

**Chazy Westport Communications  
Westelcom Networks Inc.  
Teo Communications Inc.  
Privacy Policy**

This Privacy Statement describes how Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc., collects information from or about its customers. As visitor to Chazy Westport Communications, Westelcom Networks Inc. and/or Teo Communications Inc. website(s), or as a customer who contracts for our services, this policy will outline how we use the information we collect and the choices you have concerning the collection and use of such information. The goal of this Privacy Policy is to ensure your privacy and security when you use our products and services.

This Privacy Policy will address:

Personal Information Collected

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**A. Personal Information Collected**

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will limit the information collected about you to what is needed for conducting business, this will include the offering of products and services by us or by third parties that might be of interest to you. You may choose to provide personally identifiable information (PII) in a number of ways: in person, telephonically or

electronically via our websites. Examples of how you may share PII with us might include: ordering a service or equipment from us, sending us e-mail, responding to a sponsored surveys, contests or sweepstakes, registering to receive news or public information or applying for a job. We may also obtain PII from third parties (for example, credit agencies) with your permission.

The following are examples of Personal Identifiable Information (PII) we might collect:

Name (including company name for business customers)

E-mail address

Credit card number or financial/bank account number or information, including routing numbers

Passwords or personal identification codes (PINs)

Date of birth

Social Security number

Driver's license number or government issued identification number

Company contact information for business customers

The following information is not considered Personal Identifiable Information (PII):

Mailing address, unless unlisted or restricted at your request

Telephone number, unless unlisted or restricted at your request

IP Address allowing you to use our service(s)

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. may compile or aggregate PII from numerous customers or web visitors to collect data about groups of customers or potential customers or categories of service. Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. does not consider this information as PII because the aggregated information does not contain the PII of any individual customer or web visitor.

## **B. Use of Personally Identifiable Information (PII)**

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. uses PII to provide products and services to meet our customers' needs, including new products or services. Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. may share PII with an affiliated company, and these companies are subject to the terms of this Privacy Policy.

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. retains PII only as long as is necessary to comply with business, tax and legal requirements. This retention period could be the entire time you are our customer depending on the type of PII.

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. does not:

Collect PII from you unless you provide it to us in person, telephonically or electronically by visiting our websites, including information you provide in order to use our services.

Sell the names and addresses of Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. web visitors to unaffiliated suppliers without your prior approval.

Allow third parties to change your service provider or otherwise access your account information, at your request, without complying with our security policies, which are designed to protect your account from changes not authorized by you.

### **C. Customer Proprietary Network Information (CPNI)**

CPNI is information that relates to the quantity, technical configuration, type, destination, location and usage of the telecommunications services purchased by you from Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. CPNI is available to Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. solely through its relationship with you and information contained in your bill for telecommunication services. CPNI does not include information that is typically classified as PII, such as your name or e-mail address and does not include compiled or aggregated PII. U.S. federal law requires Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. to protect the confidentiality of CPNI. Unless you opt-out from the use of CPNI, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. may use CPNI to market service offerings to you to which you do not already subscribe may, without prior approval from you, if the service offerings are within the same categories of service to which you already subscribe, regardless of your CPNI selection. You have the right to restrict our use of your CPNI for such purposes. If you wish to do so, please notify us in writing at our main local office, which will be noted in your bill, by calling 1-866-327-8832 or by filling out the CPNI Opt Out Form, which is available on our website under Legal. Should you choose not to use the electronic CPNI Opt Out Form please be sure to include your name, account number, telephone number and address on any written request. If you do not notify us within 30 days of this notification that you wish to restrict our use of your CPNI, we will assume that you approve of our use of CPNI for this purpose.

### **D. Value-Added Services**

The trust you have placed in Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. is greatly appreciated and we are continually looking for ways to enhance your customer experience. From time to time, we may notify you about a Chazy Westport Communications, Westelcom Networks Inc. and/or Teo Communications Inc. product or service using the information you have provided to us either in person, telephonically or electronically by visiting our websites, this can include information you have provided to use our services. We strive to limit our offers to those we think you would benefit from and appreciate receiving, as we want every contact you have with us to be a positive experience. If you prefer not to receive these Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. value-added services, offers and opportunities, please use the opt-out procedure as outline above in Section C.

