

Partner Communications Privacy Policy

And Your California Privacy Rights

Effective Date: September 1, 2023

Partner Communications Cooperative (“**Partner Communications**,” “us,” “we,” or “our”) values the privacy and security of customer Personal Information. This Privacy Policy describes the types of customer Personal Information collected, used, disclosed, retained, secured and disposed by us.

This Privacy Policy applies to visitors and users of Partner Communication’s website, <https://www.pcctel.net/> (“**Site**”), and applicants, current and former residential and commercial/business customers of our high speed internet access services and telephone services (individually, “**Service**” and collectively, “**Services**”) residing in the United States. All such visitors, users, applicants, current and former residential and commercial/business customers are collectively, “**Customers**” “you,” and “your.”

Any capitalized terms used herein shall have the same meaning as defined in the Partner Communications Service Agreements.

By using Partner Communications’ Site and Services, Customers consent to the data practices described in this Privacy Policy regarding the collection, use, disclosure, and disposal of your Personal Information. Partner Communications’ Site and Services are designed and targeted to United States audiences and are governed by and operated in accordance with the laws of the U.S. If Customer is not a U.S. citizen or does not reside in the U.S., Customer voluntarily consents to the collection, transfer, use, disclosure and retention of Customer Personal Information in the U.S. Customer also agrees to waive any claims that may arise under Customer’s own national laws.

[THE FOLLOWING SECTION SHOULD BE PART OF THE STANDALONE CALIFORNIA PRIVACY RIGHTS LINK ABOVE]

Your California Privacy Rights Under the Shine The Light Act

Generally, California residents that have a business relationship with Partner Communications are entitled by the “Shine the Light Act” (“**Act**”) to ask for information identifying the categories of Personal Information that Partner Communications shared with our Affiliates and/or other third parties for their marketing purposes the preceding year, and provide contact information for such Affiliates and/or third parties unless Partner Communications meets certain exceptions in the Act. This Privacy Policy and Site meet those exceptions. Importantly, Partner Communications does not target or knowingly provide Services to California residents, nor does Partner Communications share Customer Personal Information with Affiliates or third parties for their own marketing purposes. If you are a person residing in California and you believe that you have an established business relationship with Partner Communications and have questions

regarding our policy regarding the Act, you must send your questions via email or postal mail following the instructions below.

Partner Communications will not accept requests via the telephone or facsimile or respond to requests that are not labeled or sent properly, or do not have complete information.

- For all requests, include Customer's full name, street address, city, state and zip code.
- If sent via email request, Customer must state "RE: Your California Privacy Rights" in the subject line and send Customer email to privacy@pcctel.net.
- If sent via postal request, Customer must send a letter or post card to:

Partners Communications Cooperative
101 E. Church Street
Gilman, Iowa 50106-0008
Attention: Your California Privacy Rights

[END OF CA PRIVACY RIGHTS LINKED CONTENT]

1. GENERAL INFORMATION

When Customer uses the Service, the Personal Information Customer voluntarily sends and receives is transmitted over a wireless network, and may be subject to interception by unauthorized third parties. While it is Partner Communications' objective to take reasonable measures to reduce the risk that unauthorized third parties will intercept the information Customer sends and receives through the Service, Partner Communications cannot and does not make any guarantee that transmissions over the Internet are 100% secure or error-free.

Partner Communications does not knowingly collect, solicit or use Personal Information from anyone under the age of 13. If Customer is under age 13, please do not attempt to register for the Services or send any Personal Information about yourself to Partner Communications. If Partner Communications learns that Partner Communications has collected Personal Information from a child under age 13, Partner Communications will delete that information as quickly as possible to the extent technically feasible. If Customer believes that its child under age 13 may have provided Partner Communications Personal Information, please contact Partner Communications at privacy@pcctel.net.

2. WHAT TYPES OF INFORMATION DO WE COLLECT AND HOW DO WE USE THIS INFORMATION?

Generally, Personal Information is information Customer provides to Partner Communications voluntarily or passively through Customer's use of the Services and/or Site, that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. For the purposes of this Privacy

Policy, we also define Personal Information to include such information related to our commercial/business Customers and their end users.

