

HAWAIIAN TELCOM TV PRIVACY NOTICE

Hawaiian Telcom Services Company, Inc., and its affiliate providers ("Hawaiian Telcom") operates a cable television system that provides subscribers ("Customers," "you" or "your") with cable television programming services, together with other Internet access and phone services, under the trade names "Hawaiian Telcom TV."

The Cable Communications Policy Act of 1984 (the "Cable Act") governs collection, use and disclosure of personally identifiable information about Customers. Other federal laws may also apply, including the Electronic Communications Privacy Act of 1986, as amended, ("ECPA") and section 702 of the Federal Telecommunications Act of 1996, as amended, ("Telecommunications Act"). This notice informs Customers of our policies regarding personally identifiable information and other sensitive information we obtain in the course of providing our services that are subject to the privacy provisions of the Cable Act or other federal law. This notice informs you of:

- The nature of the personally identifiable information we collect and the way we use this information
- Under what circumstances we may disclose personally identifiable information and to whom
- How long we maintain personally identifiable information
- How you may obtain access to your personally identifiable information AND
- Your rights under the Cable Act concerning personally identifiable information

I. COLLECTION AND USE

What is personally identifiable information?

Personally identifiable information is information that identifies a particular person such as a name, postal address or telephone number. It can also include information that is linked to a person's identity such as activities and transactional history. It does not include information that does not permit an individual to be identified or contacted. Non personally identifiable information includes information that Hawaiian Telcom aggregates about Customer usage or is collected in an anonymous form.

This notice addresses the personally identifiable information that you have furnished to us or that we have collected when you use the Hawaiian Telcom cable system that we collect when we provide services to you. Some of the information we collect through use of your service may involve members of your household using your account but because in most cases we cannot tell if the actual user is you (the account holder) or someone else using your account, such as a spouse, child, employee or visitor/guest. Usage through devices associated with or logged into your account is attributed to you and treated in the same way as we describe for information about your personal usage. You should make sure that people who use the Services through your account are aware of the policies in this Notice.

If you visit a Hawaiian Telcom website as a customer, the policies described in this notice apply but additional online privacy policies may also apply that cover topics relevant to website visitors such as the use of cookies. If you visit a Hawaiian Telcom website for purposes unrelated to your subscription, the separate online privacy notice for that website will govern. Website privacy policies can be found at the privacy policy link on each page.

What kind of personally identifiable information does Hawaiian Telcom collect?

We collect personally identifiable information about you that either you provide to us (for example when you set up an account), with your prior written or electronic consent or when necessary to obtain information in order to render a service you receive or to detect unauthorized reception of cable communications. This personally identifiable information may include, but is not necessarily limited to, the following:

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|---------------------------------|--|
| ○ Name | ○ Driver's license number |
| ○ address (service and billing) | ○ Social Security number |
| ○ telephone numbers | ○ Credit card and/or bank account number |
| ○ e-mail address | ○ Bank account information for billing |
| | ○ Other similar account information |

If you are also a telephone customer who receives phone service over our cable system, our practices with respect to certain proprietary network information (CPNI) were disclosed in our [CPNI Notice](#) that was sent to you under separate cover. A copy may be viewed at <https://www.hawaiiantel.com/Residential/Support/Support-Articles/billing-faqs>.

We may also collect other information about your account including billing, payment, and deposit history; credit reports; correspondence and telephone conversations with you; maintenance and complaint information; information about the

services to which you subscribe and your use of those services including the channels you select on your set-top box (for example to assure you are authorized to receive that channel); information about the purchases you make over the system; and records indicating the types and number of devices you use to connect to the system (e.g., televisions, modems, set-top boxes, and computers/devices). Additionally, if you rent your residence, we may have a record of whether landlord permission was required to install our cable service facilities as well as your landlord's name and address.

Information that does not or cannot be reasonably be used to identify you as an individual and that is not linked to your identity is not personally identifiable information. For example, the data regarding the channels you select or your internet usage clickstream data when linked to your identity are treated as personally identifiable information, but when "deidentified," "delinked" or otherwise become anonymous that data is no longer treated as personally identifiable information.

What kind of information do you collect when I use internet services and cable services (including interactive or other transactional television services)?

