

Subscriber Privacy Policy

We care about your privacy

Liberty Cablevision of Puerto Rico LLC (“Liberty”) is committed to protecting our customers’ privacy. We want you to be confident in the knowledge that we treat your personally identifiable information (“PII”) with care and in accordance with our obligations under applicable data protection and privacy laws. This Privacy Policy (the “Policy”) is provided to inform you of our practices regarding Liberty’s collection, use, protection and disclosure of your PII in the course of providing our cable television, Internet and telephone services (individually and collectively, the “Service”) to you.

This Policy does not apply to information that may be collected through our website, www.libertypr.com, or any other products, services, or websites, even if accessed through our Services and even if co-branded with the Services Liberty provides. Our products and services may contain links to other companies’ websites and services which they offer; these companies may have privacy policies of their own. We recommend that you read the privacy policies of such third parties. We are not responsible for the privacy practices or content of any such third parties’ products or third parties’ services.

As required by federal law, we will notify you of our Privacy Policy annually, however we may update this Policy more frequently. If we do, we will provide you with access to the most recent version by posting it on our website at www.libertypr.com (the “Website”). We encourage you to review our policies (including our Acceptable Use Policy and any applicable Service Agreement) by visiting our Website periodically. Any updates are effective as of the date first published on www.libertypr.com. If at any time you find this Policy unacceptable, you should cancel your Services.

Information We Collect

When you subscribe to and use our Services, Liberty collects certain types of information about you, as described below. We may collect this information: (1) directly from you when you provide it to us, such as when you purchase products or services, fill out a form on our website, send us an e-mail, or respond to a survey; (2) automatically when you use an interactive or transactional service or television viewing controls; or (3) from third parties.

- **Personally Identifiable Information** – In providing our Services, we sometimes collect personally identifiable information, such as your name, physical address, telephone numbers, social security number, driver's license number, and e-mail addresses ("personally identifiable information" or “PII”). The type of personally identifiable information we collect may change depending on the Services you subscribe to. PII does not include aggregate information or information that, by itself, cannot be used to identify you (i.e., “non-personally identifiable information” or “Non-PII”).
- **Other Information** – We also collect non-personally identifiable information, including usage statistics, traffic data, the domain names and IP addresses of our Internet Service

customers, device identifiers and other information. This information will be treated as personally identifiable information when it is associated or otherwise combined with information that can identify you.

- **Cable Television Services** – For certain cable television services, such as pay-per-view, video-on-demand and interactive cable services, we collect personally identifiable information in the form of usage information for billing, programming and related purposes, including information about your video selections. We treat this information as confidential. Unless you consent, we will not use this information to identify you to third parties other than vendors and business partners who are restricted from using such information for their own purposes, or as set forth in the section of this Policy titled: “How We Share Your Information.” We use this information to make recommendations to you and for other purposes, such as to market new or additional services to you. We may collect viewing information that does not identify you personally for any reason, including determining which programs are most popular, how many people are watching the show, which system features are used most often and to make customized recommendations to you.
- **Internet Services** – Like most Internet service providers, we automatically collect and associate with your account certain information concerning your use of our Internet service, such as the Internet Protocol (IP) address(es) assigned (an identifier assigned to your computer while online), MAC addresses (individual equipment identifiers) of equipment that is used, bandwidth used, system and connection performance, browsers used, dates and times of access, and Internet resource requests. Some of this information may identify those customers who have downloaded certain materials or accessed certain websites.
- **Telephone Services** – In providing telephone services, we collect subscriber list information, which is limited to your name, address and telephone number. We also collect information about the quantity, technical configuration, type, destination, location, and amount of your use of the VoIP services and information contained on your telephone bill concerning the type of phone services and features you receive, as well as other information on your bills. That information is known as customer proprietary network information or “CPNI.” CPNI does not include subscriber list information by itself.

How We Use Your Information

- **To provide our products and services to you.** We consider your personally identifiable information to be confidential, and use it to provide our Services and for related purposes, including and without limitation, to detect and protect against fraud and the unauthorized use of our Services, to provide you with personalized content, to process and respond to your inquiries, to administer disputes, to improve our Services, as otherwise set forth in this Privacy Policy, and to enforce our legal rights, including your agreement(s) to receive the Service(s).
- **To enhance our products and services.** We may use audience measurement and other demographic data to improve our cable television service and other services and make

programming and advertising more relevant to our customers. We may also use this information to distribute and deliver relevant programming and advertising to you without disclosing personally identifiable information about you to programmers or advertisers.

