

## 2017 Spectrum Customer Privacy Policy

We value the trust you place in us when you subscribe to Spectrum branded cable video, Internet, phone, and/or home security services (collectively, the "Spectrum Services"). We take the responsibility of protecting your privacy and the information we collect seriously. The Spectrum Customer Privacy Policy (the "Privacy Policy") describes the types of information we collect; how we use and share that information; and the choices you have regarding such use and sharing. It also describes the legal limitations imposed on our collection, use and sharing of information that personally identifies you; how long we maintain that information; how you may access, review and correct that information; and your rights under federal law and this Privacy Policy concerning such information.

We will provide written copies of the then current Customer Privacy Policy as required by law. However, we may change the Privacy Policy as indicated below. To keep you informed of our current practices, the most up-to-date version of this Privacy Policy will be posted at [www.spectrum.com/privacy](http://www.spectrum.com/privacy).

The Spectrum Customer Privacy Policy only applies to subscribers of one or more of the Spectrum Services provided by Charter Communications Operating, LLC and its subsidiaries. To review the full Spectrum Privacy Policy, please visit [www.spectrum.com/privacy](http://www.spectrum.com/privacy).

Depending upon the Spectrum Service(s) to which you subscribe, parts of this Privacy Policy may not be applicable to you.

Additionally, this Privacy Policy does not cover:

- information that may be collected through any other products, services, websites, or applications, including your interactions with online video and other third party content services, even if you access them through the Spectrum platform (i.e., Spectrum products, services, websites and mobile applications (sometimes referred to as the "Spectrum Platform")); or
- information collected by devices we do not control where the manufacturer has enabled information gathering capabilities.

You should read the privacy policies for these other products, services, websites, and applications to understand their privacy practices.

Also, certain services offered through Spectrum Enterprise may be subject to contracts that contain additional or different privacy-related terms and conditions. In such event, the terms of those contracts control.

#### COLLECTION OF INFORMATION

In order to provide and market services to you, we collect a variety of information about you when you communicate with us, when you use our products and services, and when you access our websites and applications. Some of this information is collected when you provide it to us directly, such as when you create an account, enter a contest or respond to a customer survey, or contact a customer service representative. Some of the information is collected automatically when you interact with our websites and applications or use our products and services. We may also collect information about you from third parties. The information collected depends on how you access and use the Spectrum products, services, websites and applications. If you are a Spectrum customer and you allow others to access and use your accounts, products or services, we will collect information about those users, as well.

#### Information You Provide to Us Directly or When You Create an Account

We collect information you provide to us when you establish a customer or user account and when you contact us or otherwise communicate with us, such as:

- contact information (e.g., name, address, email address, and phone number) usernames, passwords, images, voiceprints, and other authenticating information associated with a Spectrum account;
- information about the types of services to which you subscribe, orders you place or downloads you make through a Spectrum product or service, the service options you have chosen, and any customized setting you have created;
- information about your payment methods, such as your payment card number or bank account information;

advertisers and marketing entities, for non-service related purposes, unless you object in advance to such sharing. This is often referred to as the "mailing list" exception. At this time, we do not share this information with third parties. If we decide to do this in the future, we will provide you notice and an opportunity to opt-out of such sharing.

Some of the advertisements we display may invite interactive or transactional follow-up from you. When you interact and provide your consent, we may share your contact information with such advertiser for the purpose of fulfilling your request. We may also share individually de-identified or aggregate information, including our business and marketing reports, with third parties for their own purposes.

If we enter into a merger, acquisition, or sale of all or a portion of our assets, we may transfer information about you, including information that personally identifies you, as part of the transaction.

#### YOUR RIGHTS AND OUR LIMITATIONS UNDER FEDERAL LAWS

The Cable Act and the Communications Act imposes limitations on our collections, use, and sharing of information that personally identifies you when you subscribe to cable video and telecommunications services, or other services delivered by Spectrum cable services (the "Spectrum Services"). The Communications Act restrictions apply to telecommunications services, which includes Spectrum phone and Internet services.

