

## **Digital Communication Media Privacy Policy and Your California Privacy Rights**

**Effective date: August 2018**

Digital Communication Media (“DCM”) understands that Customers care about how their personally identifiable information (“*Personal Information*”) is collected, used, shared, and secured. DCM takes Customers’ privacy seriously. Please read the following to learn more about DCM’s privacy practices and policies. By using the Service (as defined in the Customer’s Service Agreement and Equipment Rental/Lease Agreement (“Service Agreement”)) or accessing the DCM Website in any manner, Customer understands, acknowledges and agrees that Customer accepts the practices and policies outlined in this Privacy Policy, and Customer hereby consents that DCM will collect, use, share and secure Customer’s Personal Information and Non-Personal Information (as defined below) in the following ways.

Remember that Customer’s use of the Service is at all times subject to Customer’s Service Agreement which incorporates this Privacy Policy by reference. Customer’s use of the DCM Website is at all times subject to the DCM Website Terms of Use. Any capitalized terms not defined in this Privacy Policy will have the same meaning as defined in our Service Agreement and the DCM Website Terms of Use.

DCM Services are designed and targeted to U.S. audiences and are governed by and operated in accordance with the laws of the U.S. If Customer is not a U.S. citizen or does not reside in the U.S., Customer voluntarily consents to the collection, transfer, use, disclosure and retention of Customer Personal Information in the U.S. Customer also agrees to waive any claims that may arise under Customer’s own national laws.

When Customer uses the Service, the Personal Information Customer sends and receives is transmitted over a wireless network or another transmission standard that may be subject to interception by unauthorized third parties who seek to do you harm. While it is DCM’s objective to take reasonable measures to reduce the risk that unauthorized third parties will be able to access and/or intercept the information Customer sends and receives through the Service, DCM cannot and does not make any guarantee that transmissions over the Internet are 100% secure or error-free.

DCM recommends that you use caution when sending any Personal Information over the Internet and use encryption technology whenever possible, such as websites that have the “https” designation in the website’s address bar and show a padlock icon in the browser’s window.

DCM does not knowingly collect, solicit or use Personal Information from anyone under the age of 13. If Customer is under 13, please do not attempt to register for the Services or send any Personal Information about yourself to DCM. If DCM learns that DCM has collected Personal Information from a child under age 13, DCM will delete that information as quickly as possible to the extent technically feasible. If Customer believes that a child under 13 may have provided DCM Personal Information, please contact DCM at [support@mybridgenet.com](mailto:support@mybridgenet.com).

### **Your California Privacy Rights**

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask DCM for a notice identifying the categories of Personal Information which DCM shares (if Personal Information is shared) with its Affiliates and/or other third parties for their marketing purposes, and providing contact

information for such Affiliates and/or third parties unless DCM meets certain exceptions in the law. This Privacy Policy qualifies for the exception to those requirements. If Customer resides in California and Customer has an established business relationship with DCM, Customer may request information about DCM's opt-out and out-in policies of sharing Customer Personal Information with other companies (including our Affiliates) for their marketing purposes. Please send Customer's written request via email or postal mail following the instructions below. DCM will not accept requests via the telephone or facsimile. DCM will not respond to requests that are not labeled or sent properly, or do not have complete information.

- For all requests, include Customer's full name, street address, city, state and zip code.
- In an email request, Customer must state "Re: Your California Privacy Rights" in the subject line and send Customer email to [support@mybridgenet.com](mailto:support@mybridgenet.com).
- In a postal request, Customer must send a letter or post card to:

Digital Communication Media  
8413 SW 80<sup>th</sup> ST. Suite A Ocala, FL 34481  
Attention: Your California Privacy Rights

#### **What types of information does this Privacy Policy cover?**

Generally, Customer will be required to provide certain information to DCM and DCM will collect and use Personal Information in connection with providing the Service to Customer, including to personalize, evaluate, enhance and improve the Service and our ability to provide the Service to Customer, to contact Customer, to respond to and fulfill Customer requests regarding the Service, to troubleshoot, and to analyze how Customer uses the Service.

