

Universal TelCom Privacy Policy

Privacy Policy Scope

This Privacy Policy identifies and describes the way Universal TelCom, Inc. (“Universal TelCom”) uses and protects the information we collect about Customers and Users. All use of Universal TelCom’s products and services, as well as visits to our websites, are subject to this Privacy Policy.

The Information We Collect, How We Collect It, And How We Use It

We may collect different types of personal and other information based on your use of our products and services and our business relationship with you. Some examples include:

- *Contact Information* that allows us to communicate with you -- including your name, address, telephone number, and e-mail address;
- *Billing information* related to your financial relationship with us -- including your payment data, credit history, credit card number, Social Security numbers, security codes, and service history;
- *Equipment, Performance, Universal TelCom’s Website Usage, Viewing and other Technical Information* about your use of our network, services, products or websites.

We collect information in three primary ways:

- You give it to us when you purchase or interact with us about a product or service we offer or provide;
- We collect it automatically when you visit our websites or use our products and services;
- We obtain it from other sources, such as credit agencies.

We may use the information we collect in a variety of ways, including to:

- Provide you with the best customer experience possible;
- Provide the services you purchase, and to respond to your questions;
- Communicate with you regarding service updates, offers, and promotions;
- Deliver customized content and advertising that may be of interest to you;
- Address network integrity and security issues;
- Investigate, prevent or take action regarding illegal activities, violations of our Terms of Service or Acceptable Use Policies; and
- Provide local directory and directory assistance.

Information Sharing

With Universal TelCom Companies: Subject to applicable legal restrictions, such as those that exist for Customer Proprietary Network Information (CPNI), the Universal TelCom companies may share your Personal Information with each other to make sure your experience is as seamless as possible, and you have the full benefit of what Universal TelCom has to offer.

With Non- Universal TelCom Companies: We share your Personal Information only with non-Universal TelCom companies that perform services on our behalf, and only as necessary for them to perform those services.

- We require those non-Universal TelCom companies to protect any Personal Information they may receive in a manner consistent with this policy.
- We do not provide Personal Information to non-Universal TelCom companies for the marketing of their own products and services without your consent.

In Other Circumstances: We may provide Personal Information to non-Universal TelCom companies or other third parties for purposes such as:

- Responding to 911 calls and other emergencies;
- Complying with court orders and other legal process;
- To assist with identity verification, and to prevent fraud and identity theft;
- Enforcing our agreements and property rights; and
- Obtaining payment for products and services that appear on your Universal TelCom billing statements, including the transfer or sale of delinquent accounts to third parties for collection

Anonymous & Aggregate Information

- We collect some information on an anonymous basis. We also may anonymize the personal information we collect about you.
- We obtain aggregate data by combining anonymous data that meet certain criteria into groups.
- When we employ non-Universal TelCom companies to anonymize or aggregate data on our behalf, the requirements for sharing Personal Information with non-companies apply.
- We may share aggregate or anonymous information in various formats with trusted non-Universal TelCom entities, and may work with those entities to do research and provide products and services.

Safeguarding Your Information: Our Policy on Data Protection and Security

- We do not sell your Personal Information to anyone for any purpose. Period.
- We maintain information about you in our business records while you are a customer, or until it is no longer needed for business, tax, or legal purposes.
- We have implemented encryption or other appropriate security controls to protect Personal Information when stored or transmitted by Universal TelCom.

- We require non-Universal TelCom companies acting on our behalf to protect any Personal Information they may receive in a manner consistent with this Policy. We do not allow them to use such information for any other purpose.

Customer Privacy Controls and Choices

- You can review and correct your Personal Information collected by us.
- You can limit certain types of solicitation communications from Universal TelCom, including marketing contacts made via telephone, e-mail and text messaging.
- We will provide you with notice of changes to this policy.

Refer to our “Privacy Policy FAQ” for more information. The Privacy Policy FAQ is an essential part of our Privacy Policy.

