

Magna5, LLC Privacy Commitment

By selecting Magna5 LLC and/or Magna5 RTC LLC dba Richmond Telephone Company ("Magna5") as your voice and data solutions provider, you have indicated your confidence in our ability to serve you effectively and responsibility. Magna5 takes this responsibility seriously, and is committed to provide you with the best customer experience possible.

As an integral part of Magna5's new subscriber registration and ongoing service process, Magna5 is required to obtain a limited amount of Proprietary Information. The following information describes Magna5's Privacy Commitment, our commitment to always protect your Proprietary Information, and how our Privacy Commitment applies to you as a valued Magna5 subscriber.

Magna5's Privacy Commitment

Magna5 strictly safeguards Proprietary Information with which you have entrusted to us in order to serve you. This commitment is part of Magna5's broader commitment to conduct business honestly, ethically, and with our subscribers' best interest in mind. This is the foundation of our Privacy Commitment to you.

Collecting Limited Proprietary Information to Serve You

In order to provision and support your services, Magna5 collects certain Proprietary Information including contact and service-related information, defined below.

WHEN YOU SELECT MAGNA5 AS YOUR VOICE AND DATA SOLUTIONS SERVICES PROVIDER, YOU AGREE TO THE TERMS OF THIS PRIVACY COMMITMENT AND APPLICABLE TERMS AND CONDITIONS FOR YOUR USE OF MAGNA5's SERVICES, AS MAY BE UPDATED FROM TIME TO TIME. YOUR USE OF MAGNA5 SERVICES



CONSTITUTES YOUR AUTHORIZATION TO MAGNA5 TO COLLECT AND UTILIZE THE INFORMATION YOU PROVIDE TO MAGNA5 TO SERVE YOU, CONSISTENT WITH FEDERAL LAW, FEDERAL REGULATION, SOUND BUSINESS PRACTICES, AND THIS PRIVACY COMMITMENT.

Certain information collected from those subscribers that qualify for federal universal service fund programs such as the Schools and Libraries program must be provided to the Fund administrator. For those entities subscribing to Magna5' service for the first time, you will separately be asked to sign a consent form authorizing Magna5 to provide limited Proprietary Information to the Federal Communications Commission's designated fund Administrator.

This Privacy Commitment does not apply in instances where you may provide information in a public forum.

You have the right to deny or withdraw approval to provide Proprietary Information. You may deny or withdraw approval to provide Proprietary Information by contacting customer service at the numbers below. NOTE: That certain Proprietary Information is necessary to provide your service. A denial or withdrawal of providing certain Proprietary Information to Magna5 may preclude Magna5 from providing your service. Your denial or withdrawal of approval to use, disclose, or permit access to certain Proprietary Information will not affect the provision of any telecommunications services. Any grant, denial, or withdrawal of approval for the use, disclosure, or permission of access to certain Proprietary Information is valid until you affirmatively revoke such grant, denial, or withdrawal.

Proprietary Information

Magna5 regards all information you provide directly to Magna5 service as strictly confidential. Magna5 is required to collect limited Proprietary Information exclusively to serve you. Collecting limited Proprietary Information makes it possible for Magna5 to deliver the effective and personalized service you expect, to design products,



features, and other services to better serve you, and to comply with important Federal Communications Commission regulations as may apply, designed to protect you.

Limited Proprietary Information Required to Serve You. When subscribing to Magna5 service, you will be asked to provide certain "customer Proprietary Information" including any of the following information acquired in connection with Magna5providing telecommunications and other services:

- (1) Individually identifiable customer proprietary network information (CPNI); (2) Personally identifiable personal or corporate information (PII); and
- (3) Content of communications.

On Line Accounts When establishing an on line account with Magna5, you will also be asked to provide a login name and password. Computer and connection information including IP address, browser type and version, operating system, and computer platform data may also be collected automatically through "cookies" when you access Magna5' service. A "cookie" is a small file containing a string of characters that is sent to your computer when you visit a website. Magna5 uses cookies to improve the quality of our service and to better understand how you interact with us. Most browsers are initially set up to accept cookies. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent.

