

Farmers Cooperative Telephone Company (FCTC)

Privacy Policy

Effective Date: This Privacy Policy (“Policy”) was last updated September 1, 2024; updates are effective immediately. Farmers Cooperative Telephone Company may revise this Privacy Policy as needed.

Important Notice: This policy applies to all services provided by Farmers Cooperative Telephone Company (FCTC), together with any subsidiaries or affiliates providing communications services.

Farmers Cooperative Telephone Company (FCTC) is committed to protecting its customers’ privacy. This “Policy” is applicable to FCTC customers as well as website visitors and is intended to provide information regarding FCTC’s collecting and use of information. This Policy explains how FCTC collects, uses and discloses information when you subscribe to, access or use our communications services. Some of the information collected is “non personal” however some is “personally identifiable” and known as Customer Proprietary Network Information (CPNI), as defined by Federal law. Our use or sharing of such information is governed by applicable Federal law. You may choose to opt out of the sharing of your CPNI within our family of companies for these marketing purposes by following the instructions on our CPNI notices. **Your use of FCTC services constitutes your acceptance of this Policy.**

FCTC may collect information through communications such as our website, phone, email, mail or in person. IP addresses may be collected for the purposes of system administration and to monitor the level of activity on our site. During communications with FCTC, we may access information about your customer premise equipment such as computers, wireless devices or other device settings to provide customized technical support, install specific applications or services for your use. FCTC reserves the right to access broadband traffic from individual accounts for the purpose of general maintenance and management of the network as well as upon request by law enforcement officials.

How Your Information Is Used

To provide, deliver, change, confirm, bill, monitor, maintain and repair services and/or service-related devices. The information we collect may include your name, addresses, and other contact information; the reason for the contact; and your Social Security Number and payment information. We use this information to establish and maintain your customer account and billing records (which may include establishing credit), provide services to you, confirm your identity in connection with service or before sharing sensitive personal or account information, and contact you about FCTC’s services.

Information Collected When You Use Our Products and Services

FCTC will collect information about your use of our products, services and sites. Information such as call records, websites visited, wireless location, application and feature usage, network traffic data, product and device-specific information, service options you choose, mobile and device numbers, video streaming and video packages and usage, movie rental and purchase data, and other similar information may be used for billing purposes, to deliver and maintain products and services, or to help you with service-related issues or questions. In addition, subject to any legal restrictions that may apply, this information may be used for other purposes such as providing you with information about service enhancements, determining your eligibility for new services or service packages, and marketing to you based on your use of services. This information may also be used to: (a) manage and protect our networks, services and users from fraudulent, abusive, or unlawful uses; and (b) subject to consent practices described in this policy, help us improve our services, research and develop new services, and offer promotions and other services.

If you subscribe to our high-speed data services, we may automatically measure and monitor network performance and the performance of your Internet connection to improve your, or our, service levels and products. If you contact us for service support, we also may access information about your computer, wireless device or other device settings to provide customized technical support or to install specific applications or services that you use or that are necessary to the applications or services you use.

In certain geographic service areas where the Company receives certain types of federal high-cost universal service support, the Company may be required by the FCC to measure and collect information concerning the speed and latency of broadband services provided to randomly selected subscribers. Pursuant to applicable FCC guidelines, any required testing would be accomplished by using one of three options: (1) existing Measuring Broadband America testing infrastructure (MBA testing), (2) existing network management systems and tools (off-the-shelf testing), or (3) provider-developed self-testing configurations (self-testing). The FCC has adopted requirements regarding when tests would begin, when exactly the Company may perform the tests, and the number of active subscriber locations the Company would be required to test. Once testing begins, test results must be reported and certified to the Universal Service Administrative Company (USAC) and Iowa Utilities Board (IUB) on an annual basis. As it relates to randomly selected subscribers, this required performance testing is in addition to the automatic or Company-initiated testing we may do to measure or monitor performance and improve our service levels generally.

Information Collected on FCTC's Website

If you establish an online account, FCTC will maintain information about your user identification and password. This information is used to identify you when you sign in to your account. Information you provide when contacting FCTC online or by other means about services, we will respond to your request and may use the information you supply us to provide you with additional information. FCTC may send you emails that communicate information about your account or about services, marketing offers, or promotions that may be of interest to you. When you open an email or click on links within these emails, we may collect and retain information to provide you

with future communications that may be more interesting to you. Please note that we will not ask you to send us, via email, sensitive or personal account information.

Information Provided to FCTC by Third Parties

When you apply for or purchase service from us, we may obtain credit information about you from outside credit reporting agencies to help us with customer authentication and credit-related decisions.

