

## Southern Tier Connect Website Privacy Policy

Your privacy is important to us. It is Southern Tier Connect's policy to respect your privacy regarding any information we may collect from you across our website, and other sites we own and operate. This Privacy Policy governs data collection and usage of the products, services, software, platform and websites (collectively, "Services") provided by Southern Tier Connect and its affiliates (collectively, "Southern Tier Connect"). By using the Services, you consent to the data practices described in this policy and our Terms of Service. If you do not agree to any part of this Privacy Policy, then you should stop accessing the Services. If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us at [compliance@southerntierconnect.org](mailto:compliance@southerntierconnect.org).

### Collection of your Personal Information

Southern Tier Connect may collect personally identifiable information, such as your e-mail address, name, physical address, telephone number and IP address. The information that we collect and store often depends on the type of Service that you use. If you use our Services, we collect and store the information you enter on our site. If you use other Services, we may collect and store information about your name, email address, electronic signature, audit data, and associate it with the documents you have signed using our Services. Southern Tier Connect may also collect anonymous demographic information, which is not unique to you, such as your Postal Code. Southern Tier Connect will not delete customer information other than upon customer request. However, Southern Tier Connect reserves the right to delete customer information for as long as we need as part of our normal business practices at any time.

Southern Tier Connect follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and a part of hosting services' analytics. The information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

Southern Tier Connect encourages you to review the privacy statements of entities or services you access from our Service so that you can understand how those entities collect, use and share your information. Southern Tier Connect is not responsible for the privacy statements, privacy practices, or content on websites or services outside of those we operate.

### Use of your Personal Information

Southern Tier Connect collects and uses your personal information to operate and improve our Services and deliver the Services you have requested. Southern Tier Connect may also use your personal information

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to inform you of other products or services available from Southern Tier Connect and its affiliates that may interest you. Southern Tier Connect may also contact you to participate in option surveys of current services or of potential new services that may be offered. In addition, Southern Tier Connect may share data with vendors or processors to help us perform statistical analysis, send you email or postal mail, perform tasks required to complete a transaction, provide customer support, or provide other types of customer relationship management and fulfillment. Southern Tier Connect may also share information on your use of our Site, such as pages visited, links clicked, with third party providers of web and application analytic services in order to enable Southern Tier Connect to understand site usage, detect fraud and potential threats and improve its Services. All such third parties are prohibited from using your personal information except to provide these Services, and they are obligated to maintain the confidentiality of your information, although in some cases those third parties are allowed to use aggregated and de-identified data for the improvement of their own services.

Southern Tier Connect's Privacy Policy does not apply to other websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options.

We use third parties such as Google Analytics for data collection and analytics to collect, process and store your site usage and browser information on our behalf when you use our Services. These parties are limited to using personal information to provide support for our Services.

Southern Tier Connect may disclose personal information when we believe it is required to comply with the law (e.g., a lawful subpoena, warrant or court order); to enforce or apply this Privacy Policy or our other policies or agreements; to initiate, render, bill, and collect for amounts owed to us; to protect our or our users' rights, property or safety; to protect our users from fraudulent, abusive, or unlawful use of the Services; or if we believe that an emergency involving the danger of death or serious physical injury to any person requires or justifies disclosure of personal information.

Information about our customers, including personal information, may be disclosed as part of any merger, acquisition, debt financing, sale of company assets, as well as in the event of an insolvency, bankruptcy or receivership in which personal information could be transferred to third parties as one of Southern Tier Connect's business assets. In such an event, you may not have the right to opt out of any such transfer.

## For California Residents

Effective January 1, 2020, the California Consumer Privacy Act of 2018 (CCPA) afforded California residents (i) the right to request disclosure of data collection and sales practices in connection with the requesting consumer; (ii) the right to have the requesting consumer's information deleted, subject to certain exceptions; (iii) the right to request that their personal information not be sold to third parties, if applicable; and (iv) the right not to be discriminated against because they exercised any of the new rights.

California residents may submit a personal information or erasure request via email to [compliance@southerntierconnect.org](mailto:compliance@southerntierconnect.org). Southern Tier Connect will need to collect information from the requesting party to verify their identity, and will respond within 45 days of receiving a personal information

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request (subject to an additional 45-day extension in certain circumstances). Please be aware that such a request does not ensure complete or comprehensive removal of your content or information and that there may be circumstances in which the law does not require or allow removal even if requested. For example, if your personal information is contained in a document created by a Southern Tier Connect user, only that user can delete that document.

## Security and Retention of your Personal Information

Southern Tier Connect uses industry standard security measures to secure your personal information from unauthorized access, use or disclosure. Southern Tier Connect regularly reviews its security measures to consider appropriate new technology and methods. Please be aware that, despite our efforts, no security measures are perfect or impenetrable. Southern Tier Connect retains your personal information for the length of time needed to fulfill the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law.

## Children Under Thirteen

Another part of our priority is adding protection for children while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity. Southern Tier Connect does not knowingly collect any Personal Identifiable Information from children under the age of 13. If you think that your child provided this kind of information on our website, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records.

## Changes to this Privacy Policy

Southern Tier Connect may change the provisions of this Privacy Policy at any time, and will always post the most up-to-date version on our website. We may provide notice by posting notice of such changes on our sites and applications, or by other means consistent with applicable law.

## Online Privacy Policy Only

This Privacy Policy applies only to our online activities and is valid for visitors to our website with regards to the information that they shared and/or collect in Southern Tier Connect. This policy is not applicable to any information collected offline or via channels other than this website.

## Contact Information

Southern Tier Connect welcomes your comments regarding this Privacy Policy. Please contact us via email at [compliance@southerntierconnect.org](mailto:compliance@southerntierconnect.org).

## Consent

By using our website, you hereby consent to our Privacy Policy and agree to its Terms and Conditions.