Your California Privacy Rights

California Civil Code Section 1798.83 entitles California customers to request information concerning whether a business has disclosed Personal Information to any third parties for the third parties' direct marketing purposes. As stated in this Privacy Policy, Universal TelCom will not sell or share your Personal Information with non-Universal TelCom companies for their direct marketing purposes without your consent. California customers who wish to request further information about our compliance with this law or have questions or concerns about our privacy practices and policies may contact us at:

2550 Belle Chasse Hwy. Ste 110, Gretna, La 70053.

Universal TelCom Privacy Policy FAQ

I. QUESTIONS ABOUT DEFINITIONS

1. Do the terms used in your Privacy Policy have any special meanings I need to know about?

We recognize that many privacy policies are long, complicated and difficult to understand. That's why we've focused on using words and sentences that are easy to follow and mean just what they say. There are a few important definitions you should know about.

As used in this Policy, the terms listed below have the following meanings:

- Customer

A "Customer" is anyone who purchases Universal TelCom products or services. When a Customer purchases retail products or services for use by others, those individuals also may be considered Customers for purposes of this Policy.

- User

A "User" is anyone who visits our websites.

- Personal Information

"Personal Information" is information that directly identifies or reasonably can be used to identify an individual Customer or User. Examples include name, address, telephone number, e-mail address, Social Security number, and financial account number. Personal Information does not include Published Listing Information as discussed in more detail below.

- Anonymous Information

"Anonymous Information" means information that does not directly identify and cannot reasonably be used to identify an individual Customer or User.

- Aggregate Information

"Aggregate Information" means information about groups or categories of Customers or Users, which does not identify and cannot reasonably be used to identify an individual Customer or User. Aggregate Information is a kind of Anonymous Information.

- Website

"Website" means any page or location on the Internet, no matter what device (cell phone, lap top, PC, etc.) or protocol (http, WAP, ftp or other) is used to access the page or location. In this Policy, we use the term website other similar terms such as "Internet site," "site" and "web page."

II. QUESTIONS ABOUT THE SCOPE OF THIS POLICY

1. What does this Policy cover?

This Privacy Policy covers our practices regarding the information we collect about our Customers and Users. All use of Universal TelCom products and services, and all visits to Universal TelCom websites are subject to this Privacy Policy.

2. Does this Policy apply to my family members or other users under my account with Universal TelCom?

Yes. This Policy applies to all Customers and Users. The Customer who holds the account with Universal TelCom is responsible for making sure all family members or other Users under the same account understand and agree to this Policy.

3. When is information not covered by this Policy?

Information that you provide to non-Universal TelCom companies is not covered by this Policy. For example:

- When you download applications or make an online purchase from a non-Universal TelCom company while using Universal TelCom's services, the information collected by the non-Universal TelCom company is not subject to this Policy.
-
- If you use public forums — such as social networking services, Internet bulletin boards, chat rooms, or blogs on Universal TelCom or non-Universal TelCom websites — you should be aware that any Personal Information you disclose publicly can be read, collected, or used by others. Once you choose to reveal Personal Information on such a site, the information is publicly available, and Universal TelCom cannot prevent distribution and use of that information by other parties.

4. Can my information be subject to more than one privacy policy?

Yes. For example:

- When Universal TelCom jointly provides a service with a non- Universal TelCom company, your Personal Information may be subject to both this Policy and the privacy policy of the non- Universal TelCom company.

We encourage you to review the privacy policies of any non- Universal TelCom company with which you do business to determine what information will be collected and how it will be used or disclosed to others.

5. What about business customers?

Universal TelCom may enter into written product or service agreements with business customers that contain specific provisions related to the confidentiality, security or other handling of information. When provisions of a written product or service agreement differ from or conflict with the provisions of this Policy, the terms of the written agreement will apply. In all other instances, the terms of this Policy apply.

