

# 24/7 Mid-Atlantic Network, LLC

## PRIVACY POLICY

### I. Introduction & Scope

24/7 Mid-Atlantic Network, LLC (“24/7” or the “Company”) is committed to protecting your privacy. The Company maintains strong and meaningful privacy protections. This Privacy Policy (“Policy”) is designed to inform you about the information (including information that can identify you or things about you as an individual – “Personal Information”) that we collect from our customers and those who use our services, how we use that information, and your options with regard to that collection and use.

This Policy applies to 24/7 customers and users of 24/7 services in the United States. Although these provisions are generally applicable to you and to your use of 24/7’s services, certain services offered to consumers, as well as certain 24/7 contracts, may contain additional privacy-related terms and conditions. Any such terms and conditions are in addition to those set forth below. Please read this Policy in conjunction with the applicable general terms & conditions applicable to the service you use and with any other service specific terms and conditions applicable to the services provided to you.

Although this Policy applies to 24/7 services and to the products and services provided by all 24/7 companies, this Policy does not cover information that you provide to non-24/7 companies, such as:

- Information disclosed when you interact with, obtain, download or purchase applications or other materials from third parties.
- Information disclosed to non-24/7 websites or sources.
- Information disclosed on public sources (such as social networking websites, blogs, or any other location not controlled by 24/7).

Some websites, applications, and services may allow you to participate in discussions, message boards, chat rooms, and other forms of social networking. These forums are accessible to others who may have access to any Personal Information you submit. So if you choose to reveal Personal Information in such a manner, that Personal Information may become publicly available and the Company cannot prevent distribution or use of that Personal Information by other parties. Other locations, services and websites may have their own privacy policies and we encourage you review those policies.

### II. How 24/7 Collects Information

24/7 collects information about you primarily in the following four ways:

1) The Company Collects Information When You Communicate With 24/7: When you communicate with 24/7, the Company collects information from you. This information may

pertain for example, to your order, the Company's products and services, or your account. 24/7 may use that information to deliver, provide, confirm, change, bill, monitor, maintain and repair your products and services. The information collected may include items such as your name, address, and other contact information, the reason for the contact, your social security number, credit card information, financial, billing and payment information. The Company may also collect verification details that you provide to us in order to access and/or to use features of 24/7's services.

2) The Company Collects Information When You Use 24/7 Products and Services: The Company collects information about your use of 24/7's products, services and websites. Information such as call records, websites visited, location, application and feature usage, network traffic data, product and device-specific information, service options you choose, video streaming and video packages and usage, purchase data, technical information and other similar information. For some services, the Company may measure and monitor network performance and the performance of your Internet connection to improve your (or 24/7's) service levels and products. If you contact 24/7 for service support, the Company also may access information about your computer, wireless device or other device settings to provide customized technical support or to install specific applications or services that you use or that are necessary to the applications or services you use.

3)

The Company Receives Information from Third Parties: When you purchase products or apply to the Company services or products, 24/7 may obtain credit information about you or from outside credit reporting agencies to help with customer authentication and credit-related decisions. The Company may obtain information from outside companies that collect consumer information such as demographic and interest data. The Company may also obtain contact information and other marketing lead information from third parties, and may combine it with information 24/7 already has. Website visitors and others may provide the Company with your contact information.

The length of time we keep your information for can vary according to how the information is used. Unless there is a specific legal requirement to keep your information, the Company will long enough as the Company reasonably necessary for the purposes for which the data was collected.

### **III. Use of Collected Information**

The Company uses the information it collects in a variety of ways. For example, the Company may use some or all of the information for the following purposes:

- To provide you with access to and manage the services you purchase, and to respond to your questions or problems;
- To develop, market, sell, bill, and collect for 24/7 products and services;
- To communicate with you regarding your orders, service updates and offers and promotions for features and services;

- Provide you with customer service and to respond to your questions;
- To deliver customized content, more relevant advertising and personalized offers for products and services that may be of interest to you based on information collected;
- To conduct research and analysis directed toward maintaining, protecting and improving the Company's network and the services and products 24/7 provides;
- To address network integrity, quality control, capacity, misuse, viruses, and security issues, complete network planning, engineering and technical troubleshooting purposes or to address your complaints or inquiries;
- To investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms and conditions of service and policies.

