

### **CPNI** Policy

#### CUSTOMER PROPRIETARY NETWORK INFORMATION POLICY

Clarity VoIP (further referred to as the "Provider" or "Provider's") is committed to maintaining the privacy of its customers. The "Provider" is obligated to provide customers with protections for certain information about how they use its services. This information helps the "Provider" customize and improve the services it offers to its customers.

In this document, the "Provider" outlines what information is protected and how it is safeguarded.

#### **CPNI PROTECTIONS**

As a customer of the "Provider's" services, you have the right, and the "Provider" has a duty under federal law, to protect the confidentiality of certain types of service-related information, including:

1. Information about the quantity, technical configuration, type, destination, location, and amount of your use of its services.

2. Information contained on your telephone bill concerning the services you receive.

When this information is matched to your name, address, and telephone number, it is referred to as "Customer Proprietary Network Information" or "CPNI." Examples of CPNI include details from your monthly bill, technical information, service type, current charges, long-distance and local billing records, directory assistance charges, usage data, and calling patterns.

#### APPROVAL

From time to time, the "Provider" would like to use the CPNI information it has on file to provide you with information about its communications-related products and services or special promotions. The "Provider's" use of CPNI may also enhance its ability to offer products and services tailored to your specific needs. Accordingly, the "Provider" seeks your approval to use this CPNI to inform you about communications-related services beyond those to which you currently subscribe and that may be of interest to you.

# IF YOU APPROVE, YOU DO NOT NEED TO TAKE ANY ACTION. YOUR SIGNATURE ON THE SERVICE AGREEMENT SIGNIFIES YOUR CONSENT THAT THE "PROVIDER" MAY USE AND DISCLOSE CPNI AS DESCRIBED HEREIN.

However, you have the right to restrict the "Provider's" use of your CPNI. **YOU MAY DENY OR WITHDRAW THE "PROVIDER'S" RIGHT TO USE YOUR CPNI AT ANY TIME BY CALLING 949-307-0088.** Denying or restricting this approval will not affect how the "Provider" provides the services you subscribe to. Any denial or restriction of approval remains valid until your services are discontinued or you affirmatively revoke or limit such approval or denial.

In certain situations, the "Provider" may wish to share your CPNI with independent contractors and joint venture partners to provide you with information about the "Provider's" communications-related products and services or special promotions. Before sharing your CPNI with such entities, the "Provider" will obtain your written permission.

# **CUSTOMER AUTHENTICATION**

Federal privacy rules require the "Provider" to authenticate your identity before disclosing CPNI. Customers can discuss their services and billings with a "Provider" representative once their identity has been verified. The "Provider" employs the following methods for authentication:

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

Passwords and/or PINs cannot include any part of your social security number, mother's maiden name, account balance, telephone number, or pet name. If you forget your password or PIN, the "Provider" will verify your identity by asking a series of questions known only to you and the "Provider". You will then establish a new password or PIN for your account.

# NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES

The "Provider" will notify you of certain account changes. For instance, when an online account is created or updated, or a password or authentication method (such as a "secret question and answer") is changed, you will be notified. Additionally, if your address (postal or email) changes or is added to an account, the "Provider" will send a notification. These notifications may be sent via postal mail, email, phone call, voicemail, or text message.

### DISCLOSURE OF CPNI

The "Provider" may disclose CPNI under the following circumstances:

- When you have approved its use for the "Provider's" or its joint venture partners and independent contractors' sales or marketing purposes.
- When disclosure is required by law or court order.
- To protect the rights and property of the "Provider" or to prevent fraudulent, abusive, or unlawful use of services.
- When a carrier requests to know whether you have a preferred interexchange carrier (PIC) freeze on your account.
- For directory listing services.
- To provide services to you, including assistance with service-related issues.
- To bill you for services.

#### **PROTECTING CPNI**

The "Provider" employs multiple methods to protect your CPNI. These include software enhancements to track whether you have approved the use of your CPNI, as well as training all employees on proper CPNI handling and disclosure practices. All marketing campaigns are reviewed to ensure compliance with CPNI rules.

The "Provider" maintains records of its own and its joint venture partners' or independent contractors' sales and marketing campaigns that use CPNI, including details of the specific CPNI used. Records of all instances where CPNI is disclosed to third parties or accessed by them are also kept. The "Provider" will not release CPNI during customer-initiated telephone contact without first authenticating your identity.

Violations of this CPNI policy by any "Provider" employee will result in disciplinary action as outlined in the company's Employee Manual.

#### **BREACH OF CPNI PRIVACY**

If the "Provider" experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require notification to law enforcement. The "Provider" will notify law enforcement no later than seven (7) business days after determining a breach has occurred by submitting electronic notification through a central reporting facility to the United States Secret Service and the FBI. A link to the reporting facility is available at http://www.fcc.gov/eb/cpni.

The "Provider" cannot inform you of a CPNI breach until at least seven (7) days after notifying law enforcement unless law enforcement advises otherwise. The "Provider" will maintain records of all discovered breaches, including the date of discovery, notifications to law enforcement, a detailed description of the breach, and any responses from law enforcement. These records will be retained for at least two (2) years.

### NOTIFICATION OF CHANGES TO THIS POLICY

If the "Provider" updates this CPNI Policy, changes will be posted on www.ClarityVoIP.xyz/Legal or other appropriate locations to ensure you are aware of what information is collected, how it is used, and under what circumstances it may be disclosed. By continuing to receive services after any changes to this policy, you consent to the revised policy.