



# **The CTI Privacy Policy**

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**REVISED December 15 2003**

Like you, we at Communications Technology Inc are concerned about client and customer privacy. We have a long history of maintaining the privacy of information we obtain in the normal course of providing our products and services. We work hard to serve you through new and exciting products and services. In the process, we remain sensitive to privacy issues.

## **The Information We Obtain and How We Use It**

The information we obtain from you is generally necessary for us to provide your services and design new services for your future use. For example, we need to know your name, address and the services you buy from us to properly provide and bill for those services.

## **Accuracy of the Information We Hold**

We want the information we obtain and use about customers to be accurate. If your contact information changes or you see an inaccuracy on your Communications Technology Inc profile, please update or correct it.

## **Security and Accountability**

We have information systems that collect and store customer information in addition to systems that store our own business records. These systems have different types of security as appropriate for the information stored. Communications Technology Inc requires employees to keep customer information confidential and we hold them accountable for their actions.

## **Disclosure of Information to entities outside of Communications Technology Inc.**

As a general rule, Communications Technology Inc does not release customer account information to unaffiliated third parties without your permission unless we have a business relationship with those companies where the disclosure is appropriate. For example, we may hire outside companies as contractors or agents; or we might be engaged in a joint venture or partnership with a company. Upon occasion, Communications Technology Inc may decide to stop providing a product, service or may decide to sell or transfer parts of our business to unaffiliated companies. When this happens, we may provide confidential customer information to these companies so that they can offer you the same or similar services. In all of these situations, we provide information to these other companies only as needed to accomplish our business objectives and the companies are bound by requirements to keep Communications Technology Inc customers' information **confidential**.

There are exceptions to the general rule. For example, we might provide information to regulatory or administrative agencies so that they can accomplish their regulatory tasks (for example, responding to a customer complaint) or to maximize the efficiencies of our own processes (such as getting mailing addresses correct, for example). Other disclosures will be driven by legal requirements imposed on Communications Technology Inc. Communications Technology Inc complies with "legal process," such as a subpoena or court order or other similar demand, associated with either criminal or civil proceedings.

## **Disclosure of Account Information**

If you tell us in writing to release your account information to someone, we will honor your request and provide that information.

We may provide account information to collection agencies when customers do not pay their bills. We restrict the use that can be made of this information to collection activities only for our charges and for the charges we may bill for others.

Communications Technology Inc or its business partners may use e-mail to communicate with customers about events or new products and services or to respond to customer e-mails.

## **Privacy over the Internet**

Communications Technology Inc appreciates that some individuals believe that special privacy concerns arise around information transmitted or collected over the Internet or through web sites. Below we describe our practices to address those concerns.

**Cookies:** Some of Communications Technology Inc's Web sites may use "cookies" to improve our level of service and speed up the delivery of information to our customers. Cookies are lines of text that are transmitted to your Web browser when you click on a site. They provide a way for a server to recall a previous request or previous registration, or to keep track of a transaction as it progresses, so that information does not have to be repeated. Your browser stores the information on your hard drive and when you return to that site later, the cookie is transmitted back only to the servers that originally sent it to you. To be notified when you are about to receive a cookie you can configure your browser to alert you when a site is attempting to send you a cookie and at that time you will have the option of refusing the cookie. You can check your hard drive for cookie files in a "cookies" folder for Internet Explorer, a "cookies.txt" file for Netscape, and under "magic cookies" on a Macintosh.

How online information Communications Technology Inc collects is used: Generic Information - To gauge the effectiveness of our Web sites, we do collect some non-individually-identifiable generic information about our visitors. Our Web servers automatically recognize a visitor's Internet service provider, the IP address, the domain name, the type of browser, and the operating system. And, also which pages are viewed on our sites, the Web page you were on when you link to our sites, how much time a visitor spends on each page and other information related to the operation and interaction of Communications Technology Inc Web sites. This information does not reveal a visitor's identity. We aggregate this information and use it to evaluate and improve our Web sites.

Identifiable Information -- You can choose to provide individually-identifiable information to Communications Technology Inc in a number of ways through our Web sites - by ordering a service from us, sending us email, etc. When visitors supply information about themselves for a specific purpose, Communications Technology Inc uses the information for that purpose (such as to provide the information the visitor has requested). In addition, when customers use our Web sites to order services, or to request information about our services, we may use the individually-identifiable information as we would use the same information obtained off-line - for example, to evaluate your service needs and contact you regarding additional services you may find useful.

Sometimes Communications Technology Inc co-sponsors events with another company, such as contests or features. In that case, if you provide individually-identifiable information it most likely will be used by both Communications Technology Inc and the co-sponsor.

We treat information we collect on line similarly to that we collect off-line. We do not sell or disclose individually-identifiable information obtained on-line to non-Communications Technology Inc entities except as described above (when Communications Technology Inc is in a business relationship with an unaffiliated party and then under confidentiality restrictions) unless you specifically authorize it, it is required by law (including the service of subpoenas or court orders in either civil or criminal lawsuits), or disclosure is necessary to protect the safety of customers, employees or property.

The Communications Technology Inc Web sites may contain links to other sites. We are not responsible for the content or privacy practices employed by other sites. Other Web sites may have different privacy policies or no policy. Users should review the privacy policies of any Web site before providing personal information.

**Security of Your Information:** Communications Technology Inc has databases and systems that are maintained to reasonably secure all of Communications Technology Inc 's commercial information, including information about customers. All credit card and bank account information you submit is encrypted through Secure Sockets Layer (SSL) software. We transmit the entire credit card number or bank information to the appropriate financial institution during processing.

E-Mail Communications: Communications Technology Inc or its business partners may use email to communicate with customers about events or new products and services or to respond to emails.

Children: Communications Technology Inc does not currently target its online services to children under 13 years of age; and Communications Technology Inc has no intention of collecting any information from children under 13 years old.

To improve the services it can offer you, Communications Technology Inc may opt to expand its capabilities for obtaining information about users in the future. Communications Technology Inc will update this privacy policy continually to ensure that you are aware of developments in this area.