The California Consumer Privacy Act: Frontier Communications Privacy Policy

The California Consumer Privacy Act ("CCPA"), Ca. Civil Code §§ 1798.100-1798.199, gives California consumers certain privacy rights related to their personal information. These rights are in addition to the privacy rights set forth in Frontier’s general consumer Privacy Policy.

This document describes the rights of California consumers under the CCPA. Frontier will not discriminate against any consumer because the consumer chooses to exercise any of its rights.

The first part of this document is a Notice of Collection that sets forth the categories of personal information we collect and how we use this information. The second part of this document sets forth our Privacy Policy in greater detail and provides links to our website where you may submit requests to know the specific personal information we collect from you and requests to delete such information, subject to applicable law.

Part I – Notice of Collection

The purpose of this Notice of Collection ("Notice") is to inform consumers of the categories of Personal Information (as defined below) that Frontier (collectively, the "Company" or "we" or "us") collects and the purposes for which we use such Personal Information.

We collect, use, and disclose Personal Information for business purposes only and consistent with applicable laws. Where we disclose Personal Information to third parties, we do so for the same business purposes described below and, where appropriate, we require that such parties maintain the confidentiality of the Personal Information and maintain appropriate systems and processes to ensure its security and protection.

The following chart lists the categories of personal information Frontier has collected and, for each category, the business or commercial purpose for which it has been used in the preceding twelve (12) months or will be used. If you have any questions, please call 1800.9218.101 or email us at privacy@FTR.com.
<table>
<thead>
<tr>
<th>Categories of Personal Information We Collect</th>
<th>How We Use the Personal Information</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Information You Provide to Us.</strong> We collect information you provide to us, such as your name and contact information, driver’s license number, Social Security Number, and payment information. We also may maintain research records containing information obtained through voluntary subscriber interviews or surveys.</td>
<td>We use this information to provide, manage, and improve the services we offer; bill and collect for our services; to better understand our customers and market our services, as well as to deliver relevant advertising; respond to customer questions and concerns; and to manage, repair, and protect our network.</td>
</tr>
<tr>
<td><strong>Information Related to Your Use of Our Services.</strong> We also collect information about how you use our products and services. This information may include call records, the websites you visit, IP address, information about the devices you use in connection with our services, your bandwidth usage, and your TV and other video viewership, including movie rental and purchase data.</td>
<td>We use this information to provide, manage, and improve the services we offer; bill and collect for our services; to better understand our customers and market our services, as well as to deliver relevant advertising; respond to customer questions and concerns; and to manage, repair, and protect our network. We or agents and vendors acting on our behalf also use this information to customize your experience and gather information about how you navigate our website. For example, cookies and other tracking mechanisms allow us to remember you when you visit our websites, deliver relevant advertising to you, market our services on our websites and on third-party websites, and keep track of your online ordering and account information.</td>
</tr>
</tbody>
</table>
### Information When You Use Our Websites and Mobile Apps

We collect certain information when you visit a Frontier website or use a Frontier mobile app, including information about your operating system and browser, IP address and device identification numbers, and web addresses of the websites you come from and go to next.

Frontier, or analytic companies acting on Frontier’s behalf, also may use cookies, web beacons, and other tracking mechanisms to collect information while you visit our websites. A cookie is a small data file placed in your browser. Web beacons are small, clear graphic images. Mechanisms such as these allow for the collection of information about your interactions with our websites. We also may receive demographic information about you, or information regarding your interests, from analytics companies that use cookies and other tracking mechanisms.

We use this information to provide, manage, and improve the services we offer; bill and collect for our services; to better understand our customers and market our services, as well as to deliver relevant advertising; respond to customer questions and concerns; and to manage, repair, and protect our network.

We or agents and vendors acting on our behalf also use this information to customize your experience and gather information about how you navigate our website. For example, cookies and other tracking mechanisms allow us to remember you when you visit our websites, deliver relevant advertising to you, market our services on our websites and on third-party websites, and keep track of your online ordering and account information.

### Information During Contacts

When you contact us or we contact you, we may monitor or record the communication, and keep records of and about the communication, so that we can provide better service. We will inform you during such a call that the call might be monitored or recorded.

We use this information to provide, manage, and improve the services we offer; bill and collect for our services; to better understand our customers and market our services, as well as to deliver relevant advertising; respond to customer questions and concerns;
| **Information When You Use Social Media.** If you use social media credentials to login or interact with a Frontier website, mobile app, or Frontier’s social media pages, we may collect information about your social media profile. You can control the data we receive in this manner through the controls available in your social media account settings. | We use this information to provide, manage, and improve the services we offer; bill and collect for our services; to better understand our customers and market our services, as well as to deliver relevant advertising; respond to customer questions and concerns; and to manage, repair, and protect our network.

