



HTC, INC. PRIVACY POLICY

Your privacy is very important to us and as an HTC member, you are entitled to know what we do with the personal information we receive about you. We consider our treatment of such information to be a part of the trust you place in us by using our Broadband, Security, Video, and Voice related services. We have created this Privacy Policy to demonstrate our firm commitment to privacy and security. We provide this notice to answer questions you may have regarding treatment of your personal information. We retain only the personal information of our members that is needed to provide our services; we treat it as private, use it only for what we offer you, do not sell it to others, we work to keep it secure, and we destroy it when no longer needed. While we cannot cover every situation in this document where your personal information may be affected, we have included those which we believe are of most interest.

By law, we provide you with an annual privacy policy notice as well as provide a copy of the policy on our corporate website. Our corporate website is a great place where you can find additional and updated information at any time by visiting (www.htcinc.net). You can also learn more about your privacy rights by visiting the websites of the Federal Trade Commission, (www.ftc.gov) and the Federal Communications Commission (www.fcc.gov). If you receive your bills electronically, this notice will be sent to you electronically.

OVERVIEW

By using any of our services, visiting our websites, or applying for employment with HTC, you agree to our use of your information as set out in this privacy policy. We may share this information within the cooperative and with partner companies so that we can provide the services you order and manage your account. This privacy policy should be read in conjunction with the terms and conditions on our website and any additional terms you are provided with in relation to our services.

INFORMATION WE COLLECT

Personally Identifiable Information – When you place an order with us for any of our services or apply for employment, we will need certain information. We obtain the information that identifies you individually (“your information”) and such information may include: name, service address, billing address, telephone number(s), social security number, driver’s license number, premium services you have selected, demographic information, user ID(s), password(s), email address(es), correspondence and communications records. We maintain information concerning credit, billing and payment, security deposits, maintenance and repair, equipment and services provided and other service-related functions. In providing our services, we may also collect information about your video equipment, phone system(s), computer hardware and software, modem(s), router(s), settings and other preferences to aid in member support.

It is our policy to collect only the personal information needed to provide the services we offer. It is also our policy to keep that information secure and to retain it for only as long as needed for our business relationship or as the law may require. We take necessary precautions to identify you, or your authorized representative, when we receive an inquiry on your account. We also take reasonable steps to protect your information from unauthorized access.

We sometimes collect personal information for special circumstances, such as for surveys or while registering at our websites. In these instances, you will be notified before personal information is collected and we will have documentation explaining how it will be used and you may elect not to participate.

Video Services – We collect certain information in providing you with our cable television and other video services. The law prohibits us from using the cable system to collect personal information for unrelated purposes without your consent.

We may use various technologies, including the cable set-top box, our websites and apps, to collect information about your video selections. We treat this information as confidential, and we will not use it to identify you to third parties other than affiliates, vendors, and business partners furthering our business activities related to your services. We use this information to make recommendations to you and for other service-related purposes, such as to market new or additional services. In providing some specific cable television services, such as pay-per-view, entertainment-on-demand and interactive cable services, we do maintain limited usage information for billing, programming and related purposes. Aggregate information that does not identify you may be collected and used for programming, advertising and similar purposes. When we provide digital video recorder services, we may also receive detailed information concerning your use and operation of the recorder for the uses described below in “Use and Sharing.”

Internet Services – Like most Internet service providers, we automatically collect certain general information concerning your use, such as the Internet Protocol (IP) addresses assigned (an identifier assigned to your computer while online), bandwidth used, system and connection performance, browsers used, dates and times of access, and Internet resource requests, including requests to access web pages. We do not store online messages sent and received unless such messages are left in your HTC email account. Since we cannot control websites or Internet services provided by third parties, we recommend that you review the terms of service and privacy policies of those third-party web sites and services. You can find more detailed information concerning our Online Privacy Policy on our websites at www.htcinc.net.

