

Marshall County Fiber Privacy Policy

Effective Date: June 2025

Marshall County Fiber ("MCF," "Company," "we," "us," or "our") provides this notice of our Privacy Policy (the "Policy") to our customers regarding our policies with respect to the handling and use of information that we receive from them. As discussed herein, MCF's policy is to limit the information collected regarding our customers and users of our products and services to that which we need to conduct our business and to offer our products and services that might be of interest to our customers.

General Statement

Marshall County Fiber is dedicated to providing reliable telecommunications services including cable television, internet access, and voice services to improve the lives of individuals and businesses in our service areas. MCF's goal is to deliver carrier-grade communications services to all its customers at reasonable prices while maintaining the highest standards of privacy protection.

Data Controller and Data Processor Roles

MCF operates in different capacities depending on the service provided:

As a Data Controller: When MCF collects and processes personal information for our own business purposes, including customer account management, billing, service provisioning, and marketing our services, we act as the data controller and determine the purposes and means of processing such personal information.

As a Data Processor: MCF provides technology platforms and services that act as a conduit for data transmitted by third parties, customers, and subscribers. In these instances, MCF processes personal information controlled by or originated from other companies, such as our customers or business partners. MCF protects personal information, complies with all laws that regulate the processing of such personal information, and processes the information only as authorized by the data controller or the data subject.

While MCF processes data in its role of providing telecommunications services, it does not own, control, or direct the use of personal information stored or processed by customers for their own business purposes. MCF only processes such personal information to provide and invoice for purchased and/or subscribed services.

Information Collection

Individual Information Collected Directly

When we interact with customers, they may provide information that individually identifies them (such as name, address, telephone number, or email address) ("Individual Information"). This can occur when customers:

- Order services through our website or authorized representatives
- Correspond or communicate with us by phone, email, or otherwise
- Register or create an account on our websites

- Participate in online surveys
- Use our mobile apps
- Sign up for information, email, and/or SMS news and alerts
- Use social media to interact with us or share content from our sites
- Request technical support or customer service

Information Collected Automatically

Each time you visit our websites or use our services, we may automatically collect certain types of information:

Technical Information:

- Internet service provider's address and Internet Protocol (IP) address
- MAC address and device identifiers
- Operating system and web browser software
- Type of handheld or mobile device used
- Web page from which you came and clickstream activity
- Language and time zone settings
- Application state and usage patterns

Cookies and Tracking Technologies: We use various types of cookies and similar technologies:

- **Session Cookies:** Temporary cookies that expire when you close your browser
- **Persistent Cookies:** Cookies that remain on your device until they expire or you delete them
- **Analytics Cookies:** Help us understand website usage and improve our services
- **Functional Cookies:** Remember your preferences and settings
- **Advertising Cookies:** Enable targeted advertising and measure ad effectiveness

Web Beacons and Similar Technologies: We may use web beacons, pixel tags, or similar technologies that allow us to know if a particular web page was visited, an email opened, or if advertisements were effective.

Mobile Application Data: Our mobile applications may collect:

- Geo-location information from GPS functions on your mobile device
- Information you enter, share, or obtain from app usage
- Device-specific information and usage analytics

Customer Proprietary Network Information (CPNI)

As a telecommunications provider, MCF collects and maintains Customer Proprietary Network Information (CPNI), which includes:

- Types of telecommunications services you currently have or have purchased
- Technical configuration and location information
- Quantity, destination, and amount of service use
- Billing information for telecommunications services
- Phone numbers you call or send messages to (and numbers you receive calls/messages from)
- Date, time, and duration of calls and messages
- Call detail records and related metadata

Direct Customer CPNI: For customers who directly subscribe to MCF services, we collect and process CPNI for purposes of providing services, support, billing, conducting data analytics, and managing service performance.

Indirect Customer CPNI: When acting as a data processor for other service providers, we handle CPNI in conformity with the data controller's instructions and applicable legal requirements.

Messaging, Voicemail, Video and Media Files

MCF provides services that facilitate the recording and storage of audio, video, and other media through features including:

- Voicemail services
- Call recording capabilities
- Conference recording
- Video messaging and conferencing
- SMS and MMS messaging services
- Image and file attachments to messages

Customers may elect to store or record personal information within these services at their discretion. Images and media files are transmitted securely and may be stored as part of message history when customers choose to send them.