Information Shared with Third Parties

Except as explained in this Policy, FCTC does not sell, license or share information that individually identifies our customers, people using our networks, or website visitors with others outside our family of companies. FCTC does provide the names, addresses and telephone numbers of wireline telephone subscribers to directory publishers and directory assistance services unless a non-published or non-listed phone number has been requested.

FCTC may use vendors and partners for business purposes such as to help us provide, repair and bill for services. We share information with those vendors and partners to the extent reasonably necessary for them to perform work on our behalf. For example, we may provide your credit card information to our payment processing company solely for the purpose of processing payment for a transaction you have requested. We require them to protect the information we provide. FCTC does not permit these types of vendors and partners to use this information for their own marketing.

Should FCTC enter into a merger, acquisition or sale of all or a portion of our assets or business, customer information will also be transferred as part of or in connection with the transaction.

Unless otherwise restricted or prohibited by the Cable Act or Telecommunications Act, we may disclose information that individually identifies our customers or identifies customer devices to third parties in certain circumstances, such as:

- to protect our rights or property, or the safety of our customers or employees
- to protect against fraudulent, malicious, abusive, unauthorized or unlawful use of or subscription to our services and to protect our network, services, devices and users from such use
- to advance or defend against complaints or legal claims in court, administrative proceedings and elsewhere
- to comply with valid legal process including subpoenas, court orders or search warrants, and as otherwise authorized by law
- in cases involving danger of death or serious physical injury to any person or other emergencies
- to the FCC, IUB, USAC other federal, state, local or other governmental or quasigovernmental authority with jurisdiction over any Service
- to credit bureaus or collection agencies for reporting purposes or to obtain payment for Company-billed services
- to a third-party that you have authorized to verify your account information
- to outside auditors
- with your consent

Text Messages, Marketing Email, Postal Mail

You may opt out of receiving marketing-related postal mailings or prevent text message marketing from the Company by calling a customer service representative at 319-476-7800. Please note that the Company may use a bulk mail service for some marketing mailings. These services deliver offers to all homes in a defined area. This type of mailing will continue even if you opt out of receiving marketing-related postal mailings from the FCTC.

Marketing emails you receive from the Company include an unsubscribe instruction (usually found at the bottom of the email) that you may use to opt out of receiving future marketing-related emails. You may also opt out of receiving marketing related emails from the Company by contacting a customer service representative at office@fctc.coop.

Telemarketing

Federal “Do Not Call” laws allow you to place residential wireline and wireless phone numbers on the National Do Not Call Registry to prevent telemarketing calls to those numbers. If you would like to add your numbers to this list, you may do so by visiting www.donotcall.gov. You should be aware that even if you add your number(s) to the federal or a state Do Not Call list, most telemarketing laws allow companies to contact their own customers. It is the Company’s practice not to engage in telemarketing to our own customers. In order to keep you informed concerning our services and your account, we may use an automatic telephone dialing system, artificial or prerecorded voice, text message, or other form of written or audible communication to your designated contact number(s). For example, these informational contacts may include reminders of payment due dates, maintenance alerts and service cutovers.

How FCTC Protects and Stores Your Information

The Company has technical, administrative and physical safeguards in place to help protect against unauthorized access to, use or disclosure of customer information we collect or store, including Social Security Numbers. Employees are trained on the importance of protecting privacy and on the proper access to, use and disclosure of customer information. Under our practices and policies, access to sensitive personally identifiable information is authorized only for those who have a business need for such access, and sensitive records are retained only as long as reasonably necessary for business or legal purposes. Although we work hard to protect personal information that we collect and store, no program is 100% secure and we cannot guarantee that our safeguards will prevent every unauthorized attempt to access, use or disclose personal information. The Company maintains security and incident response plans to handle incidents involving unauthorized access to private information we collect or store. We will destroy the information if we have no pending requests, orders or court orders for access to this information, after we determine that it is no longer necessary for the purposes for which it was collected and in compliance with any applicable federal, state or local laws or requirements

Notices and Availability of This Policy

It is the practice of Farmers Cooperative Telephone Company to provide a copy of this Policy to all customers at the time you subscribe to our service as well as to make it publicly available on our website. To the extent required by applicable laws or regulations, this policy may be supplemented by service-specific privacy policies or privacy notices (i.e., our cable subscriber privacy notice for video subscribers or our CPNI policies for telephone and broadband subscribers). Subscribers may obtain a copy of this Policy by request (using the contact information and methods described herein) at any time.

If you have questions or comments related to this Privacy Policy, you may contact our office via any of the following:

Email: office@fctc.coop

Phone: 319-476-7800

Mail: Farmers Cooperative Telephone Company
PO Box 280
Dysart, IA 52224