The following are the different ways and reasons we collect Customer Personal Information:

Registration process, billing, and administration: Customer name, email address, phone number (wireless and wireline), billing address and billing information (such as credit card account number or other financial account information), service address, and the nature of any of Customer devices or other property making use of the Service. Personal Information also includes Customer Proprietary Network Information (“**CPNI**”) which is created by virtue of your relationship with Partner Communications when you subscribe to our Residential or Business telephone services. CPNI includes any information that relates to the telephone services purchased (including specific calls you make and receive), quantity, technical configuration, type, destination, location, and amount of use of our telephone service, such as call detail, logs, and specifics regarding your telephone account (such as billing information). Please note that by law, CPNI does not include a customer’s name, postal address, or telephone number. We will also use this same Personal Information for the installation, troubleshooting, maintenance of the Services, and servicing of equipment.

Social Network Platforms:

Partner Communications has a presence on social media platforms (Facebook, Twitter, LinkedIn) and Customers voluntarily view, sign up to follow, or otherwise engage with our social media at their own level of interest. Customers on our social media platforms are governed by the privacy policy of the specific platform. Partner Communications may obtain, transport or merge Personal Information posted publicly on social media platforms, however we will not share any such Personal Information with any third party, except as otherwise noted in this Privacy Policy. Occasionally, a Customer may enter their Partner Communications account identifying information on social media, sometimes to alert or inquire about service questions or service interruptions. In these cases, Partner Communications will engage with the Customer using direct messages or by directing them to our Site or support department. Partner Communications is not responsible for Personal Information that is publicly disclosed on social media platforms.

Some forms of information as described below will be classified as Personal Information if required by applicable law or when such information is directly associated with or reasonably linked to a specific person, computer or device, or is combined with other forms of Personal Information.

Website Information, Use of Cookies and other Similar Tracking Technology: When you visit Partner Communications’ Site, Partner Communications will collect information on Partner Communications server logs from Customer’s browser or device, which may include Customer IP address, unique device identifier, “cookie” information, the type of browser and/or device you’re

using to access the Service, and the page or feature Customer requested. “Cookies” and “web beacons” are text file identifiers Partner Communications transfers to Customer’s browser or device that allow Partner Communications to recognize Customer’s browser or device and tell Partner Communications how and when pages and features on the Partner Communications website are visited, by how many people, and other activity on the website. Customer can change the preferences on Customer’s browser or device to prevent or limit Customer’s devices acceptance of cookies, web beacons or other similar technology, but this may prevent Customer from taking advantage of some of the features on the Partner Communications website, or accessing certain functions and conveniences. If Customer clicks on a link to a third party website or service, such third party may also transmit cookies to Customer. Again, this Privacy Policy does not cover the use of cookies or other such tracking technology by any third parties, and Partner Communications is not responsible for their privacy policies and practices.

Partner Communications also uses Personal Information and Non-Personal Information to enhance the Partner Communications website and Partner Communications Service offerings. For example, such information can tell Partner Communications how often visitors use a particular feature of the Partner Communications website and which products and services are most interesting to current and potential customers, and Partner Communications can use that knowledge to make the website useful and interesting to as many users as possible and to enhance and refine Partner Communications’ Service offerings. Partner Communications will continue to conduct analytics on Partner Communications website performance; Customer may not opt-out of this use of cookies or other Personal Information or Non-Personal Information. Technology is improving every day and to improve Partner Communications’ Service operations and functionality, Partner Communications may introduce new technologies and monitoring techniques without advance notice or consent from Customer. Partner Communications may also use third party providers to conduct such internal analyses.

Network Information: Partner Communications also collects Network Information, information about Customer access to, and use of, the Partner Communications Network, which may or may not be directly associated with or reasonably linked to a specific person, computer or device. For example, Partner Communications may collect information about the performance of the Provider Equipment installed on Customer property or at Customer premises, when Customer is using the Service, the various devices Customer is using to access the Service, the amount of data Customer is transmitting and receiving, the content of the data Customer is transmitting and receiving, the websites Customer is visiting, and any other information that is transmitted over the Partner Communications Network. Partner Communications may also aggregate Network Information from multiple customers and Partner Communications will share such aggregated Non-Personal information about the overall performance of the Partner Communications Service and the Partner Communications Network with our Affiliates and other third parties. Aggregated information does not identify a specific individual, computer or device. We use Network Information to monitor and enhance the performance of the Partner Communications Network. Partner Communications will not monitor the content of the websites viewed or email communications as part of Partner Communications’ standard network management.

