

## CALIFORNIA PRIVACY POLICY

Last Updated: **December 31, 2019**

Northland Cable Television, Inc., and its subsidiaries and affiliates (collectively, “Company,” “we,” “our,” or “us”) takes your privacy seriously. We want you to know how we collect, use, share, and protect your Personal Information and about the rights of California Consumers under California law.

### **This Privacy Policy addresses the following topics**

- The Scope of this Privacy Policy
- The Company’s Collection, Use and Disclosure of Personal Information
- Your California Privacy Rights
- How to Exercise Your Rights
- How We Will Verify Your Requests
- Requests by Authorized Agents
- The Company’s Non-Discrimination Policy
- Your Right to Information About Disclosures of Personal Information for Direct Marketing Purposes
- Your “Do Not Track” Browser Setting
- Third-Party Links and Services
- Minors Under 13 Years of Age
- For More Information
- Changes to This California Privacy Policy

### **Assistance For The Disabled**

Alternative formats of this Privacy Statement are available to individuals with a disability. Please contact us at <https://www.yournorthland.com/contact/> for assistance.

## **The Scope Of This Privacy Policy**

### What Is Personal Information?

“Personal Information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California Consumer or household.

### Whose Personal Information Is Covered By This Policy?

This California Privacy Policy applies to the Personal Information of residents of the State of California in their capacity as consumers (“California Consumers”).

### What Personal Information Does This Privacy Policy Cover?

This Privacy Policy applies to all Personal Information of California Consumers that we collect both online and offline, including through California Consumers’ (a) visits to our website, and (b) applications for and use of our products, or services that reference this Privacy Policy (collectively, the “Services”).

### Whose Personal Information Is Not Covered By This Privacy Policy?

For purposes of this Privacy Policy, “Consumer” does not include:

- California residents who are Company’s employees, job applicants, directors, officers or independent contractors (collectively, “HR Individuals”), or the emergency contacts of HR Individuals or the dependents or spouses who receive Company benefits by virtue of their relationship to an HR Individual in their capacities as HR Individuals or emergency contacts, dependents, or spouses; or
- California residents who are employees or other agents of a business engaged in a transaction with Company in their capacities as employees or agents of that business.

### What Else Should I Know About The Company’s Handling Of California Consumers’ Personal Information?

Please read Company’s Terms of Use and our General Privacy Policy available at [www.yournorthland.com](http://www.yournorthland.com). They contain important information about your use of the Services. If you have any questions, please contact us using the information below.

## **The Company’s Collection, Use And Disclosure Of Personal Information**

This section of the Privacy Policy describes, for the 12 months preceding the date last updated, above, (a) the categories of Personal Information we have collected about you, (b) the sources of that Personal Information, (c) the business and commercial purposes for use, and (d) the categories of third party recipients of your Personal Information. Unless we inform you otherwise, this section also serves as our “notice at collection” by informing you of your Personal Information to be collected in the future and the purposes for its use.

### Categories Of Personal Information Collected

In the last 12 months, Company collected the following categories of Personal Information about California Consumers:

- **Identifiers**, including: personal information that identifies, relates to, describes, or is capable of being associated with you, such as your name, alias, address, unique personal identifier, online identifier, Internet Protocol address, email address, signature, social security number, telephone number, driver's license or state identification card number, bank account number, credit card number, debit card number, other financial information, login credentials, or other similar identifiers and account name and numbers.
- **Categories described in Cal. Civ. Code § 1798.80(e)** including those already listed in "Identifiers" above, photographs and video images, and excluding publicly available information that is lawfully made available to the general public from federal, state, or local government records.
- **Commercial information**, including: products and services purchased; product registration data; purchase, service, and installation dates.
- **Internet or other electronic network activity information**, including: IP logs, IP lease records, bandwidth usage and usage limitations, equipment identifiers (MAC Address), information necessary to apply Company's Acceptable Use Policy and comply with applicable law and requests for disclosure made by federal, state and local law enforcement, information collected regarding you activities and interactions with Company's web site or web portals, such as login dates and times and service requests.
- **Sensory information**, including: voice recordings made during customer service calls, surveillance videos at Company offices and facilities.
- **Profile information**, including: attitudes and impressions collected from comments on Company's web site, email, social media resources, service calls, customer service interactions; customer purchasing patterns, customer usage patterns.