Voice Services – We provide telephone services by traditional “switched” technology and by internet protocol (IP) technology. We do not listen to or record your calls. We do, however, monitor certain calls to our staff for quality assurance purposes. If you are uncomfortable with doing business by phone, you may visit any of our branch offices and speak with a customer relations associate. In providing telephone services, we do receive usage information including numbers called, numbers received, and duration of calls. We retain this information for billing purposes and for a time as required by pertinent regulatory authorities. We treat all such information as private and confidential.

We may receive personal information about you from third parties, including companies contracted by us to provide services to you, other telecommunications operators, marketing organizations, and credit reference agencies (CRAs) or fraud prevention agencies (FPAs). See Credit Checks section below.

CREDIT CHECKS - When you apply to buy products and services from us, we may carry out a credit check. This means that we may need to check certain records about you, including name, address, social security number, and date of birth through respective credit agencies. We may also review our own internal records on such things as payment history or outstanding debts owed. Such information is made available to our Customer Relations Associates (“CRAs”) who are placing the order for your service. Credit Agencies may supply to us both public (including the electoral register) and any shared credit and fraud prevention information. If a spouse, roommate, family member, or financial associate likewise uses the services at the same premise, we may link your records together if such users are authorized on the account. It is important that you give us accurate information. If you provide with false or inaccurate data or we suspect fraud, we will record this with the FPAs.

USE AND SHARING

Use Policy – We consider your information confidential, and use it only in providing our broadband, security, video programming, and voice related services for such things as sales, installation, operations, administration, advertising, marketing, support, network management, maintenance, member care, communications with you, billing and collection, and for accounting and tax purposes. We may also use such information in dealing with fraud and unauthorized use of our services or when required under the law.

We use aggregate information about our members and their usage for a variety of purposes. Such aggregated information does not identify individual members. We may share such aggregate information with third parties, but will not share your own information.

Sharing Policy – It is our policy not to disclose any personal identification information about you to others outside of HTC and our affiliates, vendors and business partners without your prior consent, except as permitted by law. We do not sell or provide your personal information to parties unrelated to the services we provide without your permission. You can also notify us if you prefer not to receive certain types of marketing contacts from us.

Special Exceptions – We reserve the right to disclose your information if we have a good faith belief that it is necessary to: (1) comply with the law or legal process served on us; (2) protect and defend our rights or property or those of others; (3) respond to fraud, abuse or unauthorized reception; (4) enforce our Website Terms of Use, our Acceptable Use Policy or related standards; (5) act in an emergency to protect your safety or that of another. We may also share or transfer your information along with your account as a part of any sale or transfer of all or a portion of our business operations, merger or combination with another organization. In such a case, you will be notified of any changes in policy.

Outside Parties – HTC sometimes uses affiliates, vendors or partners in providing our services and may provide your information for such purposes. We require that outside parties maintain at least the same level of confidentiality that we maintain. In addition, any use by the vendor may not exceed that needed to provide its service. We do not share your information with other third parties without your consent. If you become a member of a third party directly, you should review its privacy policy, as it may differ from ours.

Voice Services – Federal and some state regulations limit our use and sharing of certain information concerning a member’s telephone services. This information is known as “Customer Proprietary Network Information” or “CPNI”, and includes information on how you use our telephone services, such as your call patterns, service features, price plans, spending profiles, call destinations and related information. In offering our spectrum of local and long-distance telephone, we do use your telephone service information to offer new services and pricing plans. If you do not want us to use your CPNI for this purpose, you may contact us at (843) 365-2151 or you may contact us at www.htcinc.net. On the contrary, if you would like us to offer you information on video and data services or would like to learn more about our bundled offers, please contact us in any of the same ways. Consenting to allow us to use your CPNI will help us offer you the best and most up-to-date services. Your consent will remain in effect until you notify us of your request to revoke or change your permission, or as limited by law. Your choice will not affect the services you now receive. We do not disclose this information to unrelated parties, except as required by law.