We or agents and vendors acting on our behalf also use this information to customize your experience and gather information about how you navigate our website. For example, cookies and other tracking mechanisms allow us to remember you when you visit our websites, deliver relevant advertising to you, market our services on our websites and on third-party websites, and keep track of your online ordering and account information. |
| --- | --- |
| **Information Unique to a Service – Voice**

Call records (inbound and outbound), telephone number, line/repair test results, billing records, voicemail recordings if using Frontier voicemail. | We use this information to provide, manage, and improve the services we offer; bill and collect for our services; to better understand our customers and market our services, as well as to deliver relevant advertising; respond to customer questions and concerns; and to manage, repair, and protect our network. |
**Information Unique to a Service – Broadband**

The websites you visit or attempt to visit, IP address(es) assigned to your service over time, information about the devices you use in connection with our services, your bandwidth usage, speed test results, modem/gateway/set top box IDs, configuration files, and performance data. Session dates, times, and durations.

We collect certain information when you visit a Frontier website or use a Frontier mobile app, including information about your operating system and browser, IP address and device identification numbers, and web addresses of the websites you come from and go to next.

Frontier, or analytic companies acting on Frontier’s behalf, also may use cookies, web beacons, and other tracking mechanisms to collect information while you visit our websites. A cookie is a small data file placed in your browser. Web beacons are small, clear graphic images.

Mechanisms such as these allow for the collection of information about your interactions with our websites. We also may receive demographic information about you, or information regarding your interests, from

We use this information to provide, manage, and improve the services we offer; bill and collect for our services; to better understand our customers and market our services, as well as to deliver relevant advertising; respond to customer questions and concerns; and to manage, repair, and protect our network.

We or agents and vendors acting on our behalf also use this information to customize your experience and gather information about how you navigate our website. For example, cookies and other tracking mechanisms allow us to remember you when you visit our websites, deliver relevant advertising to you, market our services on our websites and on third-party websites, and keep track of your online ordering and account information.
analytics companies that use cookies and other tracking mechanisms.

If you use social media credentials to login or interact with a Frontier website, mobile app, or Frontier’s social media pages, we may collect information about your social media profile.

<table>
<thead>
<tr>
<th>Information Unique to a Service – Video</th>
</tr>
</thead>
<tbody>
<tr>
<td>Your TV and other video viewership, including movie rental, digital video recorder activity, and purchase data. Modem/gateway/set top box IDs, configuration files, and performance data. Session dates, times, and durations.</td>
</tr>
</tbody>
</table>

We use this information to provide, manage, and improve the services we offer; bill and collect for our services; to better understand our customers and market our services, as well as to deliver relevant advertising; respond to customer questions and concerns; and to manage, repair, and protect our network.

We or agents and vendors acting on our behalf also use this information to customize your experience and gather information about how you navigate our website. For example, cookies and other tracking mechanisms allow us to remember you when you visit our websites, deliver relevant advertising to you, market our services on our websites and on third-party websites, and keep track of your online ordering and account information.
Part II – Our Privacy Policy and Methods for Submitting Request to Know or Delete

What Personal Information We Collect and How We Collect It

The CCPA defines “personal information” as information that is not publicly available and that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

We collect certain personal information when you use our products, services, and websites, as well as when you communicate with us:

**Information You Provide to Us.** We collect information you provide to us, such as your name and contact information, driver’s license number, Social Security Number, and payment information. We also may maintain research records containing information obtained through voluntary subscriber interviews or surveys.

**Information Related to Your Use of Our Services.** We also collect information about how you use our products and services. This information may include call records, the websites you visit, IP address, information about the devices you use in connection with our services, your bandwidth usage, and your TV and other video viewership, including movie rental and purchase data.

**Information Collected When You Use Our Websites and Mobile Apps.** We collect certain information when you visit a Frontier website or use a Frontier mobile app, including information about your operating system and browser, IP address and device identification numbers, and web addresses of the websites you come from and go to next.

Frontier, or analytic companies acting on Frontier’s behalf, also may use cookies, web beacons, and other tracking mechanisms to collect information while you visit our websites. A cookie is a small data file placed in your browser. Web beacons are small, clear graphic images. Mechanisms such as these allow for the collection of information about your interactions with our websites. We also may receive demographic information about you, or information regarding your interests, from analytics companies that use cookies and other tracking mechanisms.

