

## **CPNI Policy**

Synapse Global Corporation is committed to maintaining the privacy of its customers. In addition to protecting your personal information as outlined in Synapse Global Corporation's Privacy Policy, we are obliged to give additional protections to certain information about how you use your services. However, that information can help us customize and improve services we offer you.

In this section, we describe what information we protect and how we protect it.

## **CPNI PROTECTIONS**

As a customer of our services, you have the right, and Synapse Global Corporation has a duty, under federal law, to protect the confidentiality of certain types of services, including: (1) information about the quantity, technical configuration, type, destination, location, and amount of your use of your services, and (2) information contained on your telephone bill concerning your services you receive. That information, when matched to your name, address, and telephone number is known as "Customer Proprietary Network Information," or "CPNI" for short. Examples of CPNI include information typically available from telephone-related details on your monthly bill, technical information, type of service, current telephone charges, long distance and local service billing records, directory assistance charges, usage data and calling patterns.

CPNI does not include things like customer name, address, or telephone number; aggregate information or data that is not specific to a single customer; customer premises equipment; and Internet access services.

Unless Synapse Global Corporation obtains your approval, Synapse Global Corporation may not use this CPNI to market products and services to you other than for services you currently purchase.

Customer proprietary network information (CPNI) is information related to the quantity, technical configuration, type, destination, location, and the amount of telecommunications a customer uses that Synapse Global Corporation has access to by virtue of the customer-provider relationship. CPNI does not include the Customer name, address and telephone number, nor does it include Internet access services.

## **APPROVAL**

From time to time, Synapse Global Corporation would like to use the CPNI information it has on file to provide you with information about Synapse Global Corporation's communications-related products and services or special promotions. Synapse Global Corporation's use of CPNI may also enhance its ability to offer products and services tailored to your specific needs. Accordingly, Synapse Global Corporation would like your approval so that Synapse Global Corporation may use this CPNI to let you know about communications-related services other than those to which Customer currently subscribes that Synapse Global Corporation believes

may be of interest to Customer. **IF YOU APPROVE, YOU DO NOT HAVE TO TAKE ANY ACTION.**

However, you do have the right to restrict our use of your CPNI. **YOU MAY DENY OR WITHDRAW SYNAPSE GLOBAL CORPORATION'S RIGHT TO USE YOUR CPNI AT ANY TIME BY CALLING 1-866-412-1115.** If you deny or restrict your approval for Synapse Global Corporation to use your CPNI, you will suffer no effect, now or in the future, on how Synapse Global Corporation provides 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 approval or denial.

In some instances, Synapse Global Corporation will want to share your CPNI with its independent contractors and joint venture partners in order to provide you with information about Synapse Global Corporation's communications-related products and services or special promotions. Prior to sharing your CPNI with its independent contractors or joint venture partners, Synapse Global Corporation will obtain written permission from you to do so.

## **CUSTOMER AUTHENTICATION**

Federal privacy rules require Synapse Global Corporation to authenticate the identity of its customer prior to disclosing CPNI. Customers calling Synapse Global Corporation's customer service center can discuss their services and billings with a Synapse Global Corporation representative once that representative had verified the caller's identity. There are three methods by which Synapse Global Corporation will conduct customer authentication:

1. by having the Customer provide a pre-established password and/or PIN;
2. by calling the Customer back at the telephone number associated with the services purchased; or
3. by mailing the requested documents to the Customer's address of record.

Passwords and/or PINs may not be any portion of the Customer's social security number, mother's maiden name, amount or telephone number associated with the Customer's account or any pet name. In the event the Customer fails to remember their password and/or PIN, Synapse Global Corporation will ask the Customer a series of questions known only to the Customer and Synapse Global Corporation in order to authenticate the Customer. In such an instance, the Customer will then establish a new password/PIN associated with their account.

## **NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES**

Synapse Global Corporation will be notifying customers of certain account changes. For example, whenever an online account is created or changed, or a password or other form of authentication (such as a "secret question and answer") is created or changed, Synapse Global Corporation will notify the account holder. Additionally, after an account has been established, when a customer's address (whether postal or e-mail) changes or is added to an account, Synapse Global Corporation will send a notification. These notifications may be sent to a postal or e-mail address, or by telephone, voicemail or text message.

## **DISCLOSURE OF CPNI**

Synapse Global Corporation may disclose CPNI in the following circumstances:

- When the Customer has approved use of their CPNI for Synapse Global Corporation or Synapse Global Corporation and its joint venture partners and independent contractors (as the case may be) sales or marketing purposes.
- When disclosure is required by law or court order.
- To protect the rights and property of Synapse Global Corporation or to protect Customers and other carriers from fraudulent, abusive, or unlawful use of services.
- When a carrier requests to know whether a Customer has a preferred interexchange carrier (PIC) freeze on their account.
- For directory listing services.
- To provide the services to the Customer, including assisting the Customer with troubles associated with their services.
- To bill the Customer for services.

## **PROTECTING CPNI**

Synapse Global Corporation uses numerous methods to protect your CPNI. This includes software enhancements that identify whether a Customer has approved use of its CPNI. Further, all Synapse Global Corporation employees are trained on the how CPNI is to be protected and when it may or may not be disclosed. All marketing campaigns are reviewed by a Synapse Global Corporation supervisory committee to ensure that all such campaigns comply with applicable CPNI rules.

Synapse Global Corporation maintains records of its own and its joint venture partners and/or independent contractors (if applicable) sales and marketing campaigns that utilize Customer CPNI. Included in this, is a description of the specific CPNI that was used in such sales or marketing campaigns. Synapse Global Corporation also keeps records of all instances in which CPNI is disclosed to third parties or where third parties were allowed access to Customer CPNI.

Synapse Global Corporation will not release CPNI during customer-initiated telephone contact without first authenticating the Customer's identity in the manner set-forth herein. Violation of this CPNI policy by any Synapse Global Corporation employee will result in disciplinary action against that employee as set-forth in Synapse Global Corporation's Employee Policies.

## **BREACH OF CPNI PRIVACY**

In the event Synapse Global Corporation experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require Synapse Global Corporation to report such breaches to law enforcement. Specifically, Synapse Global Corporation will notify law enforcement no later than seven (7) business days after a reasonable determination that such breach has occurred by sending electronic notification through a central reporting facility to the United States Secret Service and the FBI. A link to the reporting facility can be found at: <http://www.fcc.gov/eb/cpni>. Synapse Global Corporation cannot inform its Customers of the CPNI breach until at least seven

(7) days after notification has been sent to law enforcement, unless the law enforcement agent tells the carrier to postpone disclosure pending investigation. Additionally, Synapse Global Corporation is required to maintain records of any discovered breaches, the date that Synapse Global Corporation discovered the breach, the date carriers notified law enforcement and copies of the notifications to law enforcement, a detailed description of the CPNI breach, including the circumstances of the breach, and law enforcement's response (if any) to the reported breach. Synapse Global Corporation will retain these records for a period of not less than two (2) years.

#### **NOTIFICATION OF CHANGES TO THIS POLICY**

If we change this CPNI Policy, we will post those changes on [synapseglobal.com/cpni.pdf](https://synapseglobal.com/cpni.pdf) or in other places we deem appropriate, so that you can be aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If you decide to continue receiving your services after we make any changes to this the CPNI Policy, you shall be deemed to have given express consent to the changes in the revised policy.