

PRIVACY POLICY

The following is a description of the privacy policy for Hillsboro Telephone Company, Inc. and its subsidiary, Verneau Networks, Inc., (collectively, the "Company"). This privacy policy applies to Hillsboro Telephone's website and Verneau Networks' Internet access and video services. By using Verneau Networks' Internet access services or subscribing to its video services, or by accessing the Company's website, you are consenting to the Company's information gathering and use practices as in effect from time to time. If you have any questions or concerns about this privacy policy as it applies to the Company's services, please do not hesitate to contact us via telephone at (608) 489-3230 or by email at: info@hillsborotel.com

For Verneau Networks' video services, this policy is supplemented by the Cable Privacy Act Statement, which is provided annually to all video service subscribers, and which is set out below.

The privacy rules for Hillsboro Telephone's local exchange service and Verneau Networks' long distance telephone service are established by the Public Service Commission of Wisconsin and the Federal Communications Commission.

Information Collection

The Company collects information from users at several different points as it provides Internet access or video services. The Company is the sole owner of the information it collects in the course of providing Internet access and video services.

The Company is the sole owner of the information collected on its website. The Company only has access to or collects information that you voluntarily give us via email or other direct contact from you, or information obtained while providing services to you.

The Company's website uses "cookie" technology. "Cookies" are strings of text that a website stores on a user's computer. Cookies enable a website to keep track of a user's preferences and activities relating to that website. Our website creates and uses temporary cookies. These temporary cookies expire at the end of a user's visit to the website.

Use of Information

The Company uses information it obtains in the course of providing its services and from its website for the following purposes:

- internal marketing and analysis;

- order processing;

- collection of amounts owed to the Company;

- to administer and maintain the services it provides;

- to satisfy legal requirements, including but not limited to responding to legal demands for information, and enforcing the Company's use policies; and,

- as appropriate in situations the Company reasonably considers to be emergencies involving personal safety.

The Company will not sell or rent this information to anyone. The Company will use your information to respond to you regarding the reasons you contact us. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request, e.g. to ship an order or to provide services you have ordered from us. Unless you ask us not to, we may contact you via email in the future to tell you about specials, new products or services, or changes to this privacy policy.

The Company will not sell, share, or rent this information to others in ways other than as described in its Privacy Policy. We may share aggregated demographic information with our service providers. This is not linked to any personal information that can identify any individual person. These companies do not retain, share, store or use personally identifiable information for any secondary purposes.

Links and Other Company Sites

This privacy statement applies solely to information collected by the Company from its provision of video and Internet access services and from its website. The Company's website may contain links to other sites. The Company may also host websites designed and used by others. The Company is not responsible for the privacy practices of sites other than its own. The Company encourages users to be aware when they leave the Company's site, and to read the privacy statements of each and every website that collects personally identifiable information.

Minors

The Company's website and its information gathering in connection with its other services are not intended to collect information about minors. Persons under age 18 should use the Company's website, and the Company's video and Internet access services, only with the supervision of a parent or guardian.

Security

The Company takes commercially reasonable precautions to protect users' information. When users submit personal information via the Internet, when ordering or administering video services or via the Company's website, the information is protected both online and off-line. All of our users' information is restricted in our offices. Only employees, contractors, advisors and consultants who need the information to perform a specific job (for example, a customer service representative) are granted access to personally identifiable information. All employees are kept up-to-date on our security and privacy practices. The servers that the Company uses to store personally identifiable information are kept in a secure environment.

If you have any questions about security related to the Company's services, you can send an email to info@hillsborotel.com.

Correcting/Updating Personal Information

If a user's personally identifiable information changes (such as your zip code), or if a user no longer desires our service, we will endeavor to provide a way to correct, update or remove that user's personal data provided to us. This may be done by contacting Customer Support via the following methods:

Email: info@hillsborotel.com
Telephone: (608) 489-3230

Postal Mail: Hillsboro Telephone Company, Attention: Privacy Policy Request, 121 Mill Street, Hillsboro, WI 54634-0427.

If you discontinue all services from the Company, and pay all of the amounts you owe us, you may opt out of any future contacts from us.

You can do the following at any time by contacting us via the email address or phone number given on our website:

see what data we have about you, if any;

change/correct any data we have about you; and

express any concern you have about our use of your data.

