

## **Fond du Lac Communications Customer Proprietary Network Information (CPNI) policy**

Fond du Lac Communications is committed to maintaining the privacy of its customers. In addition to protecting your personal information as outlined in Fond du Lac Communications privacy policy, we are obliged to give additional protections to certain information about how you use our services. However, that information can help us customize and improve services we offer you.

### **CPNI PROTECTIONS**

As a customer of our services, you have the right, and Fond du Lac Communications has a duty, under federal law, to protect the confidentiality of certain types of services, including:

1. information about the quantity, technical configuration, type, destination, location, and usage of your services.
2. information contained on your telephone bill listing the services you receive. That information, when matched to your name, address, and telephone number is known as "Customer Proprietary Network Information," or "CPNI" for short. Examples of CPNI include information typically available from telephone-related details on your monthly bill, technical information, type of service, current telephone charges, long distance and local service billing records, directory assistance charges, usage data and calling patterns.

CPNI does not include aggregate information or data that is not specific to a single customer, customer premises equipment and Internet access services.

Unless Fond du Lac communications obtains your approval, Fond du Lac Communications may not use this CPNI to market products and services to you other than for services you currently purchase.

Customer proprietary network information (CPNI) is information related to the quantity, technical configuration, type, destination, location, and the type of telecommunications a customer uses that Fond du Lac Communications has access to by virtue of the customer-provider relationship. CPNI does not include the Customer name, address and telephone number. Fond du Lac Communications will only contact you for support related service.

However, you do have the right to restrict our use of your CPNI. You may deny Fond du Lac's right to use your CPNI information by calling 218 878 7337. If you deny or restrict your approval for Fond du Lac Communications to use your CPNI, you will suffer no effect, now or in the future, on how Fond du lac Communications provides any services to which you subscribe. Any denial or restriction of your approval remains valid until your services are discontinued or you affirmatively revoke or limit such approval or denial. In some instances, Fond du Lac Communications will want to share your CPNI with its independent contractors and joint venture partners in order to provide you with information about Fond du Lac's

Communications-related products, services or special promotions. Prior to sharing your CPNI with its independent contractors or joint venture partners, Fond du lac Communications will obtain written permission from you to do so.

## **CUSTOMER AUTHENTICATION**

Federal privacy rules require Fond du Lac Communication's to authenticate the identity of its customer prior to disclosing CPNI information. Telecommunications carriers may only disclose call detail information over the telephone, based on customer-initiated telephone contact, if the customer first provides the carrier with a password that is not prompted by the carrier asking for readily available biographical information, or account information. If the customer does not provide a password, the telecommunications carrier may only disclose call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record. If the customer is able to provide call detail information to the telecommunications carrier during a customer-initiated call without the telecommunications carrier's assistance, then the telecommunications carrier is permitted to discuss the call detail information provided by the customer. [47 C.F.R. § 64.2010(b)]

## **NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES**

Fond du Lac Communication's will be notifying customers of certain account changes. For example, whenever an online account is created or changed, or a password or other form of authentication (such as a "secret question and answer") is created or changed, Fond du Lac Communication's will notify the account holder. Additionally, after an account has been established, when a customer's address (whether postal or e-mail) changes or is added to an account, Fond du Lac Communication's will send a notification. These notifications may be sent to a postal or e-mail address, or by telephone, voicemail or text message.

## **DISCLOSURE OF CPNI**

Fond du Lac Communication's may disclose CPNI in the following circumstances:

- When the customer has approved use of their CPNI for Fond du Lac Communication's for joint venture partners and independent contractors for sales or marketing purposes.
- When disclosure is required by law or court order.
- To protect the rights and property of Fond du Lac Communication's or to protect customers and other carriers from fraudulent, abusive, or unlawful use of services.
- When a carrier requests to know whether a customer has a preferred interexchange carrier (PIC) freeze on their account.
- For directory listing services.
- To provide the services to the customer, including assisting the customer with troubles associated with their services.
- To bill the customer for services.

## **PROTECTING CPNI**

Fond du Lac Communication's uses numerous methods to protect your CPNI. This includes software enhancements that identify whether a customer has approved use of its CPNI. Further, all Fond du Lac Communication's employees are trained on the how CPNI is to be protected and when it may or may not be disclosed. All marketing campaigns are reviewed by a Fond du Lac Communication's supervisory committee to ensure that all such campaigns comply with applicable CPNI rules.

Fond du Lac Communication's maintains records of its own and its joint venture partners and/or independent contractors (if applicable) sales and marketing campaigns that utilize customer CPNI. Included in this, is a description of the specific CPNI that was used in such sales or marketing campaigns. Fond du Lac Communication's also keeps records of all instances in which CPNI is disclosed to third parties or where third parties were allowed access to Customer CPNI.

Fond du Lac Communication's will not release CPNI during customer-initiated telephone contact without first authenticating the Customer's identity in the manner set-forth herein.

## **BREACH OF CPNI PRIVACY**

In the event Fond du Lac Communication's experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require Fond du Lac Communication's to report such breaches to law enforcement. Specifically, Fond du Lac Communication's will notify law enforcement no later than seven (7) business days after a reasonable determination that such breach has occurred by sending electronic notification through a central reporting facility to the United States Secret Service and the FBI. A link to the reporting facility can be found at: <https://www.fcc.gov/general/cpni-breach-reporting-facility> Fond du Lac Communication's cannot inform its Customers of the CPNI breach until at least seven (7) days after notification has been sent to law enforcement, unless the law enforcement agent tells the carrier to postpone disclosure pending investigation. Additionally, Fond du Lac Communication's is required to maintain records of any discovered breaches, the date that Fond du Lac Communication's discovered the breach, the date carriers notified law enforcement and copies of the notifications to law enforcement, a detailed description of the CPNI breach, including the circumstances of the breach, and law enforcement's response (if any) to the reported breach. Fond du Lac Communication's will retain these records for a period of not less than two (2) years.

## **NOTIFICATION OF CHANGES TO THIS POLICY**

Fond du Lac communications may change this CPNI Policy, if changes are made we will post those changes on [www.aaniin.net](http://www.aaniin.net) or in other places we deem appropriate, given express consent to the changes in the revised policy.