



## Privacy Policy 2017

Welcome to this website, located at <http://www.celticcommunications.com/other-hosted-services/> (“Website”), a service of Celtic Communications, LLC (Celtic). This statement discloses the privacy practices for Celtic’s Hosted IP Telephony Services or products (“Privacy Policy” or “Privacy Notice”), which Services are provided by Celtic as an interconnected VoIP provider. By using the Website or such services or products, you consent to the collection and use of your information by us in accordance with this Privacy Notice.

This Privacy Notice includes an explanation of:

- the categories of personally identifiable information about you that may be collected; how the information is used;
- how we collect and use non-personally identifiable information about your use of the Website;
- the categories of persons or entities with whom the information may be shared;
- the choices that are available to you regarding collection, use, and distribution of the information;
- how you can opt in or out of Celtic’s promotional e-mail;
- the kind of security procedures that are in place to protect the loss, misuse or alteration of information;
- how you can review and request changes to the information;
- how we notify visitors and users of this Website of changes to this Privacy Notice; and
- the privacy policies that apply to subscribers to each Celtic product and service.

In this Privacy Notice, the terms “Celtic,” “we,” “us,” or “our” refer to Celtic Communications, LLC that is the company that delivers voice, phone, communications, and other services in your area. The term “you” refers to you as a subscriber to one or more of our voice service and other services.

This Privacy Notice describes the limitations imposed on our collection and disclosure of personally identifiable information (defined below) about subscribers, the nature of personally identifiable information and CPNI (defined below) we collect, how we use that information, when and why we may disclose that information and to whom, how long we maintain that information, how you can access your personally identifiable information and CPNI, how you can set preferences and opt out of certain uses of that information, and your rights under law and this Privacy Notice concerning your personally identifiable information and CPNI. Please read the entire Privacy Notice to understand our privacy policies and practices.



### **Why is Celtic providing this Privacy Notice to me?**

As a subscriber to services provided by Celtic, you are entitled to certain protections under Section 222 of the Communications Act of 1934, as amended, (the “Communications Act”) and the FCC’s rules (47 C.F.R. § 64.2001 – 64.2011).

This Privacy Notice, which includes our policies related to CPNI, describes what CPNI information we obtain, how we protect it, and how it may be used. If you are a customer of our phone services, you have the right, and Celtic has a duty, under the Communications Act and applicable state law, to protect the confidentiality of CPNI. We explain below under “How do I give or withhold my approval for Celtic to use CPNI to market additional products and services to me?” how you can approve our use of CPNI or withdraw your approval.

In an attempt to provide you with increased value, we may include third party links on our Website. These linked sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our Website and welcome any feedback about these linked sites (including if a specific link does not work).

## **I. Collection**

### **What kind of information does this Privacy Notice apply to?**

This Privacy Notice applies to personally identifiable information and individually identifiable CPNI that you provide to us or that we collect pursuant to this Privacy Notice during or related to the provision of certain services to you.

Personally identifiable information is information that identifies a particular person (“PII”); it does not include de-identified, anonymous, or aggregate data that does not identify a particular person or persons.

The Communications Act, as amended, and the Federal Communications Commission’s (the “FCC”) rules (47 C.F.R. § 64.2001 – 64.2011) provide additional privacy protections for certain information related to our phone services known as customer proprietary network information or (“CPNI”). The following information is considered CPNI:

- information about the quantity, technical configuration, type, destination, location, and amount of your use of the phone services; and
- information contained on your telephone bill concerning the type of phone services and features you receive.



### **What kind of PII does Celtic collect?**

Celtic collects information from you at several different points when you request, turn on, and use our services under an account we create for you. Some of this information is PII, but much of it is not. We collect certain PII that our subscribers furnish to us in connection with the provision of communication services. In order to provide reliable, high quality service to you, we keep regular business records containing information about you that may constitute PII. These account records include some, but typically not all, of the following information:

- your name;
- service address;
- billing address;
- e-mail address; and
- telephone number.

With respect to phone services, examples of CPNI include information typically available from telephone-related details on your monthly bill:

- location of service;
- technical configuration of service;
- type of service;
- quantity of service;
- amount of use of service; and
- calling patterns.

CPNI does not include your name, address, and telephone number, because the Communications Act classifies that information as “subscriber list information” which is not subject to the protections applicable to CPNI. However, that information is also subject to certain protections as described below under “To whom may Celtic disclose PII?”

We also collect and maintain certain other information about your account. For example, this information may include:

- your account number;
- billing, payment, and deposit history (if billed through the Celtic platform);
- additional service information;
- customer correspondence and communications records;
- maintenance and complaint information;
- the device identifiers and network addresses of equipment used with your account; and
- additional information about the service options you have chosen.



