



VTX1 Companies

PRIVACY POLICY

Valley Telephone Cooperative, Inc. and its affiliates (“VTX1” or “us”) are committed to protecting the privacy and security of the information provided by customers and other parties (“Users” or “you”) using VTX1’s services (each a “Service” and collectively the “Services”) or visiting any VTX1 websites (the “Websites”). This Privacy Policy covers the information generated when a User uses VTX1’s Services or visits any of VTX1’s Websites.

Service Information

Collection and Use of Service Information. When Users subscribe to VTX1 Services, they may be provided with certain equipment or may use their own equipment (collectively “Equipment”) to connect to our network (the “Network”). In these cases, VTX1 may collect certain Equipment-related information including information about Equipment type, identifier, status, settings, configuration, software or use (“Equipment Information”). VTX1 may also collect certain Network performance and usage -related information including information about VTX1 networks, use of our Services or Equipment on the Network, and performance data (“Network Information,” and together with Equipment Information, “Service Information”). VTX1 uses this Service Information to provide and manage our Services and to improve User experiences. VTX1 retains the right to use the Service Information for its internal business purposes to the fullest extent permitted by applicable law, including to provide, support, improve, protect, analyze and bill for its Services, Equipment, and Network; to communicate with its customers about the Services, Equipment and Network; to market its Services; to detect and avoid fraud; for advertising; and for research purposes. VTX1 does not share Service Information with external, non-affiliated companies except as provided in this Privacy Policy or as permitted in the applicable Service terms and then only uses and shares such Service Information to the extent permitted under applicable law, including applicable Federal laws concerning your “CPNI” and discussed below.

Customer Proprietary Network Information or CPNI. Certain Service Information may consist of “Customer Proprietary Network Information” or “CPNI” as defined under applicable Federal law. “CPNI” is the information that VTX1 gathers about its customers (i) that relates to the quantity, technical configuration, type, destination, and amount of use of telecommunications services subscribed to by the customer and that is made available to VTX1 by the customer solely by virtue of the carrier-customer relationship; and (ii) information contained in the VTX1 bills pertaining to a customer’s telephone exchange service or telephone toll service. CPNI does not include subscriber list information. Notwithstanding anything to the contrary in this Privacy Policy, VTX1 is committed to protecting the confidentiality of your CPNI and has the duty to do so under Federal law. Moreover, Federal law gives you a right to protection of all such information, including how many telecommunications services you have, the type of lines you buy, technical characteristics, class of service (business or residential), as well as where, when, and to whom you place a call, and the related billing for these services. VTX1 holds all CPNI in compliance with applicable law and does not disclose CPNI to any third party except as permitted by applicable law.

Website Information

Collection and Use of Personal Information Through Websites. Visitors can generally browse VTX1’s Websites anonymously without providing any personal information. However, there are cases where we may request information from people visiting our websites. When personally



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identifiable information is collected, you will know because you will need to provide the requested information through the completion of a form. Personally identifiable information may include a visitor's name, address, telephone number and email address. We will not collect any personally identifiable information unless the User provides it to us voluntarily. If you choose not to give information we request, you can still visit our Website, but you may be unable to access certain options, offers, and services. VTX1 is dedicated to building a long-term relationship with all of our Website Users. We will not sell, share or rent this information to others in ways other than as set forth in this Privacy Policy.

Log Files. Our log tracking collects Website Users' IP addresses to analyze trends, administer the Websites, track visitor movement, and gather broad demographic information to help determine the type of information visitors are interested in seeing on our Websites. This tracking may collect IP addresses, URLs, pixels, cookies and similar technologies, and identifiers such as advertising IDs and device IDs ("Data Collection"). Data Collection can also include information about the time a User spends on our Websites, the links or advertisements seen, search terms entered, items identified in a User's online shopping cart and other similar information. For clarity, Data Collection does not include any personally identifiable information. Users are not personally identifiable within our log files. VTX1 only uses this information for internal purposes and does not share this information with non-affiliated companies or institutions.

Cookies. A "Cookie" is a piece of information that is sent from a VTX1 web server to a User's browser and stored on the User's hard drive. VTX1 uses Cookies when a User orders a product or registers for a specific program. The Cookie stores information that allows VTX1 Websites to remember a User the next time he or she visits a particular VTX1 website. Cookies also allow us to tailor our websites to better match Users' interests and preferences. A User may choose to disable Cookies by changing his or her browser settings; however, such User may not be able to access some of the information or features on our Websites after doing so.

Registration. In some cases, a User may be required to complete a registration form to order a Service or to receive certain information. During the registration process, the User is required to give specific information such as name and email address. This information is used to contact the User regarding Services offered by VTX1 for which the User has expressed interest.

Ordering Services. When ordering Services online, VTX1 will request certain information from a User to complete the order. The User's information will include name, address, telephone number, email address, payment information and other information as may be requested by VTX1 in the order form. This information is used for billing purposes, fulfillment of orders, ongoing account maintenance and upgrades.

