

DOOR COUNTY BROADBAND, LLC PRIVACY POLICY AND YOUR CALIFORNIA PRIVACY RIGHTS

Last Updated and Effective: June 7, 2018

Introduction: What This Privacy Policy Covers

Your privacy is important to Door County Broadband, LLC (“DCB”, “we” “us,” or “our”) and DCB is committed to protecting the privacy of and seek to provide a safe and secure experience for you. We developed this privacy policy (this “Privacy Policy”) so you know how we collect, use, disclose, and dispose your information through the DCB Internet website (the “Site”) and any DCB Internet connection services, voice telephony services, and other related services purchased by you (collectively, the “Services”). This Privacy Policy together with the Terms and Conditions to Wireless Internet Services Provider Agreement, the Broadband Acceptable Use Policy and DMCA Copyright Infringement Notification Process (“BB AUP”), the Voice Over Internet Protocol (“VoIP”) Service Agreement & Terms and Conditions, the VoIP Acceptable Use Policy (“VoIP AUP”), and the Open Internet Policy (collectively, “Service Agreements”) govern your use of the Site and Services.

By accessing the Site or purchasing any of the DCB Services, you signify your acceptance of this Privacy Policy. Please read through this Privacy Policy to familiarize yourself with our privacy practices. If you disagree with the way we collect, use, disclose, and dispose of personally identifiable information (“Personal Information”), do not use the Site or any of the DCB Services.

DCB’s Site and Services are designed and targeted to United States audiences and are governed by and operated in accordance with the laws of the U.S. If Customer is not a U.S. citizen or does not reside in the U.S., Customer voluntarily consents to the collection, transfer, use, disclosure and retention of Customer Personal Information in the U.S. Customer also agrees to waive any claims that may arise under Customer’s own national laws.

Your California Privacy Rights. Generally, California residents are entitled by law to ask DCB for a notice identifying the categories of Personal Information that DCB shared with its Affiliates and/or other third parties for their marketing purposes the preceding year, and provide contact information for such Affiliates and/or third parties unless DCB meets certain exceptions in the law. This Privacy Policy and Site meet those exceptions. therefore, if Customer resides in California and Customer has an established business relationship with DCB, Customer may request information about DCB’s opt-out and out-in policies of sharing Customer Personal Information with other companies (including Our Affiliates) for their marketing purposes. Please send Customer’s written request via email or postal mail following the instructions below. **DCB will not accept requests via the telephone or facsimile or respond to requests that are not labeled or sent properly, or do not have complete information.**

- For all requests, include Customer’s full name, street address, city, state and zip code.

- In an email request, Customer must state **“Re: Your California Privacy Rights”** in the subject line and send Customer email to info@doorcountybroadband.com.

- In a postal request, Customer must send a letter or post card to:

Door County Broadband Inc.

2590 Triax Parkway

Baileys Harbor, WI 54202

Attention: Your California Privacy Rights

- **Type of Information Collected.**

When you use the Site or register for the Services, or visit our Facebook page or other social network platforms, we may collect a variety of information from you, which depending on the circumstances may include Personal Information such as your name, mailing address, landline or mobile telephone number, primary and alternate e-mail addresses, billing and payment information, such as your credit card and billing address, birth date, education, occupation, income, marital status, ethnicity, gender and other household and demographic information. Personal Information also includes information directly associated with or reasonably linked to a specific person, computer or device, such as IP Address, mobile device, or call detail for VoIP services. We may also collect information related to your use of the Site and the Services, such as: how often you visit the Site and browser information, how often you use the Services, how you navigate and conduct searches on the Site and your interaction with advertisements and other links contained within our Site.

We may also collect Non-Personal information which does not reveal your specific identity or does not directly identify a specific individual or device, such as: software, process type, operating system, navigational data, information collected through Cookies (as further described below), Web Beacons (as further described below) and other technologies, or through third parties using similar technologies.

IP Address and other persistent device identifiers such as cookies, plus the nature of any of Customer devices or other personal property using the Site and Services, and web-browsing or app usage history are traditionally classified as Non-Personal Information but could be classified as Personal Information when such information is either 1) linked to a specific person, computer or device; 2) is required by applicable law to be classified as Personal Information; or 3) is combined with other Personal Information.