Occasionally, the Company may combine your Personal Information with other information to understand and improve the services 24/7 provides to you and to determine what other products, services or promotions may be of interest to you.

#### **IV. Sharing of Collected Information**

From time to time, the Company may share the information it collects from you to companies affiliated with 24/7 - such as for operational and marketing purposes. Such information and company affiliates are covered by the terms of this Policy.

Except as explained in this Policy, in privacy policies for specific services, or in separately signed agreements, the Company does not sell, license or share Personal Information without the consent of the person whose Personal Information will be shared. Your Personal Information may also be accessible by or made available to third-party service providers or sub-contractors with which the Company contracts in connection with the Company's operations, including those who assist in the provision of 24/7 services, who host and maintain Company websites or other services, or who provide billing and other out-sourced services.

The foregoing notwithstanding, the Company may disclose Personal Information in certain circumstances, such as:

- Where reasonably required to comply with valid legal process including subpoenas, court orders or search warrants, and as otherwise authorized or required by law;
- To obtain payment for Company products and services, for credit reporting purposes, or to enforce Company agreements or protect Company rights or property;
- Where reasonably required in cases involving danger of death or serious physical injury to any person or other emergencies, or the safety of the Company's customers or employees (including for example responding to 9-1-1 calls);
- To protect against fraudulent, malicious, abusive, unauthorized or unlawful use of or subscription to 24/7 products and services and to protect the Company's network, services, devices and users from such use;
- To advance or defend against complaints or legal claims in court, administrative proceedings and elsewhere;
- To prevent network interruptions and outages;

- To third parties that you have authorized to verify your account information;
- To outside auditors and regulators; and,
- To third parties that you have consented to permit access.

If the Company enters into a merger, reorganizes, acquires other companies or sells all or a portion of its assets or business, customer information may also be transferred as part of or in connection with the transaction.

## **V. Customer Proprietary Network Information**

Customer Proprietary Network Information (“CPNI”) is information that relates to the quantity, configuration, type, destination, location and amount of use of the telecommunications services you purchase from 24/7, as well as the information contained in your bills for those services. Depending on the services you purchase from 24/7, the Company may collect CPNI in the normal course of providing you those services. Not all information you provide to the Company is CPNI – for example, your telephone number, name and address are not CPNI.

The Company may use your CPNI to offer you additional services of the type you already purchase from 24/7 or to offer you 24/7 products and services, packages, discounts and promotions which may be different from the types of services you already purchase. 24/7 has internal policies and safeguards designed to protect the privacy of CPNI and safeguard it from unauthorized access or improper use in accordance with federal and certain state laws. 24/7 does not sell, trade or share your CPNI, including your calling records to unaffiliated third-parties except those who perform functions on our behalf (such as billing functions) except as may be permitted or required by law or authorized by you. The Company may use or disclose your CPNI for legal or regulatory reasons such as a court order, to investigate fraud or to protect against the unlawful use of our telecommunications network and services and to protect other users of our services and to collect bills.

## **VI. Anonymous and Aggregated Information**

In some instances, the Company may collect information on an anonymous basis by collecting information about your activities without collecting your Personal Information. The Company may anonymize Personal Information 24/7 collects about you by removing any information that can be used to identify you personally. The Company may also aggregate data by combining anonymous data that meets certain criteria into groups. The Company may share aggregated or anonymous information in various formats with third-party entities, and may work with those entities in various ways, including doing research, planning, and developing, marketing and providing products and services that may be of interest to you. The Company provides aggregated and anonymous data only to third parties that satisfy our standards and limits the use of that information.

