



Privacy Policy

Pioneer Telephone Cooperative (dba Pioneer Connect) is committed to protecting the privacy of our members. We know that you place your trust in us, and we strive to provide a safe, secure Member experience. While there is certain subscriber information known as Customer Proprietary Network Information (CPNI) that Pioneer has a responsibility to protect, we also take great care to protect all of the information that you provide us.

This privacy statement sets forth the privacy policy that applies to Pioneer and its Members.

Telecommunications service information is referred to as Customer Proprietary Network Information (CPNI). Under Federal law, Pioneer has a duty to protect the confidentiality of your CPNI. This Privacy Policy, together with the Acceptable Use Policy, Terms and Conditions of service and the Network Management Policy, all posted on our website, set forth the general rules and policies governing your use of our Internet and Phone services. When you use our Internet and Phone Service, you agree to this Privacy Policy and other listed policies.

1. PRIVACY POLICY OVERVIEW

- (a) This Policy is designed to inform you of the types of information we collect from users, how we use that information, and the circumstances under which we will share it with third parties when users utilize the products and services (collectively, the "Services").
- (b) This Policy pertains to information collected only directly through the Website and does not apply to personal information collected from offline resources and. Our Services, and our collection, use, and disclosure of your information through this Website is governed by U.S. law. Accordingly, our Policy applies to Users who are located in the U.S. when visiting the Website.
- (c) We reserve the right at any time, and in our sole discretion, to change or modify this Policy. If any such changes or modifications are made, we will update the "Effective Date" on the document. Such changes or modifications shall be effective immediately upon posting to the Website and supersede any prior versions of this Policy. Your use of the Website or the Services provided through the Website following such changes or modifications shall constitute your acceptance of the Policy as last revised.

2. INFORMATION WE MAY USE TO SERVE YOU

- (a) The information we gather at Pioneer will not be shared with third parties unless necessary to make improvements to our products and services using consultants and vendors who will be contractually obligated to not further share this information.
- (b) Pioneer's website may contain links to other websites over which we have no control. We are not responsible for the privacy policies or practices of other websites to which you choose to link from our sites. We encourage you to review the privacy policies of those other websites so that you can understand the privacy of that website.

- (c) Pioneer may request that you provide personal information, including your name, address, e-mail address, telephone number, credit card number, social security number, contact information, billing information and any other information from which your identity is discernible.
- (d) We also gather or may gather certain information about your use of Pioneer products and services. There is also information about your computer hardware and software that is or may be collected by us. This information can include, without limitation, your IP address, MAC address(s), browser type, domain names, access times and referring website addresses.
- (e) We may use different types of technologies to collect this type of information, including but not limited to cookies.

3. USE OF YOUR INFORMATION

Except as expressly set forth in this Privacy Policy, Pioneer does not disclose your personal information to third parties, nor your combined personal and demographic information.

- (a) Pioneer uses the information we gather from you or when you visit our website, whether personal, demographic, collective, or technical, for operating and improving our service to you and notifying you of the products and services associated with providing you with the services that we offer.
- (b) Pioneer may use your contact information to send you e-mail or other communications regarding updates that relate to your Internet or telecommunications service or related products or services, otherwise correspond with you about our Services.
- (c) Pioneer discloses information to companies and individuals we retain to perform functions on our behalf, such as consultants or vendors that help maintain our services. For example, third parties that host our web servers that analyze data or that process credit card payments. These third parties will have access to your personal information as necessary to perform their functions that aid Pioneer's ability to provide telephone, Internet and other services, but they may not share that information with any other third party.
- (d) We may occasionally share your information with our affiliates, service providers, and other third parties that help to operate our business and this Website and deliver the Services available on or through the Website to: facilitate, improve, or outsource elements of our service or operation of the Website, including processing transactions, sending emails, and providing marketing assistance or analysis.
- (e) We may provide your information to or exchange your information with these service providers for use in their provision of services to us, such as fraud protection, compliance monitoring, or marketing analysis. These external service providers may not use your information for other purposes including their own marketing.
- (f) We aggregate information into statistics about Users, including their usage of the Website, traffic patterns, and demographics. We may provide third parties with such statistics, but such information does not constitute Personally Identifiable Information.
- (g) At times, we may be required by law or other circumstances that require Pioneer to disclose Personally Identifiable Information about you to nonaffiliated third parties, including:

1. To assist law enforcement or other governmental agencies investigating cases of possible illegal activities by third parties
2. To respond to subpoenas, court orders, legal process, and to establish or exercise Jade's legal rights to defend against legal claims.
3. To enforce or apply our agreements, and to protect the rights, property, or safety of our users or others.
4. To prevent or stop activity we may consider to be or to pose a risk of being illegal, unethical, or legally actionable activity.