Generally, Partner Communications will only monitor and preserve the following Network Information:

- When Customer is using the Service;
- How Customer is using the Service, such as monitoring traffic patterns regarding websites visited, amount of data being sent or received, or other activity;
- The amount of data Customer is transmitting and receiving through the Service; and
- General information regarding the performance of the Provider Equipment installed on Customer's property or at Customer's premises, and its interaction with the rest of Partner Communications' Network.

However, Partner Communications reserves the right to, and may, monitor, access, review and preserve any Network Information and/or content in the following situations:

- In response to an inquiry from Customer or another Authorized User on Customer's account regarding Customer or their use of the Service or problems Customer or they are experiencing using the Service;
- If Partner Communications has reason to believe Customer is using the Service in violation of Customer's Service Agreement or any applicable statutes, rules, ordinances or regulations;
- If Partner Communications has reason to believe Customer use of the Service is negatively affecting other Customers; or
- When Partner Communications is required by law or legal process to do so, or when Partner Communications in good faith believes that Partner Communications is required by law or legal process to do so.

3. IS PERSONAL INFORMATION USED FOR MARKETING AND ADVERTISING PURPOSES?

Partner Communications will use Customer Personal Information to send marketing and advertising messages related to our own Services and Site using Customer's email address, postal address, or telephone number (for voice, texts, automated and pre-recorded calls).

Partner Communications may deliver a marketing or advertising message based on Customer visits to Partner Communications Site, which will be general advertising or "Contextual Advertising," which is advertising based on the subject matter or the content of the specific website page or subject matter.

Partner Communications may also send Customer "First Party Advertising," which is advertising or marketing that is customized or personalized based on a history of Customer's use of our Services (possibly combined with information from our Facebook fan page or other social network platforms). First Party Advertising is based solely on a combination of information Partner Communications collects from Customer – not from Customer's visits to other websites

across the Internet. Partner Communications may use CPNI for its own First Party Advertising for products/services a Customer has already purchased. We will need your consent before using CPNI for marketing or advertising unrelated services. Customer may opt-out of First Party Advertising but not Contextual Advertising. No Personal Information is used to deliver Contextual Advertising; it automatically will appear based on the content or webpage Customer is viewing. And Customer may continue to receive general advertising if Customer opts-out of First Party Advertising, it will not be customized or personalized for Customer.

Partner Communications does not provide third party “Network Advertising,” which is advertising based on Customer’s overall Internet usage across different third party websites or online services. Multiple third party websites and online services are involved in this tailored or personalized advertising process, in essence a “network” of advertising providers. Because Partner Communications does not provide network ads, Partner Communications does not recognize the “Do Not Track” settings on various Internet browsers. Partner Communications does not engage or allow third parties to track you across the Internet and across time for advertising purposes.

4. LINKS TO THIRD PARTY WEBSITES AND SERVICES

The Partner Communications Site and/or our Facebook Page (or other social networking platforms) may contain a variety of content and functionality and may provide links to other third party websites or online services. Despite such links, this Privacy Policy applies only to Partner Communications and our Affiliates. The presence of a link does not constitute or imply Partner Communications’ endorsement, recommendation, or sponsorship of the content, goods, services, business or privacy practices on such websites or online services. Partner Communications encourages Customers to be aware and informed when Customers leave Partner Communications’ Site and Partner Communications’ Facebook Pages, or any other social networking platforms.

5. DO WE DISCLOSE CUSTOMER PERSONAL INFORMATION TO THIRD PARTIES?

Customer’s Personal Information will only be disclosed to third parties (including Partner Communications’ Affiliates) as listed in this Privacy Policy, and if Partner Communications has received your consent at the time Partner Communications collects your Personal Information or prior to the disclosure of any Personal Information. Partner Communications reserves the right to fully use, disclose and process any non-Personal Information collected from Customer in any manner as well as any information Customer makes public via Partner Communications Services or Site.