Some of our services permit you to establish secondary accounts, and if you do so we collect similar information in order to establish and service the secondary accounts. During the initial provisioning of our services, and during any subsequent changes or updates to our services, Celtic may collect technical information about your computer hardware and software, telephones, other service-related devices, automation devices, and customization settings and preferences.

### **Does Celtic collect “cookies”?**

Yes. Cookies are small files that a site or its service provider transfers to your computer’s hard drive through your Web browser (if you allow) that enables the site’s or service provider’s systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. Cookies are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

We may contract with third-party service providers to assist us in better understanding our Website visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Mozilla Firefox or Internet Explorer) settings. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you won’t have access to many features that make your Website experience more efficient and some of our services will not function properly.

## **II. Use**

### **How does Celtic use PII and CPNI?**

The Communications Act applies to CPNI related to our regulated phone services, and certain orders of the FCC apply the CPNI rules to our interconnected voice over Internet protocol communications (“VoIP”) services.

The Communications Act authorizes us to use, disclose, or permit access to individually identifiable CPNI in our provision of:

- the telecommunications services from which this information is derived; or



- services necessary to, or used in, the provision of these services, including the publishing of directories.

The Communications Act prohibits us from using CPNI for any purposes other than those listed above except as permitted or required by law or with your approval.

We collect, maintain, and use PII and CPNI as permitted by the Communications Act and other applicable laws. We use this information primarily to conduct business activities related to providing you with our services, and to help us detect theft of service. Generally speaking, we use PII in connection with:

- billing and invoicing;
- administration;
- surveys;
- collection of fees and charges;
- marketing;
- service delivery and customization;
- maintenance and operations;
- technical support;
- hardware and software upgrades; and fraud prevention.

More specifically, we also use PII to:

- install, configure, operate, provide, support, and maintain our cloud services and other services;
- confirm you are receiving the level(s) of service requested and are properly billed;
- identify you when changes are made to your account or services;
- make you aware of new products or services that may be of interest to you;
- understand the use of, and identify improvements to, our services;
- detect unauthorized reception, use, or abuse of our services;
- determine whether there are violations of any applicable policies and terms of service;
- manage the network supporting our services;
- configure and update service-related devices; and
- comply with law.

The Telecommunications Act of 1996 further permits Celtic to use, disclose, and permit access to CPNI obtained from our customers, either directly or indirectly, to:

- initiate, render, bill, and collect for telecommunications services;



- protect our rights and property, and protect our users of these services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, these services; and
- to provide call location information concerning the user of a commercial mobile phone service.

Celtic may not use CPNI to market products and services to you other than enhancements to services you already have without your approval in accordance with our policies described below.

Celtic transmits, and may collect and store for a period of time, PII and non-PII about you when you use our phone services to:

- send and receive e-mail, video mail, and instant messages;
- transfer and share files;
- make files accessible;
- visit websites;
- place or receive calls;
- leave and receive voicemail messages;
- use the applicable communications center or voice center;
- establish custom settings or preferences;
- communicate with us for support; or
- otherwise use the services and their features.

#### **How does Celtic use PII and CPNI in connection with other types of information?**

We associate activity data with particular phone devices, and other supported devices so that we know where to deliver the services and how to troubleshoot them. In general, Celtic uses deidentified and aggregate activity information to understand better how our customers use our products and services so that we can improve them, including by delivering more relevant content and advertising. We may try to determine how well our products and services deliver value to our customers. As discussed below, we may also combine activity data with other non-personally identifying demographic and similar information from our business records.

We may use this information to improve and communicate with you about our own products and services. When we do this, we do not share your PII, unless you provide your express consent.

We may also combine PII, which we collect as described in this Privacy Notice as part of our regular business records, with PII obtained from third parties for the purpose of creating an enhanced database or business records. We may use this database and these business records in marketing and other activities related to our services. We also maintain records of research



concerning subscriber satisfaction and viewing habits, which are obtained from subscriber interviews, questionnaires, surveys or panels.

### III. Disclosure

#### **Under what circumstances may Celtic disclose PII to others?**

Celtic considers the PII contained in our business records to be confidential. Celtic, as an operator, will disclose PII concerning any subscriber if the disclosure is:

- necessary to render, or conduct a legitimate business activity related to services provided to the subscriber, including where such disclosure is to an affiliate, website hosting partner, or other parties who assist us in operating our Website;
- required by law or legal process (described below under “When is Celtic required by law to disclose PII and CPNI by law?”); or
- of the names and addresses of subscribers for “mailing list” or other purposes (subject to each subscriber’s right to prohibit or limit this disclosure and the CPNI policy described in this Privacy Notice).