Video Services – We provide aggregate information concerning pay-per-view, entertainment-on-demand and interactive services to programmers, advertisers and certain other third parties. Digital video recorder (“DVR”) service information is not shared with programmers or third parties, except on an aggregate basis. If you use an interactive service to participate in or to order a product or service, you will be asked for your permission to provide contact information to the appropriate party. When we offer new services to you like DVR and interactive features, we will also inform you about information we may need and how it may be used.

Internet Services – We do not read your email messages, instant messages, online chats, “voice-over- Internet” calls or the content of other online HTC - Privacy Information communications that reside on, or pass through, our Service. We may however, retain and provide such communications if we are legally required to do so. Incoming and outgoing email messages are generally scanned automatically to identify and filter out likely spam or harmful messages and for viruses, spyware and related problems that could harm your equipment, the network or other users.

INTERNET SECURITY

Taking Proper Precautions – Maintaining the security of your personal computer is an important part of protecting your own privacy and assists us in protecting our network and our members’ service. You should follow our Acceptable Use Policy and regularly update your antivirus software, your firewall, and your operating system to help prevent unauthorized access by others and harm from computer viruses. You should regularly back up your computer to preserve your files, including email or other messages you want to keep.

Please be advised that persons with questionable intent may use the Internet or email to pose as someone you trust or do business with. You should always be sure to verify whom you are dealing with before clicking on any Internet link or giving personal information. To avoid all these and other forms of attack, we encourage you to visit our website at www.htcinc.net or the Federal Trade Commission (“FTC”) at www.ftc.gov for regular updates and tips on protecting yourself.

HTC may take protective action related to your service, or contact you directly, with information from time-to-time to help with this effort. While we take reasonable steps to protect your services, we highly recommend that you regularly change your login password and use hard-to-guess combinations of numbers, letters, and special characters. Once communications enter the Internet, it is possible for them to be accessed by third parties over whom we have no control. Moreover, since we cannot control the websites or services operated by third parties, you should review their terms of service and privacy policies.

Spam – HTC tries to prevent and block spam, and we encourage your help by preventing unauthorized access to your computer. We suggest that you remain up-to-date on ways to avoid and combat spam. We may use email to send transactional or relationship messages related to your service. If you prefer, you may opt-out of other marketing messages we may send by notifying us in response to any you may receive.

Cookies – A third party ad server that places ads on our websites may use “cookies” to collect anonymous information concerning your preferences. A “cookie” is a computer code added to a file on your computer as a record of its visit. It does not collect or provide your name or any other personal information about you. It can, however, be read by the website that placed it to note information about your visit, such as your type of web browser, operating system and Internet Protocol (“IP”) address. It can also be used to recognize you when you log in as a registered user or as a repeat visitor returning to our website. This allows us to tailor our site by remembering you and any options you select. You can control what cookies are accepted by your computer through the settings on your web browser or by deleting them from your files. Doing so, however, may limit any personalization available to you.

Third-Party Cookies and Web Beacons – These forms of computer code are sometimes placed by advertisers or others with connection to a webpage and may be read by the ad’s provider. They may use a form or code called a “web beacon” or “clear GIF.” These are usually contained in a transparent image on a page or in an image on an email message and serve as a way to gather information about your visit, such as your IP Address and information or statistics about your visit. As with cookies, you can use your browser settings to control web beacons with vendors, advertisers and others.

HOW LONG DO WE HOLD YOUR INFORMATION?

The time period for which we keep information varies according to what the information is used for. Unless there is a specific legal requirement for us to keep information, we will keep your information for as long as it is relevant and useful for the purpose for which it was collected (and which you agreed to).

For example, when you contact us we may monitor and record your communications with us to use this information for training and quality purposes and to meet our legal and regulatory requirements. All such recorded call information is held for a limited period of time before we delete it permanently.

In some instances, we will continue to hold information about you if you do not become our member, your application is declined, or after you have closed your account or terminated your services with us. We will only hold such information for such periods as is necessary for responding to service or credit inquiries, marketing HTC’s products and services that you may be interested in, and in complying with any legal obligation and for crime and fraud prevention and detection.

