

**NT Spark, LLC**  
**Customer Proprietary Network Information (CPNI) Policy**

NT Spark, LLC (referred to as the “Company”) is committed to maintaining the privacy of all its Users. In addition to protecting your personal information, as outlined in the Company’s Privacy Policy, we are obligated to provide additional protection for certain information about how you use your services.

**CPNI Protections**

As a User of our telephone and broadband services, you have the right, and the Company has a duty, under federal law, to protect the confidentiality of certain types of service data, including: (1) information about the quantity, technical configuration, type, destination, location, and amount of your use of your telephone and broadband usage, and (2) information contained on your bill concerning the services that you receive. That information, when matched to your name, address, and telephone number or IP address is known as “Customer Proprietary Network Information” or CPNI.

CPNI does not include your name, address, and telephone number, as this is common publicly available information.

**Giving Permission**

From time to time, the Company would like to use the CPNI information it has access to in order to provide you with information about our products and services or special promotions. Our use of CPNI may also enhance our ability to offer products and services tailored to your specific needs. Accordingly, we would like your permission so that we may use this CPNI to let you know about communications-related services other than those to which you currently subscribe. **When you contact our Customer Service Center regarding a question on your existing service, it is considered implied that we will have to access your service account data in order to assist you.**

You do have the right to restrict our use of your CPNI at any time. If you deny or restrict your permission for use of your CPNI, you will suffer no effect, now or in the future, on how we provide services to which you subscribe.

From time to time, the Company may want to share your individual CPNI with its independent contractors and joint venture partners to provide you with additional or promotional communications-related products and services or special promotions. Prior to sharing any individual CPNI with independent contractors or joint venture partners, **we will obtain written permission from you to do so.**

**Customer Authentication**

Federal privacy rules require the Company to authenticate the identity of its customer prior to disclosing CPNI. Customers contacting Customer/Member Services can discuss

their services and billings with a Company representative once that representative has verified the caller's identity. We identify by confirming full account numbers, full names, and service addresses.

### **Notifications of Certain Account Changes**

The Company 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 "security question and answer") is created or changed, the Company will notify the account holder via the email address that they provided at the time of account establishment.

### **Disclosure of CPNI**

The Company may disclose CPNI in the following circumstances:

- When the Customer has provided permission for the use of their CPNI.
- When disclosure is required by law or court order.
- To protect the rights and property of Company or to protect Customers and other carriers from fraudulent, abusive, or unlawful use of services.
- For directory listing services to be provided, if applicable.
- To provide the services to the Customer, including Customer reported trouble management.
- To bill the Customer for services.

### **Protecting CPNI**

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

The Company maintains records of its sales and marketing campaigns that utilize Customer CPNI, if any. Included in this is a description of the specific CPNI that was used in the sales or marketing campaign. We also maintain records of all instances in which CPNI is disclosed to third parties or where third parties were allowed access to Customer CPNI. Maintenance of records is in accordance with our Document Retention Policy.

The Company 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 Company employee will result in disciplinary action as set forth in the Company *CPNI Employee Manual*.

### **Breach of CPNI Protections**

In the event the Company experiences a privacy breach and CPNI is disclosed to unauthorized persons, Federal rules require the Company to report such breaches to law enforcement. Specifically, the Company 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: <https://www.cpnireporting.gov> . The Company 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 instructs the carrier to postpone disclosure pending investigation. Additionally, the Company is required to maintain records of any discovered breaches, including the date that the breach was discovered, 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. The Company will retain these records for a period of no less than two (2) years.

### **Notification of Changes to Our CPNI Policy**

**NT Spark, LLC reserves the right to modify this *CPNI Policy* at any time. We will notify you of any material changes via written, electronic, or other means permitted by law, including by posting it on our website. If you find the changes unacceptable, you have the right to cancel the Services. If you continue to use the Services after receiving notice of such changes, we will consider that as your acceptance of the changes.**

**Effective: 07/01/2024**

**Version 1**