4. CHILDREN'S PRIVACY

This website and Apps are not intended for children under 13 years of age, and Pioneer does not knowingly collect personal data of children under 13. If Pioneer learns that personal data from a child under 13 has been obtained or received without verification of parental consent, Pioneer will delete that information. If you believe Pioneer might have any information from or about a child under 13, please notify Pioneer immediately.

5. PRIVACY POLICY FOR APPS

This Privacy Policy also applies to the ConnectIQ App and other mobile apps that Pioneer may also use to provide you service. Please read this Privacy Policy carefully to understand how information collected by the App will be treated. If you do not agree with your Pioneer's Privacy Policy, you should not install, use, or access the App.

- (a) **Children Under the Age of 16.** This website and Apps are not intended for children under 16 years of age, and Pioneer does not knowingly collect personal data of children under 16. If Pioneer learns that personal data from a child under 16 has been obtained or received without verification of parental consent, Pioneer will delete that information. If you believe Pioneer might have any information from or about a child under 16, please notify Pioneer immediately.
- (b) **Your Choices About Our Collection, Use, and Disclosure of Information.** The provision of the information described in this Privacy Policy is necessary for you to use the App.
 1. Your information is retained and used as described in this Privacy Policy. If you delete your account for 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 timeline as may be mandated by applicable law. You will no longer be able to access the App when your account is deleted.
- (c) **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 your Pioneer.
- (d) **Data Security.** All information you provide to us is stored on our secure servers behind firewalls. Pioneer utilizes mechanisms such as intrusion detection systems, intrusion prevention systems, firewalls and encryption to secure information from accidental loss and from unauthorized access, use, alteration, and disclosure.

1. Pioneer deploys Intrusion Detection Systems (IDS) and Intrusion Prevention Systems (IPS) to alert and proactively contain potential threats. Enhanced security visibility and coverage is enabled through added layers of firewall and IDS beyond the network perimeter. Management connections to servers are always authenticated and encrypted via Secure Shell (SSH) when administration access is required for troubleshooting, patch management, and upgrades.
 2. Pioneer runs automated vulnerability scanning on all perimeter systems to identify potential security risks. Scanning applications are regularly updated to remain current and up to date on important security vulnerabilities. Patches are applied to all relevant systems unless a compensating control is implemented.
 3. Pioneer uses a variety of industry-standard security technologies and best practices to help protect information from unauthorized access, use, or disclosure. All data stored on the Pioneer systems is encrypted following industry standards using the strongest keys and ciphers. All communications with the App are protected with industry standard security protocols.
 4. You control access to your account. You must keep your login credentials and passwords secure and protected and maintained as confidential. Pioneer is not responsible for any circumvention of any privacy settings or security measures provided.
- (e) **How Pioneer Collects Your Information.** Pioneer collects and processes information provided directly by you when you install Apps and register for an account to use the Apps. Specifically, this information may include the following:
1. Your name, email address, password/pin, preferred language, and your account number with Pioneer;
 2. Information about the equipment deployed at your premises that you choose to connect to the App such as the MAC address, serial number or other unique identifier for your router;
 3. Data insights Pioneer attains based on correlation and analytics of your information collected in providing the App, and user-associated analytics to improve the quality of the app experience.
- (f) **How Pioneer Uses Your Information.** Pioneer may use the information collected as described in this Privacy Policy, to:
1. Provide you with the App and the Services/notifications provided through the App as described in the Terms and Conditions;
 2. Implement, improve and/or enhance the App or to provide App features, including to make future releases available to you;
 3. Carry out Pioneer's obligations as described or authorized in the Terms and Conditions and this Privacy Policy;
 4. Enforce Pioneer's rights arising from the Agreement between you and Pioneer;
 5. Fulfill any other purpose authorized by you and reasonably required for the App; and
 6. Use the information collected as described in this Privacy Policy, to inform you about goods and services that may be of interest to you.

