

## CUSTOMER INFORMATION

### YOUR PRIVACY AS A RITTER CUSTOMER AND RELATED INFORMATION

2007

#### YOUR PRIVACY AS A RITTER CUSTOMER

As a customer of a Ritter Communications company, 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 Cable Television, High Speed Internet and, Telephone Services. We have updated this notice to better answer questions you may have, but our basic privacy policy remains the same. 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. While we cannot cover here every situation where your personal information may be affected, we have included those we believe you are most interested in.

By law, 47 U.S.C 551, we tell you annually about our privacy policy, and you can find additional and updated information at any time by visiting our website at <http://www.getritter.info>. You can learn more about your privacy rights by visiting the websites of the Federal Trade Commission, <http://www.ftc.gov>, and the Federal Communications Commission, <http://www.fcc.gov>.

#### **Information We Collect**

**Personally Identifiable Information** – In providing services to you, we obtain certain “personally identifiable information”; that is, information that identifies you individually (“your information”). Your information may include: name, service address, billing address, telephone numbers, social security number, driver’s license number, premium services you have selected, demographic information, user IDs, passwords, email addresses, correspondence and communications records. We maintain customer information concerning credit, billing and payment, security deposits, maintenance and repair, equipment and services provided and other service-related functions. In providing our services, we may also collect information about your video equipment, computer hardware and software, modems, routers, settings and other preferences to aid in customer support.

It is our policy to collect only the personal information needed to provide the services we offer with the quality you desire and deserve. It is also our policy to keep that information secure and to retain it only as long as needed for our business purposes or as the law may require. We take reasonable precautions to identify you or your authorized representative when we receive an inquiry on your account. We also take reasonable steps to protect your information from unauthorized access.

**Cable Television Services** – We collect certain information in providing you with our cable television and other services. The law prohibits us from using the cable system to collect personal information for unrelated purposes without your consent.

Unless you are notified and agree, we will not collect user information concerning most video program viewing, except as needed to bill you. In providing some specific cable television services, such as pay-per-view, entertainment-on-demand interactive cable services we do maintain limited usage information for billing, programming and related purposes. Aggregate information that does not identify you may be collected and used for programming, advertising and similar purposes. When we provide digital video recorder services, we may also receive detailed information concerning your use and operation of the recorder for the uses described below in “Use and Sharing”.

**Disclosure prohibited; exceptions.** Federal law prohibits the disclosure of your personally identifiable subscriber information without your consent. The following exceptions apply:

**Business activities.** We may disclose customer information in order to conduct a legitimate business activity related to providing cable service or other service.

**Unauthorized reception of cable service.** We may disclose customer information in order to detect unauthorized reception of our cable service.

**Names and addresses to third parties.** We may disclose names and addresses to third parties for purposes as 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 cable services you view or other transactions you make over the cable system.

**Court order.** We must disclose personally identifiable information without your consent if we are required to do so by a court order obtained by a governmental entity.

**Law enforcement request.** Under the United States Patriot Act, we may also disclose personally identifiable information without your consent when requested by law enforcement in certain circumstances. In these circumstances (i) subscribers may not be entitled by law to prior notice or the opportunity to contest the disclosures; and (ii) we may not disclose information revealing your selection of video programming.

**Internet Services** – Like most Internet service providers, we automatically collect certain general information concerning your use, such as the Internet Protocol (IP) addresses assigned (an identifier assigned to your computer while on online), bandwidth used, system and connection performance, browsers used, dates and times of access, and Internet resource requests, including requests to access web pages. This type information is generally retained for about six months. We do not store online messages sent or received unless left in your Ritter High Speed Internet account file. Since we cannot control Web sites or Internet services operated by third parties, we recommend that you review the terms of service and privacy policies of those Web sites and services.

