



## ZiPLY™ Fiber Privacy Policy

Protecting the privacy of our customers is important to ZiPLY Fiber. This privacy policy is designed to inform you about how we collect, use, share, and protect the information of customers of our consumer, business and residential services, namely our Internet, Phone, TV, and Privacy products. It also governs the information we collect when you visit our website, and describes certain choices we provide to our customers regarding the use of their information. This policy does not govern the services we offer to businesses.

Please note that separate privacy policies may apply to the services of other providers that you purchase from us, such as the DISH TV Package. We encourage you to review the privacy policies and practices of such other providers.

### **What Information We Collect and How We Collect It**

We collect certain information when you use our products, services, and websites, as well as when you communicate with us.

*Information You Provide to Us.* We collect information you provide to us, such as your name and contact information, driver's license number, Social Security Number, and payment information. We also may maintain research records containing information obtained through voluntary subscriber interviews or surveys or in any correspondence between you and us (by email or otherwise)

*Information Related to Your Use of Our Services or Equipment.* We also collect information about how you use our products, equipment and services. This information may include call records, the websites you visit, information about the devices you use in connection with our services, your bandwidth usage, and your TV and other video viewership, including movie rental and purchase data.

*Information Collected When You Use Our Websites and Mobile Apps.* We collect certain information when you visit a ZiPLY Fiber website or use a ZiPLY Fiber mobile app, including information about your operating system and browser, IP address, location and device identification numbers, and web addresses of the websites you come from and go to next.

ZiPLY Fiber, or third-party analytic companies acting on ZiPLY Fiber's behalf, also may use cookies, web beacons, and other tracking mechanisms to collect information while you visit our websites. A cookie is a small data file placed in your browser. Web beacons are small, clear graphic images. Mechanisms such as these allow for the collection of information about your interactions with our websites. We also may receive demographic information about you, or information regarding your interests, from third-party analytics companies that use cookies and other tracking mechanisms.

As described below, you have choices available to you regarding the use of your information for advertising. In addition, some browsers have incorporated "Do Not Track" mechanisms. Most of these mechanisms, when turned on, send a signal to the website or online service indicating that the user does not wish to be tracked online. However, because the providers of "Do Not

Track” and similar signals do not yet operate according to common, industry-accepted standards, we currently do not respond to those signals. For more information about Do Not Track mechanisms, see <http://allaboutdnt.com>.

*Information from Third Parties.* At times, we receive information about our customers from third parties, such as credit information from credit reporting agencies, when you purchase products or apply for service. We also may receive marketing and other information, including but not limited to demographic information, about you from third parties. If you rent your residence, we may have a record of whether the landlord’s permission was required to install our facilities, as well as the landlord’s name and contact information. In addition, we may obtain information from other service providers when you purchase certain services from us, such as the DISH TV Package.

If you use social media credentials to login or interact with a ZiPLY Fiber website, mobile app, or ZiPLY Fiber’s social media pages, we may collect information about your social media profile. You can control the data we receive in this manner through the controls available in your social media account settings.

*When You Contact Us.* When you contact us or we contact you, we may monitor or record the communication, and keep records of and about the communication, so that we can provide better service. We will inform you during such a call that the call might be monitored or recorded.

### **How We Use and Share the Information We Collect**

We use the information we collect about customers to provide, manage, and improve the services we offer; bill and collect for our services; to better understand our customers and market our services, as well as to deliver relevant advertising; respond to customer questions and concerns; and to manage, repair, and protect our network and equipment.

We or third parties acting on our behalf use the information collected from cookies and other tracking mechanisms to customize your experience and gather information about how you navigate our website. For example, cookies and other tracking mechanisms allow us to remember you when you visit our websites, deliver relevant advertising to you, market our services on our websites and on third-party websites, and keep track of your online ordering and account information.

We may share personal information with third-party agents and vendors that perform services on our behalf as necessary for them to perform these services. ZiPLY Fiber requires such agents and vendors to use this information only as we direct, and to protect it consistent with this policy. In addition, we may share information with other providers when you purchase their services from us, such as the DISH TV Package.

We also may share your information (1) with your permission, (2) as required by law, including in response to a duly-served subpoena or other government request for information, (3) to investigate or defend against third-party claims or allegations, (4) to protect our rights, property, and personal safety, or that of our customers or others, (5) to any person or entity that controls,

is controlled by or under common control with Ziplly Fiber, or (6) as part of any merger, acquisition, sale of company assets or transition of service to another provider.

We do not otherwise share your personal information. We may, however, share anonymous or aggregate information with third parties, including to improve how we provide service to existing and potential customers.

### **How You Can Limit the Sharing and Use of Your Information**

We provide you several choices regarding how we use and share your information.

*Customer Proprietary Network Information.* You may limit our use and sharing of a certain type of customer information, known as Customer Proprietary Network Information, or “CPNI.” CPNI is information that relates to the type, quantity, destination, technical configuration, location, amount of use, and related billing information of your telecommunications services. Protecting the confidentiality of your CPNI is your right and our duty under federal law.

