



BCT's Privacy Notice

At BCT, we respect our members' rights to secure information. We are committed to keeping your information secure through our compliance to regulations and laws, designed to protect your privacy. This notice is to provide you a better understanding of our privacy practices and your rights.

As a subscriber to BCT services provided by BCT, you are entitled under Section 631 of the Federal Cable Communications Policy Act of 1984 (the "Cable Act") to know the following:

- The limitations imposed by the Cable Act upon cable operators in the collection and disclosure of personally identifiable information about subscribers;
- the nature of personally identifiable information we collect;
- the nature of the use of personally identifiable information;
- under what conditions and circumstances we may disclose personally identifiable information and to whom;
- the period during which we maintain personally identifiable information;
- the times and place at which you may have access to your personally identifiable information; and
- your rights under the Cable Act concerning personally identifiable information and its collection and disclosure.

In this notice, the terms "we," "us" or "our" refer to BCT (Beavercreek Cooperative Telephone Company). The term "you" refers to you as a subscriber to our cable service and or other services. In addition, Section 702 of the Federal Telecommunications Act of 1996 (the "Telecommunications Act"), provides additional privacy protections for certain information related to our telephone services:

- Information about the quantity, technical configuration, type, destination, location, and amount of your use of the phone services; and
- information contained on your telephone bill concerning the phone services you receive.

When telephone information is matched to your name, address, and telephone number, it is known as Customer Proprietary Network Information or CPNI for short. This notice, describes what CPNI information we obtain, how we protect it, and how it may be used. If you are a customer of our Telephone services, you have the right, and BCT has a duty, under the Telecommunications Act, to protect the confidentiality of CPNI.

WHAT IS PERSONALLY IDENTIFIABLE INFORMATION?

Personally identifiable information is information that identifies a particular person. It does not include data that does not identify a particular person. This notice applies to the personally identifiable information that you have furnished to us or that we have collected using the BCT cable system when we provided BCT cable or other services to you. Regarding your telephone services, examples of CPNI include information



available from telephone-related details on your monthly bill, such as, location of service, technical configuration of service, type of service, quantity of service, amount of use of service, calling patterns and other information contained on your bill for local and long distance services.

FOR WHAT PURPOSES MAY BCT COLLECT PERSONALLY IDENTIFIABLE INFORMATION?

The Cable Act authorizes BCT as a cable operator to use the cable system to collect personally identifiable information concerning any subscriber for the following purposes:

- In order to obtain information necessary to render our cable service or other services to our subscribers; and
- to detect unauthorized reception of cable communications.

The Cable Act prohibits us from using the cable system to collect personally identifiable information concerning any subscriber for any purposes other than those listed above without the subscriber's prior written or electronic consent.

WHAT KIND OF PERSONALLY IDENTIFIABLE INFORMATION DOES BCT COLLECT?

We collect certain personally identifiable information that our subscribers furnish to us in connection with our cable service or other services. In order to provide reliable, high quality service to you, we keep regular business records containing information about you that may constitute as personally identifiable information. These records include some, but typically not all, of the following information: your name, service address, billing address, e-mail address, telephone number, date of birth, driver's license number, social security number, bank account number, credit card number and other similar account information. BCT also collects and maintains other information about your account. For example, billing, payment, and deposit history, additional service information, customer correspondence and communications records, maintenance and complaint information, along with records indicating the number of televisions and set top boxes connected. Additionally, if you rent your residence, we may have a record of whether landlord permission was required prior to installing our cable facilities as well as your landlord's name and address. When a subscriber uses interactive or other transactional TV services, the cable system automatically collects certain information on the use of the service and equipment. Most of this information is not personally identifiable information and it is simply used to carry out a particular request you make using your remote control, set top box, or other equipment. In order to carry out a particular request you make to watch a pay-per-view program or purchase a product, service, or feature, for example, our system may collect certain personally identifiable information. This information typically consists of account and billing-related information such as the pay-per-view programs or other products, services and features ordered so you may be properly billed for them.



HOW DOES BCT USE PERSONALLY IDENTIFIABLE INFORMATION?