The Cable Act also limits how long we maintain information that personally identifies subscribers to the Spectrum Services, and provides subscribers with the right to access, review and correct that information. Subscribers to the Spectrum Services may enforce the limitations imposed on us by federal law with respect to the collection and disclosure of personally identifiable information about you as a subscriber to one of these services through a civil action under federal law, in addition to other rights and remedies that may be available to you under federal or other applicable laws.

#### The Cable Act and Personally Identifiable Information

Section 631 of the Cable Act gives a subscriber to the Spectrum Services the right to know about the personally identifiable information we collect and how we use it; under what conditions and circumstances and the types of persons and entities to whom we may disclose personally identifiable information; how long we maintain personally identifiable information; the limitation on our ability to collect and disclose personally identifiable information collected from the cable system; and a subscriber's rights under the Cable Act concerning personally identifiable information and its collection and disclosure.

Personally identifiable information is information that identifies a particular person; it does not include de-identified, anonymous, or aggregate data that does not identify a particular person or persons.

The Cable Act permits us to use the cable system(s) to collect personally identifiable information about our subscribers when it is necessary to render the Spectrum Services or other services we provide and to detect unauthorized reception or use of the Spectrum Services. We may use the cable system to collect personally identifiable information about a subscriber for additional purposes with a subscriber's prior written or electronic consent.

The Cable Act permits us to disclose personally identifiable information if the disclosure is necessary to render, or conduct a legitimate business activity related to, the cable service or other services provided; required by law or legal process; or limited to your name and address under a "mailing list" exception, as described in this Privacy Policy.

If you believe that you have been aggrieved by any act of ours in violation of law, we encourage you to contact us in order to resolve your question or concern. You may also enforce the limitations imposed on us by the Cable Act with respect to your personally identifiable information through a civil lawsuit in federal district court seeking damages, attorneys' fees, and litigation costs. Other rights and remedies may be available to you under federal or other applicable laws as well. Your Spectrum Residential Services Agreement contains your agreement that, to the extent permitted by law, any claims under the Cable Act may be enforced in arbitration.

#### The Communications Act and CPNI

Section 222 of the Communications Act provides additional privacy protections for information about the quantity, technical configuration, type, destination, location, and amount of your use of the Spectrum telecommunications services, and information about your Spectrum phone service that is contained on your

bill. This information, when linked to an identifiable customer of such service, is known as customer proprietary network information or "CPNI." CPNI does not include a customer's name, address, and telephone number, which is defined by the Communications Act as "subscriber list information" and is not subject to the CPNI protections. However, that information is considered "personally identifiable information," and is subject to the Cable Act protections described above.

If you are a customer of our phone or Internet service, you have the right, and we have a duty under federal law to protect the confidentiality of CPNI and to provide you with information about how we use your CPNI and explain the choices you have. Those additional protections and the choices you have regarding the use and sharing of such information are reflected in this Privacy Policy.

#### YOUR CHOICES

You have many choices in controlling how we use and share your information for marketing and advertising purposes. For instance, you can always choose whether to receive promotional emails or text messages. When you visit our websites, you may opt out of interest-based advertising, and when you use our mobile applications, you can limit the use of ad trackers. If you subscribe to Spectrum services, you may go to <http://unsubscribe.spectrum.com> to manage your privacy preferences, including:

- To be added to our "Do Not Call," "Do Not Email," "Do Not Mail" or "Do Not Knock" list, which will limit the marketing and advertising messages you receive about Spectrum products and services;
- To limit our use of your Video Usage Information, Combined Information, or our business and marketing reports to direct addressable advertisements or interest-based advertisements to you.

If you make changes to your contact information or get a new account, you will need to review and update your privacy preferences. If you do not have access to Internet service, you may call us at 855-757-7328 for residential customers and 800-314-7195 for business customers. Please note that even if you choose to limit the use of information or communications for marketing and advertising purposes, you will still receive general advertising and zone advertising, in addition to service-related messages.

