



TELESPHERE[®]

BUSINESS TELECOMMUNICATIONS. SIMPLIFIED.[®]

Telesphere Networks Ltd. – Customer Proprietary Network Information Policy Effective March 2009

Telesphere Networks Ltd. (“Telesphere”) is committed to protecting the privacy of our customers. In addition to protecting your personal information as described in our [Privacy Policy](#), Telesphere complies with federal laws regarding the protection of Customer account information. This type of information is characterized as “Customer Proprietary Network Information” or CPNI.

What is CPNI?

CPNI includes Customer account information typically available from telephone-related details on your monthly bill such as your type of service, general billing information, local and long distance service billing records, directory assistance charges, and current telephone charges. It also includes information concerning specific calls, such as who was called and the date and time of the call.

CPNI does not include Customer name, address, or telephone number; aggregate information or data that is not specific to a single Customer, Customer premises equipment, and Internet access services.

How Does Telesphere Protect Your Privacy?

Telesphere is required by the Federal Communications Commission (FCC) to protect the confidentiality of CPNI and to implement procedures to identify callers attempting to discuss account information. It is Telesphere’s policy not to use CPNI for the marketing of any services.

Telesphere uses numerous methods to protect your CPNI, and all Telesphere employees receive training regarding CPNI protection procedures and disclosure regulations. Telesphere requires secure, authenticated passwords from Customers seeking to obtain account access. CPNI shall not be disclosed to Customers over the phone or online unless the Customer has been properly authenticated.

When May Telesphere Disclose CPNI?

Telesphere may disclose CPNI under the following circumstances:

1. When disclosure is required by law or court order.
2. To protect the rights and property of Telesphere or to protect Customers and other carriers from fraudulent, abusive, or unlawful use of services.
3. To provide services to the Customer, including assisting the Customer with troubles associated with their services.
4. For directory listing services.
5. To bill the Customer for services.

What Happens if a CPNI Privacy Breach Occurs?

In the event Telesphere experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require Telesphere to report breaches to law enforcement. Telesphere will notify law



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enforcement conduct investigations, notify customers, and retain records in compliance with FCC regulations.

Policy Modifications

Telesphere reserves the right to modify this CPNI Policy at any time and in its sole discretion, with such modifications being effective when posted. Any use of Telesphere products and services after such modification constitutes acceptance of the CPNI Policy as revised.

Questions or Comments

Telesphere takes seriously our obligation to protect our Customers' information. If you have any questions regarding this policy or about our commitment to the protection of your information, please contact compliance@telesphere.com.