



FairlawnGig® Customer Privacy Notice

As a FairlawnGig customer, you have a right to know what we do with your personal information that we obtain. We consider our treatment of such information to be a part of the trust you place in us by using our Internet service, or Phone Services ("Services"). This Customer Privacy Notice ("Notice") applies to customers of our Services. Use of the words "customer," "you" or "your" refers to any subscriber of a Service. We will update this Privacy Notice as needed. We collect and keep only the personal information of our customers that is needed to provide our services. We treat your information as private. We do not sell your information to others. We work to keep your information secure, and destroy it when it is no longer needed.

We provide this Notice when you first become a customer. This Notice includes information on: (1) the kind of information FairlawnGig collects, (2) how FairlawnGig uses personally identifiable information, (3) to whom FairlawnGig may disclose personally identifiable information; (4) how long FairlawnGig keeps personally identifiable information; (5) how you can inspect records pertaining to your personally identifiable information; and (6) your legal rights. The most up-to-date Privacy Policy is posted on our website at <https://www.fairlawngig.net/policies>. We encourage you to review our policies by visiting our website periodically for the latest information and updates. You can learn more about your privacy rights by visiting the websites of the Federal Trade Commission, www.ftc.gov, and the Federal Communications Commission, www.fcc.gov.

In providing services to you, we obtain certain "personally identifiable information": that is information that identifies you individually or can be reasonably used to identify you individually. Personally identifiable information may include one or more of the following: name, service address, billing address, telephone numbers, user IDs, passwords, EMAIL addresses, and credit card information. Personally identifiable information does not include de-identified, anonymous, or aggregate data that does not identify you individually. For example, information regarding your age would only be considered personally identifiable if it was combined with your name or other information that could identify you individually.

It is important to understand the difference between personally identifiable information and information that is not personally identifiable in order to understand protections granted to Internet and Phone subscribers under the Communications Act of 1934. The Communications Act allows us to collect personally identifiable information only:

1. If you consent, in advance, in writing or electronically;
2. in order to provide other services to you; or
3. to detect unauthorized reception.

Subject to certain exceptions, we may not disclose personally identifiable information about you, except as necessary to deliver the Services to you or other Services we provide to you in related business activities or with your consent. Prior to complying with a demand by a third party for information about you, we may notify you and you may have the right to oppose the disclosure in court. There are exceptions to this, such as disclosures to law enforcement agencies required by law. We explain below how we respond to requests from law enforcement agencies for disclosure of personally identifiable information.

Information We Collect

When you subscribe to our Services and interact with us as a customer, we collect both personally identifiable information and information that is not personally identifiable. We collect this information as part of our provision of the Services and keep business records that may include personally identifiable information. The collected information includes information that you may give us when you sign up for a Service or which is provided to us during the course of your relationship with us as a customer. This information includes, but is not limited to: name, service address, billing address, telephone numbers, user IDs, EMAIL addresses, names of spouses or relatives, credit card, debit card or bank account information. Additionally, we also maintain customer information concerning credit, billing and payments, maintenance and repair, equipment and services provided, and other service-related functions. In providing our Services, we may also collect information about computer hardware and software, modems, routers, associated electronic addresses, settings, and other preferences to aid in billing, maintenance, and customer support.

Internet Services

Like most Internet service providers, we automatically collect certain general information concerning your use, such as the Internet Protocol (IP) addresses assigned (an identifier assigned to your computer while online), MAC addresses (individual equipment identifiers) of equipment that is used, bandwidth used, system and connection performance, dates and times of access, and Internet resource requests. This type of information is generally retained for about six months. Since we cannot control websites or Internet services operated by third parties, we recommend that you review the terms of service and privacy policies of those websites and services.

Phone Services

We provide telephone services by "Voice over Internet Protocol" (VoIP). We do not listen to or record your calls. In providing telephone services, we do receive usage information, including numbers called and received and duration of calls. We retain this information for up to two years, as required by some authorities, and we treat all such information as private.

Generally, we collect only the personal information needed to provide the Services we offer with the quality of services you desire and deserve. It is also our policy to keep that information secure and to retain it only as long as needed for our business purposes or as the law may require. We take reasonable precautions to identify you or your authorized representative when we receive an inquiry about your account as permitted by law. We also take reasonable steps to protect personally identifiable information from unauthorized access.

Use and Sharing

Use Policy

We consider personally identifiable information confidential and use it only for the business purpose of providing our Internet and Phone services for such things as sales, installation, operations, administration, advertising, marketing, support, network management, maintenance, customer service, communications with you, billing and collection, and for accounting and tax purposes. We may also use such information to monitor for, detect, and protect against both fraud and unauthorized use of our services.

Sharing Policy

It is our policy not to disclose any personally identifiable information about you to others outside FairlawnGig and our affiliates, agents, vendors, business partners and others who assist us with providing services to you without your prior consent. We do not sell or provide your personal information to parties unrelated to the services we provide without your permission. You can also notify us in writing if you prefer not to receive certain types of marketing contacts from us. FairlawnGig sometimes uses affiliates, vendors, or partners in providing our services and may provide personally identifiable information for such purposes. We require that third party vendors maintain at least the same level of confidentiality that we maintain.