**Telephone Services** – In some areas we provide telephone services, by traditional “switched” technology. We do not listen to or record your calls. We do, however, monitor certain calls to our staff for quality purposes. If you object to this, you may tell us when you call Customer Care. In providing telephone services, we do receive usage information, including numbers called and received and duration of calls. We retain this information for up to two years, as required by some authorities and treat all such information as private.

## **Use and Sharing**

**Use Policy** – We consider your information confidential, and use it only in providing our cable television, internet and telephone services for such things as sales, installation, operations, administration, advertising, marketing, support, network management, maintenance, customer care, communications with you, billing and collection, and for accounting and tax purposes. We may also use such information in dealing with fraud and unauthorized use of our services.

We use aggregate information about our customers and their usage for a variety of purposes. Such aggregate information does not identify individual customers. We may share such aggregate information with third parties, but will not share your own information with third parties, but will not share your own information without your permission. Ritter may associate your information with aggregate information or with information from others to better offer product and service preferences to you.

**Sharing Policy** – It is our policy not to disclose any personally identifiable information about you to others outside of Ritter and our affiliates, vendors and business partners without your prior consent. We do not sell or provide your personal information to parties unrelated to the services we provide without your permission. As a further measure, you can affirmatively opt out of such sharing by writing to the return address on your billing statement, or you may contact us online at <http://www.getritter.info>. You can also notify us in either way if you prefer not to receive certain types of marketing contacts from us.

**Special Exceptions** – We reserve the right to disclose your information if we have a good faith belief that it is necessary to: (1) comply with the law or legal process served on us; (2) protect and defend our rights or property or those of others; (3) respond to fraud, abuse or unauthorized reception; (4) enforce our Customer Privacy Policy; or (5) act in an emergency to protect your safety or that of another. We may also share or transfer your information along with your account as a part of any sale or transfer all or a portion of our business operations, merger or combination with another organization. In such a case, you will be notified of any changes in policy.

**Outside Parties** – Ritter sometimes uses affiliates, vendors or partners in providing our services and may provide your information for such purposes. We require that outside parties maintain at least the same level of confidentiality that we maintain. In addition, any use by the vendor may not exceed that needed to provide its service. We do not share your information with other third parties without your consent. If you become a customer of a third party directly, you should review its privacy policy, as it may differ from ours.

**Retention Policy** – Ritter may retain personal customer information in its regular business records as long as you are a customer or until no longer needed for business, tax or legal purposes. Our security measures for this information are discussed below.

**Telephone Services** – Federal and some state regulations limit our use and sharing of certain information concerning a customer's telephone services. This information is known as "Customer Proprietary Network Information" or "CPNI", and includes information on how you use our telephone services, such as your call patterns, service features, price plans, spending profiles, call destinations and related information. In offering our spectrum of local and long distance telephone, we do use your telephone service information to offer you new services and pricing plans. If you do not want us to use your CPNI for this purpose, you may contact us at the number or address listed on the cover of this notice or on your regular bill or by email at [customerservice@rittermail.com](mailto:customerservice@rittermail.com). On the other hand, if you would like us to offer you information on video and data services or would like to learn about our bundled offers, please contact us in any of the same ways. Consenting to allow us to use your CPNI will help us offer you the best and most up-to-date services. Your consent will remain in effect until you notify us you want to revoke or change your permission. Your choice will not affect the services you now receive. We do not disclose this information to unrelated parties, except as required by law.

**Directory Listings** – We offer our telephone customers the ability to designate their listings as non-published within print or electronic directories or directory assistance services. Because of the complexity of this process and the involvement of other entities in publishing, errors may occur from time-to-time. These and certain other telephone services are offered subject to tariff or contractual terms that limit our liability in the event of such errors.

**Cable Television Services** – We provide aggregate information concerning pay-per-view, and interactive services to programmers, advertisers and certain other third parties. Digital video recorder service information is not shared with programmers or third parties, except on an aggregate basis. If you use an interactive service to participate in or to order a product or service, you will be asked for your permission to provide contact information to the appropriate party. When we offer new services to you like DVR and interactive features, we will also inform you about information we may need and how it may be used.