## **VII. Controlling and Limiting the Use of Your Information**

You have the ability to make certain choices about how 24/7 shares and uses information. These include:

- Telemarketing: Federal "Do Not Call" laws allow you to place residential phone numbers on the National Do Not Call Registry to prevent telemarketing calls to those numbers. If you would like to add your numbers to this list, you may do so by calling 1-888-382-1222, or by visiting [www.donotcall.gov](http://www.donotcall.gov). You should be aware that even if you add your number(s) to the federal or a state Do Not Call list, most telemarketing laws allow companies to contact their own customers. If at any time you would like to be removed from the Company's telemarketing list, please contact us at:

Crown Castle  
ATTN: Legal Department  
1500 Corporate Drive  
Canonsburg, PA 15317  
Email: [privacy@crowncastle.com](mailto:privacy@crowncastle.com)

- Email, Text Messages, or Postal Mail: If we send you marketing emails, those emails will include unsubscribe instruction (usually found at the bottom of the email) that you may use to opt out of receiving future marketing-related emails. You may opt out of receiving marketing-related postal mailing or prevent text message marketing by contacting the Company at:

Crown Castle  
ATTN: Legal Department  
1500 Corporate Drive  
Canonsburg, PA 15317  
Email: [privacy@crowncastle.com](mailto:privacy@crowncastle.com)

## **VIII. Information Security**

The Company has technical, administrative and physical safeguards in place to help protect against unauthorized access to, use or disclosure of customer information that 24/7 collects and stores. We have implemented technology and security features and strict policy guidelines to safeguard the privacy of your Personal Information, such as:

- The Company maintains and protects the security of its computer network and equipment, including the use of security procedures designed to prevent access to sensitive data;
- The Company uses encryption or other appropriate security controls to protect Personal Information;
- The Company limits access to Personal Information to those individuals who need access to such information to operate, develop, or improve our services and products;
- The Company maintains authentication processes to prevent unauthorized access to your Personal Information.

Despite those safeguards, no program is 100% secure and the Company cannot guarantee that its safeguards will prevent every unauthorized attempt to access, use or improperly obtain Personal Information. Furthermore, not all types of communications are secure. For example, if you

transmit information to third parties, such as through electronic mail, the Company cannot guarantee the security of those messages or that those messages will not be intercepted.

## **IX. Keeping Minors Safe**

24/7 supports efforts to protect the safety and privacy of children on-line. The Company does not knowingly market to or solicit information from children under the age of 13 and its websites are not designed for use by children. The Company complies with applicable laws, including the Children's Online Privacy Protection Act ("COPPA") and other applicable laws relating to the use of children's data.

24/7 encourages parents and guardians to spend time online with their children, and to participate in and monitor their online activity. In some instances, Internet access and devices purchased for family use may be used by minors without 24/7's knowledge. Any Personal Information collected by 24/7 as a result of such usage may appear to be associated with the adult who subscribes to the Company's services and may be treated as such.

Certain activities, including the viewing, storage and distribution of child pornography and other types of illegal activity involving children, are strictly prohibited by law. Such activities are subject to severe criminal penalties and violate 24/7's service contracts. The Company cooperates with law enforcement to prevent such activities. To report a violation, please contact us at:

Crown Castle  
ATTN: Legal Department  
1500 Corporate Drive  
Canonsburg, PA 15317  
Email: [privacy@crowncastle.com](mailto:privacy@crowncastle.com)

## **X. Other Provisions**

- **Consent:** The submission of your Personal Information and/or use of Company services, products or websites constitutes your acknowledgment that you have read and understood this Policy and agree to its terms. You also acknowledge and consent to 24/7's collection, storage, and processing of any information, including Personal Information, collected.
- **How to contact 24/7:** If you have any questions or complaints about this Policy, the information the Company collects, or how it uses that information please contact us at:

Crown Castle  
ATTN: Legal Department  
1500 Corporate Drive  
Canonsburg, PA 15317  
Email: [privacy@crowncastle.com](mailto:privacy@crowncastle.com)

- Changes to This Policy: The Company reserves the right to make changes to this Policy without notice. As 24/7 grows, adds new features and products or conditions or legal requirements change, this Privacy Policy may be modified. Such changes shall become effective upon posting. Please check back regularly to access the most recent version of this Privacy Policy.