



PRIVACY POLICY

PURPOSE

TekLinks, Inc. dba C Spire Business ("CSB") respects the privacy of our customers, business partners, employees, job applicants, and visitors to CSB websites who may choose to provide Personal or Sensitive Information. The purpose of this document is to disclose the ways in which CSB gathers, uses, discloses, and manages this data.

SCOPE

This Privacy Policy applies to CSB, including its employees, subcontractors, divisions, and wholly-owned subsidiaries, worldwide.

In some instances, CSB may process personal information of Customer clients on their behalf. In these situations, it is CSB's Customers who decide the parameters by which the information will be processed. These situations are not within the scope of this policy. For more information regarding the collection, usage, disclosure and management of this data, please refer to the privacy policy of that entity.

POLICY STATEMENT

CSB may collect certain Personal Information from customers, business partners, employees, contractors, and candidates for employment. CSB does not collect Personal Information from website visitors unless provided voluntarily by the visitor. CSB may also collect certain Sensitive Information from its employees, contractors, or candidates for employment, including any dependents, in connection with the administration of its health and welfare benefit plans or as part of government-mandated record-keeping requirements where required by law.

CUSTOMERS AND BUSINESS PARTNERS

INFORMATION COLLECTED

CSB may collect information from customers, potential customers, and business partners such as name, address, phone number, email address, user ID, passwords, billing and transaction information, credit card or other financial information, and contact preferences.

INFORMATION USAGE

CSB may use Personal information to provide customers and business partners with information and services. Personal Information may be used to help CSB better understand needs and interests. Specifically, CSB may use this information to complete a transaction or order, for business related communications, to deliver products/ services, to bill for products purchased or subscribed services, and to provide ongoing service and support. Occasionally we may use this information to deliver surveys used for marketing and quality assurance

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purposes. Personal information collected online may be combined with information provided to CSB through other sources such as trade shows or seminars. This information may also be used to communicate information regarding products and services of CSB, its subsidiaries and divisions, or of other parties that may be applicable.

CSB may share Personal Information with third parties for the purpose of responding to requests for products or services or product evaluations. CSB may share information to allow selected partners to send special offers in blind mailings.

CSB may provide Personal Information to law enforcement agencies if requested or deemed necessary to protect CSB's business, employers, suppliers, or customers.

EMPLOYEES, CONTRACTORS, AND APPLICANTS

INFORMATION COLLECTED

CSB may collect Personal Information and Sensitive Information from its employees and applicants in connection with its recruiting and hiring activities and administration of its human resources programs and functions.

INFORMATION USAGE

CSB uses personal information of its employees, contractors, and job applicants for a variety of human resources and similar functions, including job applications and hiring programs, benefit and compensation programs, performance appraisals, training, business travel, expense and tuition reimbursement, identification cards, access to CSB facilities and computer networks, employee profiles, internal employee directories, human resources record-keeping, compliance with legal requirements and other employment-related purposes.

Unless permitted by relevant laws, CSB does not use Personal Information for a purpose other than stated in this Privacy Policy or for the stated purpose identified at the time such information is collected, received, or stored. Where appropriate under applicable laws, the employee, contractor, or applicant will be given greater detail regarding Personal Information usage at the relevant time.

Sensitive Information will not be shared with third parties except as permitted by applicable law or as required in connection with the administration of human resources programs. In addition, sensitive information that has not been made public by an affected employee will not be used for a purpose other than its original purpose without the employee's approval, unless allowed under applicable law. Where appropriate under applicable laws, the employee, contractor, or applicant will be given greater detail regarding Sensitive Information usage at the relevant time.

Human resources data may be shared with third-party vendors for the exclusive purpose of enabling the vendor to provide service or support to CSB in connection with these human resources programs and functions. Personal data concerning CSB employees is not shared with third parties for non-employment related purposes, unless disclosure of such information is reasonably necessary to comply with any applicable law, legal process, or enforceable governmental inquiry.

Third-party vendors, service providers and suppliers receiving personal information are expected to apply the same level of privacy protection as contained in this Privacy Policy. However, unless otherwise dictated by law or agreement, CSB is not responsible for any improper use by such parties.

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Social security numbers are only used when necessary for legitimate business reasons. Truncated social security numbers or other identifiers such as employee ID numbers are used when practical.

Personal Information given to CSB may be transferred within CSB or to its appointed business partners or service providers across state and country borders for efficient data consolidation, storage, and simplified information management in accordance with applicable law. CSB places appropriate restrictions on the recipients and require them to adequately protect the information according to relevant laws.

