Affinity Network, Inc. d/b/a ANI Networks Customer Proprietary Network Information (CPNI) Policy

Affinity Network, Inc. d/b/a ANI Networks and its affiliate NOS Communications, Inc. (hereinafter "ANI") is committed to maintaining the privacy of its customers. As a telecommunications carrier, ANI collects and maintains Customer Proprietary Network Information, or "CPNI." ANI has implemented policies and procedures to help ensure our compliance with the CPNI rules adopted by the Federal Communications Commission ("FCC") codified in 47 C.F.R. § 64.2001 et seq. CPNI is information generated by the telecommunications services we provide to our customers. Under federal law, you have a right, and we have a duty, to protect the confidentiality of CPNI, including (1) information about the quantity, technical configuration, type, destination, location, and amount of your use of services, and (2) information contained on your telephone bill concerning the services you receive when matched to your name, address, and telephone number. 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 things like customer name, address, or telephone number; aggregate information or data that is not specific to a single customer; customer premises equipment; and Internet access services. We may not use this CPNI to market products and services to you other than for services you currently purchase if you don't approve.

<u>Opt-out Right:</u> We have the ability to use the CPNI on file to provide you with information about our or our business partners' communications-related products and services or special promotions unless you opt-out. YOU MAY DENY OR WITHDRAW OUR RIGHT TO USE YOUR CPNI FOR MARKETING PURPOSES AT ANY TIME BY EMAILING TO <u>privacyoffice@aninetworks.com</u>. Denying or restricting approval for us to use your CPNI for marketing purposes (also known as "opting-out") will not affect any of our services to which you subscribe. Any denial or restriction of approval remains valid until you affirmatively revoke or limit such denial or restricted approval.

<u>Customer Authentication:</u> Federal privacy rules require us to authenticate the identity of its customers prior to disclosing or discussing CPNI. Customers calling our customer service center can discuss their services and billings with our representative once that representative has verified the caller's identity.

There are methods by which we will conduct customer authentication:

- 1. Having the Customer provide a pre-established password.
- 2. Calling the Customer back at the telephone number associated with their account.
- 3. Emailing the Customer the requested information to the Customer's email address of record.

In the event the customer fails to remember their password, we will send a password reset link to the Customer's email address of record in order to authenticate the customer.

<u>Disclosure of CPNI</u>: We may disclose CPNI in the following circumstances:

- 1. When the customer has approved use of their CPNI for sales or marketing purposes.
- 2. When disclosure is required by law or court order.
- 3. To protect our rights and property or to protect customers and other carriers from fraudulent, abusive, or unlawful use of services.

- 4. When a carrier requests to know whether a customer has a preferred interexchange carrier (PIC) freeze on their account.
- 5. For directory listing services.
- 6. To provide the services to the customer, including assisting the customer with troubles associated with their services.
- 7. To bill the customer for services.

<u>Protecting CPNI:</u> We use numerous methods to protect your CPNI. This includes software enhancements that identify whether a customer has approved use of its CPNI.

<u>Changes to Our Policy:</u> It is our policy to post any changes we make to our policy on this page. You are responsible for visiting our website and this policy to check for any changes.

<u>Contact Information:</u> To ask questions or comment about this policy and our privacy policies and practices, contact us at:

ANI Networks Privacy Office privacyoffice@aninetworks.com
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