Non-personally identifiable information and non-CPNI may be disclosed to other parties for marketing, advertising, or other uses.

#### **When may Celtic disclose personal information to others in connection with phone service?**

Celtic may disclose to others PII in connection with features and services such as Caller ID, 911/E911, and directory services as follows:

- We may transmit your name and/or telephone number to be displayed on a Caller ID device unless you have elected to block such information. Please note that Caller ID blocking may not prevent the display of your name and/or telephone number when you dial certain business or emergency numbers, 911, 900 numbers, or toll-free 800, 888, 877, 866 or 855 numbers.
- We may provide your name, address, and telephone number to public safety authorities and their vendors for inclusion in E911 databases and records, inclusion in “reverse 911” systems, or to troubleshoot 911/E911 record errors.
- We may also make subscriber names, addresses, and telephone numbers available, or cause such subscriber information to be made available, through directory assistance operators.

#### **When is Celtic required to disclose PII and CPNI by law?**

We make every reasonable effort to protect subscriber privacy as described in this Privacy Notice. Nevertheless, we may be required by law to disclose PII or individually identifiable CPNI about a subscriber. These disclosures may be made with or without the subscriber’s



consent, and with or without notice, in compliance with the terms of valid legal process such as a subpoena, court order, or search warrant.

For subscribers to our communication and phone services, Celtic may be required to disclose PII and individually identifiable CPNI to a private third party in response to a court order, and, if so, we are required to notify the subscriber of the court order. Celtic may also be required to disclose PII and individually identifiable CPNI about subscribers to high-speed Internet, phone, and home security services to a government entity in response to a subpoena, court order, or search warrant, for example. We are usually prohibited from notifying the subscriber of any disclosure of PII to a government entity by the terms of the subpoena, court order, or search warrant.

#### **How does Celtic protect PII?**

We follow industry-standard practices to take such actions as are necessary to prevent unauthorized access to PII by a person other than the subscriber or us. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose PII.

#### **How long does Celtic maintain PII?**

Celtic maintains PII about you in our regular business records while you are a subscriber to our services. We also maintain this information for a period of time after you are no longer a subscriber if the information is necessary for the purposes for which it was collected or to satisfy legal requirements. These purposes typically include business, legal, or tax purposes. If these purposes no longer apply, we will destroy, de-identify, or anonymize the information according to our internal policies and procedures.

## **IV. Customer Access and Choice**

#### **How can I see my PII or CPNI and correct it, if necessary?**

You may examine and correct, if necessary, the PII regarding you that is collected and maintained by Celtic in our regular business records. In most cases, the PII contained in these records consists solely of billing and account information. We will correct our records if you make a reasonable showing that any of the PII we have collected about you is inaccurate.

If you have Internet access, you can view and change certain information yourself by going to <https://service-center.celticom.com/login> and signing in with your Celtic username and password to access the Settings tab.

You may also examine the records containing your PII at the Celtic office upon reasonable prior notice to us and during our regular business hours. If you wish to examine these records, please contact us by mail or telephone at 561-300-1000, giving us a reasonable period of time to locate



and, if necessary, prepare the information for review, and to arrange an appointment. You will only be permitted to examine records that contain PII about your account and no other account.

If you make an affirmative, written request for a copy of your CPNI, we will disclose the relevant information we have to you at your account address of record, or to any person authorized by you, if we reasonably believe the request is valid. However, subscribers to our phone services should be aware that we generally do not provide them with records of any inbound or outbound calls or other records that we don't furnish in the ordinary course of business (for example, as part of a bill) or which are available only from our archives, without valid legal process such as a court order. In addition, we cannot correct any errors in customer names, addresses, or telephone numbers appearing in, or omitted from, our or our vendors' directory lists until the next available publication of those directory lists. Further, we may have no control over information appearing in the directory lists or directory assistance services of directory publishers or directory assistance providers that are not owned by us.

Celtic reserves the right to charge you for the reasonable cost of retrieving and photocopying any documents that you request.

### **How do I give or withhold my approval for Celtic to use CPNI to market additional products and services to me?**

From time to time we may like to use the CPNI information we have on file to provide you with information about our communications-related products and services or special promotions. Such use of CPNI may enhance our ability to offer products and services tailored to your specific needs. In addition, Celtic also offers various other services that are not related to the services to which you subscribe. Under the CPNI rules, some of those services may be considered to be non-communications related products and services. Therefore, you may be asked during a telephone call with one of our representatives for your oral consent to Celtic's use of your CPNI for the purpose of providing you with an offer for communications related or non-communications related products and services. If you provide your oral consent for Celtic to do so, Celtic may use your CPNI only for the duration of that telephone call in order to offer you additional services.

