

## **CUSTOMER PROPRIETARY NETWORK**

### **INFORMATION (CPNI) POLICY**

#### **CPNI PROTECTIONS**

As a customer of Tishomingo Connect, you have the right, and Tishomingo Connect has a duty, under federal law, to protect the confidentiality of certain types of telecommunications data, including: (1) information about the quantity, technical configuration, type, destination, location, and amount of your use of telecommunications services, and (2) information contained on your telephone bill concerning the services that you receive. This information is known as “Customer Proprietary Network Information or “CPNI”. CPNI does not include your customer name, address or telephone number, nor does it include Internet Access Services or Video Services information.

#### **CUSTOMER APPROVAL**

From time to time, Tishomingo Connect would like to use the CPNI information it has on file to provide you with information about Tishomingo Connect’s communications-related products and services or special promotions. Tishomingo Connect’s use of CPNI may also enhance its ability to offer products and services tailored to your specific needs. To that end, Tishomingo Connect would like your approval so that Tishomingo Connect may use this CPNI to let you know about communications-related services other than those to which you currently subscribe and that Tishomingo Connect believes may be of interest to you. **IF YOU APPROVE, YOU DO NOT HAVE TO TAKE ANY ACTION.**

However, you do have the right to restrict our use of your CPNI. **YOU MAY DENY OR WITHDRAW Tishomingo Connect’s RIGHT TO USE YOUR CPNI AT ANY TIME BY CALLING 662-423-3646 OR Emailing support@tishomingoconnect.com.** If you deny or restrict your approval to use your CPNI, you will suffer no effect, now or in the future, on how Tishomingo Connect provides the services to which you subscribe. Any denial or restriction of your approval remains valid until your services are discontinued or you affirmatively revoke or limit such approval or denial.

#### **CUSTOMER AUTHENTICATION**

Federal privacy rules require us to authenticate the identity of its customer prior to disclosing CPNI. Customers calling customer service can discuss their services and billings with a company representative once that representative has verified the caller’s identity.

PINs may not be any portion of the Customer’s social security number, portion of birthdate, or amount or telephone number associated with the Customer’s account. In the event the Customer fails to remember their PIN, Tishomingo Connect will mail the requested information to the address on record, or call the customer at the telephone number of record. If the customer can be reached by phone, the Customer will then establish a new PIN associated with their account; if not, the customer can come in the office and establish a new PIN after providing a valid photo ID matching the customer information on record.

## **NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES**

Tishomingo Connect will notify customers of certain account changes. After an account has been established, when a customer's address (whether postal or e-mail) changes or is added to an account, Tishomingo Connect will also send an Account Change Notification.

## **DISCLOSURE OF CPNI**

Tishomingo Connect may disclose CPNI in the following circumstances:

- When the Customer has approved the use of their CPNI sales or marketing purposes.
- When disclosure is required by law or court order.
- To protect the rights and property of Tishomingo Connect or to protect Customers and other carriers from fraudulent, abusive, or unlawful use of services.
- When a carrier requests to know whether a Customer has a service provider freeze on their account.
- For directory listing services.
- To provide the services to the Customer, including assisting the Customer with troubles associated with their services.
- To bill the Customer for services.

## **PROTECTING CPNI**

Tishomingo Connect uses numerous methods to protect your CPNI. All Tishomingo Connect employees are trained on the how CPNI is to be protected and when it may or may not be disclosed. All marketing campaigns are reviewed by Tishomingo Connect management to ensure that all such campaigns comply with applicable federal CPNI rules.

Tishomingo Connect maintains records of all sales and marketing campaigns that utilize Customer CPNI. Included in these records is a description of the specific CPNI used. Tishomingo Connect maintains records of all instances in which CPNI is disclosed to third parties or where third parties were allowed access to Customer CPNI.

Tishomingo Connect will not release CPNI during customer-initiated telephone contact without first authenticating the Customer's identity in the manner set-forth herein. Violation of this CPNI policy by any Tishomingo Connect employee will result in disciplinary action against that employee.

## **BREACH OF CPNI PRIVACY**

In the event Tishomingo Connect experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require Tishomingo Connect to report such breaches to law enforcement. Specifically, Tishomingo Connect will notify law enforcement no later than seven

(7) business days after a reasonable determination that such breach has occurred by sending electronic notification through a central reporting facility to the United States Secret Service and the FBI. A link to the reporting facility can be found at: <https://www.cpnireporting.gov>. Tishomingo Connect cannot inform its Customers of the CPNI breach until at least seven (7) days after notification has been sent to law enforcement, unless the law enforcement agent tells the carrier to postpone disclosure pending investigation. Additionally, Tishomingo Connect is required to maintain records of any discovered breaches, the date that Tishomingo Connect discovered the breach, the date carriers notified law enforcement and copies of the notifications to law enforcement, a detailed description of the CPNI breach, including the circumstances of the breach, and law enforcement's response (if any) to the reported breach. Tishomingo Connect will retain these records for a period of no less than two (2) years.

#### **NOTIFICATION OF CHANGES TO THIS POLICY**

If Tishomingo Connect makes modifications to this CPNI Policy, we will post those changes on <https://www.tishomingoconnect.com> or in other places that we deem appropriate. Our desire is to keep you updated as to what information we collect, how we use it, and under what circumstances, if any, we disclose it. If you decide to continue receiving your services after we make any changes to this the CPNI Policy, you shall be deemed to have given your consent to the changes in the revised policy.