

Customer Proprietary Network Information (CPNI) Policy

Customer Notification

Erwin Utilities (“Erwin”) is committed to maintaining the privacy of all of its Users. In addition to protecting your personal information, as outlined in our Privacy Policy, we are obligated to provide additional protections to certain information about how you use your telephone services.

CPNI Protections

As a User of our telephone services, you have the right, and Erwin has a duty, under federal law, to protect the confidentiality of certain types of telephone related services, including: (1) information about the quantity, technical configuration, type, destination, location, and amount of your use of your telephone usage, and (2) information contained on your telephone bill concerning the services that you receive. That information, when matched to your name, address, and telephone number is known as “Customer Proprietary Network Information” or CPNI. Examples of CPNI include information typically available from telephone-related details on your monthly bill, technical information, type of service, current telephone charges, long distance and local service billing records, directory assistance charges, call usage data and calling patterns. CPNI does not include your name, address and telephone number, as this is common publicly available information. CPNI protections do not extend to Internet access services.

Giving Permission

From time to time, Erwin would like to use the CPNI information it has access to in order to provide you with information about our communications-related products and services or special promotions. Our use of CPNI may also enhance our ability to offer products and services tailored to your specific needs. Accordingly, we would like your permission so that we may use this CPNI to let you know about communications-related services other than those to which you currently subscribe. When you contact our Customer Service Center we will ask for your permission to access your phone service data in order to serve you.

You do have the right to restrict our use of your CPNI at any time. If you deny or restrict your permission for use of your CPNI, you will suffer no effect, now or in the future, on how Erwin provides phone services to which you subscribe.

From time-to-time Erwin may want to share your individual CPNI with its independent contractors and joint venture partners in order to provide you with additional or promotional communications-related products and services or special promotions. Prior to sharing any individual CPNI with independent contractors or joint venture partners **Erwin will obtain written permission from you to do so.**

Customer Authentication

Federal privacy rules require Erwin to authenticate the identity of its customer prior to disclosing CPNI. Customers contacting our customer service center can discuss their services and billings with a Erwin representative once that representative has verified the caller's identity. There are three methods by which we will conduct customer authentication:

- 1) by having the customer provide a pre-established password created at the time of Service Contract execution and account set up.
- 2) by calling the Customer back at the telephone number associated with the services purchased; or
- 3) by mailing, if applicable, the requested documents to the Customer's address of record.

Passwords may not be any portion of the Customer's social security number, mother's maiden name, telephone number associated with the Customer's account or any pet name. In the event the Customer fails to remember their password, our customer service representatives will ask the Customer a series of questions known only to the Customer and Erwin, i.e. Security Questions in order to authenticate the Customer. In such an instance, the Customer will then establish a new password associated with their account.

Notifications of Certain Account Changes

Erwin will be notifying Customers 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 "security question and answer") is created or changed, Erwin will notify the account holder by either the E-mail address that they provided or by mailing the notification to their address of record. Additionally, after an account has been established, when a customer's address (whether postal or E-mail) changes or is added to an account, Erwin will also send a confirmation notification.

Disclosure of CPNI

Erwin may disclose CPNI in the following circumstances:

- When the Customer has provided permission for the use of their CPNI;
- When disclosure is required by law or court order;
- To protect the rights and property of Erwin or to protect Customers and other carriers from fraudulent, abusive, or unlawful use of services;
- When a carrier requests to know whether a Customer has a preferred interexchange carrier (PIC) freeze on their account; or

- For directory listing services to be provided.
- To provide the services to the Customer, including Customer reported trouble management.
- To bill the Customer for services.

Protecting CPNI

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

Erwin 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 the sales or marketing campaign. We also maintain records of all instances in which CPNI is disclosed to third parties or where third parties were allowed access to Customer CPNI. Maintenance of records is in accordance with our Document Retention Policy.

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

Breach of CPNI Protections

In the event Erwin experiences a privacy breach and CPNI is disclosed to unauthorized persons, Federal rules require Erwin to report such breaches to law enforcement. Specifically, Erwin 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: <https://www.cpnireporting.gov>. Erwin cannot inform its Customers of the CPNI breach until at least seven (7) days after notification has been sent to law enforcement, unless the law enforcement agent instructs the carrier to postpone disclosure pending investigation. Additionally, Erwin is required to maintain records of any discovered breaches, including the date that the breach was discovered, 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. Erwin will retain these records for a period of no less than two (2) years.

FCC/FTC Do Not Call List

The national Do Not Call list protects home voice or personal wireless phone numbers. You can register your numbers on the national Do Not Call list by phone or on the Internet at no cost.

- To register via the Internet, go to <https://www.donotcall.gov>
- To register by phone, call 1-888-382-1222 (voice) or 1-866-290-4236 (TTY). You must call from the phone number you wish to register.

If you received an unwanted call after your number was on the National Registry for 31 days, report it to the FTC.

Notification of Changes to Our CPNI Policy

Should we modify this CPNI Policy, we will post the changes on <http://www.e-u.cc> and/or in other places that we deem appropriate, so that you can be aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

Erwin reserves the right to modify this CPNI Policy 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. If you continue to use the Services after receiving notice of such changes, we will consider that as your acceptance of the changes.

Effective January 8, 2025