

# PRIVACY POLICY

NDTC respects your privacy. When you use our website or subscribe to one or more of our services, NDTC collects personal information. This policy addresses the collection and use of your personal information.

## Information Collected

In the course of doing business and through the offering of services, NDTC will collect personal information that is not limited to but can include your name, home and billing address, telephone numbers, Social Security number, credit information or other necessary information to provision those services.

## Use of Information

Protecting our customer privacy is important to us. NDTC has strict privacy policies in place and utilizes the latest technologies to safeguard your information from unauthorized disclosures. NDTC does not share any of this information with third parties unless required to do so by law. NDTC may use personal information, also known as Customer Proprietary Network Information (CPNI), to market new service offerings or features to augment services you already have. NDTC will not use this information if you restrict its use as described in the CPNI section below.

## Links to Other Sites

NDTC contains many links to third-party sites. NDTC is not responsible for the privacy practices of third-party sites. Once you leave our website, NDTC has no control over your privacy. Please review the privacy statement of each and every website you visit to ensure your personal privacy with respect to third-party offers. The inclusion of any link on an NDTC web site does not imply any specific recommendation, approval or endorsement of the third party by NDTC.

## Security

The privacy of information transmitted over the Internet cannot be guaranteed by NDTC, because the Internet is not 100% secure. Nevertheless, NDTC has taken technical, administrative, and physical steps to protect against unauthorized access to Customer Information and other Personally Identifiable Information used to administer NDTC's customer accounts. All such information is handled securely within NDTC and is not disclosed to unauthorized third parties.

## Use of Cookies

A "cookie" is a small piece of information sent by a web server to store on a web browser so it can later be read back from that browser. This is useful for having the browser remember some specific information.

## Protecting Your Children

NDTC's website does not target or market to children. We respect the privacy of your children and comply with rules established under the Children's Online Privacy Protection Act. NDTC does not knowingly collect or retain personal information from consumers under the age of eighteen. Children should always get permission from a parent or guardian before sending personal information over the Internet. You can find more information about protecting children's privacy by contacting the Federal Trade Commission (FTC) or by viewing its website at <http://www.ftc.gov>.



## Changes to this Policy

NDTC reserves the right to change the terms and conditions of this policy at any time. When changed, the terms and conditions will be posted at NDTC's website at [gondtc.com](http://gondtc.com).

## Customer Proprietary Network Information (CPNI)

From time to time, North Dakota Telephone Company (NDTC) changes its service offerings and makes available additional features and services, which may enhance and augment the services to which you are already subscribed.

In order for us to determine which customers may benefit from the new services and enhancements, we will use information about your account that is within our database, legally referred to as Customer Proprietary Network Information (CPNI), unless you restrict that use in the manner described below. CPNI includes information such as which long distance carrier and plan to which you are subscribed, calling features and plans to which you are subscribed, and the associated charges for those plans. Use of this data will allow NDTC to tailor its service offerings to your individual needs.

For this purpose, CPNI data will be used by NDTC and its subsidiaries and affiliates only. This data will not be shared by NDTC with any other outside source except as necessary and required to provide the service(s) to which you are already subscribed, unless we are legally compelled to do so.

You have a right under federal law to protect the confidentiality of your account information and restrict the use of CPNI data, and we have a responsibility to protect your data. To restrict the use of your CPNI data, you may contact our business office at 662-1100 or [service@ndtel.com](mailto:service@ndtel.com). Your denial of approval for NDTC to use this data will not affect the provision of any service to which you subscribe. Your approval or denial of approval for the use of CPNI outside of the service to which you already subscribe will remain valid until you revoke or limit the approval or denial.

## NDTC CommandIQ App

### How NDTC Collects Your Information

NDTC collects and processes information provided directly by you when you install the NDTC CommandIQ App and register for an account to use the App. Specifically, this information includes:

- Your name, email address, password/PIN, location and phone number.
- Browser information and session cookies related to your access to and use of the App.
- Data insights NDTC obtains based on correlation and analytics of your information collected in providing the App, which may be used in aggregated and dis-aggregated formats or to obtain trend analytics, to provide the App, and
- Use of the above-described collected information in aggregated and dis-aggregated formats to enhance our current App or to provide App features.

### How NDTC Uses the Information

NDTC uses the information collected as described in this Privacy Policy, including personal information, to:

- Provide you with the App as described in the Agreement.
- Implement, improve, and/or enhance the App, including to make future releases available to you.
- Carry out NDTC obligations as described or authorized in the Agreement and this Privacy Policy.
- Enforce NDTC rights arising from the Agreement between you and NDTC and
- Fulfill any other purpose authorized by you and reasonably required for the App.



## Your Choices About Our Collection, Use, and Disclosure of Information

The provisions of the information described in this Privacy Policy are necessary for you to use the App.

Your information is retained and used as described in this Privacy Policy. Active subscriber data is retained for as long as the subscriber is active. Inactive subscriber data is retained for 3 months. If you delete your account from the App in accordance with the terms of the Agreement, your information will be deleted within 30 days of the deletion of such account or within such other timelines as may be mandated by applicable law. You will no longer be able to access the App when your account is deleted.

## Managing Your Personal Information

### **Accessing and Correcting Information**

You can (a) access and review your contact information, and (b) correct your contact information, by logging into the App and visiting the settings page.

To access, review or correct any other information, please reach out to NDTC at 701-662-1100 or [gondtc.com/contact-us](http://gondtc.com/contact-us).

### **Deleting Information**

You can delete your App account information by logging into the App, visiting the settings page and editing your Account and Admins page.

If you have any questions, contact NDTC at 701-662-1100 or [gondtc.com/contact-us](http://gondtc.com/contact-us).

