

## Privacy Policy

### 1. Overview

Access One, Inc. (“ACCESS ONE”) respects the privacy of every individual. This Privacy Policy applies to ACCESS ONE retail Customers and visitors to ACCESS ONE websites in the United States. The policy applies to all web sites, including [www.accessoneinc.com](http://www.accessoneinc.com), and related sites that are owned and operated by ACCESS ONE (ACCESS ONE Sites) This policy statement provides detailed information about how ACCESS ONE collects and uses information gathered about web visitors and customers. This policy is dated and may change from time to time, so please check back periodically to review this information.

### 2. Purpose

Personal privacy is important to ACCESS ONE. We respect the privacy of every individual and take reasonable measures to protect the privacy of information provided to ACCESS ONE by others. The personal information collected by ACCESS ONE falls into two basic categories: (1) information collected from and/or provided by web-site visitors to the ACCESS ONE Sites; and (2) information collected about Customers.

### 3. Scope

ACCESS ONE employees are subject to privacy compliance guidelines which include, among other things, compliance with legal requirements and company policies relating to the privacy of communications and the security and privacy of Customer records. ACCESS ONE employees are expected to abide by this policy and follow applicable laws, rules, regulations, and court or commission orders that apply to our business. Employees who fail to meet the standards embodied in the privacy compliance guidelines may be subject to disciplinary action, up to and including dismissal.

### 4. Policy

#### A. Information Collected via the Internet

The information available to ACCESS ONE when a web visitor is on an ACCESS ONE Site helps ACCESS ONE to improve the quality and usefulness of our sites. In general, ACCESS ONE gathers some generic information automatically to make the ACCESS ONE Sites more helpful to visitors. Generic information does not reveal the identity of a visitor, and usually consists of the Internet address assigned to the visitor's computer, the number and frequency of visitors, the ACCESS ONE Sites visited, etc. ACCESS ONE accomplishes this by using certain technologies, such as web log analysis, data-tagging tools and/or "cookies." These technologies can be used to provide the visitor with tailored information about ACCESS ONE services and help make our sites more responsive by helping to personalize each visitor's experience. ACCESS ONE does not combine information collected in this way with any personally identifiable information.

If you don't want to accept cookies, you can set your browser to notify you when you receive a cookie, and you can then choose to accept or refuse the cookie. Refusing cookies may, however, make certain features on ACCESS ONE Sites unavailable.

Of course, some activities require personal information. Such activities include enrolling for a referral program, using a credit card to pay for services, submitting a resume, requesting certain types of information, sending an e-mail to an ACCESS ONE Site, etc. (when provided by web visitors who are or become Customers as a result of their visit to an ACCESS ONE Site, such information will thereafter be treated as Customer information, see below). On those sites where visitors voluntarily submit questions, comments, feedback, suggestions, ideas or the like, ACCESS ONE will treat that portion of the information as non-confidential and non-proprietary and assumes no obligation to protect such information from disclosure.

Whenever personal information is provided on an ACCESS ONE Site, it will be used for the specific purpose or to respond to the specific request for which it was given. ACCESS ONE continues to have, and reserves the right to send Customers service updates, bulletins and other important information about their ACCESS ONE services.

Absent any instructions limiting the use of a visitor's information, ACCESS ONE may use the contact information provided by visitors to ACCESS ONE Sites to provide information about additional services and products offered by ACCESS ONE, ACCESS ONE authorized agents, and other goods and services providers with whom ACCESS ONE has relationships and whose offerings might be of interest to visitors. ACCESS ONE will not, however, sell or trade a visitor's personal information unless we are authorized by you or legally required to do so, or in the case of imminent physical harm to the visitor or others.

Information disclosed in a public space, including on any bulletin board, chat room, or website ACCESS ONE hosts for Customers as part of ACCESS ONE services is available to anyone else who visits that space. ACCESS ONE cannot safeguard any information that is disclosed or stored in these locations. Additionally, ACCESS ONE websites contain links to sites that belong to third parties unrelated to ACCESS ONE. ACCESS ONE assumes no responsibility for the content accessible on such sites or the privacy practices of those content providers and recommends that visitors to those sites review the privacy policy statements of those sites.