**Internet Services** – We do not read your email messages, instant messages, online chats, "voice-over-internet" calls or the content of other online communications that reside on or pass through our Service. We may however, retain and provide such communications if we are legally required to do so. Incoming and outgoing email messages are generally scanned automatically to identify and filter out likely spam or harmful messages and for viruses, spyware and related problems that could harm your equipment, the network or other users.

### **Internet Security**

**Taking Proper Precautions** – Maintaining the security of your personal computer is an important part of protecting your own privacy and of helping us protect our network and customers' service. You should follow our Acceptable Use Policy and use and update regularly your antivirus software, firewall, wireless network security and your operating system to prevent unauthorized access by others and harm from various forms of viruses. You should regularly back up your computer to preserve your files, including email or other messages you want to keep.

Persons with questionable intent may use the Internet or email to pose as someone you trust or do business with. You should always be sure who you are dealing with before clicking on an internet link or giving personal information. To avoid all these and other forms of attacks, we encourage you to visit our website at <http://www.getritter.info> or the Federal Trade Commission ("FTC") at <http://www.ftc.gov> for regular updates and tips on protecting yourself. Ritter or its Customer Service Department may take protective action related to your service or contact you directly with information from time-to-time to help with this effort. While we take reasonable steps to protect your services, we highly recommend that you regularly change your login password, using hard-to-guess combinations of numbers and letters. Once communications enter the Internet, it is possible for them to be accessed by third parties over whom we have no control. Moreover, since we cannot control web sites or services operated by third parties, you should review their terms of service and privacy.

**Spam** – Ritter tries to prevent and to block spam, and we encourage your help by preventing unauthorized access to your computer. We suggest that you remain up-to-date on ways to avoid and combat spam by watching for advice and tips on our website at <http://www.myritter.com>. We may use email to send transactional or relationship messages related to your service. If you prefer, you may opt-out of other marketing messages we may send by notifying us in response to any you may receive.

**Cookies** – A third party ad server that places ads on our websites may use "cookies" to collect anonymous information about your visit to our website and to manage information concerning your preferences. A "cookie" is a computer code added to a file on your computer as a record of its visit. It does not collect or provide your name or any other personal information about you. It can, however, be read by the website that placed it to note information about your visit, such as your type of web browser, operating system and Internet Protocol ("IP") address. It can also be used to recognize you when you log in as a registered user or as a repeat visitor returning to our website. This allows us to tailor our site by remembering you and any options you select. You can control what cookies are accepted by your computer through the settings on your web browser or by deleting them from your files. Doing so, however, may limit the personalization available to you.

**Third-Party Cookies and Web Beacons** – These forms of computer code are sometimes placed by advertisers or others with connection to a webpage and may be read by the ad's provider. They may use a form of code called a "web beacon" or "clear GIF". These are usually contained in a transparent image on a page or in an image on an email message and serve as a way to gather information about your visit, such as your IP Address and information or statistics about your visit. As with cookies, you can use your browser settings to control web beacons. We may share non-personal information obtained from cookies and web beacons with vendors, advertisers and others.

## **Law Enforcement and Legal Requests**

**Information Disclosure** – We regularly receive legal requests from government and law enforcement personnel for customer information. We also receive discovery requests in civil litigation. In all such cases, we cooperate by providing such information as the law requires. The laws concerning your privacy and government access change from time to time and you may affect how we are required to respond. Under current law, many criminal subpoenas require that we not disclose or notify you of the request. Due to this fact and the volume of requests we receive, we do not assume any duty to notify you of receipt of any legal requests.

