

## SHELD PRIVACY POLICY

Applicable law authorizes South Hadley Electric Light Department (doing business as “Fiberspring”) to use the fiber system to collect personally identifiable information about our subscribers as necessary in order to render Fiberspring services and service features and other services and to detect unauthorized reception or use of Fiberspring services and service features. Applicable law prohibits Fiberspring from using the fiber system to collect personally identifiable information concerning any subscriber for any purposes other than those listed above without the subscriber’s prior written or electronic consent. When you establish an account for Fiberspring services we collect information such as your name, address, telephone number, e-mail address, as well as information used for credit checks, billing, and payment, and other information we may need to establish and service an account. During the initial provisioning of Fiberspring services, and any subsequent changes or updates to that provisioning, Fiberspring collects technical information about your computer hardware and software, fiber modem and/or other fiber service-related devices, and customization settings and preferences. If you rent your residence, we may have a record of whether landlord permission was required prior to installing our fiber facilities as well as your landlord’s name and address. Fiberspring also collects personally identifiable information about you when you communicate with us for support, maintenance, and billing, send us e-mails, respond to our surveys or e-mails, engage in chat sessions with us, register for information, or participate in promotions or contests, for example. In addition, Fiberspring may combine personally identifiable information, which we collect as part of our regular business records, with personally identifiable information obtained from third parties for the purpose of creating an enhanced personal database to use in marketing and other activities related to Fiberspring services and our other services.

## PERSONAL INFORMATION

Fiberspring considers the personally identifiable information contained in our business records to be confidential. Applicable law authorizes Fiberspring to disclose personally identifiable information concerning any subscriber for the following purposes if the disclosure is: · necessary to render, or conduct a legitimate business activity related to, Fiberspring services and service features or other services provided to the subscriber; 2 · required by law or legal process (as described below in this Policy); or · names and addresses of subscribers for “mailing list” or other marketing purposes. Applicable law prohibits us from disclosing personally identifiable information concerning any subscriber for any purposes other than those listed above without the subscriber’s prior written or electronic consent. The frequency of any information disclosure varies in accordance with our business activities and needs. Fiberspring may use and disclose personally identifiable information collected on Fiberspring services as provided for by applicable law in order to: · install, configure, operate, provide, support, and maintain Fiberspring services; · confirm that you are receiving Fiberspring services requested and are properly billed for it; · identify you when changes are made to your account;

- make you aware of new products or services that may be of interest to you;
- understand the use of, and identify improvements to, our service;
- detect unauthorized reception, use, or abuse of Fiberspring services;
- determine whether there are violations of any applicable policies and terms of service;
- manage Fiberspring services network;
- configure network interface devices or set top boxes or other service related devices; and

- comply with law, including without limitation the Public Records Laws.

Fiberspring may also use and disclose personally identifiable information as provided for by applicable law to perform, for example:

- billing and invoicing;
- administration; · surveys;
- collection of fees and charges;
- marketing;
- service delivery and customization;
- maintenance and operations;
- technical support;
- hardware and software upgrades; and
- fraud prevention.

We disclose personally identifiable information about you to our affiliates or to others who work for us. We also disclose personally identifiable information about you to our employees for Fiberspring internal business purposes, as well as to outside auditors, professional advisors and service providers, potential business transition partners, and regulators. Typically, we make these disclosures when the disclosure is necessary to render, or conduct a legitimate business activity related to Fiberspring services or other services we provide to you. We may be required by law or legal process to disclose certain personally identifiable information about you to lawyers and parties in connection with litigation and to law enforcement personnel. We may also disclose certain personally identifiable information about you to third parties such as, for example, charities, marketing organizations, or other businesses, in connection with disclosures made for “mailing list” or other purposes.

#### LEGAL DISCLAIMER

We make reasonable effort to protect subscriber privacy as described in this Policy. Nevertheless, we may be required by law to disclose personally identifiable information about a subscriber without his or her consent and without notice in order to comply with a valid legal process such as a subpoena, court order, or search warrant. We may also use or disclose personally identifiable information about you without your consent to protect our customers, employees, or property, in emergency situations, to enforce our rights in court or elsewhere, or directly with you, and for violations of Fiberspring Terms of Service policy.