## B. Information collected from Customers

### *1. Customer Information Collected by ACCESS ONE*

When enrolling for or purchasing services from ACCESS ONE, or participating in a business referral program, Customers may be required to provide some or all of the following information in order to establish an account and order services: Name; Service Delivery Location/Address; Billing Address; Account Number; Credit card number; Phone or Fax Number; and Email

Address. For account security, verification or tax purposes, ACCESS ONE may also request: Date of birth, Social Security Number or Driver's license number of the person placing the order or making a service request. For corporate accounts, ACCESS ONE may also request the Company/Customer name, Federal Tax ID, and other information a company Customer/employer may ask ACCESS ONE to collect, such as purchase order number, employee number and job title of the individual responsible for business account administration.

## *2. How ACCESS ONE Uses Customer Information*

ACCESS ONE needs the Customer information it collects from telephony and data Customers to process orders, provide and bill for services. ACCESS ONE may also share necessary information with outside parties, such as third-party vendors to complete an order.

In the normal course of providing local and long distance telephone services, ACCESS ONE collects and maintains information which, when matched with detailed Customer call activity, calling patterns, class or type of service, technical characteristics, long distance and local service billing records, directory assistance charges, and other information is known under Federal Communication Commission ("FCC") regulations as Customer Proprietary Network Information ("CPNI").

Absent any instructions otherwise, ACCESS ONE may use Customer information and/or CPNI to provide information about additional services and products offered by the ACCESS ONE family of companies and ACCESS ONE authorized agents. ACCESS ONE and its agents can and will use Customer contact information to get in touch with Customers if ACCESS ONE has trouble processing an order or needs to contact a Customer about a service or billing related matter. ACCESS ONE may also, where permitted by law or authorized by a Customer, provide this information to credit bureaus, or provide information and/or sell receivables to collection agencies, to obtain payment for ACCESS ONE-offered products and services.

## *3. Directory Information and Caller ID*

Customers that subscribe to ACCESS ONE local telephone service are given the opportunity to request that their name, number and address be or not be published in directories, be made available through directory assistance or appear in "Yellow Pages" or other similar business directories. Such requests may require payment of additional fees. Please contact your local ACCESS ONE representative for more information. Telephone service Customer's name and number may be, where available, transmitted and displayed on a Caller ID device unless caller has elected to block such information. Please note that Caller ID Blocking does not prevent the display of your number when dialing certain business numbers, 911, 900 numbers, or toll-free 800, 888, 877.

#### 4. *Email Addresses*

ACCESS ONE collects email address information from Internet visitors and Customers (where voluntarily provided or required). ACCESS ONE will use your email address to respond to any email inquiry sent to ACCESS ONE, or to follow up on your visit to the ACCESS ONE Sites. From time to time, ACCESS ONE may send emails about ACCESS ONE products and services or offers that ACCESS ONE believes will be of interest. ACCESS ONE may also share your email address with providers whom ACCESS ONE has a relationship with and who either provide ACCESS ONE-offered services or whose products or services may also be of interest. In all cases, we hope recipients will find this information useful, but if you do not wish to receive such email from ACCESS ONE, please indicate that you'd prefer not to receive such information or offers from ACCESS ONE when you provide your email address.

#### YOUR RIGHTS REGARDING THE USE OF YOUR PERSONAL INFORMATION

You have the right at any time to prevent us from contacting you for marketing purposes. You can indicate that you do not wish to receive marketing communications from us by unsubscribing or opting out in the Privacy section in the ACCESS ONE Site.