- **To present new products and services.** We may use your information to deliver to you opportunities to purchase certain goods and services, and to select and deliver advertisements that are relevant to your interests, and we may share your name and address with our partners, such as advertisers, promoters, application providers or app stores (all referred to herein as “Commerce Partners”) for use in their marketing, subject to your ability to limit certain uses and disclosures. In addition to fulfilling your request, Commerce Partners may also use PII to send you other information in which you might be interested. The use of PII by Commerce Partners will be governed by their respective privacy policies, which you should refer to in the event that you have any queries regarding how our Commerce Partners might use your PII.
- **To manage our performance.** We may use PII when asking for feedback in respect of the performance of our products and services, our customer care service and our maintenance and operations. Where allowed by applicable law, we may use information related to your use and access to our products and services for purposes of traffic management, customer inquiries and prevention or detection of fraud. Where allowed by applicable law, we may also monitor and record our communications with you, including e-mails and phone conversations, for training purposes, quality assurance and to record details about the products and services you order from us.
- **Other Uses:** Liberty may use Non-PII from any Service for any reason and share it freely with affiliates, partners and other third parties, including advertisers, content providers, audience measurement and market research firms. These firms may combine this information with information about you or your community (such as the information that merchants use in delivering catalogs by mail, or census information about neighborhoods) to generate audience analysis data and for other permitted purposes. Audience analysis helps us and the program networks we carry decide on which programs and channels to carry and to improve our cable television services. We also may use this information to provide a more personalized experience by directing advertisers to channels that produce more sales as they consider, design, and evaluate advertising campaigns. This information may then be further aggregated (combined with information from many other users), and may include information such as traffic patterns, trends in connection with various types of transactions, and other information.

How We Share Your Information

Liberty may disclose your personally identifiable information and other information it collects to another entity (i) when it is necessary to render, or conduct a legitimate business activity related to the Services we provide to you, such as outsourcing one or more business functions, to confirm or update information provided by you or as a part of a sale of assets as described below; (ii) as required by law or legal process; (iii) for mailing list or other purposes, subject to your ability to restrict this disclosure; or (iv) as otherwise authorized by you. When we provide your information

to a third party for purposes of outsourcing one or more business functions, we will restrict such entity's use of your information to the purposes for which it is disclosed and will prohibit such entity from further disclosure or use of the PII obtained from us. We may share your PII with any parent company, subsidiaries, or other companies under common control (collectively "Affiliates"). In such event, we will require our Affiliates to honor this Policy.

- **Law Enforcement and Governmental Entities:** If allowed by and after complying with any federal and/or local law requirements, Liberty may disclose personally identifiable information about you to representatives of government or to comply with valid legal process. In these situations, Liberty may be required to disclose personally identifiable information about a customer without the customer's consent and without notice to the customer. Law enforcement agencies may, by federal or state court order, and without notice to you, obtain the right to install a device that monitors your Internet and e-mail use, including addresses of email sent and received and in some cases the content of those communications; and/or your use of our telephone service, including listings of incoming and outgoing calls and in some cases the content of those calls. In some instances where there are valid legal requests for or orders for disclosure of your information, we may notify you of the requests or orders and then it may be up to you to object or take specific action to prevent any disclosures pursuant to those requests or orders.
- **Protection of Others and Our Rights:** We may also use or disclose personally identifiable information about you without your consent (a) to protect our customers, employees, or property, (b) in emergency situations, (c) to enforce our rights in court or elsewhere, or directly with you, for violations of service terms, conditions or policies and/or (d) as otherwise required by law, for example, as part of a regulatory proceeding.
- **Sale or Merger:** In the future, we may sell some or all of our assets. In the event of a sale of our assets including our database(s), the information collected by Liberty will be transferred. We may also combine personally identifiable information that we collect, as described above, with personally identifiable information obtained from third parties for our own use to better understand our customers and provide more relevant Services.
- **Internet Services:** We may use automated processes to scan incoming and outgoing email messages to, for example, identify and filter out likely spam or harmful messages. We do not read or intentionally disclose the content of your email messages or other online communications except for purposes of support, maintenance, legal compliance, emergency situations and as otherwise set forth in this Privacy Policy.
- **Telephone Services:** Liberty will only use, disclose, or permit access to your CPNI as required by law or as approved by you, and as necessary to provide communications services or other services necessary to, or used in, the provision of the communications service. Liberty may disclose to third parties your personally identifiable information in connection with features and services such as Caller ID and directory services.
- **Commerce Partners and Other Third Parties:** When you elect to participate in a special offer or engage in a transaction presented by us but provided by our Commerce Partners,

we may disclose PII to such Commerce Partners when relevant. For more details please refer to Section “[How We Share Your Information](#).” Federal law allows Liberty to disclose limited personally identifiable information, including your name, address and level of service, to other non-affiliated entities for “mailing list” or other purposes that may or may not relate to the Services, unless you object to such disclosure in advance. Any disclosure that we make under this exception will not reveal, directly or indirectly, the extent of your viewing or other use of the Services or the nature of any transaction you make over the Liberty cable system.