- **Cookies.** We use “cookies” to customize your experience with the Site and Services, and to store your information so you do not have to re-enter them each time you visit this Site or access the Services. When you access the Site, we may send one or more cookies – small text files containing a string of alphanumeric characters – to your computer. DCB may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the S. Persistent cookies can be removed. Please review your web browser “Help” file to learn the proper way to modify your cookie settings.

- **Web Beacons.** We also use “web beacons” to collect information about your use of the Site, the websites of third parties, and the Services. Web Beacons are tiny graphic image files embedded in a web page or email that provide a presence on the web page or email and send back to its home server information from the Customer’s browser. The information collected by Web Beacons allows us to statistically monitor how many people are using the Site. Although we reserve the right to monitor activity of the Site and Services, we will not intentionally disclose any private email messages or online communication between you and a third party, except in the following circumstances: (i) when we believe, in our sole discretion, you are acting in violation of our Service Agreements or any applicable law, rule or regulation; or (ii) to protect the integrity of the Services or the Internet community as a whole.

- **Use, Sharing and Disclosure of Your Information.**

- **How We Use Your Information.**

We use the Personal Information and Non-Personal Information we collect in a variety of ways, including, but not limited to: (i) to operate and improve the Site and Services; (ii) to fulfill a transaction or request; (iii) for internal purposes, such as confirming and tracking your order, subscription or registration, and for billing purposes; (iv) to understand your use of the Site and Services; (v) to better tailor and target advertisements and content to you while you are on and off the Site; (vi) to communicate with you; (vii) to provide customer support services, (viii) to offer you products and services including offers from third parties; (ix) to conduct research; and (x) to develop research reporting for us, our affiliates and third party market research partners. DCB may also combine and use Personal Information with additional data obtained from our Facebook pages or other social network platforms. We will also use your landline and/or mobile telephone number to send you pre-recorded messages and/or texts regarding service outages or other urgent notices.

We monitor the DCB Network for security threats and will monitor a Customer’s use of the DCB Network for certain activity that we may deem, in our sole and reasonable discretion, poses a potential risk to any DCB Network and/or to other Customers. Triggering conditions include but are not limited to denial of service activity, IP Address or port scanning, excessive account login failures; or certain Internet addresses that are disruptive, malicious and typically persistent. We will also use your Personal Information for the compliance and enforcement of state and federal laws, including but not limited to laws that prohibit copyright infringement, invasion of privacy, hate speech and other harmful or risky conduct or content.

- **How We Share Your Information.**

We may share your Personal Information, including in some cases information that specifically identifies you such as your name, your email address, your physical address or telephone number, with our Affiliates and trusted third party partners in the following ways: (i) to help operate the Site and Services; (ii) to facilitate fulfillment of a transaction or request; (iii) to serve

you advertisements and to improve the effectiveness of targeted advertising; or (iv) to provide research reporting for us, our affiliates and third party partners. Customers and non-Customers may also voluntarily share your Personal Information with us via a live chat customer service feature or other interactive features.

Examples of third party partners include our VoIP service provider and vendors who process credit card payments, service providers who compile and analyze data collected by us, service providers who supplement or match information we have collected with information from other parties, market research companies, advertisers, call centers, and email support vendors. Upon entering into relationships with these third party partners, we implement reasonable contractual and technical protections to limit the use of your Personal Information to the scope of the service. When we share aggregated and disaggregated reporting information about the use of and users of the Site and Services (e.g., market research data), including search and URL information, to Affiliates and third party partners, we do not intentionally disclose Personal Information.

In addition, we may share Personal Information in the following circumstances: (i) without notice, to law enforcement or government agencies in response to subpoenas, court orders, or other regulatory or legal process (including civil and criminal) or otherwise as required by law; (ii) in order to investigate, prevent, or take enforcement action regarding illegal activities, suspected fraud, and situations involving potential threats or harm to any person, the DCB Network, Site, or other company assets, or in cases where we believe our Service Agreements have been/are being violated; or (iii) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all of DCB's business, assets or membership units.