#### CPNI

If you subscribe to our telecommunications services, we would like to use the CPNI information we have on file to provide you with information about products and services or special promotions for other communications-related products and services to which you do not already subscribe. You have the right to restrict this use of CPNI. If you deny or restrict your approval for us to use your CPNI, you will experience no effect, now or in the future, on how we provide any services to which you subscribe.

We will wait at least thirty days from the date we first provide you, as a subscriber of a telecommunications service, before we use your CPNI for this purpose. During that time and at any time after, you may opt-out of our use of your CPNI to market these other communications-related services by calling us at 855-757-7328 for residential customers and 800-314-7195 for business customers.

We also offer various other non-communications related services, such as the Spectrum cable video service. When you initiate an interaction with one of our representatives, such as a phone call or a chat, we may ask for your oral consent to our use of your CPNI for the purpose of providing you with an offer for such non-communications related products or services. If you consent, we may use your CPNI for the duration of such interaction to offer you those additional services.

#### SECURITY

We take our responsibility to secure the information we collect and maintain seriously. We use reasonable security, including technical, physical and administrative controls, to secure the information we collect and maintain. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose Spectrum information.

You can help protect the privacy of your own information by using encryption and other techniques to prevent unauthorized interception of your personal information. You are responsible for the security of your information that you transmit to us or view, download, or otherwise access when using unencrypted, public or otherwise unsecured networks. For more information on things you can do to help protect the privacy of your own information, visit [www.spectrum.com/security](http://www.spectrum.com/security) or [www.OnGuardOnline.gov](http://www.OnGuardOnline.gov).

#### INFORMATION RETENTION

If you subscribe to a Spectrum service that is governed by the Cable Act, we will maintain information that personally identifies you and that is associated with your use of the services for as long as necessary for the purpose for which the information was collected, which may be as long as the duration of your subscription, in some instances. If you are no longer a subscriber to any Spectrum service, we will keep information that personally identifies you as long as necessary to comply with the laws governing our business, such as business, tax, or other legal purposes.

#### ACCESSING AND CORRECTING INFORMATION

We strive to keep our records accurate. If any of your information changes, please notify us right away so that we can update our records.

If you subscribe to a service governed by the Cable Act and you would like to see the personally identifiable information we maintain in our business records, please send a written request to your local office and we will be glad to make an appointment for you to visit during normal business hours. You will only be permitted to examine records that contain personally identifiable information about your account and no other account. If your review reveals an error in our records, we will correct it. We reserve the right to charge you for the cost of retrieving and photocopying any documents that you request. You may also be able to access certain information about you or your account by contacting one of our customer service representatives at 855-757-7328 for residential customers and 800-314-7195 for business customers.

If you make a written request for a copy of your CPNI, we will disclose the relevant information we have to you at the address we have for your account, or to any person authorized by you, if we reasonably believe the request is valid. For telephone and online access to your CPNI such as outbound call detail records, we require that you first authenticate your identity using a password established using our online system. We generally do not provide our customers with records of calls received, records that are only in our archives, other records that we do not furnish as part of a telephone bill, web-browsing history, IP address logs or any other information that we do not create or maintain in the ordinary course of business unless there is a court order or similar legal process. If there are errors in names, addresses, or telephone numbers in our vendors' directory lists, or if you have been omitted from the directory, the correction cannot be made until the next available publication. Please understand that we may have no control over information appearing in directory lists or provided by directory assistance services which we do not own.

#### CHILDREN'S PRIVACY

We do not knowingly collect the personal information of anyone under the age of 13.

#### CHANGES TO THIS PRIVACY POLICY

The most current version of our Privacy Policy is published and maintained at [www.spectrum.com](http://www.spectrum.com). We may modify this Privacy Policy at any time, and any changes will be posted at this website. If we make any changes that materially affect your rights or the ways in which we use or disclose information, we will notify you in advance through written, electronic or other means, as permitted by law, so that you can make any necessary decisions about your ongoing use of the Spectrum Platform.

