



SFW PRIVACY POLICY

The SFW Privacy Policy applies to Southern Fiber Worx, LLC (“SFW”) Internet Access and Voice Telephone Services.

This Policy explains the legal requirements that apply to SFW when we collect information from our customers, including the manner in which we collect, use, and disclose specific types of information from our customers.

Section 222 of the Communications Act of 1934 (the “Communications Act”) provides privacy protections for certain information, known as Customer Proprietary Network Information (“CPNI”), related to SFW’s Internet Access (“Internet”) and Voice Telephone (“Voice”) services. CPNI is defined by the Federal Communications Commission (“FCC”) to include the following: a) information about the quantity, technical configuration, type, destination, location, and amount of your use of the phone and Internet services; and b) information contained on your bill concerning the type of phone and Internet services and features you receive.

CPNI does not include your name, address, and telephone number, referred to by the FCC as “subscriber list information.” This Policy describes what CPNI information we obtain, how we protect it, and how it may be used. If you are a customer of our Voice and Internet services, you have the right, and SFW has a duty to protect the confidentiality of CPNI. SFW is committed to compliance with Section 222 of the Communications Act and its implementing rules (“CPNI Rules”). This Policy should be interpreted in all respects as being consistent with and requiring adherence to Section 222 and the CPNI Rules.

I. COLLECTION OF CPNI

The Communications Act applies CPNI rules to our regulated Voice and Internet services, to the extent each such service is subject to CPNI requirements. FCC orders apply the CPNI rules to our Voice services which are classified as interconnected Voice over Internet Protocol (“VoIP”) communications services.

The Communications Act authorizes us to use, disclose, or permit access to individually identifiable CPNI in our provision of: a) the telecommunications services from which this information is derived; or b) services necessary to, or used in, the provision of these services, including the publishing of directories. The Communications Act prohibits SFW from using CPNI for any purposes other than those listed above except as permitted or required by law or with your approval.

The following are some examples of CPNI that SFW collects to configure and support your services: a) the location of your service; b) the technical configuration of service; c) type of service; d) the quantity of your service; e) the amount of use of your service; and f) your calling patterns.

We also collect and maintain certain other information about your account. For example, this information may include: a) your account number; b) billing, payment, and deposit history; c) additional service information; d) customer correspondence and communications records; e) maintenance and complaint information; f) the device identifiers and network addresses of equipment used with your account; g) records indicating equipment provided to support your services; and h) additional information about the service options you have chosen.

Some of our services permit you to establish secondary accounts, and if you do so SFW may collect similar information in order to establish and service such secondary accounts. During the initial provisioning of our services, and during any subsequent changes or updates to our services, SFW may collect technical information about your equipment, including computer hardware and software, modems, telephones, or other service-related devices.

II. SFW USE OF CPNI

SFW collects, maintains, and uses CPNI as permitted by the Communications Act and other applicable laws. We use this information primarily to conduct business activities related to providing you with our Internet and Voice services.

The Communications Act further permits SFW to use, disclose, and permit access to CPNI obtained from our customers, either directly or indirectly, to: a) initiate, render, bill, and collect for telecommunications services; b) protect our rights and property, and protect our users of these services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, these services; and c) provide any inbound telemarketing, referral, or administrative services to you for the duration of the call, if you initiated the call and you approve of the use of this information to provide these services.

SFW may not use CPNI to market products and services to you other than enhancements to services you already have without your approval in accordance with our policies described below.

III. SFW DISCLOSURE OF CPNI

SFW may disclose to others personally identifiable information in connection with features and services such as Caller ID, 911/E911, and directory services as follows:

a) SFW may transmit your name and/or telephone number to be displayed on a Caller ID device unless you have elected to block such information.¹ SFW may provide your name, address, and telephone number to public safety authorities and their vendors for inclusion in E911 databases and records, inclusion in “reverse 911” systems, or to troubleshoot 911/E911 record errors.