We collect, maintain, and use personally identifiable information to conduct business activities related to providing you with our cable service and other services and to help us detect theft of service. With general industry standards, we use personally identifiable information in connection with, billing and invoicing, administration, surveys, collection of fees and charges, marketing, service delivery and customization, maintenance and operations, technical support, hardware and software upgrades and fraud prevention. More specifically, we also use personally identifiable information to:

- Install, configure, operate, provide, support, and maintain our cable service and other services;
- confirm you are receiving the level(s) of service requested and are properly billed;
- identify you when changes are made to your account or services;
- educate on new products or services that may be of interest to you;
- understand the use of, and identify improvements to, our services;
- detect unauthorized reception, use, or abuse of our services;
- determine whether there are violations of any applicable policies and terms of service;
- manage the network supporting our services;
- configure cable service and other service-related devices; and
- comply with law.

DOES BCT DISCLOSE PERSONALLY IDENTIFIABLE INFORMATION TO OTHERS?

BCT regards personally identifiable information contained in our business records to be highly confidential. The Cable Act authorizes BCT as a cable operator to disclose personally identifiable information concerning any subscriber for the following purposes if the disclosure is:

- Necessary to render, or conduct a legitimate business activity related to, the cable service or other services provided to the subscriber;
- required by law or legal process.

For example, these kinds of disclosures typically involve billing and collections, administration, surveys, marketing, service delivery and customization, maintenance and operations, and fraud prevention. The Cable Act prohibits us from disclosing personally identifiable information concerning any subscriber for any purposes other than those listed above without the subscriber's prior written or electronic consent.



www.bctelco.com

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WHO CAN BCT DISCLOSE INFORMATION TO?

BCT can disclose information through the course of providing cable service and other services to persons, such as BCT employees, repair and installation subcontractors, sales representatives, auditors, billing and collection bureaus and credit reporting agencies. Additionally, BCT may also use or disclose personally identifiable information about our subscribers without subscriber consent to protect our customers, employees, or property, in emergency situations and to enforce our rights under our terms of service and policies, in court or elsewhere.

DOES BCT DISCLOSE PERSONALLY IDENTIFIABLE INFORMATION BY LAW?

We make every reasonable effort to protect our members' privacy as described in this notice. Although, we are subjected by law to disclose personally identifiable information about a subscriber without his or her consent and without notice in order to comply with a valid legal process such as a subpoena, court order, or search warrant. The Cable Act requires that we disclose personally identifiable information to a third party or governmental entity in response to a court order. If the court order is released by a non-governmental entity, we are required to notify our subscriber of the court order. If the court order is released by a governmental entity, the Cable Act requires that the subscriber be afforded the opportunity to appear and contest any claims made in support of the court order.

HOW DOES BCT PROTECT PERSONALLY IDENTIFIABLE INFORMATION?

We follow industry-standard practices to prevent unauthorized access to personally identifiable information by a person other than the subscriber or us. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information.

HOW LONG DOES BCT KEEP PERSONALLY IDENTIFIABLE INFORMATION?

BCT files personally identifiable information about you in our regular business records while you are a current subscriber to our cable service and or other services. We also maintain this information for a period of time after you are no longer a subscriber if the information is necessary for the purposes in which it was collected or to satisfy legal requirements. These purposes typically include business, legal, or tax purposes. If these requirements or purposes no longer apply, we will destroy the information according to our internal policies and procedures. BCT does not keep personally identifiable information no longer necessary.



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CAN MEMBERS HAVE ACCESS TO THEIR OWN PERSONALLY IDENTIFIABLE INFORMATION?

All subscribers/members have the right to examine and correct their own personally identifiable information records. If you would like to see your personally identifiable information, please send us a written request to our business office. We will be glad to arrange a convenient time and location during regular business hours for you to see the information upon furnishing proper identification. Members will only be permitted to examine records that contain personally identifiable information about themselves and no one else. If you believe any of your personally identifiable information is inaccurate, we will work with you to ensure that the appropriate corrections are made.

WHAT HAPPENS IF I FEEL MY RIGHTS HAVE BEEN VIOLATED?

If you believe that you have been wronged by any action of ours in violation of the Cable Act, please contact BCT immediately to resolve your question or concern. You may also enforce the limitations imposed on us by the Cable Act as applicable with respect to your personally identifiable information through a civil lawsuit seeking damages, attorney's fees and litigation costs. Other rights and remedies may be available to you under Federal or other applicable laws as well.

WILL BCT NOTIFY ME OF CHANGES TO THE PRIVACY NOTICE?

As required by the Cable Act, we will provide you with a copy of our subscriber privacy notice annually. We may modify this notice at any time. We will notify you of any material changes through written, electronic, or other means permitted by law. If you do not agree to any changes, you may reserve the right to cancel service. By continuing to use the service after a change is in effect, you accept the change and agree to abide by it.