III. QUESTIONS ABOUT THE INFORMATION WE COLLECT, HOW WE COLLECT IT AND HOW WE USE IT

1. What information do we collect?

We may collect different types of personal and non-personal information based on your use of our products and services and on our business relationship with you. Some examples of information we collect include:

- **Account Information:** Information we obtain as a result of your business relationship with us, which may include:
 - **Contact Information** that allows us to communicate with you, including your name, address, telephone number, and e-mail address. Universal TelCom obtains your contact information when you order or register for our services.
 - **Billing Information** related to your financial relationship with us, such as the services you buy, the telephone numbers you call, the payments you make, your credit history, your credit card numbers, Social Security number, security codes, and your service history.
- **Technical & Usage Information** related to the services we provide to you, including information about your use of our network, services, products or websites. Examples of the Technical & Usage Information we collect include:
 - **Equipment Information** that identifies the equipment you use on our network, such as equipment type, IDs, serial numbers, settings, configuration, and software.
 - **Performance Information** about the operation of the equipment, services and applications you use on our network, such as IP addresses, URLs, data transmission rates and latencies, location information, security characteristics, and information about the amount of bandwidth and other

network resources you use in connection with uploading, downloading or streaming data to and from the Internet.

2. How do we collect information?

We collect information in three primary ways:

- **You Give Us Information:** We collect information from you when you purchase a service from us or when you interact with us about a product or service we offer or provide. For example, you provide us with Contact Information, and Billing Information (such as credit information and Social Security number) when you order a service or establish an account with us.
- **We Collect Information Automatically:** We automatically collect certain types of information when you visit our websites or use our products and services. For example, we automatically collect various types of Technical & Usage Information when you use our Internet products and services.
- **We Collect Information from Other Sources:** We may obtain information about you from outside sources. For example, we may request credit information about you from credit agencies for the purpose of initiating service to you, obtain commercially available demographic and marketing information about you from third parties, or purchase e-mail lists from third parties for advertising and marketing purposes.

3. How do we use the information we collect?

We use information we collect in a variety of ways. For example, we may use some or all of the information we collect as appropriate for the following purposes:

- To initiate, provide and manage the services you purchase, and to respond to your questions or problems;
- To develop, market, sell, bill, and collect for our products and services;
- To communicate with you regarding service updates as well as offers and promotions for features and services;
- To deliver customized content, more relevant advertising and personalized offers for Universal TelCom and non-Universal TelCom products and services that may be of interest to you based on information we have collected — including the preferences you have expressed or interests you have demonstrated on our websites, in our stores, and through use of our products and services;
- To conduct research and analysis directed toward maintaining, protecting and improving our network and the services we provide;
- To address network integrity, quality control, capacity, misuse, viruses, and security issues, as well as for network planning, engineering and technical troubleshooting purposes;
- To investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service, Acceptable Use Policies, or other service conditions or restrictions.

4. How do we use your information for local directory and directory assistance services?

We include Customer names, addresses and telephone numbers in third-party local directories. We make the same information available through our directory assistance services unless you request that this information remain "non-published" as discussed further below. We will not include listing information for wireless numbers in either our local directories or our directory assistance services without your consent.

- **Published Listing Information**

Listings of Universal TelCom's local telephone Customers are made available to issuers of third-party directories and through directory assistance. These directories include published Customer names, addresses and telephone numbers. We also make that information available through directory assistance operators and systems (such as directory assistance, speech recognition, reverse number lookup and automated directory assistance services) and through the Internet.

Published listing information may be used, sorted, packaged, repackaged and made available again in different formats by anyone.

- **Non-Published Information**

We offer Customers the opportunity to request that their name, number, and address not be published in our local directories or made available through directory assistance services. There is a fee for this service.

- **Non-Listed Information**

We also give Customers the opportunity to request that their names, numbers and addresses be "non-listed" in these third-party directories, but still made publicly available through directory assistance services. There also is a fee for this service. Customers in Nevada do not have the option of a non-listed number.

