

# Privacy Policy

*Updated June 23, 2020 to include information about Mobile Applications*

*Updated March 2021 to provide more information about our cookies and tracking policies*

Cumberland Electric Membership Corporation (CEMC) provides energy to five counties in northern middle Tennessee. Cumberland Connect is a wholly owned subsidiary of CEMC, and, together with CEMC, offers high-speed Internet, phone and TV service. As used in this Privacy Policy, “we,” “our,” and “us” and similar terms in this Privacy Policy refer to CEMC and Cumberland Connect.

This Privacy Policy contains important information on how we collect, use, and protect personal information collected about you on this website and webpages owned and operated by CEMC and Cumberland Connect as well as the services provided on our website through the customer portal for residential and business customers and our Mobile Applications, such as SmartHub, CCFiber SmartIQ, and CCFiber TV) (Apps). This Privacy Policy also covers certain products and services we provide, except for products and services with separate privacy notices provided when those separate products or services are downloaded or set up. By accessing this website or providing information to us through this website, using including our customer portal, or our Apps, or using our products and services, you accept the terms of this Privacy Policy.

## **Information we collect and how we collect and use your personal information**

CEMC and Cumberland Connect collect certain information from you when you request information about services, establish an account, or ask to be included in an email or other contact list. The collection and processing of information as described in this Privacy Policy may be done on our behalf by third party vendors. We use the information we collect to provide you with services and to carry out our legal and other obligations.

Through our website and customer portal, you may provide us with certain personal information in order to set up an account, contact us, request

information, access information or subscribe to services. This information may include your first and last name, phone number, email address, mailing, service or other physical address, payment information, and other information needed to provide you with the information or services you are requesting. You may enter this information through our contact us form or through our customer portal, SmartHub, which is operated by a third party, the National Information Solutions Cooperative (NISC). We are not responsible for the privacy practices of NISC or other third parties, even those that have websites linked to or from our website. We encourage you to review their respective privacy policies.

When you download, install or use one of our Apps and register for an account to use one of our Apps, we may collect information you provide to us, such as your name, email address, location, phone number, contact book data, inventory of installed applications, and your screen recording. You may be required to provide certain information about yourself as a condition of downloading, installing or using the Apps or certain of their features or functionality, such as parental controls, subscriber profiles, or time-of-day restrictions. In addition to the information you provide to us, we will automatically collect information about your mobile device and about your use of the Apps, including browser information, websites you visit, traffic usage and session cookies related to your access and use of the App. Keeping track of this information is necessary in order for some features of our Apps to function correctly. We collect this information to assist us in improving our Apps and maintaining internal records in order to understanding how it is used by our customers and to provide additional features and to fulfill any other purpose authorized by you and reasonably required for the App. We may use information we collect about you to send you marketing information, product recommendations and other non-transactional communications (SMS, in-app messages, or, with your permission, push notifications) about us, including information about our products and services and to enhance your experience after downloading the Apps.

As with most websites, our website collects certain information automatically, such as the Internet domain from which you access our websites, IP address, the type of browser and operating system you use, the date and time of access, pages visited, and the address of the website from which you linked to our website. Like many websites, our website uses cookies to collect information about how you use the website and to assist us in improving our website by understanding how it is used

by customers. Please see below for more information about our cookies and tracking policy.

We may use the information we collect about you through our website to administer your account, improve services, correspond with you, particularly when you submit an inquiry, or sign up to receive products or services, or other communications and updates from us; to analyze trends, track your usage of our website to provide more relevant and interesting content; to maintain the security and integrity of our website; products and services; to administer, review and improve our website, products or services; or, should you become a customer, for purposes permitted by your agreements with us, if any, to enable us to provide you with certain products or services. Some of these services are provided by third-party vendors, such as our billing service provider. We may use third-party service providers to provide website analytics that use cookies, web beacons, and other technologies to collect information to improve the online experience and our interaction with users and to provide personalized content based on your activities and interests. If you are a customer, we use your personal information to handle customer service requests, send marketing information or product recommendations and fulfill your requests.

