

## WHITE CLOUD COMMUNICATIONS PRIVACY NOTICE

**Scope:** WHITE CLOUD COMMUNICATIONS US, LLC has put in place the following privacy policy to inform our cable customers of our practices regarding personally identifiable information that may be collected, used and/or disclosed while providing our cable television services. We are providing you with this customer privacy notice pursuant to the federal Cable Communications Policy Act of 1984, as amended (the "Cable Act"). If you have any questions regarding this policy, please contact us at:

**White Cloud Communications**  
**Attn: Cable Service Privacy**  
**4890 KNOB CREEK RD**  
**BROOKS, KY 40109**

Please be advised that your use of other services provided by White Cloud Communications, such as White Cloud Communications' high-speed data service and White Cloud Communications' telephone service, is subject to separate privacy policies. Please review White Cloud Communications' privacy policies relating to the provision of these services to fully inform yourself of our privacy practices.

In this privacy notice, we use the terms "White Cloud Communications," we," us," or "our" to include the White Cloud Communications operating company that owns, operates or manages the cable system in your area.

**Privacy and Personally Identifiable Information:** White Cloud Communications collects and maintains personally identifiable information concerning our cable customers. Personally identifiable information is information that, when associated with an individual, identifies that individual. It does not include aggregate data that does not identify a particular person. The types of information that may constitute personally identifiable information include: customer name, addresses, such as service, billing and e-mail addresses, telephone number, home ownership or rental information, social security number, driver's license number, bank account number, credit card number, billing and credit records, service maintenance and repair records, service subscription and system transaction information, customer correspondence, marketing information and customer complaints. For customers that subscribe to our interactive cable services, in order to provide these services, we may also collect additional personally identifiable information and/or certain aggregate information as further described below.

**Collection and Use of Personally Identifiable Information:** We collect personally identifiable information from our customers when: (a) you voluntarily provide information to us; or (b) it is necessary to (i) provide cable or other services to you or (ii) detect or prevent unauthorized reception of services. Absent your prior written or electronic consent, we only use our cable system to collect personally identifiable information for these purposes.

We collect and use personally identifiable information for billing and customer service purposes, including to install, provide and enhance our services to you; confirm receipt of requested services and service changes; anticipate, identify and resolve problems with your service; communicate with you about service issues, billing and collection, enhanced features, and new products or service offerings; protect the security of our facilities, equipment, customers and/or services, including to detect unauthorized reception of services; ensure compliance with applicable laws and the terms, conditions and policies governing our services; and to maintain our business, tax and accounting records. We may also collect and maintain service research containing customer satisfaction and viewing interests. This research may be obtained from customer inquiries or questionnaires and may be maintained separately from customer personally identifiable information.

White Cloud Communications may use your personally identifiable information, in conjunction with information available from other sources, to market new services or products to you that we believe may be of interest to you or that may enhance or optimize your service features. If you do not want to receive White Cloud Communications promotional or marketing information calls or direct marketing other than bill stuffers, please contact the White Cloud Communications office.

We may also combine personally identifiable information we have obtained in accordance with this privacy notice with other publicly available information (such as census and household information), information obtained from our affiliated entities or other third parties, or with other aggregate information. We may use this information to create an enhanced customer database, to research and/or update our service features, or we may segment personally identifiable information to create separate customer lists or to separate aggregate information. Aggregate information that we may collect or create does not identify individual customers.

If you have subscribed to interactive cable television services offered by White Cloud Communications, in order to provide such services, the cable television system may automatically collect certain information to operate specific features or offerings. Most of this information is not personally identifiable and operates through aggregate identifiers through your remote control or set-top box. This information may include, but is not limited to, selections of electronic listings, guides, menus or programming; changes to your channels; or timing or on-demand features. If you make a pay-per-view request or purchase a product or service using the your cable television service, the system may collect certain personally identifiable information, such as account and billing-related information, so you may properly receive and be billed for the product or service.

**Disclosure of Personally Identifiable Information:** We may disclose personally identifiable information about you to others if you provide written or electronic consent in advance or if the disclosure is required or authorized by law or legal process. Specifically, federal law allows us to disclose personally identifiable information to third parties when: (a) it is necessary to render, or conduct a legitimate business activity related to, the cable services provided to you; (b) disclosure is required or authorized by court order or other legal process; or (c) disclosure is of the names and addresses of subscribers for mailing lists or other purposes (subject to a subscriber's right to prohibit or limit such disclosure).