#### **What Information does DCM collect and how does DCM use this Information?**

- **Personal Information**

Personal Information is the information Customer provides to DCM voluntarily or passively through Customer use of the Service and/or DCM Website, and which is directly associated with or reasonably linked to a specific person, computer or device. For example, through the registration process, when the equipment to provide the Service is installed, maintained or upgraded at Customer's premises, when Customer contacts DCM regarding the Service, and through Customer account settings, DCM collects traditional Personal Information such as Customer name, email address, phone number, date of birth, billing address and service address. IP address and other persistent device identifiers such as cookies, plus the nature of any of Customer devices or other personal property making use of the Service, web-browsing or app usage history are traditionally classified as Non-Personal Information but could be classified as Personal Information when such information is either 1) linked to a specific person, computer or device; 2) is required by applicable law to be classified as Personal Information; or 3) is combined with other Personal Information. We use such Personal Information to provide, enhance and/or customize Our Service and communications with you. We may also collect and use additional Personal Information that is deemed to be sensitive for billing, collection and identity verification purposes, such as credit card account number or other financial account information, Social Security Number, EIN Number, and driver's license information. Another type of Sensitive Personal Information we may collect and use for delivering and customizing the Service and/or troubleshooting is a Customer's specific geographic location. We use location-based services to route wireless communications and to provide 911 emergency services.

DCM will communicate with Customer if Customer has provided DCM the means to do so. For example, if Customer has given DCM Customer's email address or phone number, DCM will email or call Customer about Customer use of the Service or product improvements or upgrades, and other transactional information about Customer Service.

DCM may also combine Customer Personal Information with additional Personal Information obtained from its Affiliates, its Operational Service Providers (third party owned companies that provide or perform services on DCM's behalf, to help serve Customer better and to perform functions in order to support DCM businesses and operations), or other companies, such as credit bureaus, background check firms, and marketing research companies.

Some forms of Non-Personal Information as described below will be classified as Personal Information if required by applicable law or when such information is directly associated with or reasonably linked to a specific person, computer or device, or is combined with other forms of Personal Information.

Customer Proprietary Network Information ("CPNI") is a subset of Personal Information that is collected, generated, and used in connection with the interconnected voice telecommunications we provide to a Customer. CPNI includes information contained in your billing statement, call detail, call location information, usage and calling patterns, and certain information about your Service plan rates and features. By law, CPNI does not include your name, service or billing address, or telephone number. We are also prohibited from using your CPNI for marketing purposes unless we have your prior consent.

- **Non-Personal Information and DCM Website Information, Use of Cookies and other Similar Tracking Technology**

When you visit the DCM Website, DCM will collect various types of Non-Personal Information, such as information on DCM server logs from Customer's browser or device, which may also include the type of browser and/or device you're using to access the Service, and the page or feature Customer requested, in addition to IP Address and other persistent device identifiers like cookies. Cookies are text file identifiers DCM transfers to Customer's browser or device that allow DCM, with web beacons (also known as pixel tags, web bugs, or clear GIFs are small objects or images embedded in a webpage or email) to recognize Customer's browser or device and tell DCM how and when pages and features on the DCM Website are visited, by how many people, and other activity on the DCM Website. Cookies alone do not contain Personal Information unless you or a third party gives us Personal Information which may be linked to the data in the cookie. For example, we may use a cookie to remember your password and user ID when accessing your profile on the DCM Website.

A Customer can change the preferences on Customer's browser or device to prevent or limit Customer device's acceptance of cookies or other similar technology, but this may prevent Customer from taking advantage of some of the features on the DCM Website, or accessing certain functions and conveniences like bill payment or easy access to your profile. If Customer clicks on a link to a third party website or service, such third party may also transmit cookies to Customer. Again, this Privacy Policy does not cover the use of cookies or other such tracking technology by any third parties, and DCM is not responsible for their privacy policies and practices.

