.com), or write to us at North Atlantic Networks, LLC, ATTN: Security Officer, 16 Mason Avenue, Suite One, North Attleboro, MA, 02760. We will respond to your inquiries in a timely manner.

## **M. Definitions**

Cookies are small, encrypted data strings our server may write to your hard drive that contains your unique NAN User ID. Web beacons are small graphic images imbedded in a webpage or email.

## **N. Internet Information**

NAN's network management practices are designed to provide the best possible online experience to its customers. To that end, NAN monitors traffic flows between points within its network and between its network and locations on the internet for purposes of reasonable network management. NAN uses this information to manage its network, provide security for its customers, plan for future needs, and ensure its network runs efficiently. Monitored information may include the amount of data sent to and from your connection, the source and destination of the data, and the type of information sent and received. In limited circumstances, NAN may also look into the contents of the information to determine whether it is malicious in nature (such as a virus, spam, worm, etc.) or when required by law to comply with judicial orders or regulations.

## **O. Safe Harbor Principles**

NAN strives to adhere to the Safe Harbor Privacy Principles and the US – EU Safe Harbor Framework as agreed to and set forth by the United States Department of Commerce and the European Union ("EU"). (<http://export.gov/safeharbor>). For individually identifiable information received by NAN in the United

States, or from Users in the EU, NAN will make every effort to adhere to the following principles:

**Notice.** NAN will inform Users about the purposes for which it collects and uses PII, the types of non-agent third parties to which NAN discloses PII, and the choices and means, if any, NAN offers for limiting use and disclosure of PII.

**Choice.** NAN will offer Users the opportunity to choose (opt-out) whether their PII is: (a) to be disclosed to a third party who is not an agent, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized. For sensitive PII, NAN will provide Users the opportunity to affirmatively and explicitly (opt-in) consent to such disclosure or use.

**Access.** Upon request, NAN will provide Users with the PII that it holds about them and will take reasonable steps to provide individuals with a means to correct, amend, or delete PII that is inaccurate or incomplete.

**Dispute Resolution.** For complaints that cannot be resolved between NAN and the User, such disputes will be governed by the current provisions of NAN's Terms and Conditions.