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# Privacy Policy

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Conifer Communications, Inc. understands the trust our customers place in us, and we are committed to protecting our customers' privacy and safeguarding their information. Since our founding in 2008, we have implemented policies and practices that are consistent with the FTC's (Federal Trade Commission) privacy framework and federal and state privacy laws. We will continue to: (i) follow the FTC's guidance regarding opt-in consent for the use and sharing of sensitive information as defined by the FTC; (ii) offer an opt-out choice to use non-sensitive customer information for personalized third-party marketing, if we ever choose to utilize such methods; and (iii) rely on implied consent to use customer information in activities like service fulfillment and support, fraud prevention, market research, product development, network management and security, compliance with law, and first-party marketing. Additionally, we have implemented policies and practices to adhere to the established California Consumer Privacy Act, passed as AB 375, An act to add Title 1.81.5 (commencing with Section 1798.100) to Part 4 of Division 3 of the Civil Code, relating to privacy. For Data Security, Conifer Communications will continue to take reasonable measures to protect customer information we collect from unauthorized use, disclosure, or access. Conifer Communications will continue to notify consumers of data breaches as appropriate, including complying with all applicable state data breach laws, which contain robust requirements to notify affected customers, regulators, law enforcement, and others, without unreasonable delay, when an unauthorized person acquires the customers' sensitive personal information as defined in these laws. More details regarding our privacy policy is within the following:

## [The Information We Collect](#)

In providing our services, we may collect personally identifiable information, such as your name, physical address, mailing address, telephone numbers, bank account number, credit card number(s), and/or email addresses ("Personally Identifiable Information"). We may also collect other non-personally identifiable information, such as information about services, general location, general demographics, billing information, maintenance, repair, services, equipment, software, usage, settings and preferences to aid in customer support and service. If non-personally identifiable information is directly linked to Personally Identifiable Information, it will be considered Personally Identifiable Information while it is linked. Aggregate and de-identified information is not considered Personally Identifiable Information.

We collect Personally Identifiable Information to help us provide you with the best service possible. We take reasonable precautions to identify you or persons you have authorized when we are contacted about your Conifer Communications account.

## [Internet Services](#)

Like most Internet service providers, we automatically collect and store both dynamic and static

Internet Protocol (IP) addresses (an identifier given to your connection while online). We may also collect and store other usage statistics, such as the volume of data transmitted and received through your service, Internet connection performance, MAC addresses of equipment, connection dates and times, the volume of data transmitted by protocols, devices and services, to help us understand how our network is used and to better format our network and services.

#### VoIP Services

In providing Digital Voice, also known as VoIP (Voice over Internet Protocol) services, we collect usage information, including calls made and received and their duration, and voice data. We treat this information as private and retain it in for up to twenty-four (24) months. We do not share these records with others, unless required by law. Except when required by law, we do not listen to or record your calls to third parties. We may monitor and record calls with Conifer Communications employees and customer service personnel for quality and training purposes.

#### Information We Use or Share

##### Personally Identifiable Information

We consider Personally Identifiable Information to be confidential, and use it only as provided in this privacy notice. Personally Identifiable Information may be use for the activities such as: installation, training, operations, administration, sales, advertising, marketing, support, development of new products and services, data usage, network management, maintenance, customer service, communications with you, billing, and collection. We may combine Personally Identifiable Information with demographic and other information for purposes consistent with this notice.

##### Sharing Restrictions

It is our policy not to disclose Personally Identifiable Information to any persons outside of Conifer Communications, other than our affiliates, vendors, and business partners, without your prior consent or as otherwise specified in this statement.

##### Aggregate and De-Identified Information

Aggregate and de-identified information does not identify individual customers. We use aggregate or de-identified information along with demographic data from other sources and may share it with others. We use and share aggregate or de-identified information about connection and usage by groups of customers for a variety of purposes such network performance, optimization, and compliance with the FCC (Federal Communications Commission) and the CPUC (California Public Utilities Commission).

##### Outside Parties and Vendors

We sometimes use affiliates, vendors, and/or partners in providing services to you and may share Personally Identifiable Information for these purposes. We require these parties to maintain at least the same level of confidentiality we maintain ourselves. We also prohibit them from using Personally Identifiable Information for any purpose other than providing the services on our behalf. Our primary vendors are for VoIP service and customer support.

## VoIP Services

Our VoIP customers can designate their telephone listings as non-published for print or electronic directories or for directory assistance services as outlined in their contract. We do not publish these directories and are not responsible for their content or accuracy. Because of the complexity of this process and the involvement of others, errors sometimes occur. Our VoIP services are subject to tariff or contractual terms that limit our liability in the event of listing errors.

## Internet Services

Unless sent directly to us in an email, we do not read the content of your online communications. We do not host customer emails through a Conifer Communications owned domain and do not have access to any email sent through our network. We monitor our network for malware and other threats that could harm your equipment, the network, and other users. We may communicate with you online concerning such threats, outages, repairs, other network changes, or company offerings.

## Special Exceptions

We reserve the right to disclose Personally Identifiable Information if we have a good faith belief it is necessary to: (1) comply with the law; (2) protect our network, rights or property or those of others; (3) respond to fraud, abuse or unauthorized reception; or (4) act in an emergency to protect your safety or that of another person. We may also transfer Personally Identifiable Information as a part of a sale or transfer of our business operations.

## Law Enforcement and Legal Requests

### Information We Must Disclose

We may receive legal requests for customer information from government and law enforcement personnel. We may also receive discovery requests in civil cases. We cooperate by providing the information required by law. However, Conifer Communications does not volunteer customer information or give access to customer communications to law enforcement or others, except in the "Special Exceptions" detailed above or if we have a good faith belief that an emergency involving an immediate danger of death or serious physical injury requires disclosure. Many criminal subpoenas require that we not disclose or notify you of the request. Due to this fact, we do not assume any duty to notify you of receipt of any legal requests.

### Internet Information

We may receive subpoenas for your identity in connection with use of your Internet service for apparent copyright infringement or other civil matters. Files shared over "peer-to-peer" services often include your IP Address, and you can be identified in this way if we receive a lawful subpoena. Law enforcement can also obtain details about your Internet use and the content of communications through a warrant or similar authority.

### VoIP Information

Law enforcement must obtain a warrant or other similar authority to use a telephone wiretap or a device to capture dialing information. Law enforcement can also subpoena account and call record information.

## Security of Information

We maintain the security of your Personally Identifiable Information through multiple forms. We use encryption within controlled and secured environments that have restricted access, as well as security monitoring through third parties for our payment gateway and network access points. Although we work to ensure the integrity and security of our network and computer systems, no one can guarantee that security measures will prevent unauthorized access or use. We generally retain personal customer information of service applicants, current and former customers until no longer needed for business, tax, or legal purposes.

These principles are consistent with the FTC's privacy framework, which has proved to be a successful privacy regime for many years and which continues to apply to non-Internet Service Providers (ISPs), including social media networks, operating systems, search engines, browsers, and other edge providers that collect and use the same online data as ISPs.

We reserve the right to update this privacy policy and our practices at anytime.