Mobile App Permissions and Contact Access

For customers using MCF mobile applications:

Contact Access: Only when explicitly enabled via system permissions, our mobile apps may access and store personal contacts/phone numbers. When you send messages or initiate calls to contacts, phone numbers are transmitted securely through our API. You can revoke contact access at any time through device settings without affecting app functionality.

Photo and Media Access: When enabled, apps may access photos and media for sharing through messaging services. This requires explicit user selection and permission for each item shared.

Location Services: When enabled, apps may collect location information to improve services and provide location-relevant features. Location sharing can be disabled in device settings.

Business Contact Information

MCF collects and uses personal information about individual contacts of business customers and vendors, including:

- Account information and contact details
- Name, company name, title, and business responsibilities
- Work email address, mailing address, and telephone numbers
- Login information and device identifiers
- Additional information provided in the course of receiving services

Combined and Third-Party Information

Information provided directly to MCF may be combined with:

- Demographic information available from other sources
- Information received from third-party sources (including data brokers, credit reference agencies, and business partners)
- Marketing and biographical information about customers and their companies

We only receive third-party information where we have verified that these parties either have your consent or are legally permitted to disclose your personal information to us.

Anonymized, Non-Identifying Data

MCF may use anonymized, non-identifying data collected from use of our services for purposes including:

- Voice activation and recognition algorithm improvement
- Traffic analysis algorithm enhancement
- Service performance optimization
- Network management and maintenance

This processing supports MCF's legitimate interests in maintaining and enhancing our services while protecting individual privacy.

How MCF Uses Information

We use information about you for purposes described in this Policy, including:

Service Provision and Management:

- Process and manage your purchase and use of MCF services
- Provide technical support and respond to customer inquiries
- Maintain and improve service quality and reliability
- Enforce our agreements and prevent fraud or illegal activities

Communication and Marketing:

- Send updates on MCF news, products, and services
- Communicate about orders, purchases, accounts, and service changes
- Respond to customer inquiries and post comments on forums
- Deliver targeted advertising based on interests and usage patterns

Business Operations:

- Analyze and manage our business operations
- Conduct data analytics and service assessments
- Authenticate users and prevent unauthorized access
- Comply with legal obligations and resolve disputes

Interest-Based Advertising: We participate in interest-based advertising and may use information to deliver advertising based on your interests, searches, and activity on our sites and other websites. We may share aggregate or anonymized data with advertising partners while protecting individual privacy.

Information Sharing and Disclosure

With Service Providers and Business Partners

MCF may share personal information with companies that provide support services, including:

- Credit card and payment processing
- Website development, hosting, and maintenance
- Product warehousing, fulfillment, and shipping
- Customer service and technical support
- Marketing and advertising services
- Data analytics and customer experience improvement

Service providers are contractually restricted in how they may use your personal information and must maintain appropriate security measures.

Legal and Safety Disclosures

We may disclose information that identifies customers, subscribers, or devices in circumstances including:

- Valid legal process (court orders, subpoenas, search warrants)
- Compliance with applicable laws and regulations
- Response to lawful requests by public authorities
- Protection of health and safety in emergency situations
- Protection of MCF's rights, property, and intellectual property
- Prevention of fraud, abuse, or illegal activities
- With your explicit consent

Business Transfers

If MCF enters into a merger, acquisition, or sale of assets, customer information, including personal information, will be transferred as part of the transaction in accordance with applicable law.

Third-Party Advertising and Analytics

We may share aggregated or anonymized information with:

- Advertising partners for targeted marketing
- Analytics providers for service improvement
- Business partners for joint offerings and promotions

Your Choices and Rights

Opt-Out Mechanisms

Marketing Communications: You can opt out of promotional communications by:

- Using unsubscribe links in emails
- Contacting customer service at csrteam@rtc1.com
- Calling 574-223-2191
- Adjusting preferences in your online account

Targeted Advertising: You can opt out of interest-based advertising through:

- Browser cookie settings
- Network Advertising Initiative (NAI) opt-out tools at thenai.org
- Direct contact with our customer service team

Mobile App Permissions: You can control mobile app permissions through device settings for:

- Location services
- Contact access
- Photo and media access

- Push notifications

Access and Update Rights

You may:

- Access personal information we maintain about you
- Correct or update your information
- Request deletion of certain information (subject to legal retention requirements)
- Restrict processing for specific purposes

To exercise these rights, contact us at csrteam@rtc1.com or 574-223-2191.