**Information from Third Parties.** At times, we receive information about our customers from third parties, such as credit information from credit reporting agencies, to whom you or your agents authorize us to disclose your Personal Information in connection with products or services we provide to you, when you purchase products or apply for
service. We also may receive marketing and other information, including but not limited to demographic information, about you from third parties. If you rent your residence, we may have a record of whether the landlord’s permission was required to install our facilities, as well as the landlord’s name and contact information. In addition, we may obtain information from other service providers when you purchase certain services from us, such as our DISH TV Package.

If you use social media credentials to login or interact with a Frontier website, mobile app, or Frontier’s social media pages, we may collect information about your social media profile. You can control the data we receive in this manner through the controls available in your social media account settings.

**When You Contact Us.** When you contact us or we contact you, we may monitor or record the communication, and keep records of and about the communication, so that we can provide better service. We will inform you during such a call that the call might be monitored or recorded.

**How We Use and Share the Information We Collect**

We use the information we collect about customers to provide, manage, and improve the services we offer; bill and collect for our services; to better understand our customers and market our services, as well as to deliver relevant advertising; respond to customer questions and concerns; and to manage, repair, and protect our network.

We or agents and vendors acting on our behalf use the information collected from cookies and other tracking mechanisms to customize your experience and gather information about how you navigate our website. For example, cookies and other tracking mechanisms allow us to remember you when you visit our websites, deliver relevant advertising to you, market our services on our websites and on third-party websites, and keep track of your online ordering and account information.

We share personal information with agents and vendors (or, service providers) that perform services on our behalf as necessary for them to perform these services. The CCPA recognizes that companies use service providers and allows them to do so, provided they do not disclose such information to third parties. Frontier requires its service providers to use this information only as we direct, and to protect it consistent with this policy. In addition, we may share information with other providers when you purchase their services from us, such as our DISH TV Package.
We may share anonymous or aggregate information with third parties, including to improve how we provide service to existing and potential customers.

We also may share your information (1) with your permission, (2) as required by law, including in response to a duly-served subpoena or other government request for information, (3) to investigate or defend against third-party claims or allegations, (4) to protect our rights, property, and personal safety, or that of our customers or others, or (5) as part of any merger, acquisition, sale of company assets or transition of service to another provider.

In the preceding twelve (12) months, we have not sold and did not otherwise share your Personal Information with any non-affiliated third parties. Frontier, also, has not and will not sell the Personal Information of minors under 16 years of age to non-affiliated third parties without affirmative authorization.

**Collection, Use and Sharing of Information During the Past 12 Months**

Generally, the categories of personal information Frontier has collected over the past twelve (12) months are:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers;
- Bank account number, credit card number, debit card number;
- Commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- Internet or other electronic network activity information, including, but not limited to, network usage, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement;
- Telephone calls and similar inquiries.
- Video viewership information.

The categories of sources from which the personal information was collected over the past twelve (12) months are:

- Information you provide;
- Information related to your use of our services;
- Information collected when you use our websites and mobile apps;
• Cookies, web beacons, and other tracking mechanisms when you visit our websites.
• Hardware, such as set-top boxes, used in conjunction with our services.
• Information from third parties.

The business or commercial purpose for collecting personal information over the past twelve (12) months are:

• To provide, manage, and improve the services we offer;
• To bill and collect for our services;
• To better understand our customers and market our services, as well as to deliver relevant advertising; respond to customer questions and concerns; and to manage, repair, and protect our network; and
• To customize your experience and gather information about how you navigate our website.
• To manage security risks and prevent fraudulent activity, including to detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activities, and debug to identify and repair errors that may impair existing intended functionality.
• To perform targeted research and analytics, including to analyze consumers and better understand our current and prospective consumer customers; adjust to feedback provided by consumers; or perform tests for continuous product development and improvement.

The categories of third parties with whom Frontier shared personal information over the past twelve (12) months are:

• Service providers who market services and accept orders on our behalf;
• Service providers who provide advice or materials related to the conduct of our business;
• Service providers who deploy or repair facilities; and
• Service providers who assist in billing and collection.

The categories of personal information Frontier has disclosed for a business purpose to its service providers over the past twelve (12) months are:

• Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social
security number, driver’s license number, passport number, or other similar identifiers;

- Bank account number, credit card number, debit card number;
- Commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement;
- Viewership data, including shows and commercials.
- Telephone calls and similar inquiries.

Your Rights Under the CCPA

Right to Know. You have a right to submit a verifiable request for personal information collected about you in the preceding twelve (12) months. This right extends to the categories of personal information Frontier has collected; the categories of sources from which the personal information is collected; the business or commercial purpose for collecting or selling personal information; the categories of third parties with whom Frontier shares personal information; the specific pieces of personal information it has collected about you; and the category or categories of personal information Frontier has disclosed for a business purpose.