#### CALIFORNIA PRIVACY RIGHTS

California law entitles our California customers to request additional information from a business which shares personally identifiable information with third parties for their direct marketing purposes. We do not share personally identifiable information with unaffiliated third parties, for their own direct marketing purposes. We may share personally identifiable information with some same-branded affiliates, however, for those affiliates' direct marketing purposes. If you contact us, we will provide you with the names and addresses of our same-branded affiliates and a list of personally identifiable information that we may have shared with them.

#### CONTACT

If you have any questions about our privacy protections and policies, please contact your local customer service office. You can find the phone number for your local customer service office on your monthly bill statement or by visiting our website at [www.spectrum.com](http://www.spectrum.com).

Effective: August 1, 2017

- information related to a credit application for a product or service, which may include your Social Security number, driver's license number, or other government issued identifier;
- information you provide when you enter contests or respond to customer surveys; and
- information we keep in our records when you correspond or otherwise communicate with us, including through our call centers, online chat sessions, and through social media.

#### **Information We Collect Through the Spectrum Platform**

We may automatically collect information about your use of our services, products, websites and applications in order to provide you with the service. Federal laws limit how we use and disclose the service usage information described below. Therefore, we will only use and disclose this information to provide the products and services you use and as described in this Privacy Policy. When we provide service, we collect information such as:

- Device information, including but not limited to the device identifiers, the number of devices connected to our network, network addresses, and technical configurations of the equipment use with our services, products, websites and applications;
- network traffic data;
- performance and support data; and
- information about your use and the operation of Spectrum products, services, websites, applications, and their features.

Service usage information automatically collected includes:

- the channels, programs, and advertisements you viewed and how long you viewed such content when you subscribe to our video service ("Video Usage Information");
- content of emails, files and other information when it is necessary to provide you with the products or features of the services you use, such as email, cloud storage, and voicemail;
- the websites you visit when you are using our Internet service, in order to provide the service and connect you to the other sites and services you request ("Internet Usage Information"); and
- call records, including the phone numbers that you call and that call you, and the times and dates of those calls, when you subscribe to our phone service ("Call Detail Information")
- video recordings and alarm settings, when you subscribe to our home security service.

When you visit or use Spectrum websites and mobile applications, we collect information about your interactions within the website or applications, including where you browse, what you search, and any purchases you make within those sites and apps. We also collect device information, including your IP address and information about your browser, operating system, platform type; demographic information through cookies, web beacons, and other tracking technologies; and information about the website you just left, and the website you go to next. The collection of this information, including IP addresses and the referring websites, is required in order for users to communicate on the Internet.

#### **Location Information**

When you access our network, we may collect general location information, such as the city or zip code that correlates with the license of your device IP address, or more precise geolocation data that indicates where you are at a specific point in time.

#### **Information Obtained from Third Parties**

We may also collect information from third parties to verify information you have provided and from credit reporting agencies to, for example, determine your creditworthiness, credit score, and credit usage.

If you rent your residence, we may have a record of whether landlord permission was required prior to installing our cable facilities as well as your landlord's name and address.

Sometimes, we also obtain additional information from outside sources to supplement the information we collect from you. We may collect commercially available demographic information about you or your community available from third parties such as research consultants and marketing firms, such as age, gender,

and preferred language. We may also collect commercially available interest data, such as whether you like to travel or are a sports enthusiast.

We may also receive information from content providers and other platform providers when you use your Spectrum account to authenticate your use of Spectrum services through that provider's platform or device.

#### **USE OF INFORMATION**

First and foremost, we use the information we collect to provide you with reliable, high quality products and services, which includes using the information we collect to communicate with you, make improvements, investigate theft and other illegal activities, and personalize your experience. This may involve linking and combining information about you from across the Spectrum Platform, as well as from third parties ("Combined Information").

We may also use the information we collect to create operational and marketing reports, and to show you more relevant advertising, whether through our own services and websites, or on third party services and websites. We do not sell or otherwise share our Internet customers' Internet Usage Information, including web browsing histories obtained through our Internet service, with third parties for their own marketing or advertising purposes. In the event that we change these business practices, we would provide customers with any required notice and obtain any required consent.

