

# Rowe Internet Privacy Policy

Last Update January 2, 2017

Rowe Wireless Networks LLC ("Rowe Internet") is committed to protecting our customers' Personally Identifiable Information. Rowe Internet publishes and updates this privacy policy to better inform you of our practices regarding Rowe Internet's collection, use, protection and disclosure of your Personally Identifiable Information in the course of our providing our services ("Services") to you.

We will update this privacy policy and provide you with access to the most recent version by posting it on our websites at [www.roweinternet.com](http://www.roweinternet.com), the "Website"). We encourage you to review our policies (including our Acceptable Use Policy and any applicable Service Agreement) by visiting our Website periodically. If you have any questions about this policy you can reach us at 740-685-9000. If at any time you find this policy unacceptable, you should cancel your Services.

You can learn more about your privacy rights by visiting the websites of the Federal Trade Commission at [www.ftc.gov](http://www.ftc.gov), and the Federal Communications Commission at [www.fcc.gov](http://www.fcc.gov).

## **Information We Collect**

When you subscribe to and use our Services, Rowe Internet collects certain types of information about you, as described and illustrated below. We may collect this information (i) directly from you when you provide it to us, such as when you purchase products or services, fill out a form on our website, send us an email, or respond to a survey; (2) automatically when you use an interactive or transactional service or television viewing controls; or (3) from third parties.

**Personally Identifiable Information** – We collect certain information that identifies you individually ("Personally Identifiable Information" or "PII") in connection with the provision of our Services. The type of Personally Identifiable Information we collect may change depending on the Services you subscribe to, and may include items such as your name, service address, billing address, telephone number(s), social security number, driver's license number, bank account number, credit card number and other similar account information. PII does not include aggregate or anonymous information that, by itself, cannot be used to identify you.

**Other Information** – We also collect non-personally identifiable information, including usage statistics, traffic data, the domain names and IP addresses of our website visitors and High-Speed Internet Services subscribers, device identifiers and other information. This information will be treated as Personally Identifiable Information when it is associated or otherwise combined with information that can identify you.

**High Speed Internet Services** – Like most Internet service providers, we automatically collect and associate with your account certain information concerning your use of our high speed Internet service, such as the Internet Protocol (IP) address(es) assigned (an identifier assigned to your computer while online), MAC addresses (individual equipment identifiers) of equipment that is used, bandwidth used, system and connection performance, browsers used, dates and times of access, and Internet resource requests. Some of this information may identify those subscribers who have downloaded certain materials or accessed certain websites.

**Voice Over Internet Protocol ("VOIP") Telephone Services** – In some areas we provide telephone services by facilities-based "voice over Internet protocol" ("VoIP"). In providing telephone services, we collect subscriber list information, which is limited to your name, address and telephone number. We also collect information about the quantity, technical configuration, type, destination, location, and amount of your use of the VoIP services and information contained on your telephone bill concerning the type of phone services and features you receive. That information, when matched to your name, address, and telephone number, is known as customer proprietary network information or "CPNI." CPNI does not include subscriber list information by itself.

### **How We Use and Share Your Information**

**General Use Policy** – We consider Personally Identifiable Information confidential, and use it to provide our Services and for related purposes, including without limitation to detect and protect against fraud and unauthorized use of our Services, to provide you with personalized content, to process and respond to your inquiries, to improve our websites, mobile applications and Services, for the purposes for which you provided the information, as otherwise set forth in this Privacy Policy, and to enforce our legal rights, including the Residential Services Agreement (or, as applicable, the Commercial Services Agreement or other form of agreement) and your agreement(s) to receive Services. In the future, we may sell some or all our assets. In the event of a sale of our assets including our database(s), the information collected by Rowe Internet will be transferred. We may also combine Personally Identifiable Information that we collect, as described above, with Personally Identifiable Information obtained from third parties for our own use to better understand our customers and provide more relevant Services.