If you use a router with our services, we may collect and use technical information, such as device count and types, router configuration parameters, such as parental control settings and wireless settings, router performance and usage, in order to provide services to you and to improve our products or to provide customized services or technologies to you.

We will not share or sell your personal information with third parties, other than to our subsidiaries or vendors, including payment processors, content providers, our customer portal host, and others who perform similar functions on our behalf. Our vendors who provide product support services may collect and use technical information gathered as part of their product support services and may use that information to improve their products or to provide customized services or technologies to us. This information will be treated in accordance with the third party's privacy policy. In no event will we rent, sell or lease your personal information to third parties.

We might disclose your personal information when such disclosure is required or authorized by law through legal process, or when pertinent to judicial or governmental investigations or proceedings, to protect our legal rights and pursue remedies available to us and to limit our damages, or to defend and protect the rights of others; in connection with a sale, purchase, merger, reorganization, liquidation or dissolution involving CEMC or Cumberland Connect; and when necessary to respond to an emergency, which includes protecting your safety or the safety of others.

## **Children**

We are committed to protecting the privacy of children. We do not knowingly attempt to solicit or receive information from children under the age of 13, nor send them requests for personal information.

## **Cookies and tracking technology**

Like many other websites, we use standard technology such as cookies, web beacons, and pixels (collectively, called “cookies” herein) for a variety of purposes, including to collect information about how you use our website; to assess the performance of our website, including to improve the content, products and services offered through this website; to offer you enhanced functionality when accessing this website, including identifying you when you sign in to our website, keeping track of your specified preferences, or to track your online activities over time and across third party websites. A cookie is a small data file that may be sent to your computer when you visit our website. A cookie is used to identify you when you use our website or return to our website. We use cookies to better serve our website users and help us improve your experience on our website. We may use session and persistent cookies—a session cookie enables certain features on our website, but is deleted from your computer when you end your browsing session, whereas a persistent cookie remains on your computer after you close your browser, and may be used by your browser on subsequent visits to our website. Most web browsers allow you to control cookies through their settings tab. You may also have the option to delete most cookies. By changing the settings of your browser, you may be able to effectively refuse or delete cookies, but that may affect the display function of certain features on our Website.

**Do Not Track:** Our services are not currently configured to respond to browsers' "Do Not Track" signals, as no formal "Do Not Track" standard has been adopted, and we are trying to provide you with a personalized experience. If you would like to learn more information about "Do Not Track," click here, <https://allaboutdnt.com/>.

## **How we protect your information**

We make reasonable efforts to maintain the security of our servers and computer networks in order to help prevent the loss, misuse, and modification of the personal information we collect about you. We protect the security of your personal information by using specialized software during the service application process, enrollment, or when you pay for services via our customer portal.

We also maintain reasonable administrative, technical, and physical safeguards to protect the personal information in our possession. We have established security protocols to ensure that we are doing our part to protect against any anticipated threats or hazards to the security and integrity of our systems. Even though we take reasonable steps to maintain information security, and expect our vendors to do the same, we cannot guarantee the security of personal information. We also encourage our customers to do their part in protecting their personal and sensitive information, including being responsible for maintaining the confidentiality of their account login information and other passwords.

## **Changes and updates to this Privacy Policy**

We will change and update this Privacy Policy from time to time. When we do, the Privacy Policy version date, at the top of this page, will be updated to reflect that revision. We encourage you to periodically re-read this Privacy Policy to see if any changes could affect you.

## **Questions, concerns or complaints**

If you have any questions about this Privacy Policy, you can reach us by sending an email to [dmaloney@cemc.org](mailto:dmaloney@cemc.org) or by regular mail to 1940 Madison St. Clarksville TN, 37043.