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. complies with all applicable laws and regulations regarding Do Not Call Lists. Generally, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. is allowed to contact its customers, even if the customers are registered with federal or state Do Not Call Lists, because of our relationship with you. Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will, of course, honor any request to remove your name from our telephone, mail

or e-mail solicitation lists and will delete your information from existing files within a reasonable time period. Contact us at 1-866-327-8832 for further information or to complete the opt-out procedure in Section C.

#### **E. Information Disclosure to Third Parties**

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. does not sell PII of its customers to third parties. In limited circumstances, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. may provide PII to third parties under the following conditions:

To assist us in developing, promoting, establishing, maintaining and/or providing Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. related products and services to you, including joint marketing efforts or promotions, but PII may not be used by the third parties for any other purpose;

To assist us in establishing accounts, billing, collecting payment (i.e. credit bureaus and collection agencies), enforcing the Terms and Conditions or the Acceptable Use Policy of Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. services were permitted by law, and protecting or enforcing our rights, property or services of our other customers from fraudulent, abusive, or unlawful use by you of our services;

To comply, when required by law, with court or administrative orders, civil or criminal subpoenas, warrants from law enforcement agencies, federal or state regulatory requirements, mandatory governmental audits, E911 reporting requirements, grand jury investigations, civil or criminal governmental investigations or reporting required by the National Center for Missing and Exploited Children, designated by federal law as a reporting mechanism for child pornography; and to appropriate law enforcement, 911 centers or emergency services when Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. in good faith, believes the disclosure is necessary to protect a person, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. property or the public from an immediate threat of serious harm.

#### **F. Customer Information Response**

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc.'s principles for responding to government requests for customer data is as follows:

Our Privacy team carefully reviews all requests such as subpoenas, court orders, and search warrants. Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. reserves the right to object to process that is overbroad or inconsistent with applicable law.

Subpoenas are limited to such as basic customer information (including information captured at the time of registration, such as an alternate e-mail address, name, location, and IP address), login details, and billing information.

Court Orders may be used to get additional information, notably transactional information (e.g., "to," "from," and "date" fields from email headers).

Search Warrants may be used to obtain content that customers create, communicate, and store on or through our services. This could include, for example, words and photos in emails and other similar kinds of information.

Consistent with this approach and our commitment to defending our customers' privacy, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will notify our customers about third-party requests for their information prior to disclosure, and thereby provide them with an opportunity to challenge requests for their data. In some cases, we may be prohibited by law from doing so, such as when we receive a non-disclosure order pursuant to 18 U.S.C. § 2705(b). Additionally, in exceptional circumstances, such as imminent threats of physical harm to a person, we may elect to provide delayed notice. When the circumstance that prevented us from providing notice prior to disclosure is removed, e.g., the non-disclosure order expired or the threat has passed, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc.'s will take steps to inform the affected customer(s) that data was disclosed.

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will restrict the disclosure of content and will only disclose content (e.g. email messages, photos) with a search warrant or the customer's consent. Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will provide only that information which we are clearly obligated to provide by the legal process and as allowed by law. We will resist any overly-broad request for our customer's information. If Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. are required to provide information, we will produce only limited information to satisfy the demand in order to protect our customer's privacy.

We comply with the Electronic Communications Privacy Act ("ECPA"), 18 U.S.C. §§ 2501 et seq., when responding to any request for our customer's data. We require adherence to the requirements of 18 U.S.C. § 2703 relating to the disclosure of basic subscriber information, content, and other customer records. All legal process submitted to us must be valid and comply with applicable substantive and procedural requirements for the issuance of that type of process. In addition to requiring that all requests for user data comply with ECPA and other applicable laws, we also require that:

The legal process specifically identifies the customer account that is subject to the request by customer number, email address, screen name or other appropriate identifier. This will help us identify the particular Chazy Westport Communications, Westelcom Networks Inc. or Teo Communications, Inc. account subject to the request. Requests to identify customers based on real names or IP addresses may be declined. All requests must be submitted in writing, unless applicable law specifically allows for an oral request. In such cases, we may ask for a written request after the fact. All requests must be on official letterhead and contain sufficient information to verify that the request has originated with an entity or individual authorized to make such request.