#### TRANSMISSION OF INFORMATION

Fiberspring transmits personally identifiable and non-personally identifiable information about you over Fiberspring services when you send and receive email, video mail, and instant messages, transfer and share files, make files accessible, visit web sites, or otherwise use Fiberspring services and its features. Our transmission of this information is necessary to render Fiberspring services. Fiberspring uses third parties to deliver some features and functions of Fiberspring services, such as support, e-mail, video mail, instant messaging, and web hosting, for

example, and those third parties collect or transmit personally identifiable and non-personally identifiable information about you. These third parties are not permitted to use your personally identifiable information except for the purpose of providing their services. We will not read your outgoing or incoming e-mail, video mail, private chat, or instant messages, but we (or our third-party providers) do store e-mail messages and video mail messages on computer systems for a period of time. We could be required to disclose these messages and communications along with other personally identifiable information about you to comply with law or to protect our Service as described in the Legal Disclaimer section of this Policy. We also monitor the performance of our service and your service connection in order to manage, maintain, and improve Fiberspring services and your connection to it. We (or our third-party providers) use tools to help prevent and block "spam" e-mails, viruses, spyware, and other harmful or unwanted communications and programs on Fiberspring services. These tools may automatically scan your e-mails, video mails, instant messages, file attachments, and other files and communications in order to help us protect you and Fiberspring services against these harmful or unwanted communications and programs. However, these tools do not collect or disclose personally identifiable information about you.

#### INFORMATION PROVIDED TO THIRD PARTIES

Fiberspring services will allow you to access third parties, including without limitation, content providers, on-line services and other providers of goods, services and information. Some of these goods, services and information may be accessible directly from Fiberspring services, and others may be accessible from the third parties referenced above. In connection with this third-party access, you may be requested or required to provide your name, address, telephone number, credit card number and other personally identifiable information to such third parties. Fiberspring is not responsible for any such information provided by you to third parties and you assume all privacy and other risks and losses associated with providing personally identifiable information to third parties via Fiberspring services.

Customer understands and acknowledges that Fiberspring is not liable for any indirect, incidental, special, punitive, or consequential damages; lost profits, loss of data, loss of hardware or software, loss or liability resulting from computer viruses, Service defects, Service interruption or security insufficiency arising out of or related to this Agreement, the performance or breach thereof; the Services provided or failure to be provided; or any delay, non-delivery, wrong delivery, or Service Interruption whether or not caused by the acts or negligence of Fiberspring or their agents, employees, contractors or any party, even if the party has been advised of the possibility thereof.

Fiberspring reserves the right to change this Acceptable Use policy at any time without prior notice. In the event any changes are made, the revised terms and conditions shall be posted on this website immediately. Please check the latest information posted herein to inform yourself of any changes.

## How Fiberspring Collects Your Information

Fiberspring collects and processes information provided directly by you when you install the App and register for an account to use the App. Specifically, this information includes:

- Your name, email address, location, user's phone or contact book data, user's inventory of installed apps, and user's screen recording;
- Browser information and session cookies related to your access and use of the App;
- Data insights Fiberspring attains based on correlation and analytics of your information collected in providing the App, which may be used in aggregated and dis-aggregated formats or to obtain trend analytics, to provide the App; and
- Use of the above-described collected information in aggregated and disaggregated formats to enhance our current App or to provide App features. How Fiberspring Uses the Information Fiberspring uses the information collected as described in this Privacy Policy, including personal information, to:
  - Provide you with the App as described in the Agreement;
  - Implement, improve and/or enhance the App, including to make future releases available to you;
  - Carry out Fiberspring obligations as described or authorized in the Agreement and this Privacy Policy;
  - Enforce Fiberspring rights arising from the Agreement between you and Fiberspring; and
  - Fulfill any other purpose authorized by you and reasonably required for the App.

For questions about your service, please contact SHELD directly at 413-536-1050 or by email at [customerservice@sheld.org](mailto:customerservice@sheld.org).

REVISED SEPTEMBER 2022