**General Sharing Policy** – Rowe Internet may disclose your Personally Identifiable Information and other information it collects to another entity (i) when it is necessary to render, or conduct a legitimate business activity related to the Services we provide to you, such as outsourcing one or more business functions, to confirm or update information provided by you or as a part of a sale of assets as described in the previous section; (ii) as required by law or legal process; (iii) for mailing list or other purposes, subject to your ability to restrict this disclosure; or (iv) as otherwise authorized by you. When we provide your information to a third party for purposes of outsourcing one or more business functions, we will restrict such entity's use of your information to the purposes for which it is disclosed and will prohibit such entity from further disclosure or use of the PII obtained from us.

Rowe Internet may use non-personally identifiable information from any Service for any reason and share it freely with affiliates, partners and other third parties, including advertisers, content providers, audience measurement and market research firms. These firms may combine this information with information about you or your community (such as the information that merchants use in delivering catalogs by mail, or census information about neighborhoods) to generate audience analysis data and for other permitted purposes. Audience analysis helps us and the program networks we carry decide on which programs and channels to carry and to improve our cable television services. We also may use this information to provide a more personalized experience by directing advertisers to channels that produce more sales as they consider, design, and evaluate advertising campaigns. This information may then be further aggregated (combined with information from many other users), and may include information such as traffic patterns, trends in connection with various types of transactions, and other information.

**Governmental Entities and Enforcement of Our Rights** – If allowed by and after complying with any federal law requirements, Rowe Internet may disclose personally identifiable information about you to representatives of government or to comply with valid legal process. In these situations, Rowe Internet may be required to disclose personally identifiable information about a customer without the customer's consent and without notice to the customer. Law enforcement agencies may, by federal or state court order, and without notice to you, obtain the right to install a device that monitors your Internet and e-mail use, including addresses of email sent and received and in some cases the content of those communications; and/or your use of our telephone service, including listings of incoming and outgoing calls and in some cases the content of those calls. In some instances where there are valid legal requests for or orders for disclosure of your information, we may notify you of the requests or orders and then it may be up to you to object or take specific action to prevent any disclosures pursuant to those requests or orders.

We may also use or disclose personally identifiable information about you without your consent (a) to protect our customers, employees, or property, (b) in emergency situations, (c) to enforce our rights in court or elsewhere, or directly with you, for violations of service terms, conditions or policies and/or (d) as otherwise required by law, for example, as part of a regulatory proceeding.

**Credit Verification** – We may verify your credit standing with credit reporting agencies, and combine information received from those agencies with the Personally Identifiable Information we collect from you. We may also disclose Personally Identifiable Information and financial information (including your social security number, your account(s) and your payment history) to those credit reporting agencies.

**High Speed Internet Services** – We use automated processes to scan incoming and outgoing email messages to, for example, identify and filter out likely spam or harmful messages. We do not read or intentionally disclose the content of your email messages

or other online communications except for purposes of support, maintenance, legal compliance, emergency situations and as otherwise set forth in this Privacy Policy.

**Telephone Services** – Rowe Internet will only use, disclose, or permit access to your CPNI as required by law or as approved by you, and as necessary to provide communications service or other services necessary to, or used in, the provision of the communications service. These other services include 911/E911 services, initiating, rendering, billing and collecting for services; protecting the rights or property of Rowe Internet, or protecting users or other carriers or service providers from fraudulent or illegal use of, or subscription to, services; and marketing services within the categories of services to which you already subscribe (unless you have opted out consistent with Customer Access and Choice Section, below) as provided by law; or as expressly authorized by you.

**Caller ID, 911 and Directory Services** – Rowe Internet may disclose to third parties your personally identifiable information in connection with features and services such as Caller ID and directory services. For a fee, we offer our telephone customers the ability to designate their listings as non-published within any print, electronic directories or directory assistance services. While we take reasonable precautions to ensure that numbers will be accurate and included and requested non-published and unlisted numbers will not be included, in telephone directories or directory assistance services, we cannot guarantee that errors will never occur.

**Cookies** – We may collect information using cookies, web beacons or similar technologies. These methods permit us to collect various types of information, including which pages you visit, how you use the Services, which of our email messages you read, and other information. Rowe Internet may use this information to understand usage patterns and perform analyses, to provide you with more personalized service and to improve your online experience.