If you deny or restrict your approval for us to use your CPNI, you will suffer no effect, now or in the future, on how we provide any services to which you subscribe. Any denial or restriction of your approval remains valid until your services are discontinued or you affirmatively revoke or limit such restriction or denial.

### **How do I place myself on Celtic's "do not call" and "do not mail" lists?**

You may contact Celtic at 561-300-1000 to ask us to put your name on our internal company "do not call" and "do not mail" lists so that you do not receive marketing or promotional telephone calls or postal mail from us or made at our request. You also have the right to prohibit or limit



disclosure of your PII for “mailing list” or other purposes as described above in this Privacy Notice by contacting us at 561-300-1000.

If you prefer to contact Celtic in writing instead of by telephone, you may send a written request to the address listed below under “How do I contact Celtic?” Be sure to include your name and address, your Celtic account number, and a daytime telephone number where you can be reached in the event we have any questions about your request. The person who is identified in our billing records as the subscriber should sign the written request. If you have a joint account, a request by one party will apply to the entire account. If you have multiple accounts, your notice must separately identify each account covered by the request.

#### **What e-mail communications will Celtic send to me and how do I manage them?**

We may send a welcome email and sometimes other information to new partners or subscribers to our services (including each new secondary account holder, where applicable). We may also send service-related announcements to our subscribers from time to time. For example, we may send you an email announcement about a pricing change, a change in operating policies, a service maintenance, or new features of one or more of the services you receive from us. You may not opt-out of these service-related communications. If you fail to check your primary email address for service-related announcements, you may miss important information about our services, including legal notices, for example.

We reserve the right to send you promotional or commercial email as permitted by applicable law. You can manage the promotional or commercial emails Celtic may send to you by following the instructions contained in the emails or by going to the Web page located at <https://service-center.celticcom.com/login> and following the directions there.

#### **What can I do if I think my privacy rights have been violated?**

If you believe that you have been aggrieved by any act of ours in violation of applicable laws, we encourage you to contact us directly as described below in “How do I contact Celtic?” in order to resolve your question or concern.

#### **Will Celtic notify me if it changes this Privacy Notice?**

As required by the Communications Act, we will provide you with a copy of this customer Privacy Notice at the time we enter into an agreement to provide any cloud service or other service to you, and annually afterwards, or as otherwise permitted by law. You can view the most current version of this Privacy Notice by going to <https://service-center.celticcom.com/login> or <http://celticcommunications.com/other-hosted-services/>. We may modify this Privacy Notice at any time. We will notify you of any material changes through written, electronic, or other means and as otherwise permitted by law. If you find the changes to this Privacy Notice unacceptable, you have the right to cancel your service. If you continue to



use the service following notice of the changes, we will deem that to be your acceptance of and consent to the changes in the revised Privacy Notice. This includes your consent for any PII that we may collect and use starting on the effective date of the revised Privacy Notice, as well as for any PII that we have collected prior to the effective date of the revised Privacy Notice. However, we will only deem your continued use of the service to be your acceptance of and consent to changes in the revised Privacy Notice for changes made after January 1, 2017.

### **How do I contact Celtic?**

If you have any questions or suggestions regarding this Privacy Notice, or wish to contact us about your personal information, please reach us as follows:

Phone: 561-300-1000

Website: [www.celticcommunications.com](http://www.celticcommunications.com)

Mail:

Celtic Communications, LLC

Attn: Legal Department – Customer Privacy Notice

601 N. Congress Avenue, Ste. 112

Delray Beach, FL 33445

## **V. Additional Special Provisions Based on Customer Location**

### **Outside the United States**

It is important to note that the Website is operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us will be transferred to the United States. By using the Website and/or providing us with your visitor information, you consent to this transfer

### **California Residents**

Under California’s “Shine the Light” law, California residents who provide personal information in obtaining products or services for personal, family or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year (e.g. requests made in 2013 will receive information regarding 2012 sharing activities).

To obtain this information from Celtic please send an email message to [privacy@celticcom.com](mailto:privacy@celticcom.com) with “Request for California Privacy Information” on the subject line



and in the body of your message. We will provide the requested information to you at your e-mail address in response. Not all information sharing is covered by the “Shine the Light” requirements and only information on covered sharing will be included in our response.