### **Network Information**

We use network information and CPNI (for voice services only) to and customize the performance of the DCM Network. DCM will not monitor the content of the websites viewed or email communications as part

of DCM's standard network management. Generally, DCM will only monitor and preserve the following network information:

- When Customer is using the Service;
- How Customer is using the Service, such as monitoring traffic patterns regarding websites visited, amount of data being sent or received, or other activity;
- The amount of data Customer is transmitting and receiving through the Service; and
- General information regarding the performance of the Provider Equipment installed on Customer's property or at Customer's premises, and its interaction with the rest of the DCM Network.

However, DCM reserves the right to, and may, monitor, access, review and preserve any CPNI, network information, and/or content in the following situations:

- In response to an inquiry from Customer or an another Authorized User on Customer's account regarding Customer or his/her use of the Service or problems Customer or they are experiencing using the Service;
- If DCM has reason to believe Customer is using the Service in violation of Customer's Service Agreement or any applicable statutes, rules, ordinances or regulations;
- If DCM has reason to believe Customer's use of the Service is negatively affecting other Customers; or
- When DCM is required by law or legal process to do so, or when DCM a good faith belief that DCM is required by law or legal process to do so.

#### **How is Personal Information used for marketing and advertising purposes?**

DCM does not provide third party "Network Advertising," which is advertising based on Customer's overall Internet usage across different third party websites or online services. Multiple third party websites and online services are involved in this tailored or personalized advertising process, in essence a "network" of advertising providers.

Because DCM does not provide network ads, DCM does not recognize the "Do Not Track" settings on various Internet browsers. DCM does not engage or allow third parties to track you across the Internet and across time for advertising purposes.

#### **Links to Other Websites or Online Services**

The DCM Website and/or Facebook Pages (or other social networking platforms) may contain a variety of content and functionality and may provide links to other third party websites or online services. Despite such links, this Privacy Policy applies only to DCM. The presence of a link does not constitute or imply DCM's endorsement, recommendation, or sponsorship of the content, goods, services, business or privacy practices on such websites or online services. DCM encourages Customers to be aware and informed when Customers leave DCM's website and DCM's Facebook Pages, or any other social networking platforms.

## **Will DCM share Customer Personal Information?**

Customer's Personal Information will only be disclosed to third parties as listed in this Privacy Policy, if DCM has received your consent at the time DCM will collect your Personal Information, prior to the disclosure of any Personal Information, or without your consent if required by law, regulation or due process, if we have a good faith belief that we are required by law, regulation or legal process, or if we reasonably believe that there is an emergency involving public safety, national security, serious physical harm and/or the risk of death.

DCM reserves the right to fully use, disclose and process any Non-Personal Information collected from Customer in any manner as well as any information Customer makes public via DCM Services or DCM Website.

DCM will not rent, sell, nor disclose Personal Information to anyone not related to DCM for marketing or promotional purposes, unless DCM changes ownership via a sale, merger or a corporate restructuring. (See "For Business Transfers" below for more information.) DCM will share Customer Personal Information with other third parties as described in this section for the following reasons:

