



Privacy Policy

This privacy policy applies to services provided to you (“you,” “your,” or “Customer”) by Waitsfield and Champlain Valley Telecom and its subsidiaries (“WCVT,” “we,” “us,” or “our”) that own and/or operate the cable television, broadband, or phone services that you may purchase from us. Services may include, but are not limited to, GMA Video Service / Waitsfield Cable (“Video”), Green Mountain Access High-Speed Internet service (“Broadband”), WCVT voice services including Hosted IP Voice service and those that may that operate over a broadband connection or other local facility, and Apps and other Software we may provide (each a “Service” and collectively, “Services”).

All Services we provide are subject to our Terms of Service found at <https://www.wcvt.com/policies/>

By subscribing to and/or using our Services, we may collect personal information about you including but not limited to the following:

1. Information you provide to us, such as:

- Contact information, which may include your name, mailing address, email address, or telephone number
- Login credentials for our Services, such as your username and password
- Payment information, such as your credit/debit card or other financial account information
- Your Social Security number
- Your driver’s license, state identification cards, or other forms of identification
- Legal documents, such as documentation of the authority to act on behalf of another person

2. Information we collect when you use our services, such as:

- Household and device video selection and viewing activity
- Geolocation information on where you are at a specific point in time based on your service address to help us authenticate you for certain services on our platform
- IP addresses, device identifiers, and network equipment addresses when devices connect to our Services, and other device information, including information about Devices provided by other companies from which you use our Services
- User activity information, including what you search and how long you use our websites and applications, using cookies and other technologies, and information provided by other companies when you integrate their services with our Services

- Domain Name Server or “DNS” searches and network traffic activity when you use our Services
- General location information, such as the city or ZIP Code that correlates with the location of a WiFi service access point or with the license of your device IP address
- The quantity, technical configuration, type, features, call history, and amount of your use of voice services (known as Customer Proprietary Network Information or “CPNI”)

Information provided by third parties such as:

- Credit reporting agencies and other entities that provide credit scoring, identity verification, fraud prevention, and similar services
- Landlords and property owners that provide contact and other information
- Government entities that may be required to provide us information to confirm your qualification to receive certain Services that we may make available to you
- Providers of third-party apps that you use on devices governed by this privacy policy

We strive at all times to respect a customer’s desire for privacy and we obtain and use individual customer information, and the collective information about our customers, for business purposes only including but not limited to, network monitoring, billing, marketing, and maintenance purposes, including trouble shooting. We do not sell your information to third parties and release of your information to entities outside of WCVT is only to protect customers, employees and property against fraud, theft, or abuse, or as required by law. In some instances, you may subscribe to services that require us to disclose information to third parties to ensure your and our ongoing compliance with regulations that may govern the service and the disclosure of which is a condition of ongoing receipt of the service.

Some of the information we collect may be aggregated across multiple customers, with no individual personal data identified, so that we may report to state, federal, and other authorities regarding the services we provide.

Your rights and our limitations under federal laws

The federal Cable Act imposes limitations on our collection and sharing of information that personally identifies you when you subscribe to Services that use the facilities of our cable system. The Communications Act imposes restrictions on our use and sharing of CPNI when you use Services that are deemed telecommunications services.

The Cable Act and personally identifiable information

This Privacy Policy is designed to comply with Section 631 of the Cable Communications Policy Act of 1984, as amended, (the “Cable Act”). The Cable Act permits us to use the cable system to collect personally identifiable information about you. Personally



identifiable information is information that identifies you specifically; it does not include de-identified, anonymous, aggregate, or other data that does not identify you. We may collect personally identifiable information when it is necessary to render cable services or other services to you and to detect unauthorized reception or use of the services.

If you believe that you have been aggrieved by any act of ours in violation of the Cable Act or other applicable laws, we encourage you to contact us directly at 802-496-3391 or via email to csdept@wcvl.com in order 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, attorneys' fees, and litigation costs. Other rights and remedies may be available to you under federal or other applicable laws as well.

The Communications Act and CPNI

Section 222 of the Communications Act of 1934, as amended (the "Communications Act"), provides additional privacy protections for information about the quantity, technical configuration, type, destination, location, and amount of your use of telecommunications services, including VOIP, Hosted IP, and traditional phone service, and the information about those services contained on your bills for those Services. This information is known as customer proprietary network information or "CPNI." CPNI does not include your name, address, or telephone number, which is defined by the Communications Act as "subscriber list information."

If you are a customer of a telecommunications service, you have the right, and we have a duty, under the Communications Act and other applicable laws, to protect the confidentiality of your CPNI.

If you have any questions about this policy or believe that it has not been followed, please contact us at 1 (800) 496-3391.