When you use our internet services or cable services (including interactive apps or other transactional television services such as Video On Demand and Pay Per View programming), our system automatically collects certain information on your use of these services. This may include, but is not limited to, information related to your:

- Video on Demand selections (both free and transactional) and Pay Per View purchases,
- specific interactive TV app features used and time spent using them,
- DVR activity and interactions,
- log on/off times,
- internet bandwidth consumption,
- hawaiiantel.net email addresses,
- email (when using hawaiiantel.net email address)

What kind of information do you collect if I use phone service provided over the cable system?

Usage information about your phone service, when combined with data that can personally identify you, will be considered CPNI.

How does Hawaiian Telcom use personally identifiable information?

Generally, Hawaiian Telcom uses this information as necessary to conduct business activities related to providing cable and other services to you, to help us detect theft of service and for tax, legal, accounting and other purposes related to our business of providing service. More specifically, we use personally identifiable information for the following business purposes:

- To ensure that you are receiving the services you ordered;
- To improve the quality of Hawaiian Telcom's service and to make improvements or upgrades when necessary;
- To confirm that you are being properly billed;
- To provide you with technical support and for system maintenance;
- To inform you of new products or services that may be of interest to you provided by Hawaiian Telcom or others, subject to applicable law and any "opt-out" choice you make as described below;
- To obtain additional information, perform data analyses and work with third parties in order to enhance the value to you and consistency with your perceived or expressed interests and preferences of the programming, content, advertising and Services that are made available to you, including through delivery to you of customized content and targeted advertising and personalized offers for products and services that may be of interest to you;
- To prevent fraud, including the unauthorized use of the service or violations of applicable policies and terms of service;
- To Investigate and respond to complaints, inquiries or legal process from government, law enforcement, copyright owners or other third parties; AND
- To ensure our own compliance with the law.

As a necessary part of Hawaiian Telcom's provision of certain services such as Internet access service, transactional video products such as pay per view, video on demand, any video service that uses a set top box, or phone service provisioned over our cable system, Hawaiian Telcom automatically captures and stores information that may include, but is not limited

to, your viewing selection, including date and time; telephone calls; hawaiiantel.net e-mail addresses; and the text of e-mail or other electronic communications you send or receive using your hawaiiantel.net email address. Any personally identifiable information that may be derived from these logs is subject to the policies described in this Notice and to our obligations under the ECPA and other applicable law.

We may use aggregate and/or non-identified data about the users of our service to develop information that helps us understand your preferences and to better know what channels and services to provide. For example, information about the relative popularity of channels can help us make decisions about which television networks we should carry, enhance our ability to sell commercial time on those channels or enable us to generate additional revenues by providing that information on an anonymous basis to third parties for their own marketing and other purposes. To accomplish this, we may create anonymous pools of data about all or subsets of our subscribers derived from a variety of sources and may supplement that data from third-party sources. In doing so, for example, we might use demographic information we obtain about you from third-party sources that independently gather it, anonymize it by stripping away personally identifiable information, combine it with anonymous television or Internet clickstream data associated with your account, aggregate the results with such data generated from other accounts to develop needs, interests and preferences of various audience segments based on common characteristics such as age, gender or income. We may also use third-parties to perform some or all of these functions.

Additionally, we may use personally identifiable information about you without your consent to protect our customers, employees, or property, in emergency situations, to enforce our rights under our terms of service and policies, in court or elsewhere, and as permitted by law.

II. DISCLOSURE

Does Hawaiian Telcom disclose personally identifiable information to others?

We may disclose personally identifiable information about you with your prior written or electronic consent. Under the Cable Act, we also may disclose personally identifiable information to other parties (such as our affiliates, vendors, and agents) when it is necessary to conduct a legitimate business activity related to the cable service or other services Hawaiian Telcom provides to you. For example, we may engage third parties to assist us in billing and collections, administration, surveys, testing, marketing, service delivery and customization, maintenance and operations, and fraud prevention. We may also disclose personally identifiable information about you to outside auditors, regulator, programming/content providers as well as entities controlled by or under common control with Hawaiian Telcom. We may also disclose information in non-personally identifiable or aggregate formats, such as ratings surveys and service usage and other statistical reports, which do not personally identify you, your particular viewing habits, or any transaction you have made over our system. The frequency of our disclosure of personally identifiable information depends upon the particular business needs activity for which it is disclosed.