**Internet Information** – Your account records and information concerning your internet access may be subpoenaed by the government or by others through the courts. Internet messages and files shared over "peer-to-peer" services often include your IP Address, and you can be identified in this way if we receive a lawful subpoena. As with telephone interception, details concerning your internet access and the content of communications can be obtained by law enforcement through a court order or similar authority. In addition, the law permits us to disclose to law enforcement, voluntarily and without prior notice, customer information, including the contents of communications, if we reasonably believe that an emergency involving immediate danger of death or serious physical injury requires such disclosure without delay.

**Telephone Information** – Current law requires law enforcement to obtain a court order or other similar authority for a telephone wiretap or to use a pen register or trap and trace device to capture dialing information. Voice-over-internet services are subject to similar interception standards. Law enforcement can also subpoena account and call record information.

**Cable Television Programming Selections** – Records concerning video programming selections may generally be obtained only under court order, after notice is given to you and you have the opportunity to object in court.

### **Security of Information**

We are aware of the many recently publicized instances of customer information security breaches and continue to work on new ways to protect your information. For our most sensitive databases, we use encrypted formats within controlled and secure environments that have restricted access. Nevertheless, although we endeavor to ensure the integrity and security of our network and computer systems, we cannot guarantee that our security measures will prevent unauthorized access.

### **Children's Privacy**

The websites provided by Ritter are not directed at, or intended for use by, children under the age of 13. We do not knowingly allow anyone under 18 to provide any personal information on our websites. Children should always get permission from a parent or guardian before sending personal information over the Internet. If you believe your child may have provided us with personal information, you can contact us at the return address on this notice or found on your monthly bill and we will delete the information. You can find more information about protecting children's privacy by contacting the FTC or viewing its website at <http://www.ftc.gov>.

### **Child Pornography**

As a provider of an electronic communications service, we are required by law to report any evidence we may become aware of relating to violations of laws concerning child pornography.

### **Customer Access to Information**

You may check the accuracy of personal information in your account by contacting a Customer Care representative. We also make a more complete review of your personally identifiable information available to you within a reasonable time following a request. You may examine the information and advise us of any errors you believe we should correct, upon prior request and at your own cost, during business hours at the Ritter office listed on the return address of this notice or noted on your billing statement.

### **Your Enforcement Rights**

You can enforce your legal privacy rights concerning our collection, use and sharing of your personally identifiable information. Among your remedies is the right to seek damages under 47 U.S.C. 551.

### **Other Terms and Changes in Policy**

Other terms and conditions affect our service offerings, including certain Cable Television service contracts, our Acceptable Use Policy for High Speed Internet service, tariffs and the Terms of Use for our websites. Changes in our service offerings, the law and policy may cause us to make changes to this and other policies from time to time. Any changes will be posted with the Online Privacy Policy at <http://www.getritter.info>, which also contains provisions concerning privacy as relates to our websites.

### **Annual Do-Not-Call Registry Notice**

In an effort to reduce the number of unwanted telemarketing calls, the FCC has provided telephone subscribers the opportunity to register their residential telephone numbers, including wireless numbers, for inclusion in the national Do Not Call (DNC) registry administered by the FTC. You may register, or revoke registration of, your number without charge by calling the FTC's toll-free number, 1-888-382-1222 or TYY 1-866-290-4236, from the telephone number you are registering or revoking, or via online by visiting the FTC's website located at [www.donotcall.gov](http://www.donotcall.gov). The FCC/FTC rules contain an "established business relationship" exception that permits a company that has such a relationship with you, like Ritter, to call you even if your number is on the national DNC list. For more information, see <http://www.fcc.gov/cgb/donotcall/>.

## GENERAL INFORMATION

**Changes in Service or Prices** – As a Ritter Communications customer you will generally receive notice of changes in services or prices at least 30 days in advance or in compliance with applicable laws. The notice may be provided on your monthly bill, as a bill insert with the information or directing you to visit our website to view the information, as a newspaper legal notice or information channel notice, via email, or in a separate mailing.

**Theft of Cable Service** – An unauthorized cable hookup is a severe and expensive problem. It is also a crime punishable by fines and/or imprisonment. Cable theft increases the cost of our business as well as legitimate, paying Ritter Communications customers. Reception of any cable service without our express authorization is prohibited.