In addition, any use by the vendor may not exceed that needed to provide its service. We do not share personally identifiable information with other third parties without your consent.

Special Exceptions

We reserve the right to disclose personally identifiable information if we have a good faith belief that it is necessary to: (1) comply with the law or legal process served on us; (2) protect and defend our rights or property or those of others; (3) respond to fraud, abuse, or unauthorized reception; (4) enforce our Website Visitors' Privacy Policy, our Acceptable Use Policy, or related standards; or (5) act in an emergency to protect your safety or that of another. We may also share or transfer personally identifiable information along with your account as a part of any sale or transfer of our business operations, merger or combination with another organization. In such a case, you will be notified of any changes in policy.

Retention Policy

FairlawnGig may retain personal customer information in its regular business records as long as you are a customer or until no longer needed for business, tax, or legal purposes. Once these purposes no longer apply, we destroy, de-identify or anonymize the information according to our internal policies and protections. Our security measures for this information are discussed on the next page.

Phone and Internet Services

Federal and some state regulations limit our use and sharing of certain information concerning a customer's telephone and Internet services relating to the quantity, technical configuration, type, destination, location, nature of telecommunications or Internet, or telephone toll service you receive, and the amount of your use of telephone or Internet service. This information is known as "Customer Proprietary Network Information" or "CPNI" and includes information on how you use our telephone and Internet services, such as your call patterns, service features, price plans, spending profiles, destinations, and related information. We do not disclose this information to unrelated parties, except as required by law.

Internet Services

We do not read your email messages, instant messages, online chats, listen to your "voice-over-Internet" calls, or read the content of other online communications that pass through our service. We may however, retain and provide such communications if we are legally required to do so.

Enforcement of Your Rights

Federal law (including 47 U.S.C. §§ 222 and 551) limits the information a cable, phone and broadband provider may collect, maintain, use and share. You may enforce your rights concerning our collection, maintenance, use and sharing of your CPNI. Among your remedies is the right to seek damages and reasonable costs and attorneys' fees.

Internet Security

Taking Proper Precautions

Maintaining the security of your personal computer and mobile devices is an important part of protecting your own privacy and of helping us protect our network and customers' service. You should follow our Acceptable Use Policy which is available at <https://www.fairlawngig.net/policies>. We recommend that you use and update regularly your antivirus software, firewall and your operating system to prevent unauthorized access by others and harm from various forms of viruses. You should regularly back up your computer to preserve your files, including EMAIL or other messages you want to keep.

Persons with questionable intent may use the Internet or email to pose as someone you trust or do business with. You should always be sure whom you are dealing with before clicking on an Internet link or giving personal information. To avoid all these and other forms of attacks, we encourage you to visit the Federal Trade Commission ("FTC") at www.ftc.gov for regular updates and tips on protecting yourself. FairlawnGig may take protective action related to your service or contact you directly with information as needed to help with this effort. While we take reasonable steps to protect your services, we highly recommend that you regularly change your login password on all your online accounts, using hard-to-guess combinations of numbers and letters. Once communications enter the Internet, it is possible for them to be accessed by third parties over whom we have no control. Moreover, since we cannot control websites or services operated by third parties, you should review their terms of service and privacy policies.

Law Enforcement and Legal Requests

Information Disclosure

We may receive legal requests from governmental entities and law enforcement personnel for customer information. We also may receive discovery requests in civil litigation. In all such cases, we cooperate by providing such information as the law requires. Federal law generally allows non-governmental entities to obtain information about you only with a court order and notice to you, the subscriber. Federal law provides generally that governmental entities must obtain a court order for disclosure of personally identifiable information and can do so only upon a showing of clear and convincing evidence that you are reasonably suspected of engaging in criminal activity, and the information sought would be material to the case. The law also generally affords Internet service subscribers an opportunity to appear and contest the disclosure of personally identifiable information to a government entity pursuant to a court order.

Security of Information

We are aware of the many recently publicized instances of customer information security breaches and continue to work on new ways to protect your personally identifiable information. For our most sensitive databases, we use encrypted formats within controlled and secure environments that have access restricted to only our most trusted employees. Nevertheless, although we endeavor to ensure the integrity and security of our network and computer systems, we cannot guarantee that our security measures will prevent all instances of possible unauthorized access.

Children's Privacy

The billing account portal provided to FairlawnGig customers (<https://portal.fairlawngig.net>) is not directed at, or intended for use by, children under the age of 18. We do not knowingly allow anyone under 18 to provide any personal information on the payment portal website. Children should always get permission from a parent or guardian before sending personal information over the Internet. If you believe your child may have provided us with personal information in your billing account, you can contact us at the address on the last page of this document, and we will delete the information. You can find more information about protecting children's privacy by contacting the FTC or viewing its website at www.ftc.gov.

Customer Access to Information

You may check the accuracy of personal information in your account by contacting a Customer Service Representative or accessing your account at <https://portal.fairlawngig.net>. You may advise us of any errors you would like us to correct.



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