

## PRIVACY POLICY

This Privacy Policy applies to Clay County Rural Telephone Cooperative, Inc. d/b/a Endeavor Communications (“Endeavor”) and its website (“Site”) and governs data collection and usage. By using the Endeavor services, including but not limited to the Site, you consent to the data practices described in this policy.

### SECTION 1

#### CHILDREN'S PRIVACY

The Children's Online Privacy Protection Act of 1998 (COPPA) governs information gathered online from or about children under the age of 13. We do not knowingly contact or collect personal information from children under 13 nor is our Site intended to solicit information of any kind from children under 13. If we learn a child's personal data was collected without appropriate authorization, it will be deleted as soon as possible.

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### SECTION 2

#### COLLECTION OF YOUR PERSONAL INFORMATION

Endeavor and/or the Site collects personally identifiable information you provide directly to us through surveys, job applications, contests, service orders, inquiries on this Site, or in the course of conducting business. This information can include, but is not limited to, your name, address, e-mail address, telephone number, date of birth, and social security number. This personally identifiable information is only used to conduct business with you, provide you with specific services and/or communicate with you. We may also use this information to send you information about new products and services. If you create a personal account with us and provide us with the above information for the purpose of conducting business, you authorize us to store that information.

Endeavor and/or the Site also collects and stores information about you or your visit to the Site in collective or aggregated data that does not identify you specifically. This anonymous demographic information, which is not unique to you, may include your ZIP code, age, gender, preferences, interests and favorites. Additionally, Endeavor or its Site may collect, store and aggregate data related to the number of lines, products/services used on a monthly basis, and the minutes of use.

Information about your computer hardware and software is automatically collected by Endeavor and/or the Site. This information may include: your IP address, browser type, domain names, access times and referring web site addresses. This information is used by Endeavor and/or the Site for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Site.

While Endeavor does not read any of your private online communications, Endeavor reserves the right to review materials publicly posted to bulletin board services, chat areas, news groups, forums, communities, personal web pages, calendars, and/or other message or communication facilities designed to enable you to communicate with the public at large or with a group, and to remove any offensive or inappropriate materials in its sole discretion.

## **SECTION 3**

### **USE OF YOUR PERSONAL INFORMATION**

Endeavor collects and uses your personal information to maintain accurate accounts, to provide and to change services, to provide accurate billing and shipping, to answer your inquiries, and to help make this Site useful to you. Endeavor may also contact you via surveys to conduct research regarding your opinion of current services or potential new services that may be offered.

Endeavor may also use your personal information to market other products or services to you, provided, however, that you may contact Endeavor Communications Customer Service to opt-out of such marketing at any time.

As a general rule, Endeavor will not sell, trade, or disclose to third parties personal information gathered online about you without your consent. The only exceptions to this rule are: (i) when Endeavor works with affiliated businesses, partners, or agents to develop a relationship with you or to perform services for you on our behalf or (ii) as may be required by subpoena, search warrant, or other legal process or in the case of imminent harm to you or others. In the case of (i) above, we require the relevant businesses, partners, or agents to adhere to our policies regarding the use and protection of your personal information. Endeavor and its affiliated businesses, partners, and agents may use email to communicate with customers, respond to visitors' emails, or to inform you about events or new products. Endeavor will not send commercial solicitation via email to you if you request that it not be sent. Please make such requests to the Endeavor Communications Customer Service department.

Endeavor may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party.

Endeavor may work with third-party providers to provide services to the customer. Third-party providers are advised to adhere to the personal information policies of Endeavor, but Endeavor is not responsible for the data protection practices of third-party providers. Endeavor has and retains the right to share any personal information of the customer that is necessary for the third-party providers to provide service to the customer.

## **SECTION 4**

### **YOUR CUSTOMER PROPRIETARY NETWORK INFORMATION (“CPNI”) RIGHTS**

In the normal course of providing you telephone service, Endeavor maintains certain information about your account. This information, when matched to your name, address and calling or originating billing telephone number, is known as your CPNI. As a customer of Endeavor, you have a legal right to control certain proprietary information in your account. Endeavor will not use or share this information unless you give us permission to do so.

