



CUSTOMER PROPRIETARY NETWORK INFORMATION POLICY

Tele-Data Solution LLC, d/b/a/ TeleCloud or Tele loud, LLC ("TeleCloud") is committed to maintaining the privacy of its customers. TeleCloud is obliged to provide Customer with protections to certain information about how Customer uses its Services. However, that information can help us customize and improve services TeleCloud offers to Customer.

In this section, TeleCloud describes what information TeleCloud protects and how it is protected.

CPNI PROTECTIONS

As a customer of TeleCloud Services, Customer has the right, and TeleCloud has a duty, under federal law, to protect the confidentiality of certain types of Services, including: (1) information about the quantity, technical configuration, type, destination, location, and amount of Customer's use of its Services, and (2) information contained on Customer's telephone bill concerning the Services Customer receives. That information, when matched to Customer's name, address, and telephone number is known as "Customer Proprietary Network Information," or "CPNI" for short. Examples of CPNI include information typically available from telephone-related details on Customer's monthly bill, technical information, type of Service, current telephone charges, long distance and local Service billing records, directory assistance charges, usage data and calling patterns.

APPROVAL

From time to time, TeleCloud would like to use the CPNI information it has on file to provide Customer with information about TeleCloud's communications-related products and Services or special promotions. TeleCloud's use of CPNI may also enhance its ability to offer products and Services tailored to Customer's specific needs. Accordingly, TeleCloud would like Customer's approval so that TeleCloud may use this CPNI to let Customer know about communications-related Services other than those to which Customer currently subscribes that TeleCloud believes may be of interest to Customer. **IF CUSTOMER APPROVES, CUSTOMER DOES NOT HAVE TO TAKE ANY ACTION; CUSTOMER'S SIGNATURE ON THE SERVICE AGREEMENT SIGNIFIES CUSTOMER'S CONSENT THAT TELECLOUD MAY USE AND DISCLOSE CPNI AS DESCRIBED HEREIN.**

However, Customer does have the right to restrict TeleCloud's use of Customer's CPNI. **CUSTOMER MAY DENY OR WITHDRAW TELECLOUD'S RIGHT TO USE CUSTOMER'S CPNI AT ANY TIME BY CALLING 908-851-0444.** If

Customer denies or restricts its approval for TeleCloud to use Customer's CPNI, Customer will suffer no effect, now or in the future, on how TeleCloud provides any Services to which Customer subscribes. Any denial or restriction of Customer's approval remains valid until Customer's Services are discontinued or Customer affirmatively revokes or limits such approval or denial.

In some instances, TeleCloud will want to share Customer's CPNI with its independent contractors and joint venture partners in order to provide Customer with information about TeleCloud's communications-related products and Services or special promotions. Prior to sharing Customer's CPNI with its independent contractors or joint venture partners, TeleCloud will obtain written permission from Customer to do so.

CUSTOMER AUTHENTICATION

Federal privacy rules require TeleCloud to authenticate the identity of its customer prior to disclosing CPNI. Customers calling TeleCloud can discuss their Services and billings with a TeleCloud representative once that representative has verified the caller's identity. There are three methods by which TeleCloud will conduct Customer authentication:

- 1) by having the Customer provide a pre-established password and/or PIN;

- 2) by calling the Customer back at the telephone number associated with the Services purchased; or
- 3) by mailing the requested documents to the Customer 's address of record.

Passwords and/or PINs may not be any portion of the Customer's social security number, mother's maiden name, amount or telephone number associated with the Customer's account or any pet name. In the event the Customer fails to remember their password and/or PIN, TeleCloud will ask the Customer a series of questions known only to the Customer and TeleCloud in order to authenticate the Customer. In such an instance, the Customer will then establish a new password/PIN associated with their account.

NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES

TeleCloud will be notifying Customer of certain account changes. For example, whenever an online account is created or changed, or a password or other form of authentication (such as a "secret question and answer") is created or changed, TeleCloud will notify the account holder. Additionally, after an account has been established, when a customer's address (whether postal or e-mail) changes or is added to an account, TeleCloud will send a notification. These notifications may be sent to a postal or e-mail address, or by telephone, voicemail or text message.

DISCLOSURE OF CPNI

TeleCloud may disclose CPNI in the following circumstances:

- When the Customer has approved use of its CPNI for TeleCloud or TeleCloud and its joint venture partners and independent contractors (as the case may be) sales or marketing purposes.
- When disclosure is required by law or court order.
- To protect the rights and property of TeleCloud or to protect Customer and other carriers from fraudulent, abusive, or unlawful use of Services.
- When a carrier requests to know whether Customer has a preferred interexchange carrier (PIC) freeze on its account.
- For directory listing Services.
- To provide the Services to the Customer, including assisting Customer with troubles associated with its Services.
- To bill the Customer for Services.

PROTECTING CPNI

TeleCloud uses numerous methods to protect Customer's CPNI. This includes software enhancements that identify whether Customer has approved use of its CPNI. Further, all TeleCloud employees are trained on the how CPNI is to be protected and when it may or may not be disclosed. All marketing campaigns are reviewed by a TeleCloud supervisory committee to ensure that all such campaigns comply with applicable CPNI rules.

TeleCloud maintains records of its own and its joint venture partners and/or independent contractors (if applicable) sales and marketing campaigns that utilize Customer CPNI. Included in this, is a description of the specific CPNI that was used in such sales or marketing campaigns. TeleCloud also keeps records of all instances in which CPNI is disclosed to third parties or where third parties were allowed access to Customer CPNI.

TeleCloud will not release CPNI during Customer-initiated telephone contact without first authenticating the caller's identity in the manner set-forth herein. Violation of this CPNI policy by any TeleCloud employee will result in disciplinary action against that employee as set-forth in TeleCloud's Employee Manual.

BREACH OF CPNI PRIVACY

In the event TeleCloud experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require TeleCloud to report such breaches to law enforcement. Specifically, TeleCloud will notify law enforcement no later than seven (7) business days after a reasonable determination that such breach has occurred by sending electronic notification through a central reporting facility to the United States Secret Service and the FBI. A link to the

reporting facility can be found at: www.fcc.gov/eb/cpni. TeleCloud cannot inform Customer of the CPNI breach until at least seven (7) days after notification has been sent to law enforcement, unless the law enforcement agent tells the carrier to postpone disclosure pending investigation. Additionally, TeleCloud is required to maintain records of any discovered breaches, the date that TeleCloud discovered the breach, the date carriers notified law enforcement and copies of the notifications to law enforcement, a detailed description of the CPNI breach, including the circumstances of the breach, and law enforcement's response (if any) to the reported breach. TeleCloud will retain these records for a period of not less than two (2) years.

NOTIFICATION OF CHANGES TO THIS POLICY

If TeleCloud changes this CPNI Policy, TeleCloud will post those changes where TeleCloud deems appropriate, so that Customer can be aware of what information TeleCloud collects, how TeleCloud uses it, and under what circumstances, if any, TeleCloud disclose it. If Customer decides to continue receiving its Services after TeleCloud makes any changes to this the CPNI Policy, Customer shall be deemed to have given express consent to the changes in the revised policy.