

CPNI Policy

BCM One is committed to maintaining the privacy of its clients. BCM One's Privacy Policy outlines what we collect in the way of Personally Identifiable Information (PII). In addition to PII, we are obligated to give additional protections to certain information about how you use your services.

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

CPNI PROTECTIONS

As a BCM One client, you have the right, and BCM One has a duty, to protect the confidentiality of certain information pertaining to the services we provide to you. This includes: (1) information about the quantity, technical configuration, type, destination, location, and use of such services, and (2) related billing information. When matched to your name, address, and telephone number, it 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 BCM One obtains your approval, BCM One may not use your CPNI to market products and services to you other than for the category of services you currently have with us.

APPROVAL

From time to time, BCM One would like to use your CPNI and provide you with information about BCM One's related products and services in addition to special promotions. With your consent, BCM One will be able to share your CPNI with our parent company, affiliates and agents. The use of CPNI may also provide BCM One the ability to offer products and services tailored to your specific needs. Accordingly, BCM One would like your approval so that we may use your CPNI to let you know about related services in both categories. **IF YOU APPROVE, YOU DO NOT HAVE TO TAKE ANY ACTION.**

However, you have the right to restrict our use of your CPNI. **YOU MAY DENY OR WITHDRAW BCM ONE'S RIGHT TO USE YOUR CPNI AT ANY TIME BY CALLING 212.999.7277.** If you deny or restrict BCM One from using your CPNI, you will suffer no effect, now or in the future, on how BCM One provides any services to which you subscribe. Any denial or restriction will remain valid until your services are disconnected or you change the level of permission or denial of CPNI use. If you do not deny or withdraw approval within 30 days of the initial notification, it will be deemed as tacit approval.

DISCLOSURE OF CPNI

BCM One may disclose CPNI in the following circumstances:

- With client approval.
- When disclosure is required by law or court order.

- To protect the rights and property of BCM One or its other clients and service providers from fraudulent, abusive, or unlawful use of services.
- In response to a service provider's request as to whether a client has a preferred interexchange carrier (PIC) freeze on their account.
- For directory listing services.
- To provide services, including assistance with trouble associated with your services.
- For billing and invoicing.

CLIENT AUTHENTICATION

BCM One will request a list from the client of authorized individuals who may request Technical Support or request information related to the account. In the event of the Administrative authorized contact needing to be changed, the request must be submitted via fax and on be on company letterhead.

Clients calling BCM One's 24-hour support center can discuss their services and billings with a BCM One representative once that representative has verified the caller's identity. There are three (3) methods by which BCM One will authenticate the identity of the caller:

- confirming a pre-established password and/or PIN;
- with an immediate call back to the telephone number associated with the services purchased; or
- by mailing the requested documents to the client's address of record.

Passwords and/or PINs should not be any portion of the person's social security number, mother's maiden name, telephone number associated with the client's account or any pet name. In the event the caller fails to remember their password and/or PIN, BCM One will ask the caller a series of questions known only to the caller and BCM One in order to authenticate the caller. In such an instance, the caller will then be required to establish a new password/PIN.

Calls to open a trouble-ticket because of out-of-service conditions will not require the above-mentioned Authorized Contact authentication.

The client is responsible for maintaining and updating the Authorized Contacts list. BCM One will not be responsible for notifications missed due to out-of-date Authorized Contact information.

NOTIFICATION OF CHANGES TO THIS POLICY

Any changes to this CPNI policy will be posted on <https://www.bcmone.com/legal/> or in other places we deem appropriate and effective as set forth in any updated policy. If you decide to continue receiving your services after we make any changes to this CPNI Policy, you shall be deemed to have given express consent to the changes in the revised policy.