

**HAYNEVILLE TELEPHONE COMPANY, INC. D/B/A HTV'S  
CABLE TV SUBSCRIBER PRIVACY NOTICE**

Hayneville Telephone Company, Inc. d/b/a HTV ("HTC") respects Your right to privacy and has always guarded Our customers' private information with complete confidentiality. As a subscriber to HTC's video cable service and/or the other TV services provided over HTC's cable system, We are providing this notice to help You understand Our privacy practices and Your rights under Section 631 of the Cable Communications Policy Act of 1984 (the "Cable Act"). As used herein, the terms "HTC," "We," "Us" and "Our" refer to the HTC company or companies that is/are providing Your video cable service to You; the term "You" refers to you, as a subscriber of HTC's video cable service.

**Under the Cable Act, You are entitled to know:**

- what kind of personally identifiable information We collect on Our subscribers;
- how this personally identifiable information may be used by Us;
- when We may disclose this personally identifiable information and to whom it may be disclosed;
- how long We will keep personally identifiable information;
- how You may obtain access to Your personally identifiable information; and
- Our limitations under the Cable Act concerning the collection and disclosure of personally identifiable information and Your rights to enforce those limitations under federal law.

**What is personally identifiable information?**

Personally identifiable information is information that identifies a particular person. It does not include aggregate data that does not identify a particular person or persons. This notice concerns the personally identifiable information that You have furnished to Us or that We have collected using the HTC video cable system, in connection with the cable TV services We have provided to You.

The Cable Act only permits Us to use the HTC video cable system to collect the personally identifiable information necessary to render Our video cable service or other services or to detect the unauthorized reception of cable communications. The Cable Act prohibits Us from using our cable system to collect personally identifiable information about You for any other purpose without Your prior written or electronic consent.

The personally identifiable information We typically collect includes Your name, address, telephone number, driver's license number, Social Security Number, and credit card or bank account number. We also collect and maintain certain other information about Your account, which may not be personally identifiable, to assist Us in providing You with quality service, such as billing, payment and deposit history, service and credit records, customer correspondence, maintenance and complaint information, services subscribed to, subscriber preferences, subscriber purchases over the cable system, and the types and number of devices You use to connect to the system (e.g., televisions, Set Top Boxes). We may also maintain

research records containing information obtained through voluntary interviews or surveys in which You have participated.

If You rent Your residence, We may have a record of whether the landlord's permission was required prior to installing Our cable service facilities, as well as the landlord's name and contact information.

When You use or interact with Our video cable service or equipment, Our video cable system automatically collects certain information on the use of the service and equipment. Most of this information is not personally identifiable and is used, for example, to carry out a particular request You make when using Your remote control, Set Top Box or other equipment. This may include, among other things, information required to change the television channel, review listings in the electronic Program Guide, or pause or fast-forward through certain on demand programs. It may also include other information, such as the time You actually use Our services, the specific service features used and the amount of time spent using them. However, in order to carry out Your request to watch a pay-per-view program or Video On Demand, the video cable system may collect certain personally identifiable information, such as Your account information, in addition to the product or service purchased, so that You can be properly billed for the program viewed.

#### **How does HTC use Your personally identifiable information?**

HTC collects, maintains and uses personally identifiable information in order to provide You with the highest quality video cable services and to help Us detect theft of service. Our business records include information that We can use to help Us:

- ensure that You are receiving the services You ordered;
- properly maintain those services and make improvements or upgrades, when necessary;
- confirm that You are being properly billed;
- inform You of new products or services that may be of interest to You;
- understand how You are using, and how We may improve, Our services;
- prevent fraud, including the unauthorized reception, use or abuse of Our services; and
- ensure Our compliance with all applicable laws, rules and regulations.

We may use anonymous and/or aggregated information automatically collected when You use Your Set Top Boxes and other equipment to improve Our services and the content that You receive (i.e., to determine which programs and channels are most popular, measure viewership of commercials and understand how the electronic Program Guide is being used) and to make programming and advertising more relevant to You. Anonymous or aggregated information is not personally identifiable and is not connected or associated with any particular subscriber, and our collection, use and disclosure of this information varies in accordance with Our business needs and activities.

### **To whom does HTC disclose Your personally identifiable information?**

HTC considers the personally identifiable information it obtains to be confidential. However, the Cable Act authorizes Us to disclose personally identifiable information to other parties (such as our affiliates, vendors, and agents) if the disclosure is necessary to provide or conduct a legitimate business activity related to the video cable service or other services provided to You over Our facilities or if required by law or legal process. For example, We may contract with other parties to assist Us with billing and collections, maintenance, operations, administration, surveys, marketing and fraud prevention, and We may disclose Your personally identifiable information to the parties with whom We have contracted to provide those services.

We may also disclose personally identifiable information about You to outside auditors and regulators, as permitted as law. We may disclose information in anonymous and/or aggregate formats, such as ratings surveys and statistical reports, which do not identify particular subscribers. We may even provide certain anonymous and/or aggregate information to third parties, such as audience measurement firms, who may combine it with other anonymous and/or aggregated demographic information to provide audience analysis information, to help improve Our services and make programming and advertising decisions.

Should HTC enter into a merger, acquisition, or sale of all or a portion of its assets, Your personally identifiable information will most likely be transferred as part of the transaction.

