

Western Iowa Networks Privacy Policy

Protecting privacy is not a new endeavor for Western Iowa Networks. WIN has a long-standing tradition of recognizing and protecting the privacy of customers who use its telecommunications services. WIN maintains strict customer information privacy policies and uses state of the art technologies to safeguard customer information and communications from unauthorized intrusions.

WIN recognizes that the growth of Internet services has created additional privacy concerns, particularly for consumers. Online privacy concerns focus primarily on the protection of "customer identifiable" information which an individual or other customer reasonably expects to be kept private. As the term suggests, "customer identifiable" information is information that, when associated with an individual identifies that individual, for example, a customer's name, address, telephone number, and e-mail address.

Some Internet users may also wish to know who can learn about what they do on the Internet, even when that online behavior is not directly linked to any information that identifies an individual. For example, advertisers may observe whether visitors to a web site see or respond to online advertising without knowing who those visitors are.

It is common practice and often a necessity for companies, governments, or other organizations to collect customer identifiable information in order to conduct business and offer services. For example, a telecommunications provider may collect customer identifiable information, such as name, address, telephone number, and a variety of other information in the course of billing and providing services to a customer.

Some activities on the Internet follow very familiar patterns. Consumers signing up for an Internet access service, for example, are usually asked to provide name, address, telephone number and credit card and other information that is typical when the consumer orders a product or service. Similarly, business web sites may ask visitors to supply information about themselves, particularly when information, services or merchandise are requested, but often simply to be able to better target WIN's services to the customer's interests and requirements.

WIN HAS PUT IN PLACE THE FOLLOWING PRIVACY POLICY

This policy covers WIN and its subsidiaries, including Breda Telephone Corp., Prairie Telephone Co., Inc., BTC Inc., Tele-Services Ltd., and Westside Independent Telephone Company ("WIN"). WIN will continue to protect customer information derived from its local, long distance, Internet, video, and wireless services consistent with federal laws and with federal regulations issued by the Federal Communications Commission.

In order to be consistent with this policy, WIN expects each of its Internet customers to be familiar with and to have read and understood all of the information described in the Acceptable User Policy.

HOW WIN PROTECTS YOUR PRIVACY ONLINE

Collection and Use: WIN will collect and use customer identifiable information for billing purposes, to provide and change service, to anticipate and resolve problems with your service, or to create and inform you of products and services that better meet your needs. This means that WIN may use your customer identifiable information, in conjunction with information available from other sources, to market new services to you that WIN thinks will be of interest to you, but WIN will not disclose your customer identifiable information to third parties who want to market products to you.

When you access the Internet, the computers that host web sites you visit (web servers) automatically receive some anonymous information. This "usage data" may include a record of which pages a web browser has visited. WIN servers receive usage data when customers visit westianet.com sites, and when WIN Internet customers visit other sites as well. WIN may use usage data to provide advertising about goods and services that may be of interest to WIN customers, or to provide customized features and services. WIN will not use information about your activities on the Internet together with any information that identifies you without your consent.

DISCLOSURE

WIN will not sell, trade, or disclose to third parties any customer identifiable information derived from the registration for or use of a WIN Internet service -- including customer names and addresses -- without the consent of the customer (except as required by subpoena, search warrant, or other legal process or in the case of imminent physical harm to the customer or others).

When WIN uses other agents, contractors or companies to perform services on its behalf, WIN will ensure that it protects your customer identifiable information consistent with this Policy. If WIN includes your name and any other customer identifiable information in a directory that WIN creates from information received as an ISP, or internet service provider, WIN will give you the opportunity to have your information excluded from that directory. Business directories that WIN creates may, however, contain information obtained from other sources.

SECURITY

WIN has implemented technology and security features and strict policy guidelines to safeguard the privacy of your customer identifiable information from unauthorized access or improper use, and WIN will continue to enhance WIN's security procedures as new technology becomes available.