#### 5. *Exceptions and Limitations*

There are times when, in order to comply with applicable laws, regulations, court or administrative orders, subpoenas or other matters, ACCESS ONE must disclose information. ACCESS ONE cooperates fully with state, local, and federal officials in any investigation relating to any content (including personal or private electronic communications transmitted to ACCESS ONE) or purported unlawful activities of any user of any ACCESS ONE Site or ACCESS ONE service and takes reasonable measures to protect the proprietary rights of ACCESS ONE. If necessary to comply with law or cooperate with law enforcement activity, ACCESS ONE may disclose personally identifiable information of web visitors and/or Customers. ACCESS ONE reserves the right to, and will, share information when it believes, in its sole discretion, it is necessary to prevent unlawful use of communications services, when necessary to repair or restore network outages, in emergency situations (e.g. 911 calls; matters of public safety, etc) or to protect the security or integrity of the ACCESS ONE Sites. In addition, ACCESS ONE may monitor the areas of communication of any kind (i) to satisfy any law, regulation, or government request (e.g. response to private or law enforcement-issued subpoena); (ii) if such disclosure is necessary or appropriate to operate ACCESS ONE (e.g. recording of Customer Care calls); or (iii) to protect the rights or property of ACCESS ONE or others (e.g. to prevent fraud, infringement of rights, etc).

Additionally, in connection with the potential sale or transfer of any of its interest in any ACCESS ONE Affiliate or ACCESS ONE Site, ACCESS ONE reserves the right to sell or transfer visitor or Customer information to a third party that (i) concentrates its business in communication products or services; (ii) agrees to be ACCESS ONE's successor in interest with regard to the

maintenance and protection of information collected and maintained by ACCESS ONE; and (iii) agrees to the material obligations of this policy statement.

## 6. *Security*

ACCESS ONE utilizes technological and business efforts to keep Customers' personal information secure and confidential through safeguards such as the use of secure encryption technology during transmission of certain data, or by restricting physical access to systems on which personal information is stored by appropriate logon and/or password controls. Information collected from visitors and Customers is stored in databases ACCESS ONE controls directly or through contracts with service providers. Credit card information is used only to bill Customers for the products and services they receive. ACCESS ONE does not share credit card information except as may be necessary to process Customer transactions. On those ACCESS ONE Sites where you may provide ACCESS ONE with credit card or other ordering information via the web, ACCESS ONE employs customary web-based security and encryption protocols, examples of which include Secure Socket Layer (SSL) and Secure Electronic Transaction (SET), to secure transmission of that information. If your browser does not support use of such secure connections, or if you prefer not to send your credit card number over the Internet, you can place your order by calling us at the following toll free number: 800-804-8333 (US only). However, as effective as modern security practices are, no physical or electronic security system is impenetrable. ACCESS ONE cannot guarantee the security of databases, nor can ACCESS ONE guarantee that information supplied by you will not be intercepted while being transmitted over the Internet.

## 7. *Protecting the Privacy of Children*

Protecting the privacy of the very young is uniquely important, particularly on the Internet. Access One strongly supports the Children's Online Privacy Protection Act Rule (COPPA Rule). ACCESS ONE Sites are designed to provide commercial business information and allow service ordering and management by adults. Children should always get permission from their parents before sending any information about themselves (such as their names, email addresses, and phone numbers) to anyone over the Internet. ACCESS ONE Sites are not designed to attract minors, in particular children under the age of 13. ACCESS ONE does not market to or knowingly collect information from anyone under the age of 13. If you believe we have collected such information, please contact us at [service@accessoneinc.com](mailto:service@accessoneinc.com).

## 5. Policy Compliance

### 5.1 Compliance Measurement

The Company will verify compliance to this policy through various methods, including but not limited to, business tool reports, audio, automated software, artificial intelligence, internal and external audits, and feedback to the Company.

### 5.2 Exceptions

Any exception to the policy must be approved by the Executive Team.

### 5.3 Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

## 6. Related Standards, Policies and Processes

## 7. Definitions and Terms

Security definitions and terms can be found in the SANS Glossary located at:

<https://www.sans.org/security-resources/glossary-of-terms/>

## 8. Revision History

<b>Date of Change</b>	<b>Responsible</b>	<b>Summary of Change</b>
March 6 <sup>th</sup> , 2023	Executive Team	Approved Draft