

**BREEZELINE  
CUSTOMER PRIVACY NOTICE**

**Revised February 1, 2024**

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 ("customer," "subscriber," "you" or "your"). The terms "Breezeline," "us," "we" or "our" refer to the Breezeline entity that provides service to you. This Customer Privacy Notice applies to Breezeline cable TV, Internet and phone service subscribers and their use of [MyAccount](#) portal, [Online Payment](#) portal, and the [ECare](#) portal. Use of Breezeline's website at [www.breezeline.com](http://www.breezeline.com) and its subdomains (including the MyAccount portal and Online Payment portal available through the website), mobile applications, and their various related features are also governed by Breezeline's [Website and Mobile Application User Agreement](#).

Breezeline considers the privacy of our customers to be very important. Section 631 of the Federal Cable Communications Policy Act of 1984, as amended (the "Cable Act"), provides certain protections to you as a subscriber to cable 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 that includes personally identifiable information of a specific person, but personally identifiable information does not include any information that has been de-identified or aggregated so that it does not identify individual customers. We also collect information about your use of our products, services, and websites. In addition, we collect demographic and other data about customers from third-party data sources. The types of information we collect are set forth below.

- *Registration information.* When you register with us or sign up for our products or services, we require you to provide to us information about yourself, including all or some of the following: your name, service and billing address, e-mail address, telephone number, billing, and credit records. Bank account and credit card numbers used to pay for our services are provided to a third payment processor that we use to facilitate payments as described in more detail below.
- *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 e-mail, chat or by telephone, we collect information, including your name, address, e-mail address, telephone number, billing or account information, and any other information you choose to share with us; we also retain customer correspondence and communication records.
- *Use of our services.* When you use our cable TV 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 service, our DVR partner collects information about you, including personal and viewership information, to provide that service. When you use our Internet and phone 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 e-mail; 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 household,

general audience measurement data concerning viewing habits is de-identified or aggregated with other customer data and does not reflect names or addresses. When necessary, account and billing information is collected by us or our third-party payment processor for specific transactions, such as purchasing a pay-per-view program or other service.

- *Customer damage claims.* If you submit a damage claim concerning any of our products or services, we require you to provide to us information about the damage, the circumstances concerning damage, and certain information about yourself for purposes of processing the claim and any payments to you related thereto, including: your name, billing address, and your social security number in connection with receiving a payment.
- *Authentication.* If there is any reported fraud on your account, we may require a copy of residency documents (such as your lease agreement) to authenticate your name, phone number, and service address.
- *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 our business 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. We may also serve you cookies and advertising based on a location we associate with your IP address and zip code.
- *Data from third-party data sources.* We may collect data about you from third-party data sources, including demographic information and billing or credit history.
- *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 from you during a range of interactions and using a number of different technologies. Some of this data you provide, such as when you sign up for our service, send us an e-mail, or use our websites or Breezeline mobile applications to pay your bill. Some of this information may be submitted by you at a Breezeline marketing event, or it may be provided by you to a Breezeline representative over the phone or during a visit to your home. Some of this information we collect when you access our services, including from the equipment Breezeline provides to you as well as from equipment you may own that you use to access those services. For instance, if you subscribe to our cable TV service, our set-top boxes automatically collect information related to audience measurement. Similarly, if you watch TV online using your own computer, tablet, or smartphone, we may collect data about the type of browser or operating system you are using, your IP address, and other information.

We also create a hashed common identifier for subscribers in order to use cross-device tracking to analyze subscriber activities and usage across our websites, mobile applications, and products and services. This data from cross-context and cross-device linking is collected and used by Breezeline on an aggregated basis.

### **How We Use Data**

We use the information we collect primarily to conduct business activities related to providing you with our cable service and other services 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 cable service and other 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 subscribers; 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 and call center support, 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;
- to serve you more efficiently, we retain certain business and service records, as well as customer correspondence and communication records;
- to market and advertise, including the use of targeted advertising to facilitate personalized marketing concerning equipment refresh programs and other marketing campaigns that may fit your interests or preferences;
- to manage the network supporting our services;
- to measure credit and payment risks;

- to verify you are meeting eligibility criteria for participation in the Affordable Connectivity Program or Lifeline Program, if these criteria are applicable to you;
- 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 also combine third party data with the data we have collected about customers in order to provide and improve our products and services, to customize products and services to a particular geographic area, to better tailor them to meet our customers' needs, to maintain the security and integrity of our products, services, and websites, and to develop and offer new products and services. We maintain customer records to enable us to serve our customers and for our regulatory, audit and compliance purposes. The types of information we collect are set forth herein.

#### **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 cable TV service and other services and make programming and advertising more relevant to our subscribers; 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 generally prefer to view certain kinds of programming using cable video service, including whether they 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 cable TV 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 the places where 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;
- within the Breezeline family of companies, including with our parent company Cogeco Communications Inc. ("Cogeco") and with subsidiaries and other affiliates; we may also disclose information about you to outside auditors, professional advisors, regulators, or as part of a corporate transaction, such as a merger or sale of business assets;
- with third party service providers, vendors, and partners that help us with various business purposes, such as providing our products and services, marketing and advertising campaigns, to conduct analytics, billing, and maintaining or repairing our network, products and services;
- 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 subscriber's consent, and with or without notice, in compliance with the terms of legal process, such as subpoenas, court orders or search warrants;
- to protect against fraud, abuse, or harm, or to protect our interests; and
- to protect our customers, employees, or property, in emergency situations, to enforce our rights under our Website and Mobile Application User Agreement or other 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 (such as audience measurement or market research), these third parties are not permitted to use your information except for the purpose of providing these features or services. Third-party service providers collect and/or receive personally identifiable information about you in connection with providing services to us.

In addition, we may share subscriber 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 subscriber 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 to help us deliver relevant information and advertising on behalf of other companies and advertisers to certain subscriber 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 cable service and other 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 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 subscriber names and addresses where the disclosures do not reveal, directly or indirectly, (i) the extent of any viewing or other use by the subscriber of a cable service or other service provided by us; or (ii) the nature of any transaction made by the subscriber over the cable system. In connection with phone service, such as Caller ID, 911/E911, and directory services, we may disclose your information as follows:

- We may transmit your 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, 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 subscriber names, addresses and telephone numbers, without restriction to their use, which means this information may be scraped or otherwise obtained and used by third parties.
- We may also make subscriber names, addresses and telephone numbers available, or cause such subscriber information to be made available, through directory assistance operators.
- We may provide subscribers' 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 as 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 unauthorized attempts to access, use, obtain or disclose personally identifiable information about our customers.

## **Payment Processing**

We use a third-party payment processor to process credit and debit card transactions you initiate with us through the Online Payment portal available through our website to pay service fees and/or order other products or services. Your credit or debit card information is never shared with us, and at no point in any transaction will we have access to that 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 13 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 statements and 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 browse the Internet, and to read the privacy statements and policies 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 subscriber to our cable service or other services. We also maintain this information for a period of time after you are no longer a subscriber 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 information we collect about you through your online account with us (such as your e-mail address and bill-to address) by logging into MyAccount with your username and password. Subscribers to our phone 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 Federal Communications Commission 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 telephone service. CPNI does not include your name, address, and 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 telephone 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 e-mail, you may use the "unsubscribe" link at the bottom of any such e-mail, 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 subscribers to our cable service and other services. We may also send service-related announcements to our subscribers 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 cable service or other 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 subscriber.

**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 are a Maine resident or business, please also read the [Additional Privacy Rights for Maine Residents and Businesses](#). 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](#) published by Cogeco, containing the essential principles of the Cogeco Group's commitment to privacy.