You can limit the use and sharing of your CPNI for marketing services other than the ones we currently provide to you by calling us at 1.866.699.4759 or visiting [www.ziplyfiber.com/cpni](http://www.ziplyfiber.com/cpni). Any restriction of our use of your CPNI will stay in effect until you notify us otherwise. If you choose to restrict access to your CPNI, your service will not be affected, and you will continue to receive the same high quality services from us. Please note that restricting our use of your CPNI will not eliminate all of our marketing contacts with you, as you may still receive marketing contacts that are not based on your restricted CPNI. Ziplly Fiber takes the privacy of customer information seriously and appreciates the opportunity to provide high quality communications services to you. Other choices regarding marketing contacts are described below.

We do not disclose CPNI to third parties, other than affiliated companies or their agents, without your consent, except as required or allowed by law.

*Information Used for Online Advertising.* If you would like more information about interest-based advertising, or about ways in which you can prevent companies from using this information, you can visit [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

In addition, you can manage cookies by using features and functions available on most Internet browsers, for example by deleting or disabling cookies. Please note that disabling cookies may prevent you from using specific features on our websites and other websites.

*Do Not Call.* Federal “Do Not Call” laws allow you to place your phone number on the National Do Not Call List to prevent telemarketing calls to your phone number. Certain states have similar laws and maintain their own lists. Frontier also maintains an internal Do Not Call List. You may view our [Do Not Call Policy](#) in its entirety.

*Marketing E-Mails.* To opt out of receiving marketing emails from Ziplly Fiber, please email us at [privacy@ziplyfiber.com](mailto:privacy@ziplyfiber.com).

## **How We Protect Your Information**

We use reasonable technical, administrative, and physical safeguards to protect against unauthorized access to, use of, or disclosure of the personal information we collect and store. No program is 100% secure, however. As a result, we cannot guarantee that we will prevent every unauthorized attempt to access, use, or disclose personal information.

Personally-identifiable and other sensitive records are retained only as long as reasonably necessary for business, accounting, tax, or legal purposes.

## **Information about the Cable Act**

To the extent that Section 631 of the Communications Act of 1934, as amended (the "Cable Act") applies to services you purchase, it entitles you to know certain information about the personally identifiable information a cable service provider collects. Under the Cable Act, you are entitled to know the nature of the personally identifiable information we collect; how we may use this personally identifiable information; under what conditions and circumstances we may disclose personally identifiable information and to whom; how long we maintain personally identifiable information; how you may obtain access to your personally identifiable information; and your rights under the Cable Act concerning the collection and disclosure of personally identifiable information and your right to enforce limitations provided by federal law. (Personally identifiable information is information that identifies a particular person; it does not include aggregate data that does not identify a particular person.)

The Cable Act permits ZiplY Fiber to use its cable systems to collect personally identifiable information necessary to render our cable service or other services or to detect unauthorized reception of cable communications. The Cable Act prohibits us from using our cable system to collect personally identifiable information about any subscriber for any other purpose without the subscriber's prior written or electronic consent. ZiplY Fiber considers the personally identifiable information contained in our business records to be confidential. We are, however, authorized under the Cable Act to disclose personally identifiable information if the disclosure is necessary to provide or conduct a legitimate business activity related to ZiplY Fiber's cable service or other services provided over our facilities.

We may be required by law to disclose personally identifiable information about a subscriber without his or her 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 that we disclose personally identifiable information (including the selection of video programming) to a third party or governmental entity in response to a court order. In the event the court order is sought by a nongovernmental entity, we are required to notify our subscriber of the court order. If the court order is sought by a governmental entity, the Cable Act requires that the subscriber be afforded the opportunity to appear and contest any claims made in support of the court order. 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 valid legal process, such as warrants, court orders or subpoenas without any subscriber notice or consent to such disclosure.

The Cable Act permits cable operators to disclose subscriber name and address information to other parties, but only after providing subscribers with the opportunity to limit or prohibit such disclosure. It is ZiPLY Fiber's policy not to disclose any personally identifiable information about our cable subscribers to others outside of ZiPLY Fiber and its affiliates, vendors and business partners, unless our subscribers provide prior consent, or we are required to do so by law. Before ZiPLY Fiber ever makes such mailing lists available to others outside of itself and its affiliates, vendors and business partners, we will provide our subscribers with notice and an opportunity to prohibit or limit such disclosure.

If you believe that your privacy rights have been violated, please contact us at [privacy@ziPLYfiber.com](mailto:privacy@ziPLYfiber.com) immediately. We will take immediate steps to address your concerns. If you believe that you have been aggrieved as a result of our violation of the Cable Act, you may enforce the limitations imposed on us by the Cable Act through a civil lawsuit seeking damages, attorney's fees and litigation costs. Other rights and remedies may be available to you under federal or other applicable laws, as well.

### **Links to Non-Frontier Websites and Content**

Our websites and apps may contain links to websites and apps managed and controlled by entities other than ZiPLY Fiber. We are not responsible for the content on those websites and apps, or their privacy policies and practices. We encourage you to review the privacy policies and practices of such websites and apps.

### **Children's Privacy**

We do not knowingly collect any information from children under 13.

### **Changes to This Privacy Policy**

We may make changes to this policy from time to time, and encourage you to periodically review this policy for any such changes. We will notify you of any material changes by posting a notice on our website home page and the privacy policy page 30 days before any change takes effect.

### **Contact Us**

If you have questions or concerns related to our privacy policy or information practices, email us at [privacy@ziPLYfiber.com](mailto:privacy@ziPLYfiber.com) or contact us at ZiPLY Fiber, Privacy Department, 135 Lake Street S, #155, Kirkland, WA 98033.