

## BREEZELINE CUSTOMER PRIVACY NOTICE

Revised January 10, 2022

This Customer Privacy Notice describes our practices with respect to information Breezeline collects, uses, shares, and protects as part of the services we provide to our customers. The terms “Breezeline,” “us,” “we” or “our” refers to Cogeco US Finance, LLC d/b/a Breezeline and its applicable operating entity that provides service to you, the customer. This Customer Privacy Notice applies to Breezeline customers and their use of Breezeline’s broadcast and cable TV and digital music services (“Video Services”), Internet and voice services. Depending upon the Breezeline service which you receive, parts of this Customer Privacy Notice may not be applicable to you. Use of Breezeline’s applications, website, any subdomains, and its various related features, is governed by Breezeline’s Mobile Application Agreement and its Website Privacy Policy, both of which can be found at [www.breezeline.com](http://www.breezeline.com) (or any successor URL) (the “Website”).

Breezeline considers the privacy of our customers to be very important. Section 631 of the Federal Cable Communications (“FCC”) Policy Act of 1984, as amended (the “Cable Act”), provides certain protections to you as a customer to Video Service or other services provided by Breezeline. In accordance with the Cable Act, this Customer Privacy Notice explains the following:

- the limitations imposed by the Cable Act upon Breezeline in its collection and disclosure of personally identifiable information about you;
- the type of personally identifiable information we collect about you;
- how we use your personally identifiable information;
- under what circumstances we may disclose your personally identifiable information and to whom we may disclose it;
- the duration for which we maintain your personally identifiable information; and
- how you may access your personally identifiable information in our possession.

### Information We Collect

Breezeline collects information about our customers from several sources. This includes personally identifiable information that identifies a specific person. Personally identifiable information does not include any information that has been de-identified or aggregated so that it does not identify individual customers. We ask you to provide some data directly to us when you sign up for a service. We also collect information about your use of our products, services, and sites. In addition, we collect data from third-party companies, and we may combine this third-party data with the data we have collected. We collect this information in order to provide and improve our products and services and better tailor them to meet our customers’ needs, and to develop and offer new products and services. We maintain customer records to enable us to better serve our customers. The types of information we collect are set forth below.

### What Information We Collect

- *Registration information.* When you register with us or sign up for our products or services, we require you to provide to us information about your entity, including all or some of the following: your legal entity name, a contact/representative name, service and billing address, email address, telephone number, tax identification number, billing and credit records, and bank account and credit card numbers used to pay for our services.
- *Account and technical information.* In order to provide you with services, we collect and maintain some or all of the following: your account number, billing, payment and deposit history, services to which you subscribe, maintenance and complaint information, device identifiers and network addresses of equipment used with your account, the number of television sets, set-top boxes, modems, telephones, routers and other devices connected to our cable system and other service-related information.
- *Communications with us.* When you contact us by email, chat or by telephone, we collect information, including your name/entity name, business address, email address, telephone number, and billing or account information; we also retain customer correspondence and communication records.
- *Use of our services.* When you use our Video Service, our equipment automatically collects information about your use of the services and features, including your use of set-top boxes, remote controls, electronic program guides, video players, applications, tablets and other devices and software that are connected to our cable system or other services. This information includes which channels, programs and advertisements are viewed and for how long. When you use our digital video recording (“DVR”) service, our DVR partner collects information about you, including personal and viewership information, to provide that service. When you use our Internet and voice services, we may transmit, collect, and store information about you for a period of time related to your use of our services and features. This information may include your email; instant messaging activity; file transfers and sharing; web browsing; telephone activity including voicemails; custom settings or preferences; and communications with us for support; or other uses of our services and features. Depending on how you access our services, we may also collect voice recordings to the extent you use a voice-operated device to navigate or make selections. While the data collected from your devices may be attributable to your business, general audience measurement data concerning viewing habits is de-identified or aggregated with other customer data and does not reflect names/entity names or addresses. When necessary, account and

billing information is collected for specific transactions, such as purchasing a pay-per-view program or other service.

- *Location data.* If the device you use to access our services supports location-based services, and you choose to enable sharing the device's location, we may collect your device's location for certain purposes. If you do not want us to collect your device's location, you can disable location services on your device using the device settings.
- *Data from other sources.* We may collect additional data, including demographic and billing or credit history, from other sources. We also use customer surveys, questionnaires, and interviews to gather information about your interests and use of our products and services.