### **When does the law require HTC to disclose personally identifiable information?**

HTC may be required by law to disclose Your personally identifiable information without Your consent and without notice in order to comply with a valid legal process, such as a subpoena, court order or search warrant.

The Cable Act requires the disclosure of personally identifiable information (including the selection of video programming) to a third-party or governmental entity in response to a court order. If the court order is sought by a non-governmental entity, We are required to notify You of the court order. If the court order is sought by a governmental entity, the Cable Act requires that You be afforded the opportunity to appear and contest any claims made in support of the order. At the proceeding, the Cable Act requires the governmental entity to offer clear and convincing evidence that the subject of the information is reasonably suspected of engaging in criminal activity and that the information sought would be material evidence in the case. We may also be required by federal law to disclose certain subscriber record information (but not records revealing the selection of video programming) to comply with a valid legal process without notice to You and/or without Your consent.

We may also use or disclose Your personally identifiable information without Your consent in order to protect Our customers, employees, or property, in emergency situations, and to enforce Our rights under Our terms of service and company policies.

### **How can I withhold or limit HTC's use of My personally identifiable information?**

You may contact HTC at the telephone number listed on Your bill to ask Us to place You on

Our “Do Not Call,” “Do Not Email” or “Do Not Mail” lists so that You do not receive marketing or promotional materials from Us or Our agents.

The Cable Act permits Us to disclose Your name and address information to other parties, but only after providing You with the opportunity to limit or prohibit such disclosure. It is HTC’s policy not to disclose any personally identifiable information about You to others outside of HTC and its affiliates, vendors and business partners, unless You provide prior consent or We are required to do so by law. Before HTC ever makes such mailing lists available to others outside of HTC and its affiliates, vendors and business partners, it will provide You with notice and an opportunity to prohibit or limit such disclosure.

### **How does HTC maintain and protect My personally identifiable information?**

HTC follows industry-standard practices to prevent unauthorized access to personally identifiable information by a person other than You or Us. However, We cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose Your personally identifiable information.

HTC will maintain Your personally identifiable information in Our regular business records so long as You are a subscriber to Our cable services. We may also maintain this information for a period of time after You are no longer a subscriber, if necessary for business, legal, or tax purposes. We will destroy the information according to Our internal policies and procedures and any local requirements if We have no pending requests, orders, or court orders for access to Your personally identifiable information, after determining that it is no longer necessary for the purposes for which it was collected.

### **How can I see My personally identifiable information?**

You may examine Your personally identifiable information that We have collected and maintain in Our regular business records after providing Us with a written request, sent to the correspondence address listed in the “Contact Us” section of your bill. We will be glad to arrange a convenient time and location during regular business hours for You to see the information upon furnishing proper identification. You will only be permitted to examine records that contain personally identifiable information about Your account and no one else’s. If you believe any of Your personally identifiable information is inaccurate, We will work with you to correct Our records if You make a reasonable showing that any of the personally identifiable information We have collected about You is inaccurate. HTC reserves the right to charge You for the cost of photocopying any documents that You request.

### **What can I do if I think My privacy rights have been violated?**

HTC takes Your privacy rights very seriously. If You believe that Your privacy rights have been violated, please contact Us immediately, and We will take immediate steps to address Your concerns. If You believe that You have been aggrieved by any act of Ours in violation of the Cable Act, You may enforce the limitations imposed on us by the Cable Act as applicable with respect to Your personally identifiable information through a civil lawsuit seeking damages, attorney’s fees, and litigation costs. You may also have other rights and

remedies available to You under federal or other applicable laws.

**Does this notice also apply to HTC’s Internet service, telephone or wireless services?**

If You are a subscriber to HTC’s Internet service, a description of Our privacy practices may be found at [htcnet.net](http://htcnet.net). If You are a subscriber to HTC’s telephone services, Our privacy practices are described in HTC’s Notice regarding Customer Proprietary Network Information (“CPNI”), available at [htcnet.net](http://htcnet.net). If You are a HTC Wireless subscriber, a description of HTC’s Wireless privacy practices can be found at [htcnet.net](http://htcnet.net).

**If HTC changes this notice, will I be notified?**

The Cable Act requires Us to provide You with a copy of Our subscriber privacy notice at the time You subscribe to Our cable services, as well as on an annual basis thereafter. You may view the most current version of this notice at any time by going to [htcnet.net](http://htcnet.net). We may modify this notice at any time. We will notify you of any material changes through written, electronic, or other means and as otherwise permitted by law. You may cancel Your service at any time if You do not agree to any change We make in this notice. If You continue to use Our cable services after We have provided You with notice of any changes, Your use of Our services will constitute Your acknowledgement that you have read and understand the notice and that you agree to be bound by its terms.

**How do I contact HTC?**

If You wish to contact Us with questions regarding this privacy notice or concerning Your personally identifiable information, please contact Us as follows:

By telephone: 334-548-2101

On the web: [www.htcnet.net/company/contactus.html](http://www.htcnet.net/company/contactus.html)

At Our business office: 208 East Tuskeena Street  
Hayneville, Alabama 36040

By mail: Hayneville Telephone Company, Inc.  
P.O. Box 175  
Hayneville, Alabama 36040

Effective: October 15, 2009