#### **To Provide and Improve our Products, Services, Websites and Applications**

We use the information we collect to:

- properly deliver, maintain and improve our products, services, websites and applications;
- fulfill requests for new service or changes to your account or the products and services you already receive;
- provide you with technical support and high quality customer service, including through the use of recorded or monitored communications between you and our customer service agents;
- create and administer a Spectrum account, including activating your service, billing, invoicing, and debt collection activities;
- authenticate or otherwise provide you access to your Spectrum products and services;
- provide updates, upgrades, repairs or replacements for any of our service-related devices or software used in providing or receiving services;
- manage and configure our device(s), system(s) and network(s);
- understand how the service is being used, including through the creation of operational and marketing reports based on de-identified or aggregated service usage information;
- inform you of additional products and services that may be of interest to you;
- protect the security of the system, prevent fraud, detect unauthorized reception, use, and abuse of any Spectrum product, service, website or application, and to enforce any Spectrum policy or applicable terms of service;
- protect our rights, our personnel, our property, and the safety of others;
- maintain our accounting, tax and other records; and
- comply with applicable federal and state laws and regulations, as well as for the general administration of our business.

#### **To Communicate With You**

We use the information we collect to deliver and personalize our communications with you. For example, if you use an interactive or transactional service, e.g., responding to a survey or ordering a Pay-Per-View event, we will use that information and information from your account to send you billing information, as well as recommendations for additional Spectrum products or services that may be of interest to you and to provide you with a more personalized experience. We may use the information to remind you of a service appointment, to follow up with you after a service request, and to send you important service-related notices and announcements. If you are a website visitor, we may send you reminders about items left in your online shopping cart.

We may send you promotional communications for products and services that may be of interest to you through the mail, over our cable system, or online. Some of these communications may be directed to you because of the Spectrum services to which you subscribe or your interactions on the Spectrum Platform, and some may

be directed to you because of your general geographic location. For example, if we are launching a new service in limited areas, only residents of that particular area will receive that promotional communication. This is often called "zone" advertising.

#### **To Create Business and Marketing Reports**

Our business and marketing reports use Combined Information to provide insights into what products and services our customers are using, how long they are using our products and services, and how some of our services are accessed. In the video context, for example, these reports contain information such as channel tuning, the time a channel is changed, when a Spectrum set-top box is "on" or "off", whether a program or commercial was watched to its conclusion or skipped, and whether the content was accessed during its regular airing schedule, from our on-demand service, or through a Spectrum website or app or a third party's platform. We may create similar reports in the phone, broadband, and home security contexts that measure and analyze service usage information, such as the peak times of usage, the amount of bandwidth used, and the amount of data stored on our systems (but not the content).

#### **These reports only contain de-identified or aggregated information; and they do not contain information that personally identifies you.**

We use these reports for our own internal purposes, such as improving our products and services, determining what content to provide our customers, measuring the effectiveness of our marketing and advertising, and other research and analytics. We may also share these de-identified or aggregate reports with third parties, as described in "When We Share Information with Others." You should review the "Your Choices" section of this Privacy Policy to understand the choices you have with respect to the sharing of this information.

#### **ADVERTISING AND TRACKING**

We use some of the information we collect to make the marketing and advertising you see on the Spectrum Platform more relevant to you, as well as to market the Spectrum products and services on other websites and platforms. Many of our marketing and advertising activities use information that does not personally identify you, such as your ZIP Code, your IP address, advertiser IDs and other persistent identifiers that are not directly linked to any identifiable information. Some of our marketing and advertising activities, however, do include the use of information that personally identifies you. For example, we use your postal and email address to deliver marketing and advertising to you. We may also use Combined Information to create marketing and advertising campaigns. For information about how to limit the use of information for these purposes, see the "Your Choices" section below.

#### **Addressable Advertising on our Cable System**

Some of the advertisements you see on cable channels are placed by us. Some of those advertisements are placed in particular shows or channels; others are shown in particular geographic areas. Some of our cable advertisements will ask for your permission to take certain actions, like mail you information or allow the advertiser to contact you. In some areas we will be able to address advertisements to your household through our cable system that will be more relevant to your interests based on your Video Usage Information and/or Combined Information. For information about how to limit the use of information for these purposes, see the "Your Choices" section below.

