

ANNUAL CUSTOMER PRIVACY NOTICE

2022

This notice contains important information concerning the broadband services that the City of Hudson dba Velocity Broadband (“Velocity”) provides. We provide this notice as a service to our customers and in accordance with applicable federal law and FCC regulations. It is important to us that you are informed about the services we provide, our policies and procedures and your rights as a customer. We encourage you to review the following information and contact us at 330-342-9544 with any questions or concerns you may have.

YOUR PRIVACY AS A VELOCITY CUSTOMER

As a customer of Velocity Broadband, you are entitled to know what we do with personal information about you that we receive. We consider our treatment of such information to be a part of the trust you place in us by using our broadband internet and telephone services. We keep only the personal information of our customers that is needed to provide our services; treat it as private, use it only for what we offer you, do not sell it to others, work to keep it secure, and destroy it when no longer needed.

Velocity takes the privacy of our customers data very seriously. FCC regulations provide certain protections to you, and requires that Velocity disclose to you the following:

- The limitations imposed on Velocity Broadband in its collection and disclosure of personally identifiable information about you.
- The type of personally identifiable information we collect;
- How we use your personally identifiable information;
- Under what circumstances we may disclose your personally identifiable information and to whom;
- The period during which we maintain your personally identifiable information; and
- How you may access your personally identifiable information.

In addition, Section 222 of the Communications Act, as amended, provides privacy protections for certain information related to Velocity’s telephone and broadband Internet access services:

- Information about the quantity, technical configuration, type, destination, location, and amount of your use of the phone and broadband Internet access service; and
- Information contained on your bill concerning the type of phone and broadband Internet access services and features you receive.

This information is known as customer proprietary network information (“CPNI”). Please carefully review the Velocity Broadband CPNI Policy posted on our website

<https://www.hudsonvelocity.com/>

Personally identifiable subscriber information; restrictions on access. To provide our services, we collect and maintain personally identifiable information concerning customers. That information may include name, address, phone number, social security number, driver's license number, billing records, service maintenance and repair records, premium service subscription information, marketing information, and customer complaints. Except as indicated below under "Disclosure prohibited; exceptions" below, all personally identifiable information is used for the normal business purpose of offering and providing service to you. Only persons authorized by us may access this information. Persons authorized to access customer information include our employees and sales agents, billing and collections services, accountants, and other businesses that provide products and services to the City of Hudson and Velocity Broadband that have a direct connection to your information, such as billing software, telecom partner, technical support partners. These persons may access customer information on a regular basis. We maintain certain customer information for as long as we provide service to a customer and for a commercially reasonable time thereafter. Other customer information is periodically destroyed.

Disclosure prohibited; exceptions. Federal law prohibits the disclosure of your personally identifiable subscriber information without your consent, except under the following circumstances:

Business activities. We may disclose customer information in order to conduct business activities related to telecom or internet or other service.

Unauthorized reception of services. We may disclose customer information in order to detect unauthorized reception of our services.

Names and addresses to third parties. We may disclose names and addresses to third parties for the purposes of mailing lists, charities, and direct mail marketing, unless you notify us in writing that you do not wish us to disclose it. You may write us at any time with this request. No such disclosure may reveal directly or indirectly the internet services you view or other transactions you make.

Court order. We must disclose personally identifiable information without your consent if we are required to do so by a court order. If we are served with a court order requiring disclosure of your subscription, internet, or telecom information, we will promptly inform you before releasing any information. You will then have an opportunity to contest the order.

Law enforcement request. We may also disclose personally identifiable information without your consent when requested by law enforcement under certain circumstances.

Customer rights. As a customer, you may review your personal information maintained by us by contacting us and making an appointment to meet at our office

during normal business hours. We will need a reasonable amount of time to collect the information and remove any references to other customers. You may request correction of any errors in personal information that we collect or maintain pertaining to you. You have the right under federal law to enforce your subscription privacy rights through a civil action in federal district court.

Communications preferences/opt-out. Subscribers who do not wish to receive marketing materials, phone calls, emails or direct mail may notify Velocity Broadband at any time. You may also prohibit our permitted disclosure of your information to third parties (except as otherwise required by legal process or applicable law) by notifying us in writing. You may opt-out of receiving marketing communications by telephone by notifying the calling party that you wish to opt-out. You may also opt-out of such calls by sending a request in writing to the address below.

CUSTOMER SERVICE

Complaint procedures. At Velocity Broadband, providing high-quality customer care and technical service is our top priority. We endeavor to resolve any complaints concerning any Velocity services as soon as possible. Please use the following procedures to help us resolve your complaints:

1. Contact our Customer Service group at 330-342-9544. An answering service may take your message after our normal business hours.
2. During our normal business hours, you may speak with a Customer Service Representative (CSR). Our CSR will attempt to determine the nature of the problem. If the problem cannot be resolved over the phone, the CSR will schedule a Service Technician to visit your home or business, usually by the next business day.
3. If you do not call during our normal business hours, leave a complete message with the answering service. Please leave your name, address, work and home telephone numbers and a brief description of the nature of the problem. When possible, a Service Technician will be dispatched by the next business day to fix the problem. In other cases, the answering service will forward the message to our office, and we will contact you as soon as we are able, usually during normal business hours.
4. Emergencies such as fallen trees or utility poles, violent storms or very cold weather may interfere with our services. We promptly dispatch our crews to correct any emergency. Please keep in mind that some emergency situations may affect a large service area, and it may take several days to resume full service to the entire area.
5. We maintain complaint records for at least one year. Those records are available for inspection by the applicable state authorities and the FCC during that time.

If a problem is not resolved to your satisfaction, you may write or call us with concerns or complaints. For phone service you may also contact the Public Utility Commission of Ohio, at (800) 686-PUCO (7826) 180 E Broad St, Columbus, OH 43215.

GENERAL INFORMATION

Services and Prices – Please contact us at 330.342.9544 or by visiting our offices or our website for information on services and prices including:

- Products and services offered
- Options for subscribing to services
- Installation and maintenance policies
- Help Menu for using our internet and/or phone services
- Terms and conditions applicable to our internet and/or phone services

HOW DO I CONTACT HILIGHT?

If you have any questions regarding this annual notice, or wish to contact us about your personal information, please visit us at our office or contact us directly at:

Phone: 330-342.9544

Mail: Hudson City Hall, 1140 Terex Rd, Hudson Ohio 44236

Velocity Broadband reserves the right to modify the policies set forth in this customer notice 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 you purchase from Velocity Broadband. If you continue to use the services after receiving notice of such changes, we will consider that as your acceptance of the changes.

Effective 03/01/2022