

Privacy Policy

Privacy Statement

Highland Telephone Cooperative (HTC) recognizes the importance of protecting your personal information and we are committed to safeguarding your privacy in-person and online.

Because HTC respects its customers and understands that they are concerned about privacy, we have instituted policies intended to ensure that your personal information is handled in a safe and responsible manner.

Our commitment to privacy

HTC' Privacy Policy is an extension of our Values Statement to deliver telecommunications services and interact with members, vendors and the community with honesty, integrity and respect.

This policy is designed to assist you in understanding how we collect, use, and safeguard the personal information you provide to us and to assist you in making informed decisions when using our products and services. This statement will be continuously assessed against new technologies, business practices, and our customers' needs.

What information do we collect?

When you visit us either on the phone, in person or on online, you may provide us with two types of information: personal information you knowingly choose to disclose that is collected on an individual basis, and website use information collected on an aggregate basis as you and others browse our website.

1. Personal information you choose to provide

When you engage in certain activities on this site, on the phone or in-lobby, such as ordering products, downloading software, or entering a contest, HTC may ask you to provide certain information about yourself by filling out and submitting a form. It is optional for you to engage in these activities. If you elect to engage in these activities, however, HTC may require that you provide us personal information such as your name, mailing or street address, e-mail address, and other personal identifying information for purposes of completing a transaction, delivery of service or awarding a prize. When ordering products on site, or paying your bill online, you may be asked to provide a credit card number along with other personal information such as your mailing or street address, and e-mail address.

When you submit personal information to HTC, you understand and agree that HTC, its subsidiaries and affiliates may transfer, store, and process your customer profile. That personal information will remain confidential to HTC.

HTC collects this information in order to record and support your participation in any activities you select. If you order a product, for example, the information is used to register your license and rights, if any, to technical support, upgrade discounts, or other benefits that may be made available to registered users. If you enter a contest, information is collected to qualify the entry and contact you regarding the contest or prize awards. HTC also uses the information that you provide as part of our effort to keep you informed about product upgrades, special offers, and

other products and services offered by HTC.

Credit card information

This section applies when online credit card payment options are available through HTC's website. If you choose to purchase products or services from HTC or HTC's partners, you may need to give personal information and authorization to obtain information from various credit services. For example, you may need to provide the following information: Name; Mailing address; E-mail address; Credit card number; Home and business phone number; Other personal information (for example, your mother's maiden name)

E-mail information

If you choose to correspond further with us through e-mail, we may retain the content of your e-mail messages together with your e-mail address and our responses. We provide the same protections for these electronic communications that we employ in the maintenance of information received by mail and telephone.

2. Website use information

Similar to other commercial websites, our website may utilize a standard technology called "cookies" (see explanation below: What are cookies?) and web server logs to collect information about how our website is used. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our website, and the websites visited just before and after our website. This information is collected on an aggregate basis. None of this information is associated with you as an individual.

How we use the information that you provide to us?

Broadly speaking, we use personal information for purposes of administering our business activities, providing customer service and making available other products and services to our customers and prospective customers.

Occasionally, we may also use the information we collect to notify you about important changes to our website, new services and special offers we think you will find valuable. The lists used to send you product and service offers are developed and managed under our traditional corporate standards designed to safeguard the security and privacy of our customers' personal information.

What are cookies?

Cookies are a standard feature of web browser software that allow web servers to recognize the computer used to access a website. Cookies are small pieces of data that are stored by a user's web browser on the user's hard drive. Cookies store select pieces of information a user accesses on a web page to simplify subsequent interactions with that website by the same user or to use the information to streamline the user's transactions on related web pages. This makes it easier for a user to move from web page to web page and to complete commercial transactions over the Internet. Cookies are used to make your online experience easier and more personalized.

Cookies help us collect important business and technical statistics. The information in the cookies lets us trace the paths followed by users to our website as they move from one page to another; this helps us improve our navigation and make it easier for you to find things. Web

server logs allow us to count how many people visit our website and evaluate our site's traffic patterns. We do not use these technologies to capture your individual e-mail address or any **personally identifying information about you, although they do permit us to display information most likely to be of interest to you.**

Sharing information with affiliates

We do not currently host advertising for outside companies on our website. However, we may decide sometime in the future to display notices or advertisements from outside companies on our website. In that event, we will take commercially reasonable measures to select product or service providers that appear to be responsible and provide privacy protections to their customers. However, we cannot make any representations about the practices and policies of these companies, and we do not warrant their products or services.

No sharing of information with third parties

We do not sell, trade or disclose to third parties any customer identifiable information derived from the registration for or use of our online services (including customer names and addresses) without your consent (except as required by subpoena, search warrant or other legal process, or in the case of imminent physical harm to yourself or others). When we use other agents, contractors, or companies to perform services on our behalf, we will ensure that the company protects your personal information in a manner consistent with this policy.

How do we protect your information?

Employee access, training, and expectations

Our values, ethical standards, policies and practices are committed to the protection of customer information as described in this policy. In general, our business practices limit employee access to confidential information, and limit the use and disclosure of such information to authorized persons, processes, and transactions.

Evaluation of information protection practices

Periodically, our operations and business practices are reviewed for compliance with our policies and procedures governing the security, confidentiality and quality of our information.

How can you access and correct your information?

To update your account information with any of our family of companies (such as your mailing address, primary customer name, which features or services you subscribe to, or other details), call the customer service number shown on your bill.

Do we disclose information to outside parties?

We may provide aggregate information about our customers, sales, website traffic patterns and related website information to our affiliates or reputable third parties, this information will not include any personally identifying data, except as otherwise provided in this privacy policy.

What about legally compelled disclosure of information?

We may disclose information when legally responsible to do so: under court or legal order, or when we, in good faith, believe that the law requires it for the protection of our legal rights.

What about other websites linked to our website?

We are not responsible for the practices employed by websites linked to or from our website nor the information or content contained therein. Often links to other websites are provided solely as pointers to information on topics that may be useful or of interest to the users of our website.

Please remember that when you use a link to go from our website to another website, our privacy policy is no longer in effect. Your browsing and interaction on any other website, including websites which have a link on our website, is subject to that website's own rules and policies. Please read over those rules and policies before proceeding.

Your consent

By using our website you consent to our collection and use of your personal information as described in this privacy policy. If we change our privacy policies and procedures, we will post those changes on our website to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it.

Opt-Out or Correct and Update

If you would like to remove your information or to receive future communications, or wish to change or modify information previously provided, please contact us at htc@htcnet.org

Contacting our Web Site and Companies

If you have questions about this privacy policy, the practices of this site, or your dealings with HTC, contact co-General Managers, Gideon Hiner [hinerg@htcnet.org] and Ruth Newman [newmanr@htcnet.org] at P O Box 340, Monterey, VA 24465 or by calling (540) 468-2131.