- **Sharing with Unaffiliated Entities**

We are required by law to provide wireline directory assistance information to unaffiliated telephone companies and directory assistance providers on an unrestricted basis. However, we do not provide non-published telephone numbers to these providers.

We provide non-published telephone numbers, where permitted by law, to government entities and public safety providers for public health or safety reasons such as responding to 911 calls and notifying the public of wide-spread emergencies.

We may also provide Published Listing Information to government agencies, municipalities, utilities and other such entities for address and telephone number verification purposes.

IV. QUESTIONS RELATED TO INFORMATION SHARING

1. What Is CPNI?

Customer Proprietary Network Information (CPNI) is information that relates to the quantity, configuration, type, destination, location and amount of use of the telecommunications services you purchase from us, as well as the information contained in your bills for those services. We collect CPNI in the normal course of providing you with telecommunications services. Your telephone number, name and address are not CPNI.

2. Do we share your Personal Information with non-Universal TelCom companies?

We share your Personal Information only with non-Universal TelCom companies that perform services on our behalf, and only as necessary for the provision of those services. We use non-Universal TelCom companies to perform many of the services outlined in the FAQ "How do we use the information we collect?" For example, we may use external vendors to process and print your Universal TelCom billing statement, or to market, sell and provide customer service for Universal TelCom products and services. We share your information with such vendors solely for that purpose.

We require non-Universal TelCom companies acting on our behalf to protect any Personal Information they may receive in a manner consistent with this Policy, and do not allow them to use that information for any other purpose. Most importantly, we do not sell, give or "rent" your Personal Information to non-Universal TelCom companies for the marketing of their own products and services without your consent.

3. Are there any other circumstances in which your Personal Information may be provided to non-Universal TelCom entities?

We may provide Personal Information to non-Universal TelCom companies or other third parties (for example, to government agencies, credit bureaus and collection agencies) without your consent for certain purposes, such as:

- To comply with court orders, subpoenas, lawful discovery requests and other legal or regulatory requirements, and to enforce our legal rights or defend against legal claims;
- To obtain payment for products and services that appear on your Universal TelCom billing statements, including the transfer or sale of delinquent accounts to third parties for collection;
- To enforce our agreements, and protect our rights or property;
- To assist with identity verification, and to prevent fraud and identity theft;

- To prevent unlawful use of Universal TelCom's services and to assist in repairing network outages;
- To provide information regarding the caller's location to a public safety entity when a call is made to 911, and to notify the public of wide-spread emergencies;
- To notify or respond to a responsible governmental entity if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires or justifies disclosure without delay;
- To display name and telephone number on a Caller ID device;
 - Note: Universal TelCom's Caller ID Blocking services will not always prevent display of the calling party's name and number. For example, your name and number will not be blocked when you dial 911, or when you dial pay-per-call (900) or toll-free numbers.
 - Be aware: A variety of websites and vendors offer services that will allow a caller to make it look like they are calling from a different number. In this situation, the name or number that displays on the caller ID or similar equipment will not be the actual number of the calling party. This is often called "number spoofing."
- To notify the National Center for Missing and Exploited Children of information concerning child pornography of which we become aware through the provision of our services.
- Customers and Users should be aware that Universal TelCom's affiliates and non-Universal TelCom companies that perform services on behalf of Universal TelCom may be located outside the country where you access our services. As a result, when your Personal Information is shared with or processed by such entities, it may be accessible to government authorities according to the laws of those jurisdictions.

V. QUESTIONS ABOUT AGGREGATE AND ANONYMOUS INFORMATION

1. Where do you get anonymous and aggregate information?

We collect some information about how people interact with Universal TelCom on an anonymous basis. For example, the information we collect about your visits to our websites using cookies and other similar technologies does not include information that would identify you personally.

We may anonymize the personal information we collect about you by removing or "hashing" any data fields (such as name, address and telephone number), that identify you or that can be used to identify you personally. We use industry best practices and state-of-the-art techniques to anonymize and aggregate data.

