



Grand River Mutual Telephone Corporation d/b/a GRM Networks Privacy Policy

Grand River Mutual Telephone Corporation (hereinafter “GRM Networks”) strongly believes in the protection of each and every customer’s personal privacy and in taking steps to maintain that protection. Pursuant to Federal Law (47 U.S.C. §551), GRM Networks is providing notice of the manner with which it collects, uses and shares customer information in the course of providing its services.

Information Collected

The Communications Act of 1934 (hereinafter the “Communications Act”), allows for us to collect personally identifiable information over a cable system without your consent if it is necessary to provide our services to you or to prevent unauthorized access to services or subscriber data. Also, we may collect other information that you consent to our collecting and that we will use as you direct. Below is a description of the information that we may collect, using the system or otherwise, about our users in order to provide our services and to prevent unauthorized access to our services.

In the course of providing our services to you, the customer, situations will arise which require GRM Networks to collect certain personal information about you including: your name; home, work and e-mail addresses; home, work and cellular telephone numbers; credit, credit card, debit card and bank account information; social security and driver’s license numbers; billing and payment information; records of damage and security deposits; records of maintenance and repairs; data on the broadband (high speed) internet or telephone equipment installed in your home or office, whether personal property or property of GRM Networks; the service options you have chosen; the programs, features and services you have chosen; records of violations of GRM Networks’ Terms of Service and information from third parties that is commercially available, such as age, gender, income and other demographic information.

GRM Networks will **not** collect information from any personal communications. GRM Networks will not read/listen, retain, or disclose the content of your email messages, instant messages, telephone conversations, voice over internet calls, or online chats. Email messages may be scanned to assure they are secure to be opened on the network, they are not spam, or they are not harmful to the user. GRM Networks may also track numbers dialed and addresses emailed.

Use and Sharing

GRM Networks will only collect and use the information which GRM Networks deems necessary to provide our services with the expected quality and efficiency. GRM Networks will keep all personal information secure and will retain personal information as long as necessary to suit its business purposes, or as the law may require. Personal information is to be kept confidential by GRM Networks, only to be used for the business purpose of providing the services contracted for and other related business purposes. Personal information may be further used to detect fraud or investigate any unauthorized uses of our services.

GRM Networks will occasionally use third party providers for various services to be used by our customers. GRM Networks reserves the right to provide these business partners with various pieces of personal information in the interest of providing the best services possible. Our business partners are required by GRM Networks to maintain or exceed the level of confidentiality used by GRM Networks as pertaining to your personal information. GRM Networks does not permit other third parties access to your personal information without your consent except as required by law. If at any

point, you, while using our services, become a customer of a third party vendor, you have the responsibility of reviewing that vendor's privacy policy, as it may differ from GRM Networks.

GRM Networks reserves the right to verify your credit standing without your approval, which may include disclosing personal information to the credit reporting agencies.

Customer Proprietary Network Information

Customer proprietary network information (hereinafter "CPNI") refers to information about an individual's calling tendencies including to whom calls are placed, the duration of calls, date and time. This information will not be released to unauthorized persons over the phone. This information may be used by GRM Networks to determine billing, to maximize the quality of your service, to market products to you in which you may have an interest, and to create directory listings. Further information about GRM Networks CPNI Policy is available upon request.

Legal and Governmental Disclosures

Federal law requires GRM Networks to disclose certain personal information to governmental entities or third parties pursuant to legal process. A legitimate and legal request by a governmental entity or third party will generally be honored by GRM Networks. This information, generally, may only be obtained through a court order, in which case you will have an opportunity to go before a court of law and contest the disclosure. Governmental entity or third party must show by clear and convincing evidence that you are suspected of engaging in a fraudulent or criminal activity and the information sought is material to the case.

In certain situations a governmental entity may obtain and issue a warrant, summons, or subpoena to retrieve information concerning you such as your name; address; local and long distance connection records; records of internet usage; records of telephone usage; telephone or instrument number; an IP address, or any similar record; and any means for payment for our services. There will be times when these disclosures, as required by law, are required to be completed without notice to the customer. GRM Networks will abide by the federal law and make disclosures without notifying customer.

Time Period for Holding of Information

As mentioned above, GRM Networks reserves the right to maintain records of customer's personal information for as long as may be necessary to serve our business purposes. This may extend beyond the termination of your account. When GRM Networks determines it no longer needs the information to serve a business purpose, it will be destroyed.

Your Communications Act Rights

We are providing this notice to you in accordance with the Communications Act. The Communications Act provides you with a cause of action for damages, attorneys' fees and costs in Federal District Court should you believe that any of the Communication Act's limitations on the collection, disclosure and retention of personally identifiable information have been violated by us. Your Terms of Service contain your agreement that, to the extent permitted by law, any such claims will be decided in arbitration and attorneys' fees and punitive damages will not be available.

Severability

If any part or provision of this Policy is held to be unenforceable for any purpose, then both parties agree that the remainder of the Policy shall be fully enforceable as if the unenforceable part or provision never existed.