### **How We Collect Data**

We may collect data using a number of different technologies. Some of this data you provide, such as when you sign up for our service, use eCare to pay your bill, or when one of your representatives send us an email. Some of this information we collect when you access our services. The information may come from the equipment Breezeline provides to you or it may come from equipment you may own that you use to access those services. For instance, if you subscribe to our Video Service, our set-top boxes automatically collect information related to audience measurement. Similarly, if you watch TV online using your, customer-owned computer, tablet, or smartphone, we may collect data about the type of browser or operating system being used, your IP address(es), and other information.

### **How We Use Data**

We use the information we collect primarily to conduct business activities related to providing you with our service(s) and to help us detect theft of service. Below are specific ways in which we use customer information:

- to install, configure, operate, upgrade, support and maintain our services;
- to provide billing, account maintenance, product and service repair and to provide customer service to you;
- to monitor and detect against fraud or abuse of our products and services and to protect against harm to us or our customers; we also use this data to determine whether there are violations of any applicable policies and terms of service;
- to provide you with accurate and high-quality customer service, authenticate access to your account, and enable technical support;
- to properly deliver your services and protect the security of the system;
- to communicate with you, in response to your inquiries and customer service requests, to notify you about your account and subscription information, to inform you of software and security updates, and to create offers and contact you about other products or services that may be of interest to you; we may combine this data with third-party data to allow us to customize products and services to a particular geographic area;
- to serve you more efficiently, we retain certain business and service records, as well as customer correspondence and communication records;
- to market and advertise;
- to manage the network supporting our services;
- to measure credit and payment risks;
- to enhance and improve our offerings and their functionality, to provide you with personalized offers and features, and tailor our services to make them more useful and enjoyable for you;
- to personalize your settings on our products and services so that you don't have to change these settings each time you use them;
- to measure Internet service performance, including network and connection performance, device configuration, and other service related data; and
- to protect our rights, personnel, and property; and to comply with applicable law.

We may also use:

- viewership information to customize and personalize television service offerings. Viewership information may be used to determine which shows are most popular, how many people watch a program to its conclusion, and whether people are watching commercials. An analysis of this information helps improve our Video Service and other services and make programming and advertising more relevant to our customers; it also allows us to distribute and deliver relevant programming and advertising to you without disclosing personally identifiable information about you to programmers or advertisers; and
- activity data associated with particular devices, such as set-top boxes, portable devices and other supported devices so that we know where to deliver the services and how to troubleshoot them. Activity data may be used to help us learn how popular certain programs are and how our customers as a whole generally prefer to view certain kinds of programming using Video Service, including whether customers like to watch certain programs live, on demand, on mobile devices or online. This may require us to compare or combine activity data on our cable system with online activity data. We may also use activity data to determine whether promoting content and services in certain ways helps attract a larger audience and more customers. We may

compare or combine information, such as activity data, we receive when you use Video Services to view content or advertising with information about your use of content and advertising that we deliver on other platforms, such as DVR devices, websites and mobile applications. We do this to better understand how our customers access and use our products and services in all of the places that we offer them.

### **How We Share Data**

Except as described in this Customer Privacy Notice, we do not share your personal data without your consent. We may share or disclose your information in the following ways:

- as necessary to render or conduct a legitimate business activity related to the services we provide to you, as described in this Customer Privacy Notice;
- within the Breezeline family of companies, including with affiliates and subsidiaries or to others who work for us, we may also disclose information about you to outside auditors, professional advisors, service providers, vendors and regulators, or as part of a corporate transaction, such as a merger or sale of the business' assets;
- with third party service providers, vendors, and partners that help us with various business purposes, such as offering, marketing, providing, billing for, and maintaining or repairing our network, products and services;
- with other outside companies to deliver advertising campaigns and to conduct analytics, as described in this Customer Privacy Notice;
- with law enforcement agencies and other parties as required by law or to respond to lawful requests; these disclosures may be made with or without the customer's consent, and with or without notice, in compliance with the terms of legal process, such as subpoenas, court orders or search warrants;
- in order to protect against fraud, abuse, or harm or to protect our interests; and
- in order to protect our customers, employees, or property, in emergency situations, to enforce our rights under our terms or service and policies in court or elsewhere, and as otherwise permitted by law.