We get aggregate information by combining anonymous data that meet a certain criteria into groups.

We may employ non-Universal TelCom companies to anonymize or aggregate information on our behalf. If we do, all of the requirements discussed in response to the FAQ, "Do we share your Personal Information with non-Universal TelCom companies?" apply. The non-Universal TelCom company is required to protect any personal information they may receive from Universal TelCom, and is not allowed to use the information for any purpose other than as directed by Universal TelCom.

2. How do you use aggregate and anonymous information?

We use aggregate and anonymous information for a variety of purposes, as described in response to the FAQ "How do we use the information we collect?"

3. Do you share aggregate or anonymous information with non-Universal TelCom companies?

Yes. We may share Aggregate or Anonymous Information in various formats with trusted non-Universal TelCom entities, and may work with those entities to do research and to provide products and services. For example:

- Retail, marketing and advertising companies that do not provide services directly for Universal TelCom, but do offer products and services that may be of interest to you or to others;
- Media research companies that may use the data we provide in combination with other information to provide audience analysis services;
- Universities, laboratories, think tanks and other entities that conduct networking, social, behavioral, environmental and other types of scientific research, for the purpose of creating fundamental new knowledge;
- Government or other entities that may use this data for purposes such as municipal planning, transportation planning and navigation services, and emergency and disaster response coordination.

4. How do I know that these non-Universal TelCom entities won't "re-identify" me based on the aggregate or anonymous information you share with them?

Respect for individual privacy is fundamental to any decision we make about sharing information with non-Universal TelCom entities. We provide that data only to non-Universal TelCom entities that satisfy our security standards, and prohibit those entities from using that information for any purpose other than as agreed upon with Universal TelCom. Re-identification is never one of those purposes.

VI. QUESTIONS ABOUT DATA PROTECTION AND SECURITY

1. Do we sell your Personal Information?

No. We do not sell your Personal Information to anyone, for any purpose. Period.

2. How long do we keep your Personal Information?

We keep your Personal Information only as long as needed for business, tax or legal purposes, after which we destroy it by making it unreadable or undecipherable.

3. What safeguards does Universal TelCom have in place?

We have established electronic and administrative safeguards designed to secure the information we collect, to prevent unauthorized access to or disclosure of that information and to ensure it is used appropriately.

4. Will you notify me in case of a security breach?

Although we strive to keep your Personal Information secure, no security measures are absolute, and we cannot guarantee that your Personal Information will never be disclosed in a manner inconsistent with this Policy (for example, as the result of unauthorized acts by third parties that violate the law or this Policy). We will make reasonable attempts to notify you if we determine that Universal TelCom has experienced a security breach and there is a reasonably likely risk of identity theft, or where otherwise required by law.

VII. QUESTIONS ABOUT CUSTOMER CONTROL

1. Can I review and correct my Personal Information?

Yes. Universal TelCom honors requests from Customers to review their Personal Information maintained in reasonably retrievable form, and we are happy to correct information found to be inaccurate. Customers may verify that appropriate corrections have been made.

2. How can I limit your sales efforts?

We have established policies and practices to meet the expectations of Customers and potential customers who have expressed a desire to limit certain types of solicitation communications from Universal TelCom, including marketing contacts made via telephone, e-mail and text messaging.

You also can request to be removed from these telemarketing lists when you receive a marketing or promotional call. Where required by state laws and/or regulations, we honor requests from businesses to be removed from our telemarketing lists.

The FTC maintains a National Do Not Call Registry at <https://www.donotcall.gov/>, and your state may maintain its own Do Not Call Registry. Putting your number on these Registries also may limit our telemarketing calls to that number.

Our practices as described above are designed to satisfy state and federal legal requirements limiting marketing contacts. You should know that those laws and regulations — such as the requirements governing the state and federal "Do Not Call" lists — generally permit companies to contact their own current and, in some cases, former customers, even when those customers are listed on the federal and state "Do Not Call" lists. Similarly, restricting our use of your CPNI will not eliminate all types of Universal TelCom marketing contacts.

