Privacy Policy Notice

This Privacy Policy Notice ("Privacy Policy") discloses the privacy practices for BENTON COOPERATIVE TELEPHONE COMPANY (dba BENTON COMMUNICATIONS) ("we," "our," "us" or "the Company"). This Privacy Policy applies solely to information collected by our website located at <u>WWW.BCTELCO.COM</u> ("Site").

Information Collection, Use, and Sharing

In general, you can visit our Site without sharing any personally identifiable information (name, email, address) about yourself. There may be some portions of our Site that you cannot visit without an account, user name and password. You may be required to provide us with personally identifiable information in order to receive or purchase goods or services from us or in order to use any accounts set up on our Site.

We may use and share your information for any legally permissible purpose. We may match, use, and share any of the information we collect from you to any personally identifiable information we obtain through third-parties.

Examples of some ways we may use or share information that we collect about you include (without limitation):

- providing you with products or services;
- providing you with customized content and services;
- improving and developing our products and services;
- personalizing our products and making recommendations;
- providing professional support;
- communicating with you by e-mail, United States mail, telephone, text message, and/or mobile devices about products or services that may be of interest to you either from us, any affiliates, sponsors or other third-parties;
- advertising and marketing to you, which includes sending promotional communications, targeting advertising, and presenting you with relevant offers;
- enforcing our terms and conditions;
- managing our business; and
- performing functions as otherwise described to you.

In order to perform certain services on your behalf, we may publish certain information that you provide. You agree that any testimonial feedback or other comments provided by you to us becomes the sole and exclusive property of the Company and that such information may be used by us for any legally permissible purpose, including but not limited to marketing and advertising our services and products. If you choose to give us personal information, we will use your personal information as necessary for our legitimate business purposes and other legal purposes. We may also share your personal information with others as needed to operate our business. The Company is the owner of the information that is submitted or collected while you are using our Site. We will generally not sell, disseminate, disclose, trade, transmit, transfer, share, lease or rent any personally identifiable information to any third party except as outlined in this Privacy Policy or as required by applicable laws, statutes, codes, rules, regulations or requirements of any state, federal or other governmental authority ("Laws").

Information Collection Technology (Web Beacons and Cookies)

We use various technologies to collect information from your electronic device about your activities on our Site. We collect and store non-personally identifying information through cookies, log files, clear gifs (commonly known as "web beacons"), and third-parties to profile user activity and preferences. Technical and specification information about your browser and computer is automatically collected when you use or visit our Site. This information may include your Internet Protocol ("IP") address, your browser type, operating system, access time(s), the content of previously accepted "cookies" from us, and the website address that referred you to our Site.

A cookie is data stored on your computer that tracks non-personal information about you. When using our Site, we may assign your computer one or more cookies that enable us to improve the quality of our service and to personalize your experience. Cookies allow us to automatically collect information about your activity on our Site, such as the content you access while on our Site, the links you click, and other activity you conduct while using our Site. You may choose to modify your web browser's setting to disable cookies or limit their use. If you choose to disable or limit cookies, you are still able to access our Site, but you may be unable to use all of the features on our Site.

Our Site may contain web beacons (also known as "clear gifs") or similar technologies which gather non-personally identifiable information about your use of our Site. Such technology may also be contained in e-mail messages or newsletters from us that allow us to determine whether messages have been accessed. The purpose of our use of this technology is so that we may analyze the effectiveness of our marketing efforts, the quality of our Site, and the services we provide.

Google Analytics

Our Site uses Google Analytics, a web-analysis service of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses cookies and similar technologies to analyze and improve our Site on the basis of your usage pattern. The data accrued in this context may be transmitted by Google for analysis to a server and stored there. Your IP address will be abbreviated prior to the analysis of usage statistics, however, so that no conclusions can be drawn about your identity. For this purpose, Google Analytics has been extended on our website to include the code "anonymizeIP", in order to guarantee an anonymised capture of IP addresses.

Google will process the information in order to evaluate your use of the website, to assemble reports on the website activities for the website operators, and to supply further services connected with website use and internet use.

As mentioned above, you can configure your browser so that it rejects cookies, or you can prevent the data being used by Google Analytics by downloading and installing a browser add-on provided by Google. You will find more detailed information on this matter in the Privacy Statement of Google Analytics. <u>https://policies.google.com/privacy</u> By using this website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

Personal Information About Users Under 18 Years of Age Not Collected

Our Site is meant for adults and those who have reached the age of majority as defined by the laws of their domicile. Our Site is not meant for individuals under the age of 18 or those defined by the laws of their domicile as minors. Nonetheless, this Privacy Policy is still designed to comply with the Children's Online Privacy Protection Act ("COPPA") to the extent COPPA applies. Accordingly, we do not knowingly collect or retain any personal information about users under the age of 13. If we obtain actual knowledge that we collected or retained personal information about a child under the age of 13, that information will be promptly deleted from our database, servers, and all other media. Since we do not collect information from users under 13 years old, no such information is disclosed to third-parties.

Legal Process and Investigation Issues

From time to time, the Company may be required to respond to a subpoena or similar investigative demand from law enforcement, a court order, a government agency, or a private litigant. We reserve all rights to defend, within our sole discretion, against such legal requests, demands, and claims. For instance, we may raise or waive legal objections or rights. We also reserve the right to disclose your information, as allowed by applicable Laws, when we believe it is reasonably appropriate based on the situation. Such disclosure may occur, but is not limited to, disclosing your information in connection with efforts to: investigate, prevent, or commence other actions regarding suspected illegal activity or other wrongdoing; to protect; defend the rights, property or safety of our company, our users, our employees, or others; comply with applicable law or cooperate with law enforcement; or enforce our terms of use, agreements or policies.

Third Party / Linked Websites

Our Site contains links to other sites on the World Wide Web. The linked sites are not under control of the Company, and the Company is not responsible for the contents of any linked site or any link contained in a linked site, or any changes or updates to such sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

Visitors Outside the United States

This Privacy Policy is intended to cover collection of information on our Site from residents of the United States. The laws in other countries may or may not be as comprehensive as those in the United States. If you are a resident of another country and/or are visiting our Site from outside the United States, you acknowledge and agree that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. You also acknowledge that your use of our Site or our services shall be governed exclusively by the laws of Minnesota and as if all transactions take place within Minnesota. By using our Site, you acknowledge and agree that your information may be transferred to our facilities and those third-parties with whom we share it as described in this Privacy Policy. If you are unwilling to accept these terms, then you agree that you will not use or access our Site or our services.

Limitations

The adoption or publication of this Privacy Policy does not subject us to any stricter duty than otherwise applies under applicable Laws. No person or entity shall have any right or recourse against the Company, its affiliates, agents, sponsors, or other related parties based on any alleged violation or noncompliance with this Privacy Policy by the Company.

Policy Applicable to California Residents Only

We will not share any personal information about you with other companies if prohibited by applicable California law or to the extent your prior consent to share is required by applicable California law. California residents may, no more than once per calendar year, request information about our disclosures of certain categories of personal information to third-parties for direct marketing purposes. To be valid, requests must be submitted to us at <u>customerservice@bctelco.net</u> and have "California resident information request" written in the "subject" line of the e-mail. Within thirty days of receiving this request, we will provide a list of the categories of personal information disclosed for direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of the third-parties.

The Company reserves the right to modify this Privacy Policy at any time. Such changes will become effective and binding after their posting on our Site.