When we allow third-party service providers to transmit, collect and store information on our behalf to provide features of our services or to perform services on our behalf, these third parties are not permitted to use your information except for the purpose of providing these features or services. The same applies when we provide information to third-party service providers working on our behalf, such as audience measurement or market research firms, or programmers.

In addition, we may share customer lists, activity data associated with particular devices, or certain de-identified or aggregate information with third-party service providers. This information may be combined with aggregated or non-aggregated demographic information (such as census data) and other audience attributes, such as purchasing data, demonstrated interests (such as a preference for sports programming), loyalty programs, organizational affiliations, advertiser customer lists and similar data to provide us with audience analysis data. Our third-party service providers may provide such de-identified or aggregate audience measurement data to others, including advertisers, so that they may better focus their advertising resources. We may also work with academic or research interest groups to analyze de-identified information we provide to them for specific purposes or projects. We, or third parties working on our behalf, may combine demographic and other generally available information or advertiser information with our customer lists. Aggregate reports are then generated to reflect how groups of customers with common characteristics, such as age and gender or a demonstrated interest in a particular product, use our services and respond to the programming and advertising that we distribute. We may use this information to improve and communicate with you about our own products and services and also to help us deliver relevant information and advertising on behalf of other companies and advertisers to certain customer groups who may be most interested in this information and advertising. When we do this, we do not share your personally identifiable information with these advertisers, unless you provide your express consent. We may also combine information about you from our business records with information obtained from third parties to create a database, which we use in marketing and other activities related to our services.

The Cable Act authorizes Breezeline to disclose limited personally identifiable information to others for cable or non-cable "mailing list" or other purposes. Although we do not generally provide mailing lists to third parties, we may disclose your name/entity name and address for these purposes. However, you have the right to prohibit or limit this kind of disclosure by sending us a written request as described below. Any "mailing list" and related disclosures that we may make are limited by the Cable Act to disclosures of customer names/entity names and addresses where the disclosures do not reveal, directly or indirectly, (i) the extent of any viewing or other use by the customer of a Video Service or other service provided by us; or (ii) the nature of any transaction made by the customer over the cable system.

In connection with voice service, such as Caller ID, 911/E911, and directory services, we may disclose your information as follows:

- We may transmit your name, entity name and/or telephone number to be displayed on a Caller ID device unless you have elected to block such information. 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, 855 or 844 numbers.

- We may provide your name/entity 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.
- We may publish and distribute, or cause to be published and distributed, telephone directories in print or on the Internet. Those telephone directories may include customer names/entity names, addresses and telephone numbers, without restriction to their use.
- We may also make customer names/entity names, addresses and telephone numbers available, or cause such customer information to be made available, through directory assistance operators.
- We may provide customers’ names/entity names, addresses and telephone numbers to unaffiliated directory publishers and directory assistance providers for their use in creating directories and offering directory assistance services.

We take reasonable precautions to ensure that non-published and unlisted numbers are not included in telephone directories or directory assistance services, but we cannot guarantee that errors will never occur.

The Cable Act also requires us to disclose personally identifiable information to a third-party or governmental entity in response to certain subpoenas, search warrants, court orders, or otherwise authorized by law. In some cases the government may be required to obtain a court order to obtain certain information about your account and provide you notice and an opportunity to appear and contest the government’s claims.

### **How We Protect Your Data**

We endeavor to follow industry-standard practices to prevent unauthorized access to personally identifiable information. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use or disclose personally identifiable information.

### **Protecting Children’s Privacy**

Our websites, products, and services are not directed to children under 13. We do not knowingly collect personally identifiable information about children under 18 unless expressly specified.

### **Third-Party Products & Services**

Our products and services may enable you to access other websites, services, mobile applications, virtual and voice-activated assistances, home automation, or other third-party products or services. Our websites, products, or services may even contain direct links to or permit you to access other websites and services that are not offered or maintained by Breezeline. The privacy policies of those third parties apply to your access and use of those websites, products and services and to the information they collect about you. We encourage you to be aware when you leave our service or surf the Internet, and to read the privacy statements of the websites and services that you visit.