Security. When asked to enter certain sensitive information (such as credit card number and/or social security number), that information is encrypted and is protected through third party security systems. Access to User information is restricted to VTX1 and its affiliates and underlying parties through their respective developers, network operations personnel and other qualified employees or agents (such as billing clerks or customer care representatives). In addition, the servers on which VTX1 stores personally identifiable information are kept in a secure location. While we use reasonable efforts to safeguard the confidentiality of your information, VTX1 will have no responsibility for disclosure of any information obtained due to errors in transmission or the unauthorized acts of third parties.



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Marketing Contacts. If a User wishes to subscribe to newsletters or other marketing information, such as email updates, VTX1 will ask for contact information, including a street address or email address. In addition, we may ask for information that will help in delivering pertinent information from VTX1. Users who do not wish to receive VTX1 newsletters or promotional materials may opt-out of receiving these communications. Each contact the visitor receives from VTX1 will inform the visitor how to unsubscribe from these communications.

Personal Information

Sharing of Personal Information. Collected personal information is only used for the business purposes of VTX1 and is not shared with external, non-affiliated companies except as provided in this Privacy Policy. VTX1 may partner with other parties to provide specific services, such as billing solutions, which are designed to enhance the functionality of our Services. When use of these services is required, VTX1 will only share names or other contact information that is necessary for the third party to provide these services. We may also provide your personal information to third party agents we have hired to help us provide products or services you have requested. For example, we would need to provide your address to a shipping company to deliver a package you have ordered. In addition, we outsource certain functions of our business, and those agents may have access to your personal information; however, in such cases our agents are prohibited from disclosing your personal information to others.

We may share statistical or aggregated non-personal information about our Users with advertisers, business partners, sponsors and other third parties. No personal information is supplied in these cases. This data is used to improve our Services, customize our Website content and advertising, and for other appropriate purposes to deliver a better experience to our Users.

Correction/Updating Personal Information. If a User needs to update or change personally identifiable information, VTX1 will help the User to correct, update or remove personal data provided to VTX1. Users can update or change personally identifiable information by contacting VTX1 directly or through its Website.

Other Privacy Terms

Notification of Changes. If we make any changes to the VTX1 Privacy Policy, we will post those changes on our Website at <https://www.vtx1.net/policies-information/> so Users are informed of what information we collect and how we use that information. We will only use information in accordance with the current VTX1 Privacy Policy.

Links. VTX1 Websites contain links to other websites. VTX1 is not responsible for the contents or privacy practices of these websites. We encourage our Users to read the privacy policy of each website they visit. This Privacy Policy applies solely to information collected through VTX1 Services and on VTX1 Websites.

Policies For Children. VTX1 DOES NOT KNOWINGLY SOLICIT, COLLECT OR USE ANY PERSONAL INFORMATION FROM VISITORS UNDER 13 YEARS OF AGE. NO INFORMATION SHOULD BE SUBMITTED TO OUR WEBSITES BY VISITORS UNDER 13



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VTX1 CommandIQ App

Collection of Data. VTX1 collects, and processes information provided directly by you when you install the App and register for an account to use the App. Specifically, this information includes:

- Your name, email address, location, phone number.
- Browser information and session cookies related to your access and use of the App.
- Data insights VTX1 attains based on correlation and analytics of your information collected in providing the App, which may be used in aggregated and dis-aggregated formats or to obtain trend analytics, to provide the App; and
- Use of the above-described collected information in aggregated and dis-aggregated formats to enhance our current App or to provide App features.

How VTX1 Uses the Information

VTX1 uses the information collected as described in this Privacy Policy, including personal information, to:

- Provide you with the App as described in the Agreement.
- Implement, improve and/or enhance the App, including to make future releases available to you.
- Carry out VTX1 obligations as described or authorized in the Agreement and this Privacy Policy.
- Enforce VTX1 rights arising from the Agreement between you and VTX1 and
- Fulfill any other purpose authorized by you and reasonably required for the App.

YEARS OF AGE, AND VISITORS UNDER 13 YEARS OLD ARE NOT ALLOWED TO REGISTER FOR OUR CONTESTS, NEWSLETTER, PRODUCTS OR SERVICES.

Special Cases. VTX1 reserves the right to disclose personal information in special cases, when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other Users, or anyone else that could be harmed by such activities. We may disclose personal information without notice to you in response to a subpoena or when we believe in good faith that the law permits it or to respond to an emergency situation.

In the event any VTX1 entity or its assets are sold, merged or otherwise involved in a corporate transaction, your information will likely be transferred as part of that transaction. We reserve the right to transfer your information without your consent in such a situation; provided that we will make reasonable efforts to see that your privacy preferences are honored by the transferee.

Conflicts. Specific Service terms or other areas or pages of our Websites may include additional or different provisions relating to collection and disclosure of your information. In the event of a conflict between those provisions and this Privacy Policy, such specific provisions shall control.

Questions. If you have any questions or concerns about this Privacy Policy or the privacy practices of VTX1, please contact us at our corporate offices or on our corporate website at <https://www.vtx1.net>.