- **To Our Affiliates.** DCM may rely on various Affiliates in order to provide the Service to Customers. These are companies that are related to DCM by common ownership or control. DCM may share Personal Information and Non-Personal Information with any of its Affiliates for business, operational, promotional and/or marketing and advertising purposes.
- **To Operational Service Providers:** DCM and its Affiliates contract with other companies and people to perform tasks or services on DCM's behalf and need to share Customer Personal Information to provide products or services to Customers. For example, DCM may use a payment processing company to receive and process Customer's ACH or credit card transactions for DCM, or DCM may contract with third parties to assist DCM in optimizing DCM's network. Unless DCM tells Customer differently, DCM does not grant its Operational Service Providers any right to use the Personal Information DCM shares with them beyond what is necessary to assist DCM.
- **For Business Transfers/Restructuring:** DCM may choose to buy or sell assets, or DCM may sell assets or be sold. In these types of transactions, Customer Personal Information is typically one of the business assets that would be disclosed and transferred. Also, if DCM (or DCM's assets) are acquired, or DCM goes out of business, enters bankruptcy, or goes through some other change of control, including restructuring, re-organization or financing arrangements, Personal Information would be one of the assets disclosed, transferred to or acquired by a third party.
- **For Protection of DCM, and Our Affiliates, Employees, Operational Service Providers, Users and Subscribers and Public Safety:** DCM reserves the right to access, read, preserve, and disclose any Personal Information DCM has access to if DCM believes doing so will implement and/or enforce our Service Agreement, DCM Website Terms of Use Agreement, Privacy Policy or any legal document; protect our Network(s), DCM Website(s), and company assets; protect the interests, rights, property, and/or safety of the DCM or our Affiliates, employees and officers/directors, shareholders, Operational Service Providers, Users and Subscribers, agents, representatives, third party licensors or suppliers, or the general public.
- **When Required by Law, in Response to Legal Process, or in an Emergency:** DCM reserves the right to access, read, preserve, and disclose any Personal Information and Non Personal Information to

which DCM has access if DCM is required by law, regulation or legal process to do so, if DCM has a good faith belief that DCM is required by law, regulation or legal process to do so, or if we reasonably believe that there is an emergency involving public safety, national security, serious physical harm and/or the risk of death.

### **Is Customer Personal Information secure?**

DCM endeavors to protect the privacy of Customer's account and other Personal Information DCM holds in its records using reasonable administrative, technical and physical security measures. We also monitor the DCM Network for security threats and may prohibit certain activity on the DCM Network that we may deem, in our sole and reasonable discretion, poses a potential risk to the DCM Network or to other Customers. However, DCM cannot and will not guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of Personal Information at any time.

Customer's account is protected by a password for Customer privacy and security. It is Customer's responsibility to prevent unauthorized access to Customer's account and Personal Information by selecting and protecting Customer's password and/or other sign-on mechanism appropriately and limiting access to Customer computer, tablet or device and browser by signing off after Customer has finished accessing Customer's account. Customer is required to notify us immediately if Customer's password or account has been disclosed to a person whose name does not appear on Customer's account, even if you have allowed such disclosure. Customer understands, acknowledges and agrees that Customer is solely responsible for any use of DCM Services via Customer's username and password.

Additionally, if Customer contacts DCM, DCM will ask Customer for verification of Customer's identification and account. DCM will not send an email or text, nor should Customer respond to any email or text communications asking for any sensitive or confidential Personal Information, such as social security number, bank account or credit card account number, or a driver's license number. If Customer receives an email or text requesting any such information from DCM or someone that claims they are with DCM, please contact our Privacy Administrator immediately: [Jorge\\_santiago@otowfl.com](mailto:Jorge_santiago@otowfl.com).

### **What Personal Information can Customers access, modify and/or delete?**

Generally, Customer may access the following Personal Information in Customer's account:

- Full name
- Username and password
- Email address
- Telephone number; and
- Billing and Service address
- Account and billing information

By contacting DCM at [support@mybridgenet.com](mailto:support@mybridgenet.com), or any other online access DCM may create to enable Customers to view and modify Customer account settings, Customer may access, and, in some cases, edit or delete the Personal Information listed above. For example, DCM may retain historic email, billing

and/or Service addresses for security and verification purposes. Customer may not delete such information.