Sources Of Personal Information and Purposes For Using Personal Information

In the last 12 months, Company collected the categories of Personal Information listed above from the following sources and used those categories of Personal Information for the following purposes:

Categories Of Personal Information Collected In The Last 12 Months	Sources Of That Personal Information	Business Purposes And Commercial Purposes For Collecting That Personal Information
<b>Identifiers</b>	The California consumer himself or herself	<ul style="list-style-type: none"> <li>• Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting impressions to unique visitors, verifying positioning and quality of impressions, and auditing compliance with the law.</li> <li>• Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</li> <li>• Debugging to identify and repair errors that impair existing intended functionality.</li> <li>• Short-term, transient use.</li> </ul>

		<ul style="list-style-type: none"> <li>• Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, and providing analytic services.</li> <li>• Undertaking internal research for technological development and demonstration.</li> <li>• Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by Company, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by Company.</li> <li>• Product and service training, for example, by providing training and information on using, servicing, selling, and displaying Company's products and services.</li> <li>• Communications about promotions, for example, by communicating about special events, sweepstakes, promotions and surveys.</li> <li>• Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.</li> </ul>
<b>Categories described in Cal. Civ. Code § 1798.80(e)</b>	The California consumer himself or herself	The purposes listed for "Identifiers."
<b>Commercial information</b>	The California consumer himself or herself; Automated technologies used to provide the Services and comply with applicable law.	The purposes listed for "Identifiers."
<b>Internet or other electronic network activity information</b>	The California consumer himself or herself; Automated technologies in the website; Automated technologies used to provide the Services	The purposes listed for "Identifiers."

	and comply with applicable law.	
<b>Sensory information</b>	The California consumer himself or herself; from security recording equipment located in company facilities; from customer interaction with the Company's customer services, technical services and from the consumer's use of the Services.	<ul style="list-style-type: none"> <li>• Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting impressions to unique visitors, verifying positioning and quality of impressions, and auditing compliance with the law.</li> <li>• Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</li> <li>• Short-term, transient use.</li> <li>• Product and service training, for example, by providing training and information on using, servicing, selling, and displaying Company's products and services.</li> <li>• Communications about promotions, for example, by communicating about special events, sweepstakes, promotions and surveys.</li> <li>• Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.</li> </ul>
<b>Profile information</b>	The California consumer himself or herself; from third party providers; from customer interaction with the Company's customer services, technical services and from the consumer's use of the Services.	<ul style="list-style-type: none"> <li>• Short-term, transient use.</li> <li>• Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, and providing analytic services.</li> <li>• Undertaking internal research for technological development and demonstration.</li> <li>• Product and service training, for example, by providing training and information on using, servicing, selling, and displaying Company's products and services.</li> <li>• Communications about promotions, for example, by communicating about special events, sweepstakes, promotions and surveys.</li> <li>• Facilitating communications, for example, by collecting and organizing contact</li> </ul>

		information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.
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Disclosure Of Personal Information To Third Parties

In the last 12 months, Company disclosed the following categories of Personal Information about California Consumers to the following categories of third parties for a business or commercial purpose:

<b>Category of Personal Information</b>	<b>Categories of Third Parties</b>
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>• Service Providers including providers of Internet access services, telephone services, video services, billing and collection services, service installation, maintenance and repair providers, data storage or the purpose of providing, maintaining, enhancing and improving the services; and</li> <li>• Government agencies, law enforcement, and other parties as required by law, including in litigation</li> </ul>
<b>Categories described in Cal. Civ. Code § 1798.80(e)</b>	<ul style="list-style-type: none"> <li>• To the same categories of third parties as Identifiers above.</li> </ul>
<b>Commercial Information</b>	<ul style="list-style-type: none"> <li>• To the same categories of third parties as Identifiers above.</li> </ul>
<b>Internet or Other Electronic Network Activity Information</b>	<ul style="list-style-type: none"> <li>• To the same categories of third parties as Identifiers above.</li> </ul>
<b>Sensory Information</b>	<ul style="list-style-type: none"> <li>• To the same categories of third parties as Identifiers above.</li> </ul>
<b>Profile Information</b>	<ul style="list-style-type: none"> <li>• To the same categories of third parties as Identifiers above.</li> </ul>

No Sale Of Personal Information

The Company does not sell California Consumers' Personal Information.

**Your California Privacy Rights**

Right to Know

California Consumers have the right to submit a verifiable request to know:

- The categories and specific pieces of Personal Information that Company has collected about them;
- The categories of sources from which Company collected the Personal Information;

- The categories of Personal Information that Company sold or disclosed to a third party (other than a service provider) for a business purpose and the categories of recipients of that information; and
- The business or commercial purposes for Company's collection, disclosure, or sale of the Personal Information.

#### Right To Delete

- California Consumers have the right to submit a verifiable request for deletion of their Personal Information that Company has collected from the Consumer.