E-MAIL CONTENTS

WIN will not read or disclose to third parties private e-mail communications that are transmitted using WIN services except as required to operate the service or as otherwise authorized by law.

IMPROPER CONDUCT

WIN may also use customer identifiable information to investigate and help prevent potentially unlawful activity or activity that threatens the network or otherwise violates the customer agreement for that service.

ACCOUNT INFORMATION

WIN honors requests from customers to review all customer identifiable information maintained in reasonably retrievable form, which currently consists of your name, address, e-mail address, telephone number and/or billing information, and will correct any such information which may be inaccurate. Customers may verify that appropriate corrections have been made.

ADDITIONAL PRIVACY PROTECTION FOR CHILDREN USING THE INTERNET

WIN joins the industry in recognizing that children, including young teens, may not be able to make informed choices about personal information requested online. Accordingly, WIN does not target children or teenagers (younger than eighteen years of age) for collection of information online. WIN does not solicit or collect customer identifiable information targeted at children and teenagers under eighteen and does not allow anyone else to do so on a WIN web site. In addition, the editorial content of WIN web sites designed for children will not knowingly promote or link to any third party web site that collects customer identifiable information unless that Web site publishes a privacy policy that is easily accessible.

In addition, on all of its online services and WIN web sites, WIN will encourage children to seek the consent of their parents before providing any information about themselves or their households to anyone on the Internet.

WIN encourages parents to take an active role to protect the privacy and security of their children and to prevent the inappropriate use of information about their children. WIN supports the development of technologies that help parents to control the collection and use of personal information from children who use online services in their households.

Finally, WIN is compliant with the PROTECT Our Children Act. The PROTECT Our Children Act is a federal statute which imposes certain reporting and retention requirements for ISPs (and other companies which provide electronic communications services or remote computing service) and who have actual knowledge of activities involving child pornography or the sexual exploitation of children. Service providers are required to report actual knowledge of certain

criminal behavior to the National Center for Missing and Exploited Children (NCMEC) tip line but are not required to monitor users or to affirmatively seek facts or circumstances that would trigger a report.

If you would like more information on how to protect your children while they are online, visit the Federal Trade Commission's OnGuardOnline website at <https://www.onquardonline.gov>.

CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) POLICY

WIN knows the importance of personal privacy to WIN's customers. WIN keeps all account information strictly confidential to the fullest extent possible and uses industry-accepted technology to safeguard customer data. Federal law concerning telecommunications companies regulates the use of account information to selectively market specific products and services to specific customers.

TO WHAT KIND OF INFORMATION IS WIN REFERRING?

This information, legally referred to as Customer Proprietary Network Information (CPNI) includes data such as which long distance carrier you have chosen, what calling features you use and which calling plans, if any, to which you may be subscribed.

WHO USES THIS INFORMATION AND IS IT PROTECTED?

Only WIN can see or use this information. It is never released to outside companies. You have the right, and WIN has the duty under federal law, to protect the confidentiality of this type of information.

WHAT DO I NEED TO DO?

No action on your part is necessary unless you wish to restrict WIN's use of this type of information to contact you for the purpose of tailoring WIN service offerings to your individual needs. Should you wish to restrict use of your CPNI, or if you have any concerns about the WIN privacy policy or its implementation, please call us at 888-508-2946 or send an e-mail to customerservice@westianet.com with your request within 30 days of receipt of this policy. Restricting CPNI may make you ineligible to receive information from WIN about new products and services, promotions and packaged offerings.

HOW DOES THIS AFFECT SERVICES I RECEIVE?

Whatever you decide will not affect the provision of any services to which you subscribe. Your approval or denial for use of CPNI will remain valid until you notify WIN otherwise. Again, WIN only uses your account information to market other telecommunications services and products WIN offers and no action is required on your part unless you wish to restrict WIN's use of your CPNI. You will still receive monthly bill inserts, quarterly newsletters, blanket advertisements and promotions, and any other publications which are sent to all customers at the same time, so that WIN can keep you up to date on what is happening.