When Customer updates Personal Information, however, DCM may maintain a copy of the unrevised information in DCM's records for internal security reasons and recordkeeping. Some information may remain in DCM's records after it is modified, amended or deleted by Customer or DCM. DCM may use any aggregated data derived from or incorporating Customer's Personal Information after Customer updates or deletes it, but not in a manner that would identify Customer personally. DCM may also maintain Personal Information regarding Customer and Customer's use of the Service after Customer is no longer a DCM Customer as required by DCM's business practices, by law, and/or tax reporting purposes.

The information Customer can view, update, and delete may also change. If Customer has any questions about viewing or updating information DCM has on file about Customer, please contact DCM at [support@mybridgenet.com](mailto:support@mybridgenet.com).

### **What third party disclosure choices do Customers have?**

Customers can always choose not to disclose Personal Information to DCM; however, certain Personal Information is necessary for DCM to provide the Service to Customer. Customer may not opt out of sharing Personal Information for business or operational purposes but may opt-out of any sharing for marketing or advertising purposes.

Customers may opt out of email marketing and advertising from DCM or its Affiliates using the "Unsubscribe" mechanism in each email. Before DCM sends Customers a text or a pre-recorded or artificial voice call that contains advertising or marketing information, DCM will secure Customer's prior written express consent, which can be given via a voice recording, email, text message, postal mail, or telephone key press. (Non-telemarketing pre-recorded/artificial voice calls (including texts) to a wireless device or a wireline residential phone using an autodialer only require a Customer's prior express consent). Customers understand, acknowledge and agree that such texts and pre-recorded/artificial telemarketing calls may be sent using an autodialer and are not conditioned on your purchase of the Service. Customers may opt out of receiving text messages any time by replying "STOP" or "UNSUBSCRIBE" to the text message. Customers may opt out of receiving pre-recorded/artificial voice calls by the opt-out instructions in the call. Customer can also request to be added to DCM's company-specific Do Not Call list to opt-out of advertising and marketing calls of all types. However, Customers will continue to receive calls related to debt-collection and Customer's current Service. Customers may also opt-out of First Party Advertising, but not Contextual Advertising, as detailed in the "Use of Personal Information for Marketing or Advertising Purposes" section above.

Customer may not opt out of DCM's use of cookies or other similar technology, or use of Customer's Personal Information and Non-Personal Information for DCM's internal analytics used to monitor activity on the DCM Website, measure DCM Service performance, or to operate and protect the DCM network.

**Will this Privacy Policy ever change?**

Yes, DCM is constantly working to improve the Service, so DCM will need to update this Privacy Policy from time to time as DCM's business practices and technology changes and service offerings increase, and/or there are changes in local, state or federal laws. Additionally, DCM will also make stylistic, organizational and/or grammatical changes to present DCM privacy practices in a user friendly easy to read manner. DCM will alert Customers to any such changes by placing a notice on the DCM Website with the effective date of the revised Privacy Policy, and/or by sending Customers an email, or by some other means to the extent required by law. Please note that if Customers have not provided DCM with Customer's email address or Customer has not updated Customer contact information, those legal notices will still govern Customer use of the Service, and Customer is still responsible for reading and understanding all notices posted on the DCM Website. Customer's continued use of the Service or the DCM Website after notice of any changes have been provided will indicate Customer's acceptance of such changes, except where further steps are required by applicable law.

Use of Customer's Personal Information is primarily governed by the Privacy Policy in effect at the time Customer subscribed to the Service or visited the DCM Website. If DCM elects to use or to disclose Personal Information that identifies DCM as an individual in a manner that is materially different than that stated in the Privacy Policy in effect at the time you subscribed to the Service or visited the DCM Website, DCM will provide Customer with an opportunity to consent to such use or disclosure. Depending on the circumstances, that consent may include an opt-out.

**What if you have questions or comments about this Privacy Policy?**

If you have any questions or concerns regarding DCM's privacy practices and policies, please contact DCM at [Jorge\\_santiago@otowfl.com](mailto:Jorge_santiago@otowfl.com).

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