Disclosures necessary to render or conduct a legitimate business activity include, but are not limited to, disclosures to connect and utilize your cable or other services, fulfill requested transactions, personalize your cable experience, properly service, maintain and bill your account, to help research, develop and offer new and enhanced services provided by White Cloud Communications and/or its affiliates, and to prevent fraud or other unlawful service activity. Persons that may have authorized access to personally identifiable information include, but may not be limited to, White Cloud Communications employees and sales agents; businesses that provide services to White Cloud Communications, such as our accountants, attorneys, consultants, billing and collection services, program and program guide providers, software and other service suppliers, which may periodically audit subscription information, strategic partners offering or providing products or services jointly or on behalf of White Cloud Communications, or entities affiliated with us through common ownership or control. In addition, if we enter into a merger or sell all or a portion of our assets, customer personally identifiable information likely will be among the items transferred as part of the transaction. The frequency of disclosures to these parties varies according to business or legal needs. For example, information for billing purposes is generally provided on a monthly basis. Information for other purposes may be provided on a daily basis.

Consistent with the requirements found in the Cable Act, the Electronic Communications Privacy Act ("ECPA") and other federal laws, we may disclose personally identifiable information to representatives or agents of government or other authorized persons. We will disclose such information pursuant to a warrant, court order, administrative subpoena, other legal process or requirement, or voluntarily if we reasonably believe that an emergency involving immediate danger of death or serious injury to any person justifies disclosure of the information or if such disclosure is otherwise required or authorized under applicable law. The Cable Act provides, however, that, except under certain circumstances, prior to disclosing personally identifiable information to a government entity pursuant to a court order, (i) the government entity must offer clear and convincing evidence that the subject of the information is reasonably suspected of engaging in criminal activity and that the information sought would be material evidence in the case, and (ii) the affected cable subscriber must be afforded the opportunity to appear and contest such disclosure in a court proceeding relevant to such order.

Unless you object, the law allows us to disclose your name and address for non-cable service related mailing lists or other purposes. We may disclose this limited information to charities, marketing organizations and other businesses or third parties. Such disclosures may not be in a form that reveals the extent of any viewing or other use you make of the cable service or other service we provide, nor may it disclose the nature of any transaction you make over the cable system. If you do not wish to have your name and address disclosed, even in this limited manner, or if you wish to limit the circumstances in which we will disclose it, please present your request in writing to the White Cloud Communications business office.

If federal law requires, we will provide you with additional notice of any disclosures identified above.

**Access to Personally Identifiable Information:** As a customer, you may review personally identifiable information held by us that pertains to you if you give us a reasonable period of time to prepare the information for review. (Preparation is sometimes necessary to avoid disclosure of information relating to other customers.) If you wish to review your personally identifiable information, please contact us by letter or telephone. We will then gather and prepare your personally identifiable information and arrange a time for you to come in to your local White Cloud Communications business office during normal business hours to examine this information. You may request correction of any errors in personally identifiable information that we collect or maintain pertaining to you. Upon such request, we may require that you submit a reasonable showing that such personally identifiable information we have collected or maintained about you is inaccurate. We reserve the right to determine, in our sole discretion, whether or not to make changes to a customer's personally identifiable information that we maintain in our business records. We also reserve the right to charge for copies of documents you request.

**Length of Personally Identifiable Information Retention:** White Cloud Communications retains personally identifiable information for as long as it is necessary for the purpose for which it was collected, to comply with laws governing our business, including tax and accounting laws, or to satisfy pending requests or orders for access by subscribers, the government or pursuant to court order or other lawful process. These retention requirements apply while you are a White Cloud Communications customer and may continue for a period of time after you are no longer a subscriber. When information is no longer necessary for the above purposes, we destroy it.

**Changes to These Privacy Practices:** White Cloud Communications will review our privacy practices as we deem appropriate and/or when we update or change our cable or other services. We reserve the right to modify this privacy notice at any time. We will inform you of any changes that we make to this notice by posting changes in a revised privacy notice that will be made available to you through our service, postal mail or other means as permitted by law. As required by the Cable Act, we will provide you with a copy of this customer privacy notice at the time we enter into an agreement to provide any cable service or other service to you and annually thereafter, or as otherwise permitted by law. If you find the changes unacceptable, you have the right to cancel your cable service. Use of White Cloud Communications' cable services following notice of changes or revisions to these privacy practices constitutes your acceptance to the revised privacy provisions.

**Your Rights Under Federal Law:** If you believe that we have violated the Cable Act's provisions regarding the collection, disclosure or retention of personally identifiable information, you have the right to bring an action against us in Federal District Court, including the right to seek recovery of statutory damages and attorney's fees.

If you have any questions: Write us, call us or come into the White Cloud Communications office.