The law requires us to keep certain information about how you use our services for a period of twelve (12) months. This information may be used by certain law enforcement agencies to prevent and detect crime and to protect national security. We will only disclose this information to duly authorized parties when we are legally required to.

SENSITIVE PERSONAL DATA

You may want to make us aware of certain special information about you, such as information relating to your health or medical circumstances. For example, if you are registered as being legally blind, we can use this information to improve your service experience with us. We need your consent to retain this data about you in order for us improve your service experience. You can withdraw your consent for us to retain and use these special types of information at any time, but doing so may impact your service experience.

LAW ENFORCEMENT & LEGAL REQUESTS

Information Disclosure – We sometimes receive legal requests from government and law enforcement personnel for member information. We also receive discovery requests in civil litigation. In all such cases, we operate by providing such information only to the extent that the law requires. The laws concerning your privacy and government access change from time to time and may affect how we are required to respond. Under current law, many criminal subpoenas require that we not disclose or notify you of the request. Due to this, we do not assume any duty to notify you of receipt of any legal requests.

Internet Information – Your account records and information concerning your Internet access may be subpoenaed by a governmental agency or by others through the courts. Internet messages and files shared over “peer-to-peer” services often include your IP Address, and you can be identified in this way if we receive a lawful subpoena. As with telephone interception, details concerning your Internet access and the content of communications can be obtained by law enforcement through a court order or similar authority. In addition, the law permits us to voluntarily and without prior notice, disclose to law enforcement member information, including the contents of communications, if we reasonably believe that an emergency involving immediate danger of death or serious physical injury requires such disclosure without delay.

Telephone Information – Current law requires law enforcement to obtain a court order or other similar authority for a telephone wiretap or to use a pen register or trap and trace device to capture dialing information. Voice-over-Internet services are subject to similar interception standards. Law enforcement can also subpoena account and call record information.

Cable Television Programming - Records concerning video programming selections may generally be obtained only under court order, after notice is given to you and you have the opportunity to object in court.

COMMITMENT TO CHILDREN'S PRIVACY

The websites provided by HTC are not directed at, or intended for use by, children under the age of 13. We do not knowingly allow anyone under 18 to provide any personal information on our websites. Children should always obtain 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 at the address found on your monthly bill and we will delete this information. You can find more information about protecting children's privacy by contacting the FTC or viewing its website at www.ftc.gov.

CHILDREN'S PORNOGRAPHY

As a provider of an electronic communications service, we are required by law to report any evidence we may become aware of relating to violations of laws concerning child pornography.

PROTECTING YOUR INFORMATION

We take protecting your data seriously, and will do our utmost to employ appropriate organizational and technical security measures to protect you against unauthorized disclosure or processing. Unfortunately, we cannot guarantee the security of transmitting information via the internet. We have tried to create a secure and reliable website for our users; however, we have no responsibility or liability for the security of personal information transmitted via the internet. Please remember that any information you may disclose in public areas of our website or the Internet becomes public information. You should exercise caution when deciding to disclose personal information in these public areas.

COMMITMENT TO DATA SECURITY

Services and websites we sponsor have security measures in place to protect the loss, misuse, and alteration of the information under our control. While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information.

HOW TO ACCESS OR MODIFY YOUR INFORMATION

HTC offers Members the opportunity to access or modify information provided during registration. To access or modify such information, contact our Member Service Department at 843.365.SURF.

CHANGES TO PRIVACY POLICY

Please note that this policy will be reviewed and may change from time to time. The revised policy will be posted to this page so that you are always aware of the information we collect, how we use it and under what circumstances we disclose it.

CONTACT US

If you have any questions about this Privacy Policy or the practices described herein, you may contact:

Member Service HTC

3480 Highway 701 North

PO Box 1820

Conway, SC 29528-1820

Or contact us at 843.365.SURF or via e-mail at ComplianceDepartment@htcinc.net .