Most web browsers permit users to disable or reject cookies, though doing so may limit the personalization available to you and your access to sections of our websites. Because a "Do Not Track" protocol has not yet been finalized, Rowe Internet's information collection and disclosure practices, and the choices that we provide to consumers, will continue to operate as described in this Privacy Policy, whether or not a Do Not Track signal is received.

**Marketing and Advertising** – We may use your information to deliver to you opportunities to purchase certain goods and services, and to select and deliver advertisements that are relevant to your interests, and we may share your name and address to our partners or affiliates for use in their marketing, subject to your ability to limit certain uses and disclosures.

Federal law allows Rowe Internet to disclose limited Personally Identifiable Information, including your name, address and level of service, to other non-affiliated entities for "mailing list" or other purposes that may or may not relate to the Services, unless you

object to such disclosure in advance. Any disclosure that we make under this exception will not reveal, directly or indirectly, the extent of your viewing or other use of the Services or the nature of any transaction you make over the Rowe Internet cable system.

We may use audience measurement and other demographic data to improve our cable television service and other services and make programming and advertising more relevant to our subscribers. We may also use this information to distribute and deliver relevant programming and advertising to you without disclosing personally identifiable information about you to programmers or advertisers.

Rowe Internet may partner with third-party advertising companies who may utilize cookies, web beacons, or other technology to deliver or facilitate the delivery of targeted advertisements. Rowe Internet also uses third-party advertising companies to identify and present tailored online advertisements for its goods and services. Rowe Internet does not share or provide personally identifiable information we may collect, such as names, e-mail addresses and phone numbers with our advertisers without your expressed permission.

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

**Third Party Websites and Services** – Since we cannot control websites or Internet services operated by third parties that you may visit through use of our Services, we recommend that you review the terms of service and privacy policies of those websites and services.

**Children's Privacy** – The websites provided by Rowe Internet are not directed at, or intended for use by, children under the age of 13. Children should always get permission from a parent or guardian before sending personal information over the Internet. If you believe your child may have provided us with personal information, you can contact us and request that we delete the information. You can find more information about protecting children's privacy by contacting the FTC or viewing its website at [www.ftc.gov](http://www.ftc.gov).

**Child Exploitation** – We are required by law to report any evidence we may become aware of relating to violations of laws concerning child exploitation.

## **Customer Access and Choice**

You may check the accuracy of your Personally Identifiable Information in your account by contacting a Customer Care representative at 740-685-9000. In most cases, the personally identifiable information contained in these records consists solely of billing and account information. You may also examine the records containing your personally identifiable information at your local Rowe Internet office during business hours and at your own cost and upon reasonable prior notice to us. If you wish to examine these records, please contact the Rowe Internet office noted on your billing statement. If your review reveals an error in our records, Rowe Internet will correct it. You will only be permitted to examine records that contain Personally Identifiable Information about your account and no other account.

You have the right to prohibit or limit certain kinds of disclosures and marketing. You may contact Rowe Internet at [support@roweinternet.com](mailto:support@roweinternet.com) or 740-685-9000 to ask us to put your name on our internal company “do not call” and “do not mail” lists so that you do not receive marketing or promotional telephone calls or postal mail from us or made at our request.

You also have the right to prohibit or limit disclosure of your personally identifiable information for “mailing list” or other purposes as described above in this notice. You may contact us online at [support@roweinternet.com](mailto:support@roweinternet.com), or at the mailing address located on your billing statement to restrict such disclosures. Please include your name, address and account number when contacting us for this purpose.

## **Retention**

Rowe Internet may retain Personally Identifiable Information and other information in its regular business records while you are a subscriber and for a period of time after you are no longer a subscriber until such information is no longer needed for any business, tax or legal purpose.

## **How We Secure Your Information**

We protect against the loss, misuse and alteration of the Personally Identifiable Information we collect through the use of appropriate administrative, technical and physical safeguards. Our servers are protected by reasonable physical and electronic security measures, and we use encryption wherever required or if we feel it is otherwise warranted. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information.

For questions about our privacy policy, practices, services, or policies that are not addressed by the information provided here, please email us at [support@rowenetworks.com](mailto:support@rowenetworks.com) or call 740-685-9000.