

# Privacy Policy

Randolph Communications including one or more of its affiliates (“Randolph Telephone Telecommunications Inc. (RTTI)”) and (collectively, “Randolph Communications”, “we”, or “us”), have created this Privacy Policy to demonstrate our firm commitment to privacy and security. This Privacy Policy describes how Randolph Communications collects information from all end users of Randolph Communications services (the “Services”) — those who access some of our Services, but do not have accounts (“Visitors”); as well as, those who pay a monthly service fee to subscribe to the Service (“Members or Customers”) — what we do with the information we collect, and the choices Members, Customers, and website Visitors have concerning the collection and use of such information. Randolph Communications requests that you read this Privacy Policy carefully.

## PERSONAL INFORMATION RANDOLPH COMMUNICATIONS COLLECTS AND HOW IT IS USED

### Introduction

Randolph Communications collects information in different ways from Members, Customers, and Website visitors who access the various parts of our Services and the network of Web sites accessible through our Service. We use this information primarily to provide a customized experience as you use our Services and, generally, do not share this information with third parties. However, we may disclose personal information collected if we have received your permission beforehand or in very special circumstances, such as when we believe that such disclosure is required by law or other special cases described below.

### Registration

Customers are asked to provide certain personal information when they sign up for our Services, including name, address, telephone number, billing information, and if you wish to automate payments, financial account information (such as credit card numbers, account numbers, and/or social security number). The personal information collected from Customers during the registration process is used to manage each Customer’s account (such as for billing purposes). This information is not shared with third parties, unless specifically stated otherwise or in special circumstances. Randolph Communications may also generate non-identifying and aggregate profiles from personal information Customers provide during registration (such as the total number, but not the names, of Customers). As explained in more detail below, we may use this aggregated and non-identifying information to sell advertisements that appear on the Services.

In addition, we may ask you for information about the type of personal computer being used to access the Services, your interests in television viewing, sports, personal finance, or other topics when registering on our Web sites; ordering products or services; sending us an e-mail; responding to our surveys; entering contests or sweepstakes; or in connection with online billing functions. The information you supply will help us to offer you more personalized features, complete the particular function of the website you are using, tailor our website to your interests to make it more useful to you, or resolve any trouble shooting issues that may arise. The more you tell us about yourself, the more value we can offer you. Supplying the information is entirely voluntary. But if you choose not to supply the information, we may be unable to provide you with the products and services we make available to other users of and visitors to our website. And you will not be able to order selected products or services, or automate payments, over our website unless you provide certain personally identifiable information about yourself. When you submit any personally identifiable information over this website, Randolph Communications (i) will use the information for the purposes described at the time you submit it (for example, your name, address, telephone number, e-mail address provided while ordering one of our products or services will be used in connection with the processing and fulfillment of your order) and (ii) may use the information to contact you to make you aware of other products and services of interest. Of course, if you wish to remain completely anonymous, you are still free to take advantage of the publicly available content on our website without registration. Personally, identifiable information is information that identifies a particular person.

### Information Included in Our Directories and Directory Assistance Service

We publish and distribute directories in print and on the Internet, which include customer information (such as customer names, addresses, and telephone numbers) without restriction to their use. Our directories may also include information obtained by third parties, which is also made available through the Internet and directory assistance operators. This directory information is not legally protected by copyrights and may be sorted, packaged, repackaged and made available again in different formats by anyone, including Randolph Communications.

We are required by law to provide published customer names, addresses and telephone numbers (or non-published status) to unaffiliated directory publishers and directory assistance providers, over whom Randolph Communications has no control, for their use in creating directories and offering directory assistance services. To restrict the disclosure of such information, you may obtain a non-published number from Randolph Communications.

### Obtaining Non-published Numbers

By default, all telephone listings are made available to the public through our directory, directory assistance, and the Internet. You have the option of restricting your listing when you choose a non-published number for a monthly fee. You may choose to exclude partial or all address information from your listing.

A "non-published" number will keep your name, number, and address from being published in our directory, listed online, and unavailable via our directory assistance. Non-published numbers are not provided to other telecommunications companies for publication in their directories or directory assistance listings.

### **Customer Proprietary Network Information**

Federal regulations permit Randolph Communications to use information about your telecommunications services to recommend other categories of products and services to you, unless you notify us otherwise. This applies to information about telecommunications services you buy from Randolph Communications, including the types of services you receive, how much you use them, how we provide them to you, and calling/billing records. Randolph Communications will use this information to offer you valuable new and additional services, including packages or bundles containing both Randolph Communications and Randolph Communications subsidiary products and services.

This information will be used by only those companies now or in the future that design, market or sell, or assist in the design, marketing or sale of (1) Randolph Communications communications-related services or (2) Randolph Communications subsidiaries communications-related services sold as part of a package or bundle with Randolph Communications communications-related services, including our agents, authorized sales representatives, joint venture partners/participants and independent contractors. Those companies include Randolph Telephone Membership Corporation, and Randolph Telephone Telecommunications, Inc., and any other current or future direct or indirect subsidiaries of Randolph Communications that provide, design, market, sell, or assist in the design, marketing or sale of any of the services described at the beginning of this paragraph. Randolph Communications will protect the confidentiality of this information regardless of whether you approve or disapprove the uses described in this Notice. Under Federal law, you have the right to have your account treated confidentially and to restrict our use of this information, and Randolph Communications has a duty to protect the confidentiality of that information.