**Miscellaneous Fees** – A fee is added to any bill amount unpaid after the due date. If your payment is made with a non-sufficient fund check, you may be charged a fee for handling.

**Delinquent Accounts** – If your service is disconnected for non-payment, we require full payment of the balance, a deposit, a reconnect fee, and a minimum of one month's service before reconnecting service.

**Disconnect Policy** – A request to disconnect cable service can occur at any time. Billing for service will stop on the day you request the service to be discontinued. Equipment provided to you by your local cable office must be returned upon disconnecting or appropriate charges will be assessed.

**Signal Blocking Devices** – If you can see images or hear sound from a scrambled premium or adult channels that you do not subscribe to, you may have these channels blocked.

## TELEVISION EQUIPMENT COMPATIBILITY

**Cable Converters** – Some models of TVs and VCRs – especially older TV sets that are not “cable ready” – may not receive all of the channels offered when connected directly to the cable system. If your TV or VCR is not able to receive all of the channels desired, you can obtain a set-top channel converter from Ritter or a retail store at a nominal charge. If you plan to purchase cable services that we scramble or encrypt, such as premium, pay-per-view or digital services, you should make sure that any set-top converter or navigation device you purchase from a retail outlet is capable of working with separate security cards that we must provide in order for your equipment to access such programming devices. Upon request, we will provide you with the technical parameters that are needed for any such device to operate with our security cards and cable system. Also, you should know that receivers with descrambling units are illegal to sell or use unless authorized by Ritter.

If you receive service through a set-top channel converter, you may not be able to use special features and functions of your TV and VCR. These may include features that allow you to: view a program on one channel while simultaneously recording a program on another channel; record two or more consecutive programs that appear on different channels; and, use advanced picture generation and display features such as “Picture-in-Picture” and channel review. Ritter may be able to resolve these issues through an additional converter or other equipment that is available for lease upon request.

**Cable Cards** – Certain new TVs are sold with a Cable Card, which can substitute for a set-top channel converter. Currently, these cards do not allow you to use any interactive or two-way services that we offer. For more information, you may contact us by calling Customer Care.

**Remote Controls** – Ritter includes a remote control unit with set-top channel converters. Some television, VCR or DVD remote controls are also capable of controlling the basic features of your set-top box. “Universal” remote control units that are compatible with the basic features of set-top boxes may also be obtained from other sources, such as consumer appliance, electronics outlets or over the Internet. These universal remote controls may not be compatible with certain set top features or services available from Ritter in certain markets. If you have specific questions concerning remote control compatibility, we encourage you to contact Customer Care at the number listed on this notice or on your monthly bill.

**Television Picture Quality** – If you experience problems with the quality of television signals you receive, you should call us at the telephone number listed on this notice. A fully trained Customer Service Representative can often resolve your problem over the telephone. If this cannot be done, we will set up an appointment for a skilled technician to come to your home. If, in your opinion, the service technician fails to correct the reception problem, you should call us again and we will review the actions taken. Should we continue to be unable to resolve the problem to your satisfaction, we will explain the reasons we cannot solve the problem. If you believe Ritter has not properly resolved your issue, you have the right to contact the applicable franchise authority at the address and telephone number listed on your monthly cable bill.

