

## **Cass Communications Management, Inc Privacy Policy**

Section 631 of the Cable Communications Policy Act of 1984 ("Cable Act") requires us to inform you of the following matters:

### **1. Collection**

The Cable Act requires us to inform you of the nature of personally identifiable subscriber information that we collect and of the nature of the use we make of such information.

Generally, the Cable Act permits us to collect and use only the information needed for the business of providing cable and other services to subscribers. In order that we may continue to provide reliable, high quality service and maintain adequate records, we keep regular business records that contain your name, address, telephone number, social security number and other personally identifiable information.

Such records include billing, payment, deposit, complaint and service records, records of information you have furnished to us such as the location and number of television sets connected to cable and the service options you have chosen.

We use this information to sell, maintain, disconnect and reconnect services to make sure that you are being billed properly for the services you receive; to maintain financial, accounting, tax service and property records, including records required by the terms of our franchise. Periodically, the information is used for cable-related market research by the company.

### **2. Disclosure**

The Cable Act allows you to collect personally identifiable information and to disclose to a third party only if (a) you consent in advance in writing or electronically; (b) disclosure is necessary to deliver cable service and other services we provide to you and related business activities; (c) disclosure is required pursuant to a court order and you are notified of such order; or (d) for mailing lists as described below:

The Cable Act requires us to inform you of the nature, frequency and purpose of any disclosure which may be made of such information, including an identification of the type of persons to whom the disclosure may be made.

We may make your records available to employees, agents and contractors to install, market, provide and audit cable service on each occasion access is needed for the specific job at hand. Access for these purposes is routine, and does not occur with any specific frequency.

We may occasionally release our subscriber list to a customer research organization to conduct market research. This typically occurs no more than once each year. Further, we make our subscriber list available each month to an independent billing house to send bills; to mailing services and programmers each month for sending program guides; to programmers and outside auditors to check our records whenever such checks are required, which occurs irregularly; to attorneys and accountants on a continuous basis as necessary to carry out service to the company; to potential purchasers in connection with a system sale which occurs only at the time such sale is contemplated and at the irregular times when compliance concerns are raised.

Information on delinquent accounts may be supplied to collection agencies and credit bureaus when delinquency occurs. We take reasonable precautions to prevent unauthorized access to this information

### 3. Mailing Lists

The Cable Act also allows us to disclose your name and address for mailing lists and other purposes unless you object. We do not presently sell our subscriber list or otherwise disclose it to commercial users, and do not anticipate making any such disclosure in the future. Should we make any such disclosure in the future, we will not disclose the extent of your viewing or use of a particular service or the nature of any transaction you may make over the cable system, but we may disclose that you are among those who subscribe to a particular service. If you do not wish to have your name and address included on a subscriber list disclosed to commercial or charitable users, please contact us at our system business office. Please refer to your bill for the address of our system office, our phone number and our office hours.

### 4. Retention

The Cable Act requires us to inform you concerning the period during which we will retain subscriber information. As required by the Cable Act, we destroy subscriber information that is no longer necessary for the purpose for which it was collected unless there is a legitimate request or order to inspect the information still outstanding. Paper records such as work orders and installation records are generally retained for up to three years. Converter records are retained for as long as a subscriber has a converter. Subscriber records maintained in our management information system are routinely deleted from our records as newer information is added. The age of these records varies from address to address, depending on the date when service commenced and the number of transactions. Ledger data is deleted after a varying period, at the most six months. Records of technical maintenance and service are retained for as long as you are a subscriber, except that the oldest records in the system may be deleted occasionally to free storage space for new records.

Market research information is retained for a maximum of two years. Accounting and billing records are retained in historical ledgers for six years for tax and accounting purposes.

#### 5. Disclosure by Court Order

The Cable Act also provides that the government may obtain disclosure of personally identifiable information by court order, if it offers evidence that such records are material to a criminal case, and if you are given the opportunity to appear and contest the evidence.

#### 6. Subscriber Rights

As described on page 12, the Cable Act establishes your rights as a subscriber and the limits upon the cable operator with respect to the collection and disclosure of subscriber information. You have the right to inspect our records that contain information about you and to correct any errors in our information.

If you wish to inspect the records pertaining to you at our system office, please contact us at the system business office during business hours to set up an appointment. You may bring a private civil action in U.S. District Court and you may seek to recover damages, costs and attorney fees if the limits under the Cable Act have been violated.