- **Third Party Websites and Services:** Since we cannot control websites or Internet services operated by third parties that you may visit through use of our Services, we recommend that you review the terms of service and privacy policies of those websites and services.
- **Child Exploitation:** We are required by law to report any evidence we may have or become aware of relating to violations of laws concerning child exploitation.

How do we protect personally identifiable information?

We work very hard to protect your privacy and have taken key steps in protecting it. We protect against the loss, misuse and alteration of the personally identifiable information we collect through the use of appropriate administrative, technical and physical safeguards. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information.

How long do we keep personally identifiable information?

Liberty may retain personally identifiable information and other information in its regular business records while you are a customer and for a period of time after you are no longer a customer until such information is no longer needed for any business, tax or legal purpose.

How to Access Your Information

You may check the accuracy of your personally identifiable information in your account by calling our administrative offices at (787) 657-3050 and/or e-mailing us at servicio@libertypr.com. In most cases, the personally identifiable information contained in these records consists solely of billing and account information. You may also examine the records containing your personally identifiable information by contacting us at the number or email address above and setting up an appointment. If you wish to inspect our records containing your PII, our offices are open from 9:00 am to 6:00 pm on Monday through Friday, excluding holidays. If your review reveals an error in our records, Liberty will correct it. You will only be permitted to examine records that contain personally identifiable information about your account.

How can you contact us about this Policy?

If you have any comments or queries concerning this Policy or you wish to request access to the PII that we hold on you then please contact our Privacy Officer at servicio@libertypr.com.

Your Choices Regarding the Use and Disclosure of Your Information

You have the right to prohibit or limit certain kinds of disclosures and marketing. You may contact us at Liberty Cablevision of Puerto Rico, Marketing Department, P.O. Box 192296 San Juan, PR 00919-2296 or to servicio@libertypr.com to ask us to put your name on our internal company “do not call” and “do not mail” lists so that you do not receive marketing or promotional telephone calls or postal mail from us or made at our request. Similarly, you may always opt-out of receiving future e-mail marketing messages from Liberty by clicking on the link in the applicable marketing email and following the instructions provided there.

You also have the right to prohibit or limit disclosure of your personally identifiable information for “mailing list” or other purposes as described above in this Policy. To restrict such disclosures, you may contact us online at servicio@libertypr.com, or at the mailing address located on your billing statement. Please include your name, address and account number when contacting us for this purpose.

Your Enforcement Rights

You may enforce the limitations imposed on us by federal law with respect to the collection and disclosure of your personally identifiable information collected through the provision of our service, 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.

Special Notice Concerning Customer Proprietary Network Information

If you subscribe to a Liberty service classified as a “telecommunications service,” federal law creates separate protections with respect to information known as “customer proprietary network information” or “CPNI.”

CPNI refers to the quantity, technical configuration, type, destination, location, and amount of your use of a telecommunications service that is made available to us solely by virtue of our relationship with you, as a customer. CPNI also includes information in your bills pertaining to your telephone service, as described in this Policy. CPNI does not include subscriber list information, such as your name, address and telephone number or other information that has been published in any directory format. Examples of CPNI include information about your phone service found on your monthly telephone bill, your current telephone charges, your long distance and local service billing records, directory assistance charges, usage data, and calling records.

In providing telephone services, we collect subscriber list information, which is limited to your name, address and telephone number. We also collect information about the quantity, technical configuration, type, destination, location, and amount of your use of the telephone services and information contained on your telephone bill. That information is known as customer proprietary network information or “CPNI” and is subject to additional privacy protections. CPNI does not include subscriber list information, by itself. Examples of CPNI include information typically available from details on a customer's monthly telephone bill -- the type of line, technical

characteristics, class of service, current telephone charges, long distance and local service billing records, directory assistance charges, usage data, and calling patterns.

For your protection, we will not disclose your call detail records over the phone to an inbound caller unless you provide a password to authenticate our identity. We will also require the use of a password to log into accounts where you can view your CPNI online. We will use, disclose, or permit access to CPNI to provide you with the services to which you subscribe, including for use in directories; to bill and collect for communications services; to protect our rights or property, or to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services; to provide inside wiring installation, maintenance, or repair services; as required by law; or as expressly authorized by the customer. Although federal law permits us to use CPNI for certain marketing, we have elected not to use such information for marketing services outside of the family of services to which you already subscribe. We also do not provide or sell your CPNI to any third party for marketing activities.

Pursuant to an order of the Federal Communications Commission (the “FCC”), certain information relating to your use of our broadband Internet Service is subject to associated additional privacy protections and use restrictions. In the absence of specific guidance from the FCC, we will take reasonable, good faith steps to protect such information of our broadband Internet customers in accordance with the requirements of the Communications Act, as applicable, and as described in this notice.

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