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. retain different types of information for varied periods of time depending on a variety of factors, such as user account activity, user requests for deletion, and/or storage capacity. In many cases, our users maintain control over the content they store on our network and may remove, alter, or otherwise modify such content at any time. Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. preserve user data, to the extent it is available, for 90 days upon receipt of a valid preservation request from a government agency issued in accordance with applicable law.

Requests should be made in writing and should be addressed to:

Westelcom  
Custodian of Records  
130 Park Place  
Watertown New York 13601

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will generally accept legal process from a U.S. government agency via email to [lawenforcement@westelcom.net](mailto:lawenforcement@westelcom.net). We retain the right, in our sole discretion, to raise jurisdictional and/or service objections in any specific instance.

Consistent with the emergency disclosure provisions in ECPA (18 U.S.C. § 2702), Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will make disclosures to government officials in instances where we have been provided sufficient information to conclude that disclosure without delay is necessary to prevent imminent danger of death or serious physical injury to any person. All emergency disclosure requests should be submitted in writing using our Emergency Disclosure Form which can be found on our website under Policies and Notifications. There is a charge for this service, as listed below, because these records are not kept in the normal course of business.

Service	Charges
Legal Document Responses	\$0.10 per screen print
Diskette/CD	\$10.00 processing fee
Special Computer Searches	\$150.00 for 1-3 consecutive days, or \$1000 for 30 consecutive days or calendar month, regardless of results.

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will, in its sole discretion, determine whether the circumstances warrant disclosure, utilizing the information provided on the Emergency Disclosure Form. Consistent with our commitment to protecting our customer's privacy and discretion allowed under ECPA, we reserve the right to only share information that we believe is necessary to avert an emergency situation.

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will generally provide a declaration with records produced in response to a request. (This declaration is usually sufficient to authenticate the records at trial.) However, we cannot generally provide a custodian of records to testify for authentication purposes, nor can we provide personnel to testify as expert witnesses on Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. services or the internet in general.

If a non-U.S. law enforcement agency seeks to obtain data on a customer of Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. the non-U.S. agency must work through the available diplomatic channels in its jurisdiction including any bi-lateral or multi-lateral legal assistant treaties ("MLATs") or letters rogatory processes. Such requests may be made to the U.S. Department of Justice Office of International Affairs. Only after such requests have been processed by the U.S. Department of Justice and U.S. legal process is issued to Chazy Westport Communications, Westelcom Networks Inc. and/or Teo Communications Inc. will Chazy Westport Communications,

Westelcom Networks Inc. or Teo Communications respond to the process. Please be advised that the requirements and restrictions discussed in the foregoing sections will apply to all legal process received by Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. including non-U.S. process that has been domesticated through diplomatic channels. Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. can only respond as permitted by U.S. law, including ECPA. Non-U.S. law enforcement may contact Chazy Westport Communications, Westelcom Networks Inc. or Teo Communications directly to make a preservation request or in the case of an emergency. For more information or for questions regarding a pending law enforcement request, please email [lawenforcement@westelcom.net](mailto:lawenforcement@westelcom.net).

#### **G. On-line Information**

In addition to PII identified in Section A of this Privacy Policy, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc., or our third party partners, may collect non-personal information automatically when you enter Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. websites, such as domain name, browser, your computer operating system, information about the web page from which you linked to the site, and time spent on different pages within the site. We or our partners may use this information to evaluate and improve our site, and may share the information with third parties on an aggregated basis to enhance our products and services offered. This on-line information is typically collected via cookies or web beacons (see Section N for definitions). Like virtually all other web sites that you visit, we use cookies to deliver web content specific to your interests and to control access to your personal shopping cart after your initial entry. The cookie permits the server to recall information from your previous shopping trip, should you decide to think about your purchase. A cookie is not used to access or otherwise compromise the data on your hard drive. With most browsers, you can choose to change your browser settings to disable cookies. Please be aware that cookies may be required to complete certain functions on Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. websites and other websites you may link to from Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. websites, including making purchases or payments on your Chazy Westport Communications Westelcom Networks Inc. or Teo Communications Inc. account.

#### **H. Security Measures**

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. uses security techniques designed to protect your information from unauthorized access, including firewalls and access control procedures. We have security measures in place to protect against the loss, misuse and alteration of information under our control. For example, when you place an order on a Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. website, the information you submit is encrypted using the Secure Sockets Layer (SSL) protocol.