To limit postal mail solicitations, contact us at [\(504\) 962-3500](tel:5049623500). With this limitation you will continue to receive billing statements, legal notices, product updates and other similar correspondence, and you may still receive some promotional mailings.

3. What can I do to limit junk e-mails and unwanted text messages?

Universal TelCom works hard to detect and prevent junk e-mails (also referred to as "spam" e-mails) from ever reaching your computer. However, if you are receiving unwanted spam from a Universal TelCom e-mail address, please contact us for assistance at (504) 962-3500.

To report unwanted text (SMS) and picture text (MMS) messages, you may contact us at (504) 962-3500.

4. What can I do to protect my passwords and Account Information?

When selecting User names and passwords for Universal TelCom accounts, you should choose words or characters that are not obvious. Likewise, you should always keep Personal Information such as account numbers, Usernames, passwords or similar information in a secure place and not share the information with others.

VIII. QUESTIONS ABOUT CHANGES...

1. ... To Corporate Control?

Information about our Customers and Users, including Personal Information, may be transferred as part of any merger, acquisition, sale of company assets, or transition of service to another provider, as well as in the unlikely event of an insolvency, bankruptcy, or receivership in which Customer and User records would be transferred to another entity as a result of such a proceeding.

2. ... To This Policy?

We reserve the right to update this Privacy Policy as necessary to reflect any changes we make and to satisfy legal requirements. If we make a material change to this Policy, we will post a prominent notice of the change on our websites, and provide you with other appropriate notice and choice regarding the use of your information, at least 30 days before the effective date.

Please check our websites periodically for changes to this Privacy Policy.

HOW TO CONTACT US ABOUT THIS POLICY...

We are happy to address any questions or concerns you may have about our privacy practices and policies. You may e-mail us at service@universaltelcom.com or write to us at 2550 Belle Chasse Hwy, Ste 110, Gretna, La 70053.

. If you believe you have been aggrieved by any act of ours in violation of the law, we encourage you to contact us directly at either of these addresses to resolve your question or issue.

You also have the option of filing a complaint with the FTC Bureau of Consumer Protection, using an online form, or by calling toll-free 1-877-FTC-HELP (1-877-328-4357; TTY: 1-866-653-4261). Other rights and remedies also may be available to you under federal or other applicable laws.

Customer Proprietary Network Information (CPNI)

What is CPNI?

Customer Proprietary Network Information (CPNI) is information that Universal TelCom's telecommunications carriers obtain when providing your telecommunications services to you. CPNI includes the types of telecommunications services you currently purchase, how you use them, and the billing information related to those services, including items such as the types of local, long distance and wireless telecommunications services that you have purchased and your calling details. Your telephone number, name and address are not considered CPNI.

Use and Disclosure of CPNI

We use your CPNI to offer you additional services of the type you already purchase from Universal TelCom. We also may use your CPNI to offer you products and services, packages, discounts and promotions from the Universal TelCom companies, which may be different from the types of services you already purchase.

Universal TelCom uses technology and security features and strict policy guidelines to safeguard the privacy of CPNI and protect it from unauthorized access or improper use. Universal TelCom does not disclose CPNI outside of the Universal TelCom companies or their agents without customer consent except as required or allowed by law. When Universal TelCom uses third parties to perform services on its behalf that require the use of CPNI, Universal TelCom requires that they protect CPNI consistent with this privacy policy. *Universal TelCom does not sell CPNI to unaffiliated third parties.*

Restricting our use of your CPNI

If you wish to restrict our use of your CPNI for marketing purposes, you may contact a customer service representative at the customer service phone number located on your Universal TelCom bill or one of the following numbers:

(504) 962-3500 or 1-866-962-3500

Customer Service Contact Numbers

(504) 962-3500 or 1-866-962-3500