#### FRANCHISE AUTHORITY CONTACT INFORMATION

FRANCHISE AUTHORITY	ADDRESS	PHONE NUMBER
Arbryd, MO	102 Douglas St. P.O. Box 338 Arbryd, MO 63821	(573-654-3834)
Bassett, AR	101 Main St. P.O. Box 73 Bassett, AR 72323	(870-537-4648)
Black Oak, AR	P.O. Box 148, Black Oak, AR 72414	(870-486-5675)
Bono, AR	103 E. College Street P.O. Box 127 Bono, AR 72416	(870-932-0100)
Brookland, AR	309 N. Bemis Street P.O. Box 7 Brookland, AR 72417	(870-953-0538)
Caraway, AR	102 E. State Road P.O. Box 549 Caraway, AR 72419	(870-482-3716)
Cardwell, MO	119 E. Loeb P.O. Box 216 Cardwell, MO 63829	(573) 654-2112
Cash, AR	P.O. Box 95 Cash, AR 72421	
Cherry Valley, AR	166 Hwy. 1 B P.O. Box 130 Cherry Valley, AR 72324	(870-588-3323)
Craighead, AR	Craighead County Courthouse, Annex Bldg. 511 Union, Rm. 119 Jonesboro, AR 72401	(870-933-4500)
Crawfordsville, AR	104 S. Main P.O. Box 147 Crawfordsville, AR 72327	(870-823-5204)
Dyess, AR	104 Center Drive P.O. Box 49 Dyess, AR 72330	(870-764-2101)

Everton, AR	5441 Main St. P.O. Box 64 Everton, AR 72633	(870-429-5900)
Fisher, AR	105 N. Front Street P.O. Box 64 Fisher, AR 72429	(870-328-7275)
Gilmore, AR	97 Front Street P.O. Box 253 Gilmore, AR 72339	(870-343-2697)
Grubbs, AR	420 N. Main Street P.O. Box 48 Grubbs AR 72431	(870-252-3487)
Harrisburg, AR	401 Market Street Harrisburg, AR 72432	(870-578-5333)
Hickory Ridge, AR	135 S. Front Street P.O. Box 34 Hickory Ridge, AR 72347	(870-697-2012)
Jasper, AR	101 E. Elm P.O. Box 434 Jasper, AR 72641	(870-446-2633)
Joiner, AR	104 Gin Street P.O. Box 216 Joiner, AR 72350	(870-537-4252)
Keiser, AR	112 East Main P.O. Box 145 Keiser, AR 72351	
Lake City, AR	300 Cobean Road Lake City, AR 72437	(870-237-4431)
Leachville, AR	116 S. Main P.O. Box 67 Leachville, AR 72438	(870-539-2428)
Lepanto, AR	117 Greenwood P.O. Box 610 Lepanto, AR 72354	(870-475-2415)
Leslie, AR	P.O. Box 366 Main Street Leslie, AR 72645	(870-447-2240)
Luxora, AR	204 N. Main P.O. Box 250 Luxora, AR 72358	(870-658-2233)
Manila, AR	116 W. Olympia P.O. Box 895 Manila, AR 72442	(870-561-4437)
Marked Tree, AR	1 Elm Street Marked Tree, AR 72365	(870-358-3216)

Monette, AR	119 N. Edmonds P.O. Box 382 Monette, AR 72447	(870-486-2121)
Osceola, AR	316 W. Hale Avenue P.O. Box 443 Osceola, AR 72370	(870-563-5245)
Osceola (Mississippi Co), AR	200 Walnut Street Osceola, AR 72370	
Poinsette Co, AR	401 Market Street Harrisburg, AR 72432	(870-578-5333)
Swifton, AR	P.O. Box 129 Swifton, AR 72471	(870-485-2662)
Trumann, AR	225 Hwy. 463 P.O. Box 100 Trumann, AR 72472	(870-483-5355)
Turrell, AR	160 Eureka Street P.O. Box 249 Turrell, AR 72384	(870-343-2537)
Tyronza, AR	114 Junction St. P.O. Box 275 Tyronza, AR 72386	(870-487-2168)
Weiner, AR	123 W. 2nd Street P.O. Box 338 Weiner, AR 72479	(870-684-2284)
Western Grove, AR	500 Hwy. 65 N P.O. Box 79 Western Grove, AR 72685	(870-429-6263)
Wilson, AR	1 Park P.O. Box 96 Wilson, AR 72395	(870-655-8167)