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. employees are bound by non-disclosure agreements designed to prevent them from disclosing any PII or CPNI. Our policies also limit access to PII to only those employees, contractors, agents or representatives that require the information to perform their jobs or assist Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. with providing products and services to you.

## **I. Protection of Underage Internet Users**

Children below the age of majority should consult with their parents or guardians before furnishing any data to us. Parents should consider using one of a number of available parental control tools that provide a child-friendly, on-line environment and can prevent children from disclosing PII without parental consent. If a child has provided personal information without the consent of a parent or guardian, that parent or guardian should contact us to request that the information be deleted from our records. Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. does not knowingly collect PII from children under the age of 13 in connection with providing products and services, and it strives to comply with all provisions of the Children's Online Privacy Protection Act (COPPA). If Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. inadvertently collects information from minors below the age of 13, the information will be treated as PII of the adult customer.

## **J. Links**

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. are not responsible for the content or privacy policies of other non-Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. websites. You should keep this in mind when accessing sites through links on Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. websites or through third party advertisements appearing on Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. websites. Further, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. may advertise on other websites. The advertising companies placing our ads may use cookies or web beacons to track the effectiveness of our ads. The use of such technology is subject to the privacy policies of the advertising companies, and not this Privacy Policy.

## **K. Statement Updates**

We may update this Privacy Policy at any time in connection with our constant efforts to improve our products and services. We strongly encourage you to periodically review this Privacy Policy. We reserve the right to expand our capabilities for information collection and use and change this Privacy Policy in this regard. If any change constitutes a material change to this Privacy Policy, we will post a notice on our websites in a prominent position. If Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. decide to use PII in a manner that is materially different from what is contained herein, we will post the change on our websites for 30 days before making the change.

## **L. Security Breaches**

While our goal is to prevent any unauthorized disclosure of PII, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. cannot guarantee that an unauthorized disclosure will not occur. We will make reasonable efforts to contact you if we determine that a security breach has occurred and that there is a reasonable risk of identity theft or as otherwise required by law.



## **M. Contact Us**

If you have questions, comments or concerns, about this Privacy Policy or any other Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc.'s privacy practices, please contact a customer care representative at 1-866-327-8832; email us at [privacy@westelcom.com](mailto:privacy@westelcom.com) ; or write to us at

Westelcom

ATTN: Privacy Officer

130 Park Place,

Watertown New York 13601.

We will respond to all inquiries in a timely manner.

## **N. Definitions**

Cookies are small, encrypted data strings our server writes to your hard drive that contains your unique Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc.

## **O. Network Management Practices**

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc.'s network management practices are designed to provide the best possible online experience to its customers. To that end, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. monitor traffic flows between points within its network and between its network and locations on the internet for purposes of reasonable network management. Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. use this information to manage its network, provide security for its customers, plan for future needs, and ensure its network runs as efficiently as possible. Monitored information includes the amount of data sent to and from your connection, the source and destination of the data, and the type of information sent and received. In limited circumstances, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. may also look into the contents of the information to determine whether it is malicious in nature (such as a virus, spam, worm, etc.) or when required by law to comply with judicial orders or regulations.

## **P. Safe Harbor Principles**

Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. adhere to the Safe Harbor Privacy Principles and complies with the U.S.\EU Safe Harbor Framework as agreed to and set forth by the United States Department of Commerce and the European Union ("EU"). For individually identifiable information received by Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. in the United States, from users in the EU, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. adhere to the following principles:

**Notice.** Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will inform customers about the purposes for which it collects and uses PII, the types of non-agent third parties to which Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. discloses PII, and the choices and means, if any, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. offers for limiting use and disclosure of PII.

**Choice.** Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will offer customers the opportunity to choose (opt-out) whether their PII is (a) to be disclosed to a third party who is not an agent, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized. For sensitive PII, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will give users the opportunity to affirmatively and explicitly (opt-in) consent to such disclosure or use.

**Access.** Upon request, Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. will provide customers with the PII that it holds about them and will take reasonable steps to provide individuals with a means to correct, amend or delete PII that is inaccurate or incomplete.

**Dispute Resolution.** For complaints that cannot be resolved between Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc. and the customer, such disputes will be governed by the current provisions of Chazy Westport Communications, Westelcom Networks Inc. and Teo Communications Inc.'s Terms and Conditions.