WEBSITE VISITORS

CSB websites may provide links to third-party web sites for convenience and information. By accessing those links, the visitor leaves the CSB website. CSB does not control those sites or their privacy practices, which may differ from those of CSB. CSB does not endorse or make any representations about third-party web sites. The personal data provided to unrelated third parties is not covered by the CSB Privacy Policy. CSB encourages visitors to review the privacy policy of any company before submitting Personal Information.

INFORMATION COLLECTED

CSB collects and/or logs Internet Protocol addresses, Internet domain names, the web browser, and operating system used to access the CSB website, the files visited, the time spent in each file, and the time and date of each visit.

CSB may also use Cookies on its website. Users may elect not to accept cookies by changing the designated settings on their web browser. However, not utilizing cookies may prevent certain functions and features of websites.

INFORMATION USAGE

The information collected from the use of cookies is used and analyzed to improve CSB's websites, such as gaining a better understanding of visitor interests and requirements. The information collected and analyzed is used to improve our service and personalize the web-browsing experience. Websites of CSB may use tracking tools for internal business purposes only. These websites may not offer opt-out functionality.

ACCESS TO AND ACCURACY OF INFORMATION

CSB strives to keep Personal Information and Sensitive Information accurate. CSB has implemented technology, management processes, and policies to maintain data integrity. CSB will take reasonable steps to ensure that the data is complete, accurate, and reliable for its intended use. CSB will provide customers, business partners, employees, contractors, and candidates for employment access to their information when reasonable, or in accordance with relevant laws, including making reasonable effort to provide online access and the opportunity to change information. To protect privacy and security, we will also take reasonable steps to verify the identity of the requester before granting access or making changes to data. Requests to delete personal data are subject to any applicable legal and ethical reporting or document retention obligations. A request to access, delete, or correct Personal or Sensitive Information may be made to askus@cspire.com or C Spire Business, 201 Summit Parkway Birmingham, AL 35209.

CHOICE AND CONSENT

CSB does not require that customers, business partners, or non-employee visitors to CSB websites provide CSB with personal information. The decision to provide personal information is voluntary. However, this information may be necessary in order to proceed with the activity or receive the benefit for which the personal information is requested. To exercise any opt out rights under applicable laws, please notify CSB at askus@cspire.com or C Spire Business, 201 Summit Parkway Birmingham, AL 35209. All requests will be processed within a reasonable time.

CSB employees and applicants for employment are required to provide CSB with personal information as a condition of employment, or to apply for employment, with CSB.

SECURITY OF INFORMATION

CSB is committed to taking reasonable efforts to secure collected Personal and Sensitive Information. CSB employs industry-standard physical and logical access controls that change in response to the changing regulatory and threat environments including Internet firewalls, intrusion detection, anti-virus protection, and network monitoring, and, where appropriate, Secure Socket Layer (SSL) or similarly encrypted browsers. Access to Sensitive Information is limited to those individuals and agents having a need to know.

CSB protects the confidentiality and security of social security numbers. CSB prohibits the disclosure of social security numbers for any unlawful purpose. CSB takes measures to limit access to information and documents that contain social security numbers.

ROLES & RESPONSIBILITIES

BUSINESS PARTNERS

Business Partners are responsible for understanding this Privacy Policy and determining the Personal Information they wish to share with CSB. Business Partners are also responsible for requesting access to and verifying the accuracy of any information when desired.

CUSTOMERS

Customers are responsible for understanding this Privacy Policy and determining the Personal Information they wish to share with CSB. Customers are also responsible for requesting access to and verifying the accuracy of any information when desired.

JOB APPLICANTS

Job Applicants are responsible for understanding this Privacy Policy before sharing Personal or Sensitive Information with CSB.

CSB EMPLOYEES

All CSB Employees are required to adhere to this policy regarding the collection and protection of Personal Information and Sensitive Information of any customer, business partner, employee, job applicant, and visitor to CSB websites.

CSB MANAGERS

Managers are responsible for maintaining awareness of, and complying with, all policies, processes, procedures, and standards that are relevant to their area of responsibility.

WEBSITE VISITORS

Website Visitors are responsible for understanding this Privacy Policy and CSB's usage of logs and Cookies.

ENFORCEMENT, AUDITING, & REPORTING

CSB will engage in periodic self-assessment of its compliance with this policy.

Failure to adhere to this policy may result in disciplinary action, up to and including termination.

REFERENCE DOCUMENTS

- Gramm-Leach-Bliley Act
- Health Insurance Portability and Accountability Act
- Online Privacy Protection Act

DEFINITIONS

- Cookies – Identifiers sent from a website via a browser to be placed on a user's computer hard drive. Thereafter when the user visits a website, a message is sent back to the web server by the browser accessing the website, identifying the return user.
- Personal Information – Any information that identifies or can identify a specific individual.
- Sensitive Information – Personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information specifying the sexual orientation of the individual.