¹ Please note that Caller ID blocking may not prevent the display of your name and/or telephone number when you dial certain business or emergency numbers, 911, 900 numbers, or toll-free 800, 888, 877, 866 or 855 numbers.

b) SFW may publish and distribute, or cause to be published and distributed, telephone directories in print, on the Internet, and on disks. Those telephone directories may include customer names, addresses, and telephone numbers, without restriction to their use.

c) SFW may also make customer names, addresses, and telephone numbers available, or cause such customer information to be made available, through directory assistance operators.

d) SFW may provide customers' names, addresses, and telephone numbers to unaffiliated directory publishers and directory assistance providers for their use in creating directories and offering directory assistance services.

e) Once our customers' names, addresses, and telephone numbers appear in telephone directories or directory assistance, they may be sorted, packaged, repackaged and made available again in different formats by anyone. SFW will take reasonable precautions to ensure that non-published and unlisted numbers are not included in our telephone directories or directory assistance services, but we cannot guarantee that errors will never occur.

IV. REQUIREMENTS FOR SFW TO DISCLOSE CPNI AND MAKE APPLICABLE OPEN INTERNET DISCLOSURES

SFW may be required by law to disclose CPNI about a customer. SFW may legally make such disclosures without customer consent or customer notice consistent with the terms of valid legal process such as a subpoena, court order, or search warrant.

SFW may be required to disclose CPNI to a private third party in response to a court order, and, if so, we are required to notify the customer of the court order. SFW may also be required to disclose CPNI about Internet and Voice customers to a government entity in response to a subpoena, court order, or search warrant, for example. We are usually prohibited from notifying the customer of any disclosure of personally identifiable information to a government entity by the terms of the subpoena, court order, or search warrant.

SFW, in addition to required CPNI disclosures, will also make all disclosures required by the FCC's Open Internet Rules, where applicable, with respect to SFW Internet service, including: disclosing the price, all fees, and any data caps or allowances that limit SFW Internet services; disclosing network performance data, including packet loss rates; disclosing the impact of other data services on the Internet service; and disclosing to consumers whether their use of the service will trigger a network practice.

V. CUSTOMER ACCESS AND CHOICE

If a customer makes an affirmative, written request for a copy of your CPNI, SFW will disclose the relevant information we have by sending it to your account address of record, or to any person authorized by you, if we reasonably believe the request is valid.

Please be advised, however, that SFW does not generally provide customers with records of any inbound or outbound calls or other records that we don't furnish in the ordinary course of

business (*e.g.*, as part of a customer invoice) or which are available only from our archives, without valid legal process such as a court order.

Moreover, SFW cannot correct any errors in customer names, addresses, or telephone numbers appearing in, or omitted from, our or our vendors' directory lists until the next available publication of those directory lists. Further, we may have no control over information appearing in the directory lists or directory assistance services of directory publishers or directory assistance providers. SFW reserves the right to charge you for the reasonable cost of retrieving and photocopying any documents that you request.

VI. CUSTOMER APPROVAL OF SFW'S USE OF CUSTOMER CPNI

Periodically, SFW may like to use the CPNI information we have on file to provide you with information about our other communications-related products and services or special promotions. Our use of CPNI may also enhance our ability to offer new services tailored to your specific needs. Therefore, you may be asked during a telephone call with one of our representatives for your oral consent to SFW's use of your CPNI for the purpose of providing you with an offer for new communications-related services. If you provide your oral consent for SFW to do so, SFW may use your CPNI only for the duration of that telephone call in order to offer you additional services. If you deny or restrict your approval for us to use your CPNI, there will be no effect, now or in the future, on how we provide any services to which you subscribe.

SFW reserves the right to send you promotional or commercial e-mail to the extent permitted by law. SFW may also send, for example, e-mail announcements about a pricing change, a change in operating policies, a service appointment, or new features relating to one of our services you receive from us. You may not opt-out of these service-related communications. If you fail to check your primary e-mail address for service-related announcements, you may miss important information about our services, including legal notices, for example.

If you have questions, concerns, or suggestions related to our Privacy Policy or our privacy practices, please do not hesitate to contact us at:

Southern Fiber Worx, LLC
1216 E 13th Ave
Cordele, GA 31015
229-271-7925

Version 1.0 Effective August 1, 2016