We will respond in writing, addressed to the address for you that we have in our records.

If you feel that the Company is not abiding by this privacy policy, you should contact us immediately via the "Contact Us" area of the Company's website <https://www.hillsborotel.com/contact.html> .

Notification of Changes

If we decide to change our privacy policy, we may post those changes on this site so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an email. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected.

Cable Privacy Act Statement

The Federal Cable Privacy Act requires that the Company inform each of its video service subscribers of the following information. The privacy protections in this statement are in addition to those provided under the Company's privacy policy. In the event of any conflict between the privacy policy and this statement, the terms of this statement shall control. Verneau Network's privacy policy may be accessed at <https://www.hillsborotel.com/policies.html>, or by making a written request for a copy of the policy to the company at Verneau Networks, Attention: Privacy Policy Request, 121 Mill Street, Hillsboro, WI 54634-0427.

This Cable Privacy Act Statement concerns Verneau Networks' collection and use of "personally identifiable information." Personally identifiable information is information that identifies a particular person. Personally identifiable information includes a subscriber's name, address, telephone number, Social Security number, billing, service and credit records, purchasing information, and equipment used by a subscriber to access Verneau Networks' services. Personally identifiable information may also include information the subscriber voluntarily provides to Verneau Networks. Personally identifiable information does not include any record of aggregate data that does not identify particular persons.

Verneau Networks collects personally identifiable information, in addition to nonpersonal information, as necessary for Verneau Networks to provide the services it provides to subscribers, for the purpose of maintaining and administering facilities used to provide the services, and to protect those services from unauthorized or inappropriate use. Verneau Networks also collects information, including personally identifiable information, to maintain its accounting and tax records.

Personally identifiable information is only disclosed to those employees, contractors, advisors and consultants that have a need to know the information for the purpose of carrying out their duties related to the services provided. This information, including personally identifiable information, may be collected while subscribers use the service, from communications from subscribers to Verneau Networks, including account payments and service ordering. How often personally identifiable information is accessed depends on the type of information and Verneau Networks' business needs. Authorized persons may have access to personally identifiable information on a regular basis.

Verneau Networks may disclose personally identifiable information with a subscriber's prior written or electronic consent. Verneau Networks may also disclose personally identifiable information to comply with a court order or to representatives of government in certain circumstances. A governmental entity may obtain personally identifiable information under a court order if the governmental entity offers clear and convincing evidence that the subject of the information is reasonably suspected of engaging in criminal activity, that the information sought would be material evidence in the case, and the subject of the information is afforded an opportunity to appear and contest the governmental entity's claim. To the extent required by law, Verneau Networks will notify any subscriber of a court order authorizing Verneau Networks to disclose personally identifiable information about a subscriber.

Verneau Networks may also disclose the name and address of subscribers to unrelated entities, unless a subscriber notifies us that the subscriber does not wish to have such information disclosed. If you wish to notify Verneau Networks that you do not want this information disclosed, please

notify Verneau Networks in writing at the address shown above, or by email at info@hillsborotel.com. This information will not include the extent of any individual subscriber's use of any service provided by Verneau Networks, or the nature of any transaction made by an individual subscriber over Verneau Networks' video services system.

Each subscriber has the right to review all personally identifiable information regarding the subscriber that is collected and maintained by Verneau Networks. That information will be made available to a subscriber at Verneau Networks' offices at 121 Mill Street, Hillsboro, Wisconsin, during regular business hours, upon the subscriber's request. Subscribers will be given a reasonable opportunity to correct any errors in the personally identifiable information Verneau Networks has collected concerning that subscriber.

Verneau Networks retains personally identifiable information only for as long as it is needed for Verneau Networks' business purposes. Verneau Networks is required to destroy personally identifiable information if it is no longer necessary for the purpose for which it was collected, and there are no pending requests or orders for access to that information by the subscriber or pursuant to a court order.

Any person aggrieved by Verneau Networks' violation of the Federal Cable Privacy Act may bring a civil action in the United States District Court for actual and punitive damages, and reasonable attorneys fees and other reasonably incurred litigation costs. This remedy is in addition to any other lawful remedy available under federal or state law.

Please direct any questions concerning this statement to customer service at (608) 489-3230.