



**Paulding Putnam Electric Cooperative, Inc., “Paulding Putnam”**  
**Broadband Service Privacy Policy**

Effective Date of Policy: July 10, 2025

The purpose of this policy statement is to explain how Paulding Putnam treats your Personally Identifiable Information (PII”) collected by us relating to your subscription to a broadband service. PII is any information that identifies you individually. Aggregate non-individual information about a group of subscribers, which may include you, is not considered PII.

1. Information Collected About You. In the course of providing you our services, we may collect certain information that identifies you personally from all other subscribers. This information may include any of the following: your name, service address, billing address, telephone numbers, social security number, driver's license number, e-mail address, and credit information. We also maintain consumer service records about you relating to the following: billing and payment records, equipment usage, credit history, violations of your agreement with us, your service packages, the types and location of equipment installed by us in your home, equipment service calls and repairs, and whether you rent or own your home, if required to provision service. We may also collect information about your equipment to aid in providing consumer service support. From time-to-time, we may also collect consumer satisfaction surveys, interviews, and questionnaires from you. We may also keep records of all calls, e-mails, and correspondence received from you and sent to you by us.
2. Why We Collect Your Personal Information. We collect the PII described above to help provide you with the best and highest quality service possible. We also collect this information for related business purposes and as may be required by our contractual and legal obligations.
3. How We Use Your Personal Information. We utilize your PII for the following purposes: installation of equipment, repair and maintenance activities, billing of services, quality of service improvement, consumer service, advertising and marketing, verifying compliance with all applicable laws, verifying compliance with contractual obligations, tax and accounting purposes, and creating and marketing better service packages to you.
4. How We Protect Your Personal Information. We will take reasonable technical and organizational precautions to protect against the loss, misuse or alteration or personal information. Such precautions may include:
  - Firewalls
  - Secure servers
  - Password protected computer stations
  - Encryption technology



- Restricted access to facilities and/or storage units
- Establishment of policies for the prevention and mitigation of identity theft

Such precautions do not guarantee that personal information cannot be accessed, altered or deleted due to physical, electronic or procedural failures, but are intended to be our reasonable precautions to protect your personal information.

5. Parties Who May Receive Your Personal Information. The following parties may receive or have access to PII about you: our employees, agents and contractors, accountants, billing and collection services, credit reporting agencies, and authorized governmental bodies. Unless you object by contacting us, we may also disclose PII to some of our vendors. These vendors are obligated to treat your personal information as confidential and may not disclose it to any third parties without your consent. It is also important for you to understand that we do not sell or give access to your personal information to any third party for telemarketing, direct mail or solicitation.
6. Disclosure Required by Law. As part of civil litigation or a regulatory proceeding, if we are required by a valid court or agency order, we may provide personal information about you to a party requesting such information provided that you are notified of such order by the party to whom the order is directed. We may also disclose your personal information to a governmental entity pursuant to a valid court order, if such entity offers clear and convincing evidence that you are reasonably suspected of engaging in criminal activity and that the information sought would be material to their case, and you are afforded an opportunity to appear and contest such entity's claim. We may also have to disclose the name and addresses of individuals as they appear in our subscriber records with respect to those who owe, or are owed, welfare support as part of an administrative subpoena from a state welfare agency. No court order or notice to you is required for such disclosure.
7. Retention of Your Personal Information. We may retain your personal information as long as you are our consumer or until it is no longer needed for business or legal purposes, most notably for tax and accounting purposes. When your information is no longer needed for such purposes, we may destroy the information unless there is an outstanding request pursuant to a court order.
8. Access to Your Personal Information. You have the right to inspect any of our records that contain your personal information for the purpose of correcting such records. If you wish to inspect your records, please notify us in writing and we will arrange such access, during normal business hours, at our office.