#### Right to Opt Out of Sale of Personal Information

- California Consumers have a right to opt-out of the sale of the Personal Information. However, as stated above, Company does not and will not sell Personal Information.

### **How to Exercise Your Rights**

Company will respond to requests in accordance with applicable law if it can verify the identity of the individual submitting the request. California Consumers can exercise their rights in the following ways:

- Complete the online request via the Company's web site: [www.yournorthland.com/contact](http://www.yournorthland.com/contact).
- Contact by telephone: (888) 667-8452.
- **At any of our retail office locations:** You may make your request in person at any of our retail office locations. See [www.yournorthland.com/contact](http://www.yournorthland.com/contact) for a complete list of locations.

## **Requests By Authorized Agents**

You may designate an authorized agent to exercise your right to know or your right to delete by submitting to us a completed “Authorized Agent Designation” form. You can obtain the designation form by contacting us at [www.yournorthland.com/contact](http://www.yournorthland.com/contact).

If an authorized agent submits a request to know or a request to delete on your behalf, the authorized agent must submit with the request either (a) a power of attorney that is valid under California law, or (b) a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you to follow the applicable process described above for verifying your identity

## **How We Will Verify Your Requests**

The processes that we follow to verify that the person making a request to know or a request to delete is the person about whom we have collected personal information are described below.

- **Requests To Know Categories Of Personal Information:** We will match at least two data points that you provide with your request to know, or in response to our request for verification information, against information about you we already have in our records and that we have determined to be reliable for purposes of verifying your identity. Examples of relevant data points include your mobile phone number, your zip code, or information about products or services that you have purchased from us.
- **Requests To Know Specific Pieces Of Personal Information:** We will match at least three data points that you provide with your request to know, or in response to our request for verification information, against information that we already have about you in our records and that we have determined to be reliable for purposes of verifying your identity.
- **Requests To Delete Personal Information:** Our process for verifying your identity will depend on the sensitivity (as determined by Company) of the personal information that you ask us to delete. For less sensitive personal information, we will require a match of two data points as described in Point No. 1, above. For more sensitive personal information, we will require a match of three data points as described in Point No. 2, above.

We have implemented the following additional procedures when verifying the identity of requestors:

1. If we cannot verify your identity based on the processes described above, we may ask you for additional verification information. If we do so, we will permanently delete the verification information that you provide promptly after we have completed the verification process. We will not use that information for any purpose other than verification.
2. If we cannot verify your identity to a sufficient level of certainty to respond to your request, we will let you know promptly and explain why we cannot verify your identity.

## **The Company’s Non-Discrimination Policy**

California Consumers have the right not to be subject to discriminatory treatment by Company for exercising their privacy rights under the California Consumer Privacy Act, and Company will not discriminate on that basis. However, Company may charge a California Consumer a different

price or rate or provide a different level or quality of goods or services if the difference is reasonably related to the value provided to the California Consumer by the Consumer's Personal Information. If Company does so, it will provide Consumers with any legally required notice.

### **Your Right to Information About Disclosures of Personal Information for Direct Marketing Purposes:**

Under California law, California Consumers can request information from us whether we have disclosed Personal Information to any third parties for the third parties' direct marketing purposes. We will not sell your Personal Information to, or share it with, third-party companies for their direct marketing purposes without your consent. California Consumers desiring to request further information about our compliance with these laws or who have questions or concerns about our privacy practices and policies are welcome to contact us using the contact information below.

### **Your 'Do Not Track' Browser Setting**

The Company collects personally identifiable information about your online activities over time and across third-party websites or online services. We support the Do Not Track (DNT) browser setting. DNT is a preference you can set in your browser's settings to let the websites you visit, know that you do not want the sites collecting your personally identifiable information.

### **Third-Party Links And Services**

We provide links to third party websites operated by organizations not affiliated with Company. We do not disclose your Personal Information to organizations operating such linked third-party websites. We do not review or endorse, and are not responsible for, the privacy practices of these organizations. We encourage you to read the privacy policy of each and every website that you visit. This Privacy Policy applies solely to information collected by Company through the Services.

### **Minors Under 16 Years of Age**

We respect the privacy of children. Our Services are not designed to attract an audience younger than sixteen (16), and we do not knowingly collect Personal Information from children under sixteen (16). If you are under the age of sixteen (16), should not send us any information about yourself. Please contact us using the contact details below if you believe we may have collected information from your child under the age of sixteen (16), and we will work to delete it.

### **For More Information**

For questions or concerns about Company's privacy policies and practices, please contact us at [www.yournorthland.com/contact](http://www.yournorthland.com/contact) or call 888-667-8452.

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