- **To Our Affiliates.** Partner Communications relies on various Affiliates in order to provide the Services to Customers. Affiliates are companies that are related to Partner Communications by common ownership or control. Partner Communications may share Personal Information and non-Personal Information with any of our Affiliates for business, operational, promotional and/or marketing and advertising purposes related to our Services.

- **To Our Operational Service Providers:** Partner Communications and its Affiliates contract with other companies and people to perform tasks or services on Partner Communications' behalf and need to share Customer Personal Information to provide products or services to Customers. For example, Partner Communications may use a payment processing company to receive and process Customer's ACH or credit card transactions for Partner Communications, or Partner Communications may contract with third parties to assist Partner Communications in optimizing Partner Communications' Network. Unless Partner Communications tells Customer differently, Partner Communications does not grant its Operational Service Providers any right to use the Personal Information Partner Communications shares with them beyond what is necessary to assist Partner Communications.
- **For Business Transfers/Restructuring:** Partner Communications may choose to buy or sell assets, or Partner Communications may sell assets or be sold. In these types of transactions, Customer Personal Information is typically one of the business assets that would be disclosed and transferred. Also, if Partner Communications (or Partner Communications' assets) are acquired, or Partner Communications goes out of business, enters bankruptcy, or goes through some other change of control, including restructuring, re-organization or financing arrangements, Personal Information could be one of the assets disclosed, transferred to or acquired by a third party.
- **For Protection of Partner Communications, and Our Affiliates, Employees, Operational Service Providers, Users and Customers and Public Safety:** Partner Communications reserves the right to access, read, preserve, and disclose any Personal Information Partner Communications has access to if Partner Communications believes doing so will implement and/or enforce the Service Agreement, Website Terms of Use Agreement, Privacy Policy or any legal document; protect our Network(s), website(s), and company assets; protect the interests, rights, property, and/or safety of Partner Communications or Our Affiliates, employees and officers/directors, Operational Service Providers, Customers, agents, representatives, third party licensors or suppliers, or the general public.
- **When Required by Law or in Response to Legal Process:** Partner Communications reserves the right to access, read, preserve, and disclose any Personal Information when Partner Communications is required by law or legal process to do so, or if Partner Communications has a good faith belief that Partner Communications is required by law or legal process to do so.

6. HOW DO WE PROTECT CUSTOMER PERSONAL INFORMATION?

Partner Communications endeavors to protect the privacy of Customer's account and other Personal Information using reasonable administrative, technical and physical security measures. However, Partner Communications cannot and does not guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of Personal Information at any time. Customer's account is protected by a User ID and

password for Customer's privacy and security. It is Customer's responsibility to prevent unauthorized access to Customer's account and Personal Information by selecting and protecting Customer's password and/or other sign-on mechanism appropriately and limiting access to Customer's computer, tablet or device and browser by signing off after Customer has finished accessing Customer's account. Customer is required to notify us immediately if Customer's password or account has been disclosed to a person whose name does not appear on Customer's account, even if you have allowed such disclosure. Customer understands, acknowledges and agrees that Customer is solely responsible for any use of Partner Communications Services via Customer's username and password.

Additionally, if Customer contacts Partner Communications via Site, telephone or in person, Partner Communications will ask Customer for verification of Customer's identification and account and request Customer's response to a security question (e.g. mother's maiden name) and/or the last 4 digits of Customer's tax identification number.

Partner Communications will not send an email or text, nor should Customer respond to any email or text communications asking for any sensitive or confidential Personal Information, such as social security number, bank account or credit card account number, or a driver's license number. If Customer receives an email or text requesting any such information from Partner Communications or someone that claims they are with Partner Communications or Our Affiliates please contact our Privacy Administrator immediately: privacy@pcctel.net.