Your Proprietary Information Is Protected

Magna5 maintains strict business practices to ensure the security and confidentiality of Proprietary Information. Magna5 maintains physical security at our offices, passwords to protect our databases, compliance audits, and constantly updated virus/intrusion detection software. Access to your information is limited to designated Magna5 employees entrusted to serving you. Proprietary information is not used, sold or otherwise distributed, and complies with the Federal



Communications Commission's regulations governing customer proprietary network (confidential) information, 47 C.F.R. §§ 64.2001 et seq.

Collected Proprietary Information may Be Shared in Limited Circumstances As Permitted by Law

Magna5 may share general user information outside of Magna5 to properly manage service. Certain information may be used to report call volume in aggregate to regulators and program administrators, to prevent fraud, to comply with court orders, and for tax reporting. Federal and State laws may require us to send you additional notices or may give you additional rights. If we are required to obtain your permission before using or disclosing information, we will do so.

If a circumstance arises where Magna5 is required to provide information to outside parties, as authorized under Federal Communications Commission regulation, such information will be aggregated and will not enable identification of you, any individual user, any individual account information, or any specific service data, unless otherwise required. Use of such information by outside parties will be expressly limited. Any Proprietary Information that might be shared with others will require your approval following a notification that describes the specific conditions and benefits to you for sharing information.

It may become necessary to share information with government or law enforcement agencies in order to investigate, prevent, or take action against illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Magna5's terms of use, or as otherwise required by law. Magna5 will cooperate with government and law enforcement officials under a lawful subpoena or directive.



Contacting You

In order to better serve you, Magna5 may contact you directly via electronic or U.S. mail. You may also receive information regarding your account, changes in Magna5 service and features, and periodic surveys regarding your Magna5 experience. Information you provide in response may be used and retained by Magna5 exclusively to better serve you.

BY PROVIDING MAGNA5 WITH YOUR EMAIL ADDRESS, YOU CONSENT TO ALLOW MAGNA5 TO COMMUNICATE WITH YOU REGARDING YOUR ACCOUNT, THE SERVICE YOU RECEIVE FROM MAGNA5, AND TO PROVIDE ADDITIONAL INFORMATION REGARDING NEW MAGNA5 FEATURES.

What You Can Do to Protect Proprietary Information

You can protect yourself against unauthorized use of your account information by signing off when you have finished using our Web site or using a shared computer.

If accessing Magna5 on a mobile device through public Wi-Fi access to the Internet, your username and passcode could be compromised. You should be aware of this possibility before placing calls in public locations.

You can elect not to provide certain optional information, although a decision not to provide certain information such as an email address or other Proprietary Information will make it more

difficult for Magna5 to serve you or could preclude Magna5 from providing certain services to you.

If using a private branch exchange (PBX), it is critical that you monitor usage and ensure that access to your PBX is not compromised to avoid unauthorized usage charges.



If you do not wish to receive any communications from Magna5, or determine that you no longer wish to be a Magna5 subscriber and wish to have your information removed from Magna5's records, please indicate your preferences through our Web portal or contact Magna5.

Privacy Commitment Updates

Magna5 may update this Privacy Commitment from time to time, although changes to Magna5's Privacy Commitment will never be less protective of your information. We will notify you about significant changes in the way we treat your Proprietary Information by sending a notice to the primary email address specified in your Magna5 account and by placing a prominent notice on our web site. You are encouraged to review Magna5's Privacy Commitment periodically for changes. Those objecting to the terms of this Privacy Policy or other Magna5 policies, agreements, or disclaimers, should exit Magna5's web site and/or cease using all Magna5 services immediately.

To contact us about privacy issues, write to us at:

Magna5, LLC ATTN: Legal 2828 N. Harwood Street, Suite 1700 Dallas, TX 75201

Email: support@magna5global.com | Telephone: 866.240.1912

Additional Information

For additional information regarding online privacy, visit the Federal Trade Commission or Federal Communications Commission websites.