Cookies and Tracking Technologies

Types of Cookies We Use

Essential Cookies: Required for basic website functionality and service provision.

Analytics Cookies: Generated by services like Google Analytics to track website usage. These help us understand visitor patterns and improve our services.

Functional Cookies: Remember your preferences and settings to enhance user experience.

Advertising Cookies: Enable targeted advertising and measure campaign effectiveness.

Third-Party Cookies: Set by other organizations for tracking success of their services or customizing your experience.

Managing Cookie Preferences

You can control cookies through:

- Browser settings to refuse or delete cookies
- Opt-out tools provided by advertising networks
- Privacy settings on social media platforms

Note: Disabling cookies may limit website functionality and service features.

Do Not Track

At present, the World Wide Web Consortium (W3C) has not established universal standards for recognizable Do Not Track (DNT) signals. Therefore, MCF does not currently respond to DNT browser settings.

Social Media Integration

MCF maintains social media presence on platforms including Facebook, LinkedIn, Twitter, and Instagram. When you interact with us through social media:

- We may receive information based on your privacy settings
- Your interactions are governed by the social media platform's privacy policies

- We may use received information for the same purposes described in this Policy

Security and Data Protection

Security Measures

MCF employs security safeguards appropriate to the sensitivity of information, including:

- Administrative controls and access restrictions
- Technical measures including encryption and secure transmission
- Physical safeguards for data storage and processing facilities
- Employee training and confidentiality agreements
- Regular security assessments and updates

Data Transfer and Storage

Your information may be transferred to and maintained on computers and servers located outside your jurisdiction where data protection laws may differ. By using our services, you consent to such transfers. We ensure appropriate safeguards are in place for international transfers.

Retention Policies

We retain personal information for as long as:

- Your account is active or needed to provide services
- Required to comply with legal obligations
- Necessary to resolve disputes and enforce agreements
- Permitted by applicable law for legitimate business purposes

Special Privacy Protections

Children's Privacy

MCF services are not directed to children under 18. We do not knowingly collect personal information from children under 18 without verifiable parental consent. If we learn that we have collected such information, we will take measures to delete it promptly. Parents should supervise children's online activities and use parental control tools when appropriate.

Health Information (HIPAA)

Unless expressly stated otherwise, MCF services do not comply with Health Insurance Portability and Accountability Act (HIPAA) requirements. Customers must not use our services to create, receive, transmit, or store Protected Health Information (PHI) unless specifically authorized in writing.

Accessibility

MCF is committed to providing accessible services. We offer navigation devices and features for customers with visual impairments, including:

- Screen reader compatibility
- Keyboard navigation support
- Large print documentation
- Audio accessibility features

Contact Information and Complaints

Contact Methods

For privacy-related questions or concerns:

Email: csrteam@rtc1.com

Phone: 574-223-2191

Mail: Marshall County Fiber
117 W Eighth Street
Rochester, IN 46975

Complaint Procedures

If you have privacy-related complaints:

1. Contact us using the information above
2. Describe your concern with specificity
3. Provide supporting documentation if available
4. We will investigate and respond promptly

Policy Updates and Changes

MCF reserves the right to modify this Privacy Policy at any time. We will notify you of material changes by:

- Posting updates on our website at www.rtc1.com
- Email notification to your account email address
- Bill inserts or other appropriate communication methods

Your continued use of services after changes become effective constitutes acceptance of the updated Policy. We encourage you to review this Policy regularly.

Additional Protections

Credit Information

You authorize MCF to make credit inquiries and receive information about your credit history as necessary for service provision decisions. We may report payment history to credit agencies and industry clearinghouses.

Network Management

MCF reserves the right to manage our network for optimal performance, including:

- Traffic prioritization and protocol filtering
- Rate limiting and bandwidth management
- Spam and malware protection
- Security monitoring and threat prevention

Vendor and Supplier Information

We collect personal information about individuals employed by our suppliers and vendors strictly for administering business relationships and payment processing.

Legal Framework

This Privacy Policy is governed by applicable federal and state privacy laws, telecommunications regulations, and industry standards. We comply with all applicable legal requirements while maintaining our commitment to protecting customer privacy.