Similarly, if we (or our parent company) enter into a merger, acquisition, or sale of all or a portion of our assets, subscribers' personally identifiable information will, in most instances, be transferred as part of the transaction.

The Cable Act also authorizes Hawaiian Telcom to disclose limited personally identifiable information to others including charities, marketing organizations, or other businesses for cable or non-cable "mailing list" or other purposes. Any "mailing list" or related disclosure that we may make is limited to disclosure of your name and address. Such information does not reveal the extent of any viewing or use of cable or other services or the nature of any transaction made over our cable system. If you do not want your information provided to third parties, you can opt-out of such disclosure by visiting hawaiiantel.com/CPNI, or for residential customers call (808) 643-3456 or business customers call (808) 643-4411.

Opting out only impacts disclosure of your personally identifiable information to third-parties for their own marketing or business purposes unrelated to your Hawaiian Telcom services, it would not prevent disclosure of deidentified or aggregate information for use by third-parties. It would also not prevent Hawaiian Telcom from using your information to market our own and third-party products and services to you.

When is Hawaiian Telcom required to disclose personally identifiable information by law?

We may be required by law to disclose personally identifiable information about you without your consent and, in some cases, without notice to you in order to comply with a valid legal process such as a subpoena, court order, or warrant.

The Cable Act may require that we disclose personally identifiable information to a third party or governmental entity in response to a court order or other legal process. If a court order is sought by a non-governmental entity, we may be required to notify you of the court order and your opportunity to appear in court and contest the order. If a court order or other legal process is sought by a governmental entity, the Cable Act requires that we disclose the information to the government unless the records sought involve your video programming selections, in which case you will be given the opportunity to appear and contest any claims made in support of the court order or legal process.

How does Hawaiian Telcom protect personally identifiable information?

We follow industry-standard practices designed to prevent unauthorized access to personally identifiable information. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information.

How long does Hawaiian Telcom maintain personally identifiable information?

Hawaiian Telcom maintains personally identifiable information about you in our regular business records while you are a subscriber to Hawaiian Telcom's cable or other services. We may also maintain this information for a period of time after you are no longer a subscriber as necessary for business, legal, or tax purposes. We will destroy the information if we have no pending requests, orders, or court orders for access to this personally identifiable information, after we determine that it is no longer necessary for the purposes for which it was collected.

III. CUSTOMER CHOICE AND ACCESS**Where and when can I see my personally identifiable information?**

If you would like to see your personally identifiable information, please send us a written request to the correspondence address listed in the "Contact Us" section of your bill. We will be glad to arrange a convenient time and location during regular business hours for you to see the information upon furnishing proper identification. You will only be permitted to examine records that contain personally identifiable information about you and no one else. If you believe any of your personally identifiable information is inaccurate, we will work with you and if we determine the information is inaccurate, we will make appropriate corrections. Hawaiian Telcom reserves the right to charge you for the cost of providing copies of any documents that you request.

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

If you believe that your privacy rights have been violated, please contact us immediately. We will take immediate steps to address your concerns. You may enforce the limitations imposed on us by the Cable Act through a civil lawsuit seeking damages, attorney's fees, and litigation costs. Other rights and remedies may be available to you under federal or other applicable laws as well.

Does this notice apply to Hawaiian Telcom's Internet service or voice service?

If you are a subscriber to Hawaiian Telcom's internet service, a description of our privacy practices may be found at: <https://www.hawaiiantel.com/Portals/0/pdfs/Hawaiian%20Telcom%20Res%20Terms%20and%20Conditions%20-%20int%202025.pdf>

If you subscribe to Hawaiian Telcom's voice service, you may review our CPNI Notice at: <https://www.hawaiiantel.com/Residential/Support/Support-Articles/billing-faqs>. Will Hawaiian Telcom notify me if it changes this notice?

Hawaiian Telcom will provide you with a copy of our subscriber privacy notice on an annual basis. We may modify this notice at any time.. We will notify you of any material changes through written, electronic, or other means as permitted by law. You should cancel your service if at any time you do not agree with a change. By continuing to use the service after a change is in effect, you accept the change and agree to abide by it.