



Internet Service Privacy Policy

Wintek Corporation (“Wintek”) is committed to maintaining privacy protections. This Privacy Policy applies to all uses of Wintek's Internet services, and it describes how we collect, use, disclose, and store information. As technologies and business practices change, Wintek may update this privacy policy from time to time. Customers should review this privacy policy from time to time for recent updates.

How Wintek Receives Information

We receive information when you apply for, purchase, or use our products or services, or otherwise communicate with us. For example, when you purchase products or services we may collect personal contact, billing, and credit information. We also collect a variety of information associated with your use of your device and our products and services. Some of the ways we may collect information include using technologies to identify your device and record your preferences and other data and to gather information about the performance of your device and our network. We have the right, but not the obligation, to at any time to monitor bandwidth, usage, transmissions, and content on the services from time to time for the purposes described herein. We do not, however, routinely monitor the activity of your account for violations of your Service Agreement.

We may also obtain information about you from other sources. We may also obtain updated address information from our agents, vendors, or other third parties, or purchase or obtain personal information (such as e-mail lists and demographic and marketing data) from others.

The Type of Information Collected

We may collect different types of information depending on your use of our products and services.

We collect various types of personal and proprietary information that can identify the customer. For example, we collect account information that includes your contact information and billing information. We also collect Customer Proprietary Network Information (CPNI) that is generated in connection with the services we provide to you, such as the quantity, technical configuration, type, destination, location, and amount of use of services and certain billing information.

We also collect technical and usage information related to the products and services we provide to you. This includes information about your use of device(s) associated with your account, information related to Internet and network usage (such as websites visited, content accessed, and network traffic data), and performance information, as well as data relating to your use of other

products and services. We may also collect information about your device's location and performance and diagnostic data about your use of our network, Internet services, or your device.

In the event you access or use any Third Party Service (as defined in the Wintek Terms and Conditions of Internet Service), your information—including your personal information—may be collected and used by Third Party Suppliers as described in the privacy terms set forth in the applicable Third Party Agreement, including any incorporated privacy policy. We strongly advise you to review the privacy policies of every Third Party Service you intend to access or use. Wintek has no control over, and assumes no responsibility for, the content, privacy policies, or privacy practices of any Third Party Service or Third Party Supplier.

How the Information Is Used

We use your information to provide, manage, bill for, market, research, and improve our services, to respond to your questions, and to address technical and customer service issues. We also use your information to deliver customized content or advertising and to communicate service updates, offers, and promotions. Your information may be used to protect network integrity and security, to ensure quality control, to optimize capacity and prevent misuse of Wintek's network, products, and services, and to implement Wintek's Internet Service Policies and Disclosures. Your information may also be used for engineering and technical support. We also reserve the right to share any collected information with Tipmont Rural Electric Membership Corporation in connection with its services, our services, and internal or shared business purposes.

Except as set forth in this Privacy Policy, in privacy policies for specific services, or in agreements with customers, Wintek does not sell, license, or share information that individually identifies our customers or people using our networks without the consent of the person whose information will be shared.

We use vendors and partners to help us manage, provide, bill for, market, research, and improve our services. We share information with those vendors and partners when that information is helpful for them to perform work on our behalf. We require that these vendors and partners protect the customer information we provide to them and limit their use of customer data to the purposes for which it was provided. We do not permit these vendors and partners to use this information for their own marketing purposes.

We may also, as permitted by law, disclose information (including information that individually identifies our customers or identifies customer devices) in certain circumstances, including: (1) to comply with valid legal process; (2) to prevent illegal activities; (3) to protect our rights or property; (4) to protect the safety of any person; (5) to a third-party that you have authorized to verify your account information; (6) as part of a corporate business transaction, such as a merger or acquisition; (7) with your consent; or (8) to enforce the Service Agreement.

We will sometimes collect information about how you use our products and services in an anonymous manner that does not include personal or proprietary information. We use this information to analyze and improve our services and marketing efforts. This anonymous information may be shared with other entities, such as governments or trade groups that may use

this data for purposes of industry analysis, strategic or municipal planning, and emergency and disaster response coordination. This anonymous information may also be shared with other companies for their own marketing, advertising or other similar uses.

How Wintek Stores and Protects the Information Collected About You

We retain information only for as long as we have a business or tax need or as applicable laws, regulations, or government orders require. When we dispose of personal information, we use reasonable procedures designed to erase or render it unreadable.

We use a variety of physical, technical, and procedural safeguards to protect personal information against unauthorized access, use, or disclosure while it is under our control. Our employees must comply with the legal requirements and company policies surrounding the privacy of communications and the security and privacy of your records.

Likewise, under federal law, you have a right, and we have a duty, to protect the confidentiality of CPNI. We will not intentionally disclose your CPNI to third-parties without your permission, except as allowed under FCC rules, applicable law, or as explained in this Privacy Policy. If you wish to restrict our use of CPNI for marketing purposes, you may contact a customer service representative.

Your Role in Protecting Your Privacy

We encourage you to use available safeguards to protect your information and devices. For example, we encourage you to use passwords to prevent unauthorized access to your devices, network, and account. We recommend that you use unique, non-obvious passwords, that you periodically change your passwords, and that you do not share your passwords with others.

Questions

Please contact (800) 726-3953 with concerns or questions about this Privacy Policy or the collection or use of customer information.

SPECIAL NOTICE CONCERNING CUSTOMER PROPRIETARY NETWORK INFORMATION

In addition to the provisions of this Privacy Notice, Federal law protects your privacy rights as a customer of Wintek's phone Services. These rights are in addition to the existing safeguards that Wintek already has in place to protect your privacy rights. The Federal Communications Commission (FCC) requires Wintek to notify you of your right to restrict the use of your Customer Proprietary Network Information (CPNI).

What is CPNI?

Customer Proprietary Network Information (CPNI) is personally identifiable information that a telecommunications carrier collects when providing phone services to a customer. CPNI typically

consists of telephone numbers you have called, call duration and timing of those calls, as well as call frequency and any call management services you use.

Permitted Use of CPNI by a Telephone Company Without Your Permission

Wintek may use CPNI for certain purposes without your permission, including marketing. Wintek may also use CPNI to respond to your inquiry regarding services you currently use or related services offered. In addition, we may use CPNI in connection with repair and maintenance services, billing and collection, to protect our property and to prevent fraud.

Additional Information Regarding Your CPNI Rights

You have the right to deny or withdraw access to CPNI at any time or to instruct us to disclose CPNI to unaffiliated third parties by written request. Any approval or denial for use of CPNI is valid until you affirmatively revoke or limit such approval or denial. A denial of your approval will not affect the Services to which you subscribe.

Date Original Adopted: March 20, 2019