When we receive your properly verified request, we will deliver the information to you free of charge. We will deliver the information within 45 days, unless it is reasonably necessary for Frontier to extend the delivery date up to an additional 45 days.

You may submit a request to know your personal information at https://frontier.com/california-consumer-privacy-act or call 1.800.921.8101.

Please note that under the CCPA, Frontier is not required to provide personal information to a consumer more than twice in a 12-month period. Also, Frontier is not required to retain any personal information collected for a single, one-time transaction, if such information is not sold or retained by Frontier, or to re-identify or otherwise link information that is not maintained in a manner that would be considered personal information.

Right to Delete. You have the right to submit a verifiable request that Frontier (and its Service Provider(s) that process Personal Information about you) delete any personal information about you that it has collected. Upon receipt of your request, Frontier will
delete the personal information from our records and direct any service providers to
delete the personal information from their records. Information required to continue
providing service, however, cannot be deleted (see below).

You may submit a request to know your personal information at

In our response to your request to delete, we will specify the manner in which we have
deleted your Personal Information or, if we must deny your deletion request, the basis
for this refusal. Please note that under the CCPA, Frontier is not required to comply
with a request to delete personal information if the information is necessary for
Frontier or its service providers to:

(1) Complete the transaction for which the personal information was collected,
    provide a good or service requested by the consumer, or reasonably anticipated
    within the context of a business’s ongoing business relationship with the
    consumer, or otherwise perform a contract between the business and the
    consumer.
(2) Detect security incidents, protect against malicious, deceptive, fraudulent, or
    illegal activity; or prosecute those responsible for that activity.
(3) Debug to identify and repair errors that impair existing intended functionality.
(4) Exercise free speech, ensure the right of another consumer to exercise his or her
    right of free speech, or exercise another right provided for by law.
(5) Comply with the California Electronic Communications Privacy Act.
(6) Engage in public or peer-reviewed scientific, historical, or statistical research in
    the public interest that adheres to all other applicable ethics and privacy laws,
    when the businesses’ deletion of the information is likely to render impossible or
    seriously impair the achievement of such research, if the consumer has provided
    informed consent.
(7) To enable solely internal uses that are reasonably aligned with the expectations
    of the consumer based on the consumer’s relationship with the business.
(8) Comply with a legal obligation.
(9) Otherwise use the consumer’s personal information, internally, in a lawful
    manner that is compatible with the context in which the consumer provided the
    information.

Right to Opt Out. The CCPA gives consumers the right, at any time, to direct a business
that sells personal information about the consumer to third parties not to sell the
consumer’s personal information. This is referred to as the “right to opt-out.” Frontier, however, does not and will not sell your personal information to third parties.

**Right to Non-Discrimination.** Frontier does not discriminate against any California Consumer who exercises any of the rights described above. This includes denying goods or services; charging different prices or rates, including through granting discounts or other benefits, or imposing penalties; providing a different level of service or quality of goods or services; or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

**Submitting a Request Through Your Authorized Agent**

California consumers have the option to designate an authorized agent to submit a request on your behalf. To do this, the authorized agent must provide all of the required information in the online request form, along with proof of authorization in the form of a notarized affidavit signed by the California Consumer who is the subject of the request. The notarized affidavit must be attached to the online submission or scanned and emailed to privacy@ftr.com when making a request by phone. We may need to contact you directly to verify the request.

If you would like to designate an agent, your agent must register as such with the California Secretary of State and submit a copy of this registration along with the consumer request to us.

**How We Verify Your Request**

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us.

To submit a request or review the information required to do so, please go to https://frontier.com/california-consumer-privacy-act or call 1 800 9 2 1 8 1 0 1.

**Changes to This Privacy Policy**

We may make changes to this policy from time to time, and encourage you to periodically review this policy for any such changes. We will notify you of any material
changes by posting a notice on our website home page and this CCPA privacy policy page 30 days before any change takes effect.

**Authorized Agent**

You may use an authorized agent to submit a request to know or delete the personal information we have collected. To do so, you must (a) provide the authorized agent with written permission to do so, and (b) verify your own identity with us (unless you have provided the authorized agent with power of attorney pursuant to California’s Probate Code). If you wish to appoint an authorized agent, please contact us at privacy@FTR.com.

**Contact Us**

If you have questions or concerns related to our privacy policy or information practices, e-mail us at privacy@FTR.com or contact us at Frontier Communications, P.O. Box 5165, Tampa, FL 33675.

Effective Date: January 1, 2020

Date Last Updated: April 1, 2021