6. HOW WE USE AND SHARE YOUR DATA

- (a) In addition to the uses listed in other sections of this Policy, the information you provide to us and automatically collected information is used to provide a number of different functions and services on our website and to provide an enhanced online experience for users. We collect information so we can identify you as our member, to establish, manage and protect your accounts, to verify your identity in the event that you lose or forget your website login credentials, to complete your transactions, to offer you Services you might be interested in, to personalize and improve upon your experience with us, and to comply with various legal and regulatory requirements.
- (b) This Policy applies only to this website. It does not apply to your use of any other websites (whether or not operated by us), including any websites to which we provide links or websites of our business partners. We are not responsible for the collection and use of information by companies or individuals unaffiliated with us whose websites may contain links to ours. Your browsing and interaction on any third-party website or service are subject to that third party's own rules and policies. We are not responsible for and will not be liable for such third parties' conduct, actions, omissions, or information handling or dissemination practices.
- (c) Third-party advertising companies may also be utilized by us to target display advertising to you once you leave the Website. These companies may use Non-Personal Identifiable Information about your visits to the Website in order to provide advertisements about goods and services that may be of interest to you. It is solely your obligation to review and understand the privacy practices and policies of these advertisers and their associated third parties. These advertisers and their associated third parties are independent entities over which Jade exercises no control. Jade is not responsible for, and will not be liable for, their conduct, actions, omissions, or information handling or dissemination practices. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by clicking here. Please note, this does not opt you out of being served advertising. You will continue to receive generic ads.

7. DISCLOSURE OF INFORMATION

- (a) Pioneer discloses information if legally required to do so, if requested to do so by a governmental entity, or if we believe in good faith that such action is necessary to conform to legal requirements or comply with legal process;
 - 1. protect our rights or rights and property of our affiliated companies;
 - 2. prevent a crime or protect national security; or
 - 3. protect the personal safety of one or more users or the public.
- (g) Pioneer may disclose and transfer information to a third party who acquires all or a substantial portion of our business, whether such acquisition is by way of merger, consolidation or purchase of all or substantial portion of our assets.

8. TESTIMONIALS

We may use customer testimonials, comments, or reviews of our Services from our Website or from social media for marketing purposes, which may contain personally identifiable information,

such as your name. We obtain the user's consent to use his/her personal information, along with the testimonial, prior to using the testimonial.

9. EMAIL OPT-OUT POLICY

By providing your email address through the Website and to Pioneer, you consent that Pioneer may send email to you regarding our Services. You can choose to opt out of receiving email communications from us by selecting to opt out by following the unsubscribe instructions in the email communication you receive from us.

10. OTHER USES AND INFORMATION

(a) **Statistical Information.** An IP address is a number that is automatically assigned to your computer/device whenever you are using the Internet. Web servers (computers that "serve up" web pages) automatically identify your computer/device by its IP address. When visitors request pages from our websites, our servers typically log their IP addresses. We collect IP addresses for purposes of system administration, to report non-personal aggregate information to others, and to track the use of our website. IP addresses are considered non-personal information and may also be shared as provided above. We reserve the right to use IP addresses and any personally identifiable information to identify a visitor when we feel it is necessary to enforce compliance with our website rules or to:

1. fulfill a government request;
2. conform with the requirements of the law or legal process;
3. protect or defend our legal rights or property, our website, or other users; or
4. in an emergency to protect the health and safety of our website's users or the general public.

(b) **Cookies.** "Cookies" are small text files from a website that are stored on your hard drive. These text files make using our website more convenient by, among other things, saving your passwords and preferences for you, along with the ability to personalize content and other services and functions. Cookies themselves do not typically contain any personally identifiable information. We may analyze the information derived from these cookies and match this information with data provided by you or another party. A cookie does not retrieve any data from your hard drive.

This website uses links to external websites and those websites may use cookies as well. Pioneer does not control use of these cookies from third-parties.

If you are concerned about the storage and use of cookies, you may be able to direct your internet browser to notify you and seek approval whenever a cookie is being sent to your hard drive. You may also delete a cookie manually from your hard drive through your internet browser or other programs. Please note, however, that some parts of our website will not function properly or be available to you if you refuse to accept a cookie or choose to disable the acceptance of cookies.

