



POWERED BY REC

**Objective:**

To protect proprietary telephone information.

**Policy:**

In the course of providing telephone services to you, Ciello, Inc. along with its external service providers, obtain certain information (Customer Proprietary Network Information, CPNI) such as time of call, number called, length of call, etc., as well as the other subscribed services. CPNI includes all information necessary to bill you for these services.

Both congress and the Federal Communications Commission (FCC) impose strict requirements on service providers about how they can use CPNI information and the measures required to protect such information from disclosure. The law also prohibits the unauthorized sale or transfer of confidential phone records or the purchase or receipt of such information with knowledge that it was obtained fraudulently or without authorization. Ciello, Inc. has taken measures to protect all of our customers' CPNI and is in full compliance with these laws.

Both federal law and the FCC rules impose a general duty on service providers to protect the confidentiality of your customer information. Ciello, Inc. may only use, disclose, or permit access to your customer information in these circumstances: (1) as required by law; (2) with your approval; and (3) in providing the service from which the customer information is derived.

Only if customer designates another party to have access to their CPNI information will Ciello, Inc. provide such information to that designated party.

Ciello, Inc. will only use CPNI as allowed by law to provide service to our customers.

Adopted: March 16, 2017  
Reviewed: September 25, 2017  
Revised:

A handwritten signature in blue ink, appearing to read "Loren H. Howard".

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Loren H. Howard, Chief Executive Officer



POWERED BY REC

**Objective:**

To protect proprietary broadband information.

**Policy:**

In the course of providing broadband services to you, Cielo, Inc. along with its external service providers, obtain certain information such as IP address, date and time IP address was obtained, and other subscribed services. This and other information is collected to accurately bill for service.

Only if customer designates another party to have access to their information will Cielo, Inc. provide such information to that designated party.

Cielo, Inc. will only use customer information as allowed by law to provide broadband services to our customers.

Adopted: March 14, 2017  
Reviewed: September 25, 2017  
Revised:

A handwritten signature in blue ink, appearing to read "Loren H. Howard".

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Loren H. Howard, Chief Executive Officer