



## **CUSTOMER PROPRIETARY NETWORK INFORMATION POLICY**

Coastline Technology Group, LLC ("Coastline") is committed to maintaining the privacy of its customers. Coastline is obliged to provide Customer with protections to certain information about how Customer uses its Services. However, that information can help us customize and improve Services Coastline offers to Customer.

In this section, Coastline describes what information Coastline protects and how it is protected.

### **CPNI PROTECTIONS**

As a customer of Coastline Services, Customer has the right, and Coastline has a duty, under federal law, to protect the confidentiality of certain types of Services, including: (1) information about the quantity, technical configuration, type, destination, location, and amount of Customer's use of its Services, and (2) information contained on Customer's telephone bill concerning the Services Customer receives. That information, when matched to Customer's name, address, and telephone number is known as "Customer Proprietary Network Information," or "CPNI" for short. Examples of CPNI include information typically available from telephone-related details on Customer's monthly bill, technical information, type of Service, current telephone charges, long distance and local Service billing records, directory assistance charges, usage data and calling patterns.

### **APPROVAL**

From time to time, Coastline would like to use the CPNI information it has on file to provide Customer with information about Coastline's communications-related products and Services or special promotions. Coastline's use of CPNI may also enhance its ability to offer products and Services tailored to Customer's specific needs. Accordingly, Coastline would like Customer's approval so that Coastline may use this CPNI to let Customer know about communications-related Services other than those to which Customer currently subscribes that Coastline believes may be of interest to Customer. **IF CUSTOMER APPROVES, CUSTOMER DOES NOT HAVE TO TAKE ANY ACTION; CUSTOMER'S SIGNATURE ON THE SERVICE AGREEMENT SIGNIFIES CUSTOMER'S CONSENT THAT COASTLINE MAY USE AND DISCLOSE CPNI AS DESCRIBED HEREIN.**

However, Customer does have the right to restrict Coastline's use of Customer's CPNI. **CUSTOMER MAY DENY OR WITHDRAW COASTLINE'S RIGHT TO USE CUSTOMER'S CPNI AT ANY TIME BY CALLING 949-209-8752.** If Customer denies or restricts its approval for Coastline to use Customer's CPNI, Customer will suffer no effect, now or in the future, on how Coastline provides any Services to which Customer subscribes. Any denial or restriction of Customer's approval remains valid until Customer's Services are discontinued or Customer affirmatively revokes or limits such approval or denial.

In some instances, Coastline will want to share Customer's CPNI with its independent contractors and joint venture partners in order to provide Customer with information about Coastline's communications-related products and Services or special promotions. Prior to sharing Customer's CPNI with its independent contractors or joint venture partners, Coastline will obtain written permission from Customer to do so.

### **CUSTOMER AUTHENTICATION**

Federal privacy rules require Coastline to authenticate the identity of its customer prior to disclosing CPNI. Customers calling Coastline can discuss their Services and billings with a Coastline representative once that representative has verified the caller's identity. There are three methods by which Coastline will conduct Customer authentication:

- 1) by having the Customer provide a pre-established password and/or PIN;
- 2) by calling the Customer back at the telephone number associated with the Services purchased; or
- 3) by mailing the requested documents to the Customer 's address of record.

Passwords and/or PINs may not be any portion of the Customer's social security number, mother's maiden name, amount or telephone number associated with the Customer's account or any pet name. In the event the Customer fails to remember their password and/or PIN, Coastline will ask the Customer a series of questions known only to the Customer and Coastline in order to authenticate the Customer. In such an instance, the Customer will then establish a new password/PIN associated with their account.

### **NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES**

Coastline will be notifying Customer of certain account changes. For example, whenever an online account is created or changed, or a password or other form of authentication (such as a "secret question and answer") is created or changed, Coastline will notify the account holder. Additionally, after an account has been established, when a Customer's address (whether postal or e-mail) changes or is added to an account, Coastline will send a notification. These notifications may be sent to a postal or e-mail address, or by telephone, voicemail or text message.

### **DISCLOSURE OF CPNI**

Coastline may disclose CPNI in the following circumstances:

- When the Customer has approved use of its CPNI for Coastline or Coastline and its joint venture partners and independent contractors (as the case may be) sales or marketing purposes.
- When disclosure is required by law or court order.
- To protect the rights and property of Coastline or to protect Customer and other carriers from fraudulent, abusive, or unlawful use of Services.
- When a carrier requests to know whether Customer has a preferred interexchange carrier (PIC) freeze on its account.
- For directory listing Services.
- To provide the Services to the Customer, including assisting Customer with troubles associated with its Services.
- To bill the Customer for Services.

### **PROTECTING CPNI**

Coastline uses numerous methods to protect Customer's CPNI. This includes software enhancements that identify whether Customer has approved use of its CPNI. Further, all Coastline employees are trained on the how CPNI is to be protected and when it may or may not be disclosed. All marketing campaigns are reviewed by a Coastline supervisory committee to ensure that all such campaigns comply with applicable CPNI rules.

Coastline maintains records of its own and its joint venture partners and/or independent contractors (if applicable) sales and marketing campaigns that utilize Customer CPNI. Included in this, is a description of the specific CPNI that was used in such sales or marketing campaigns. Coastline also keeps records of all instances in which CPNI is disclosed to third parties or where third parties were allowed access to Customer CPNI.

Coastline will not release CPNI during Customer-initiated telephone contact without first authenticating the caller's identity in the manner set-forth herein. Violation of this CPNI policy by any Coastline employee will result in disciplinary action against that employee as set-forth in Coastline's Employee Manual.

### **BREACH OF CPNI PRIVACY**

In the event Coastline experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require Coastline to report such breaches to law enforcement. Specifically, Coastline will notify law enforcement no later than seven (7) business days after a reasonable determination that such breach has occurred by sending electronic notification through a central reporting facility to the United States Secret Service and the FBI. A link to the reporting facility can be found at: [www.fcc.gov/eb/cpni](http://www.fcc.gov/eb/cpni). Coastline cannot inform Customer of the CPNI breach until at least seven (7) days after notification has been sent to law enforcement, unless the law enforcement agent tells the carrier to postpone disclosure pending investigation. Additionally, Coastline is required to maintain records of any discovered breaches, the date that Coastline discovered the breach, the date carriers notified law enforcement and copies of the notifications to law enforcement, a detailed description of the CPNI breach, including the circumstances of the breach, and law enforcement's response (if any) to the reported breach. Coastline will retain these records for a period of not less than two (2) years.

### **NOTIFICATION OF CHANGES TO THIS POLICY**

If Coastline changes this CPNI Policy, Coastline will post those changes on [www.coastlinetechgroup.com](http://www.coastlinetechgroup.com) or in other places Coastline deems appropriate, so that Customer can be aware of what information Coastline collects, how Coastline uses it, and under what circumstances, if any, Coastline disclose it. If Customer decides to continue receiving its Services after Coastline makes any changes to this the CPNI Policy, Customer shall be deemed to have given express consent to the changes in the revised policy.