If you wish to prohibit our use of this information as described in this notice, call us at 336-879-5684 or e-mail us at [csrep@rtmc.coop](mailto:csrep@rtmc.coop) with your request within 30 days of your receipt of this notice. Your denial of approval for Randolph Communications to use this information will not affect the provision of any services to which you subscribe. Your approval or denial of approval for the use of CPNI outside of the service to which you already subscribe will remain valid until revoked or limited.

### **Special Cases**

It is Randolph Communications' policy not to use or share the personal information about Visitors or Customers in ways unrelated to the ones described above without also providing you an opportunity to opt out or otherwise prohibit such unrelated uses. However, Randolph Communications may disclose personal information about Visitors or Customers, or information regarding your use of the Services or Web sites accessible through our Services, for any reason if, in our sole discretion, we believe that it is reasonable to do so, including: to satisfy laws, such as the Electronic Communications Privacy Act, regulations, or governmental or legal requests for such information; to disclose information that is necessary to identify, contact, or bring legal action against someone who may be violating our Acceptable Use Policy or other user policies; to operate the Services properly; or to protect Randolph Communications and our Customers.

## **WHAT ONLINE INFORMATION WE COLLECT, HOW WE USE IT AND HOW YOU CAN CONTROL ITS USE**

### **"Cookies" and How Randolph Communications Uses Them**

A "cookie" is a small data file that can be placed on your hard drive when you visit certain Web sites. Randolph Communications may use cookies to collect, store, and sometimes track information for statistical purposes to improve the products and services we provide and to manage our telecommunications networks. If you are a Customer and have created your own Personal Start Page, we will use a cookie to save your settings and to provide customizable and personalized services. These cookies do not enable third parties to access any of your customer information. Additionally, be aware that if you visit non-Randolph Communications web sites where you are prompted to log in or that are customizable, you may be required to accept cookies.

### **Randolph Communications Commitment to Children's Privacy**

Protecting children's privacy is especially important to us. It is our policy to comply with the Children's Online Privacy Protection Act of 1998 (COPPA), as amended December 2012 and effective July 1, 2013, and all other applicable laws.

We believe that there is no substitute for proper parental supervision. For further information about tips, tools, age-appropriate or kid-friendly Web sites, and how to report online trouble, please visit [www.getnetwise.org](http://www.getnetwise.org).

Finally, Randolph Communications recommends that children always ask a parent or legal guardian for permission before sending personal information to Randolph Communications, or to anyone else online.

### **Linking to Other Sites and Public Forums**

Our Web sites may provide links to third party sites. We are not responsible for the privacy, security or content of such sites. Please remember that any information you may disclose in public areas of Web sites or the Internet becomes public information. You should exercise caution when deciding to disclose personal information in these public areas.

### **Online Shopping**

At some Web sites, you can purchase products and services or register to receive materials, such as a catalog or new product and service updates. In many cases, you may be asked to provide contact information, such as your name, address, email address, phone number, and credit/debit card information. If you complete an order for someone else, such as an online gift order sent directly to a recipient, you may be asked to provide information about the recipient, such as the recipient's name, address, and phone number. Randolph Communications has no control over the third parties' use of any personal information you provide when placing such an order. Please exercise care when doing so.

If you order products directly from Randolph Communications, we will use the personal information you provide only to process that order. We do not share this information with outside parties, except to the extent necessary to complete that order.

### **Email Marketing Practices**

Customers may receive newsletters, surveys, and promotions via email from time to time regarding Randolph Communications product and service updates and company events. Every marketing e-mail will contain an opt-out link so you may discontinue receipt of emails of this nature. Your e-mail address will not be provided to third-parties for the marketing of third-party products without your consent.

### **Responses to Email Inquiries**

When Visitors or Customers send email inquiries to Randolph Communications, the return email address is used to answer the email inquiry we receive. Randolph Communications does not use the return email address for any other purpose and does not share the return email address with any third party.

### **Voluntary Customer Surveys**

We may periodically conduct both business and individual customer surveys. We encourage our customers to participate in these surveys because they provide us with important information that helps us to improve the types of services we offer and how we provide them to you. Your personal information and responses will remain strictly confidential, even if the survey is conducted by a third party. Participation in our customer surveys is voluntary.

We take the information we receive from individuals responding to our Customer Surveys and combine (or aggregate) it with the responses of other Randolph Communications customers to create broader, generic responses to the survey questions (such as gender, age, residence, hobbies, education, employment, industry sector, or other demographic information). We then use the aggregated information to improve the quality of our services to you, and to develop new services and products.

### **Randolph Communications Commitment to Data Security**

Services and Web sites, we sponsor have security measures in place to protect the loss, misuse, and alteration of the information under our control. While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information.

### **How to Access or Modify Your Information**

Randolph Communications offers Customers the opportunity to access or modify information provided during registration. To access or modify such information, contact our Customer Service Department at 879-5684, if you are able to verify your identity using a Randolph Communications personal identification number or PIN, or other identifier requested by Randolph Communications. Please choose the number that is a local call from your area.

### **Revisions to This Policy**

Randolph Communications reserves the right to revise, amend, or modify this policy, our Internet Service Agreement and our other policies and agreements at any time and in any manner. Notice of any revision, amendment, or modification will be posted in accordance with the Service Agreement.

### **Where to Direct Questions About Randolph Communications Privacy Policy**

If you have any questions about this Privacy Policy or the practices described herein, you may contact:

Randolph Communications Customer Care  
317 East Dixie Drive  
Asheboro, North Carolina 27203  
336-879-5684  
csrep@rtmc.coop