- **Links and Third Parties' Privacy Practices.**

This Privacy Policy applies to the Site and Services only. When you visit websites to which we link, or if you click on third party advertisements that appear on our Site, you will be interacting with a third party that operates under its own privacy and security policies. For example, a third party website will have its own policy regarding the use of cookies and web beacons or collection of your information. If you choose to obtain products or services from such third parties, the data collected by the third party is governed by that third party's privacy policy. We encourage you to review the privacy policies of any other website from whom you request products or services.

- **How We Keep Your Information Secure.**

We use secure socket layer ("SSL") technology to protect your Personal Information. SSL encrypts your Personal Information as additional protection against the decoding of that information by anyone other than us. However, despite all reasonable security precautions and processes, such as password protection, encryption technology, and use of firewall technology,

no data transmission over the Internet can be guaranteed to be one hundred percent (100%) secure. As a result, while we strive to protect all information we collect and process, we cannot guarantee or warrant the security of any information you transmit to or from our Site, and you do so at your own risk. Once we receive your transmission, we will take commercially reasonable precautions to protect its security on our systems.

Additionally, although DCB is committed to taking commercially reasonable precautions to protect the security of your Personal Information we store on our systems, it is your obligation to protect the privacy of information you send over the Internet or information you store on your computer. DCB does not warrant that any equipment or supplies provided by DCB in connection with your use of the Services will protect your home network from any cyber-attacks.

- **How You Can Modify, Update or Delete your Account Information.**

To prevent unauthorized access to your account and Personal Information, we will need to authenticate your identity first. In other words, we need to know you are who you say you are to prevent identity theft or the theft of Personal Information. In addition to your name, address and account number, we will also require you to provide a unique password, a PIN, and/or answer a security question. Only then will you have the ability to modify, update and/or delete your Personal Information, and receive other account information by contacting us via telephone. Current subscribers may not delete any Personal Information. Former subscribers may be able to delete Personal Information from active status depending on the services you subscribed to. However, we will retain Personal Information for business and legal reasons for at least seven (7) years.

- **Time Period That We Retain Information.**

We maintain Personal Information about you for as long as it is necessary for business purposes. This period of time may last as long as you are a subscriber to any Services and, if necessary, for additional time so that we can comply with tax, accounting and other legal requirements. When Personal Information is no longer needed for these purposes, it is our policy to destroy or anonymize it. Further, upon termination of the Services, DCB will maintain your IP Address for at least six (6) months.

- **Your Opt In and Opt Out Choices.**

If you are a subscriber to the Services, you may exercise your opt out option not to receive email marketing communications from DCB by: (i) clicking the links under communications preferences on the bottom of these email marketing communications or (ii) contacting DCB via telephone regarding your opt in or opt out choices. Your opt out choices will remain in effect until you change them. You cannot opt out of receiving administrative or transactional communications from DCB because they communicate information that affects your customer account.

Because DCB does not provide network advertising (see below for definition), DCB does not recognize the “Do Not Track” settings on various Internet browsers. DCB does not engage or allow third parties to track you across the Internet and across time for advertising purposes. “Network Advertising” is advertising based on Customer’s overall Internet usage across different third party websites or online services. Multiple third party websites and online services are involved in this tailored or personalized advertising process, in essence a “network” of advertising providers.

Changes and Updates in Technology. Technology is improving every day and to improve DCB’s operations, functions, and Services, DCB may introduce new technologies and monitoring techniques without advance notice or consent from Customer. DCB may also use third party providers to conduct such internal functions and analyses.

- **Minors’ Use of the Services.**

DCB believes it is important for parents and guardians to participate in and monitor their children’s use of the Internet. DCB offers general audience Site and Services and these Site and Services are not intended for children under the age of thirteen (13). If we have actual knowledge that a user is under the age of thirteen (13), we require the parent or guardian to provide parental consent as required by the Children’s Online Privacy Protection Act (“COPPA”). DCB will not use or disclose Personal Information from children under thirteen (13) except as may be permitted under COPPA.

IX. Changes to the Privacy Policy.

This Privacy Policy and the Service Agreements may be changed at any time at the sole discretion of DCB. Your continued use of our Site or Services will signify your acceptance of the changes to this Privacy Policy. Notification of any changes to this Privacy Policy will be posted on the DCB home page and/or member start page, unless further steps are required by law. If you have any questions about this Privacy Policy please contact us at: info@dcb.us.com.