(b) **Mobile App.** Pioneer uses the information collected as described in this Privacy Policy, including personal information, to:

1. Provide you with the App and the Services/notifications provided through the App as described in the Terms and Conditions;
 2. Implement, improve and/or enhance the App or to provide App features, including to make future releases available to you;
 3. Carry out Pioneer's obligations as described or authorized in the Terms and Conditions and this Privacy Policy;
 4. Fulfill any other purpose authorized by you and reasonably required for the App.
 5. Use the information collected as described in this Privacy Policy, to inform you about goods and services that may be of interest to you.
- (c) **Email Communications.** If you send us an email with questions or comments, we may use your personally identifiable information to respond to your questions or comments, and we may save your questions or comments for future reference. For security reasons, we do not recommend that you send non-public personal information, such as passwords, social security numbers, or bank account information, to us by email. We may email you information regarding your services with Pioneer, important network information, along with email communications that relate to purchases you have made with us (e.g., product updates, customer support, etc.), other services we may offer, or you consented to be contacted by email for a particular purpose. In certain instances, we may provide you with the option to set your preferences for receiving email communications from us.
- (d) **Google Analytics Advertising Features.** We use Google Analytics to collect information about the use of the Website. Google Analytics collects information such as how often users visit the Website, what pages they visit when they do so, and what other sites they used prior to coming to the Website. We use the information we get from Google Analytics only to improve the Website. Google Analytics collects only the IP address assigned to you on the date you visit the Website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with Personally Identifiable Information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). You can prevent Google Analytics from recognizing you on return visits to this Website by [disabling the Google Analytics cookie](#) on your browser. You can also view and change the currently available opt-outs for Google Ads.

We also use the Google Ads remarketing service to advertise on third-party websites (including Google) to previous visitors to of our website. This could be in the form of an advertisement on other websites or on the Google search results page. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to the Website. Any data collection will be used in accordance with our own privacy policy and Google's privacy policy. You can set preferences for how Google advertises to you using [Google's Ads Settings](#). Alternatively, you can opt-out of a third-party vendor's use of cookies by visiting the [Network Advertising Initiative](#) opt-out page.

11. SECURITY MEASURES

- (a) Pioneer has put in place measures designed to secure your personal information from accident, loss, and from unauthorized access, use, alteration or disclosure. However, while we try to protect your personal information, we cannot guarantee or warrant the security of any information you disclose or transmit to us online. We are not responsible for the theft, destruction, or inadvertent disclosure of your personally identifiable information.
- (b) Transmissions over the Internet are never entirely secure, and we cannot guarantee the security or the preservation of the integrity of any transmitted data. Please consider this fact before transmitting via the Website any Personal Information or information that you consider confidential.

12. OTHER SITES

- (a) You may use our Internet service to link or otherwise access third-party websites that we do not control or maintain. There may even be links on our website to third-party websites. We are not responsible for the privacy practices and policies employed by any third party. You are encouraged to be aware of when you leave Pioneer's website. We further encourage you to read the privacy statements of all third-party websites before submitting any personally identifiable information on that website.
- (b) We may offer chat rooms, blogs, message boards, bulletin boards, or similar public forums where you and other users of our websites can communicate. The protections described in this Privacy Policy do not apply when you provide information (including personal information) in connection with your use of these public forums. We may use personally identifiable information and non-personal information about you to identify you with a posting in a public forum. Any information you share in a public forum is public information and may be seen or collected by anyone, including third parties that do not adhere to our Privacy Policy. We are not responsible for events arising from the distribution of any information you choose to publicly post or share through our websites.

13. MANAGING YOUR PERSONAL INFORMATION

- (a) You may have a right to correct, update, delete, or request access to the Personal Information that you have provided to us. You may submit the following [Request Form](#). These rights are limited and may not be available to you depending on where you are located.
- (b) For your protection, we will only implement requests with respect to Personal Information about you (not anyone else), and we may need to verify your identity before implementing your request. We may need to retain certain information for recordkeeping purposes, as required under applicable legal obligations. And even if you have a right to deletion, some of your information may remain within our systems and other records or archives, in compliance with applicable law.

14. CHANGES

If Pioneer decides to materially change our Privacy Policy, we will post those changes on the pioneer.net website so that you will always know what information is being gathered and how that

information might be used. We encourage you to review the Privacy Policy from time to time to be sure you know what the policy provides.

You may review, correct, update or change your member information at any time.

15. CONTACT US

If at any time, you have questions or concerns about this privacy statement or believe that we have not adhered to this privacy statement, please call us at 541.929.3135 (Philomath) or 541.563.3135 (Waldport) and speak to one of our Customer Experience Team Members.