



## CUSTOMER PROPRIETARY NETWORK INFORMATION POLICY

Tele-Data Solution LLC, d/b/a/ Tele Cloud or Tele Cloud, LLC ("Tele Cloud") is committed to maintaining the privacy of its customers. Tele Cloud is obliged to provide Customer with protections to certain information about how Customer uses its Services. However, that information can help us customize and improve Services Tele Cloud offers to Customer.

In this section, Tele Cloud describes what information Tele Cloud protects and how it is protected.

### CPNI PROTECTIONS

As a customer of Tele Cloud Services, Customer has the right, and Tele Cloud has a duty, under federal law, to protect the confidentiality of certain types of Services, including: (1) information about the quantity, technical configuration, type, destination, location, and amount of Customer's use of its Services, and (2) information contained on Customer's telephone bill concerning the Services Customer receives. That information, when matched to Customer's name, address, and telephone number is known as "Customer Proprietary Network Information," or "CPNI" for short. Examples of CPNI include information typically available from telephone-related details on Customer's monthly bill, technical information, type of Service, current telephone charges, long distance and local Service billing records, directory assistance charges, usage data and calling patterns.

### APPROVAL

From time to time, Tele Cloud would like to use the CPNI information it has on file to provide Customer with information about Tele Cloud's communications-related products and Services or special promotions. Tele Cloud's use of CPNI may also enhance its ability to offer products and Services tailored to Customer's specific needs. Accordingly, Tele Cloud would like Customer's approval so that Tele Cloud may use this CPNI to let Customer know about communications-related Services other than those to which Customer currently subscribes that Tele Cloud believes may be of interest to Customer. **IF CUSTOMER APPROVES, CUSTOMER DOES NOT HAVE TO TAKE ANY ACTION; CUSTOMER'S SIGNATURE ON THE SERVICE AGREEMENT SIGNIFIES CUSTOMER'S CONSENT THAT TELE CLOUD MAY USE AND DISCLOSE CPNI AS DESCRIBED HEREIN.**

However, Customer does have the right to restrict Tele Cloud's use of Customer's CPNI. **CUSTOMER MAY DENY OR WITHDRAW TELE CLOUD'S RIGHT TO USE CUSTOMER'S CPNI AT ANY TIME BY CALLING 908-851-0444.** If Customer denies or restricts its approval for Tele Cloud to use Customer's CPNI, Customer will suffer no effect, now or in the future, on how Tele Cloud provides any Services to which Customer subscribes. Any denial or restriction of Customer's approval remains valid until Customer's Services are discontinued or Customer affirmatively revokes or limits such approval or denial.

In some instances, Tele Cloud will want to share Customer's CPNI with its independent contractors and joint venture partners in order to provide Customer with information about Tele Cloud's communications-related products and Services or special promotions. Prior to sharing Customer's CPNI with its independent contractors or joint venture partners, Tele Cloud will obtain written permission from Customer to do so.

### CUSTOMER AUTHENTICATION

Federal privacy rules require Tele Cloud to authenticate the identity of its customer prior to disclosing CPNI. Customers calling Tele Cloud can discuss their Services and billings with a Tele Cloud representative once that representative has verified the caller's identity. There are three methods by which Tele Cloud will conduct Customer authentication:

- 1) by having the Customer provide a pre-established password and/or PIN;

- 2) by calling the Customer back at the telephone number associated with the Services purchased; or
- 3) by mailing the requested documents to the Customer's address of record.

Passwords and/or PINs may not be any portion of the Customer's social security number, mother's maiden name, amount or telephone number associated with the Customer's account or any pet name. In the event the Customer fails to remember their password and/or PIN, Tele Cloud will ask the Customer a series of questions known only to the Customer and Tele Cloud in order to authenticate the Customer. In such an instance, the Customer will then establish a new password/PIN associated with their account.

## **NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES**

Tele Cloud will be notifying Customer of certain account changes. For example, whenever an online account is created or changed, or a password or other form of authentication (such as a "secret question and answer") is created or changed, Tele Cloud will notify the account holder. Additionally, after an account has been established, when a Customer's address (whether postal or e-mail) changes or is added to an account, Tele Cloud will send a notification. These notifications may be sent to a postal or e-mail address, or by telephone, voicemail or text message.

## **DISCLOSURE OF CPNI**

Tele Cloud may disclose CPNI in the following circumstances:

- When the Customer has approved use of its CPNI for Tele Cloud or Tele Cloud and its joint venture partners and independent contractors (as the case may be) sales or marketing purposes.
- When disclosure is required by law or court order.
- To protect the rights and property of Tele Cloud or to protect Customer and other carriers from fraudulent, abusive, or unlawful use of Services.
- When a carrier requests to know whether Customer has a preferred interexchange carrier (PIC) freeze on its account.
- For directory listing Services.
- To provide the Services to the Customer, including assisting Customer with troubles associated with its Services.
- To bill the Customer for Services.

## **PROTECTING CPNI**

Tele Cloud uses numerous methods to protect Customer's CPNI. This includes software enhancements that identify whether Customer has approved use of its CPNI. Further, all Tele Cloud employees are trained on the how CPNI is to be protected and when it may or may not be disclosed. All marketing campaigns are reviewed by a Tele Cloud supervisory committee to ensure that all such campaigns comply with applicable CPNI rules.

Tele Cloud maintains records of its own and its joint venture partners and/or independent contractors (if applicable) sales and marketing campaigns that utilize Customer CPNI. Included in this, is a description of the specific CPNI that was used in such sales or marketing campaigns. Tele Cloud also keeps records of all instances in which CPNI is disclosed to third parties or where third parties were allowed access to Customer CPNI.

Tele Cloud will not release CPNI during Customer-initiated telephone contact without first authenticating the caller's identity in the manner set-forth herein. Violation of this CPNI policy by any Tele Cloud employee will result in disciplinary action against that employee as set-forth in Tele Cloud's Employee Manual.

## **BREACH OF CPNI PRIVACY**

In the event Tele Cloud experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require Tele Cloud to report such breaches to law enforcement. Specifically, Tele Cloud will notify law enforcement no later than seven (7) business days after a reasonable determination that such breach has occurred by sending electronic notification through a central reporting facility to the United States Secret Service and the FBI. A link to the

reporting facility can be found at: [www.fcc.gov/eb/cpni](http://www.fcc.gov/eb/cpni). Tele Cloud cannot inform Customer of the CPNI breach until at least seven (7) days after notification has been sent to law enforcement, unless the law enforcement agent tells the carrier to postpone disclosure pending investigation. Additionally, Tele Cloud is required to maintain records of any discovered breaches, the date that Tele Cloud discovered the breach, the date carriers notified law enforcement and copies of the notifications to law enforcement, a detailed description of the CPNI breach, including the circumstances of the breach, and law enforcement's response (if any) to the reported breach. Tele Cloud will retain these records for a period of not less than two (2) years.

#### **NOTIFICATION OF CHANGES TO THIS POLICY**

If Tele Cloud changes this CPNI Policy, Tele Cloud will post those changes on <https://tele-datasolutions.com/Tele-Cloud Terms> or in other places Tele Cloud deems appropriate, so that Customer can be aware of what information Tele Cloud collects, how Tele Cloud uses it, and under what circumstances, if any, Tele Cloud disclose it. If Customer decides to continue receiving its Services after Tele Cloud makes any changes to this the CPNI Policy, Customer shall be deemed to have given express consent to the changes in the revised policy.