### **How Long We Retain Personally Identifiable Information**

Breezeline maintains personally identifiable information about you in our regular business records while you are a customer to our services. We also maintain this information for a period of time after you are no longer a customer if the information is necessary for the purposes for which it was collected or to satisfy legal requirements. These purposes typically include business, legal or tax purposes.

### **Accessing Personal Information**

You may see the information that we collect about you. You can access and update some of the personal information we collect about you through your account with us by logging into your account with your username and password. You may also schedule an appointment at your local business office to see your personally identifiable information. Please send us a written request at the address below or to the business office address listed on your monthly bill, and we will make an appointment for you to come in during our regular business hours. Customers utilizing our voice services should be aware that we generally do not provide them with records of any inbound or outbound calls or other records that we don’t maintain in the ordinary course of business or which are available only from our archives, without valid legal process such as a court order. If your review reveals an error in our records, we will correct it, to the extent within our control (for example, we cannot control information in telephone directories).

### **CPNI**

Federal law and FCC rules provide additional protections for “Customer Proprietary Network Information” or CPNI, which includes the quantity, technical configuration, type, destination, location, and information regarding the use of your telecommunications services, such as your voice service. CPNI does not include your name or entity name, business address, or telephone number. Under federal law, we may use CPNI in connection with the provision of the telecommunications service from which the information is derived; to bill and collect for voice service; to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services; to provide maintenance or repair services; to protect our rights or property; as expressly authorized by the customer; or as otherwise

permitted by law and regulation.

Occasionally, you may be asked during a phone call with one of our representatives for your oral consent to Breezeline's use of your CPNI for the purpose of providing you with an offer of products or services. If you provide your oral consent for Breezeline to do so, Breezeline may use your CPNI for the duration of such phone call in order to offer you additional services. Any action that you take to deny or restrict approval to use your CPNI will not affect our provision to you, now or in the future, of any service to which you subscribe.

### **Communication Preferences**

You may opt out of receiving marketing communications from Breezeline at any time. To opt out of marketing communications sent by email, you may use the "unsubscribe" link at the bottom of any such email, or you may send your request in writing. You may also prohibit our permitted disclosure of your mailing list information to third parties under the Cable Act (except as otherwise required by legal process or applicable law) by notifying us in writing. Such requests should be sent to the address provided below.

You may opt out of receiving marketing communications by telephone by notifying the calling party that you wish to opt out or by following the automatic opt-out instructions on such a call. You may also opt out of such calls by sending a request in writing to the address below.

### **What Other E-Mail Communications Will Breezeline Send Me?**

We may send a welcome e-mail and sometimes other information to new customers to our services. We may also send service-related announcements to our customers from time to time. We may send you an e-mail announcement of pricing changes, changes in operating policies, a service appointment or new features of one or more of the services you receive from us. You may not opt out of these service-related communications. If you fail to check the e-mail address that you have provided to us, you may miss important information about our services, including legal notices. We reserve the right to send you promotional or commercial e-mail as permitted by applicable law. You can manage the promotional or commercial e-mails we may send to you by following the instructions contained in the e-mails.

### **Changes to Customer Privacy Notice**

We may update this Customer Privacy Notice from time to time. We will notify you of any changes by posting the updated Customer Privacy Notice online. If you object to a change, you may cancel your service. If you continue to use the service following notice of the changes, we will deem that to be your acceptance of and consent to the changes in the revised Customer Privacy Notice. This includes your consent for any personally identifiable information that we may collect and use starting on the effective date of the revised notice, as well as for any personally identifiable information that we have collected prior to the effective date of the revised notice. We will provide you with a copy of the current Customer Privacy Notice at the time you subscribe to our service, and each year that you continue to be a customer.

### **How Do I Contact Breezeline?**

If you have any questions regarding this Customer Privacy Notice, or if believe that your privacy rights have been violated in any way, please contact us directly at the address below. If you believe that your rights under the federal law have been violated, you may bring a private civil action in U.S. District Court to recover damages, costs, and attorneys' fees.

Breezeline ATTN:

Privacy Officer

3 Batterymarch Park, Suite 200

Quincy, MA 02169

### **Corporate Privacy Commitment**

Breezeline also abides by the principles of the [Corporate Privacy Commitment](#), containing the essential principles of the Cogeco Group's commitment to privacy.