Endeavor reserves the right, afforded by law, to use your CPNI to market additional services to you, however, Endeavor may not use your CPNI if you have requested your CPNI be considered “restricted/opt-out” for this purpose. If you wish to have your CPNI “restricted/opt-out,” call Endeavor at 765-795-4261 during our normal business hours. Tell us that you wish to restrict our use of your CPNI. The restriction will remain in effect until you notify us otherwise. Please note that restricting your CPNI will not eliminate all of our marketing contacts with you. You could still receive marketing contacts from us that are not based on your CPNI. Also, we are permitted to use your CPNI to contact you about additional services when we already provide you that same type of service. Finally, even if your CPNI is restricted, we may still use it to market any other telecommunications services or features with your permission or if you contact us and ask about them. For more detailed information on CPNI, visit [www.fcc.gov](http://www.fcc.gov).

## **SECTION 5**

### **USE OF COOKIES**

The Endeavor website uses “cookies” to help you personalize your online experience. A “cookie” is a text file that is transmitted to your web browser when you click on a site, providing a way for a server to recall a previous request or previous registration or keep track of a transaction as it progresses.. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you personalize Endeavor’s website’s pages, or register with Endeavor website or its services, a cookie helps Endeavor’s website to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Endeavor website, the information you previously provided can be retrieved, so you can easily use the Site features that you customized. You have the ability to accept or decline cookies.

## **SECTION 6**

### **SECURITY OF YOUR PERSONAL INFORMATION**

Endeavor and/or its Site maintains the personally identifiable information you provide on computer servers in a controlled, secure environment, which is protected by means reasonably designed to prevent unauthorized access, loss, alteration, use or disclosure of such information and in accordance with industry-standard practices. When personal information (such as a credit card number) is transmitted to other web sites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol. However, the nature of the Internet is such that information may be transmitted over networks without appropriate security measures and may be accessed, deleted, altered, used or disclosed by unauthorized persons. Endeavor is not responsible for how personal information is stored, maintained, or transferred by third-party providers.

## **SECTION 7**

### **DISPUTE RESOLUTION**

Any disputes arising under this Privacy Policy should be brought in the jurisdictions or resolved as set forth in the Terms and Conditions of Site Usage or the applicable Services Agreement.

## **SECTION 8**

### **CHANGES TO THIS STATEMENT**

Endeavor reserves the right to modify this Privacy Policy in its sole and absolute direction from time to time and without prior notice to users. Such modifications will be effective when posted and users are advised to periodically review this Policy to be informed of any changes.

Notwithstanding the foregoing, Endeavor will notify you if we make material changes to this Privacy Policy that increase our rights to use personal information that we have previously collected about you.

## **SECTION 9**

### **CONTACT INFORMATION**

Endeavor and/or its Site welcome your comments regarding this Policy. If you believe that Endeavor and/or its Site have not adhered to this Policy, please contact Endeavor at [abuse@weendeavor.com](mailto:abuse@weendeavor.com).

## **SECTION 12**

### **INDIRECT END USER PHONE CONTACT INFORMATION (PERSONAL IDENTIFIABLE INFORMATION)**

GigTel acts as a data processor with regard to indirect end user personal identifiable information (“PII”) and our customers act as the data controller of such data. In the course of GigTel’s processing and protection of such data, all use will be in conformity with the customer’s instructions.

Specifically, only when enabled via system permission on GigTel Mobile Android and GigTel Mobile iOS, GigTel shows personal contacts within the respective application. When the user sends an SMS message to one of his/her phone contacts, or when the user initiates a call to one of his/her phone contacts, the phone number is sent securely through the GigTel API (Application Program Interface). GigTel does not store this number with any other PII, and it cannot be directly or indirectly attributed to any person or persons; GigTel stores only the phone number and pertinent metadata so as to be compliant with all applicable state and federal laws, and GigTel does not share this data with any advertisers or third parties under any circumstances. A user can revoke phone contact access on his/her mobile device at any time, and his/her app experience will not be hindered or interrupted.

GigTel Mobile Android and iOS also uses Gravatar, which is a service that provides avatar images linked to the MD5 hash (encrypted identifier) of the user’s email address, only when

enabled via settings and UIConfigs(User Interface).. This means that, only when Gravatar use is enabled, we hash each contact's email address and send it to Gravatar to try and retrieve an avatar image. MD5 hashes cannot be directly or indirectly attributed to any person or persons, and we only send the MD5 hash, not the user's email address in plain text, to Gravatar. As with phone contacts, a user can revoke Gravatar access at any time in settings or via UIConfig, and his/her app experience will not be hindered or interrupted.