#### **Online Advertising and Customization**

We may place "cookies" in your browser that contain information about you or your account when you set up a personalized service or customize your settings and preferences on our websites or mobile applications. We do not store sensitive information such as your password, e-mail address or credit card number in cookies. Cookies enable us to control the display of ads, track usage patterns, help diagnose problems with our services, gather demographic information, analyze trends, conduct research, and otherwise administer the Spectrum services.

We use third party service providers to place advertisements for the Spectrum services on the Internet. These providers use standard tracking technologies used by most major websites and mobile applications to collect non-personal information about your visits to our websites and mobile applications, as well as your interaction with our products and services. These providers may also use information about your visits to other sites to send interest-based advertisements for other products and services and to gauge the effectiveness of advertisements. No information that personally identifies you, such as your name, address, phone number or email address, is collected or used in this process.

#### **WHEN WE SHARE INFORMATION WITH OTHERS**

We share information with others when it is necessary to provide you with the products and services you request and to which you subscribe. We also share information with others when you direct us to do so, such as other users on your account; when required by law or to respond to legal process; or to protect our property or rights or the safety of our employees, our customers, or other individuals. We share information with Charter/Spectrum affiliates and subsidiaries and unaffiliated third parties for their own marketing activities only after we have obtained any necessary consent to do so.

#### **Service Providers**

We may disclose your information to third-party service providers who perform business activities and functions on our behalf to support our interactions with you such as customer service, system maintenance or supporting the features of this App. These third-party service providers are authorized to use your personal information only as necessary to provide these services on our behalf.

#### **Account Holders and Other Authorized Users**

We may disclose any information about a customer's account and use of a service or feature to the primary account owner after appropriate authentication. The primary account owner may also authorize other users to access information on the account, which may include information about the primary account owner's use of the relevant service.

#### **Affiliates**

We may share information about you with our affiliates in order to provide the services you have requested or to which you subscribe, or to make your Spectrum experience more streamlined, such as through combining account information into a single location for easier access. We may also share information about you with our affiliates for their own marketing purposes, when we have any necessary consent required to do so.

#### **Governmental Entities or Pursuant to Valid Legal Process**

We may disclose information that personally identifies you to comply with valid legal process, including subpoenas, court orders or search warrants. In some instances where there is a valid legal request for or the order for disclosure of information about you, we may notify you of such request or order and then it may be up to you to object or take specific action to prevent any disclosures pursuant to those requests or orders.

If you subscribe to Spectrum services, we may be required to disclose information about you, including information that personally identifies you, your use of our services, and the content of your communications, to governmental entities upon receipt of valid legal process. These disclosures may be made with or without your consent and with or without notice, in compliance with the terms of process.

If you subscribe to Spectrum cable video service and a governmental entity is seeking information about your selection of video programming, the Cable Act requires the governmental entity to obtain a court order. In the proceeding relevant to the issuance of the court order, the government must provide clear and convincing evidence that you are reasonably suspected of engaging in criminal activity and that the video records sought would be material evidence in the prosecution of the case. You are to be afforded the opportunity to appear and contest the governmental entity's claims in such proceeding.

We may also 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, for violations of service terms, conditions or policies; and/or as otherwise required by law.

#### **Third Parties**

If you subscribe to our telephone service, your name, address and/or telephone number may be transmitted via Caller ID, published and distributed in affiliated or unaffiliated telephone directories, and available through affiliated or unaffiliated directory assistance operators. We take reasonable precautions to ensure that non-published and non-listed numbers are not included in the telephone directories or directory assistance services, although we cannot guarantee that errors will never occur. Please note that Caller ID blocking may not prevent the display of your name and/or telephone number when you dial certain business numbers, 911, 900 numbers or toll-free 800, 855, 844, 866, 877 or 888 numbers.

If you subscribe to Spectrum services covered by the Cable Act, federal law allows us to share your name and address with non-affiliated third parties, including