7. WHAT DISCLOSURE CHOICES DO CUSTOMERS HAVE?

Customer can always choose not to disclose Personal Information to Partner Communications; however, certain Personal Information is necessary for Partner Communications to provide the Service to Customer. Customer may opt out of sharing Personal Information with Our Affiliates only for marketing or advertising purposes, but not for business or operational purposes. Customer may opt out of email marketing and advertising from Partner Communications or its Affiliates using the "Unsubscribe" mechanism in each email. Before Partner Communications sends Customer a text for any reason, or sends Customer a pre-recorded call that contains advertising or marketing information, Partner Communications will secure Customer's prior written express consent, which can be given via a voice recording, email, text message, postal mail, or telephone key press. Non-telemarketing pre-recorded calls do not require Customer's prior express consent in writing, unless they are sent to a wireless device. Customer understands, acknowledges and agrees that such texts and pre-recorded telemarketing calls may be sent using an autodialer and are not conditioned on your purchase of the Service. Customer may opt out of receiving text messages any time by replying "STOP" or "UNSUBSCRIBE" to the text message. Customer may opt out of receiving pre-recorded calls by the opt-out instructions in the call. Customer can also request to be added to Partner Communications' company-specific Do Not Call list to opt-out of advertising and marketing calls of all types. However, Customer will continue to receive calls related to debt-collection and Customer's current Service. Customer may also opt-out of First Party Advertising, but not Contextual Advertising, as detailed in the "Use of Personal Information for Marketing or Advertising Purposes" section above. Customer may not

opt out of Partner Communications' use of cookies or other similar technology, or use of Customer's Personal Information and Non-Personal Information for Partner Communications' internal analytics used to monitor activity on Partner Communications' website, measure Partner Communications' Service performance, or to operate and protect the Partner Communications Network.

8. WHAT PERSONAL INFORMATION CAN CUSTOMERS ACCESS, MODIFY AND/OR DELETE?

Generally, Customer may access the following Personal Information in Customer's account:

- Full name
- Username and password
- Email address
- Telephone number
- Billing and Service address
- Account and billing information

By contacting Partner Communications at customercare@pcctel.net, or through any online access portal and/or via telephone, Partner Communications may enable Customers to view, access and modify Customer account settings, and in some cases, edit or delete the Personal Information listed above. Partner Communications will retain historic email, billing and/or Service addresses for security and verification purposes and Customers may not delete such information even after the subscription expires or terminates. Generally, Partner Communications will delete Customer information within seven (7) years following termination of relationship with Customer.

Existing Customers may not delete any Personal Information because such information is necessary to provide and bill for the Services; Customers may only update or modify the following Personal Information: Last name; password; email address; or telephone number.

Partner Communications may use any aggregated data derived from Customer's Personal Information but not in a manner that would identify Customer personally. Partner Communications may also maintain Personal Information regarding Customer and Customer's use of the Service after Customer is no longer a Partner Communications customer as required by Partner Communications' business practices, by law, and/or tax reporting purposes. The information Customer can view, update, and delete may also change if required by law. If Customer has any questions about viewing or updating information Partner Communications has on file about Customer, please contact Partner Communications at customercare@pcctel.net.

9. WILL THIS PRIVACY POLICY EVER CHANGE?

Yes, Partner Communications is constantly working to improve the Service, so Partner Communications will need to update this Privacy Policy from time to time as Partner

Communications' business practices change and service offerings increase, and/or there are changes in local, state or federal laws. Additionally, Partner Communications will also make stylistic, organizational and/or grammatical changes to present Partner Communications privacy practices in a user friendly easy to read manner. Partner Communications will alert Customers to any such changes by placing a notice on Partner Communications' Site and App with the effective date of the revised Privacy Policy, and/or by sending Customers an email, or by some other means to the extent required by law. Please note that if Customers have not provided Partner Communications with Customer's email address or Customer has not updated Customer contact information, those legal notices will still govern Customer's use of the Service, and Customer is still responsible for reading and understanding all notices posted on Partner Communications' website. Customer's continued use of the Service or website after notice of any changes have been provided will indicate Customer's acceptance of such changes, except where further steps are required by applicable law.

Use of Customer's Personal Information is primarily governed by the Privacy Policy in effect at the time Customer subscribed to the Service or visited the Partner Communications website. If Partner Communications elects to use or to disclose Personal Information that identifies Partner Communications as an individual in a manner that is materially different than that stated in the Privacy Policy in effect at the time you subscribed to the Service or visited the Partner Communications Site, Partner Communications will provide Customer with an opportunity to consent to such use or disclosure. Depending on the circumstances, that consent may include an opt-out.

10. WHAT IF YOU HAVE QUESTIONS OR COMMENTS ABOUT THIS PRIVACY POLICY?

If you have any questions or concerns regarding Partner Communications' privacy practices and policies, please contact Partner Communications at privacy@pcctel.net.

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