

# Privacy Policy

Venture Communications Cooperative (hereinafter “Venture Communications,” “Company,” “our,” or “we”) is committed to respecting and protecting the privacy of our customers and business partners. Protecting your private information or Personally Identifiable Information is our priority. Accordingly, we deploy a standard of least privilege and least access through role-based access to minimize risk. We utilize policies, controls, and evidence review to ensure our standards are understood and effective. We train our workforce and partners about their obligation to safeguard customer information and communications, and we hold them accountable for their actions.

This Privacy Policy applies to Venture Communications-managed assets, systems, and data, including [www.venturecomm.net](http://www.venturecomm.net) (“website”), but not exclusive to it. Through the use of any managed asset, system or through the use of the website, you consent to the data practices described in this Privacy Policy.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information. By accessing or using this website, you agree to this Privacy Policy.

## Definitions

- **Personal Identifiable Information or “personal information”** refers to any information that can be used to identify a specific individual. This includes information that is directly linked to a person, such as their name, date of birth, social security number, or email address, as well as information that can be used to identify them indirectly, such as their physical characteristics, biometric data, or online identifiers like IP addresses or device identifiers.
- **Allowable Tracked Information** refers to the specific types of data that a website or application is permitted to collect, use, and share with third parties. Examples of allowable tracked information that a website or application may collect and use could include: User behavior data, such as website usage patterns, search history, or clickstream data; location data, such as GPS data or IP address; demographic information, such as age, gender, or occupation; contact information, such as email address or phone number; or financial information, such as credit card numbers or payment information.
- **Third Party** refers to any entity that is not directly affiliated with Venture Communications or Venture Communications’s website that is collecting or processing user data. This can include companies that provide services or products to the company, analytics providers, or other third-party service providers. Examples of third parties that may be involved in the collection and processing of user data include: Analytics providers that collect data on user behavior and provide insights to the organization, or

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payment processors or financial institutions that process transactions and collect payment information, etc.

- **Cookies** refer to text files placed on a computer, mobile phone, or other device used to navigate the internet. Cookies transmit information back to the website's server about the browsing activities of the user and may also be used to collect and store information about your preferences after you visit a website.

## Collection of Your Personal Information

Venture Communications limits the collection, use, retention, and disclosure of personal information to what is reasonably necessary and proportionate to achieve the purposes for which the personal information was collected or processed. Venture Communications also limits secondary use to that which is compatible with the original purpose of the personal information collection.

When you visit our website, you may provide us with two types of information: personal information that you knowingly choose to disclose that is collected on an individualized basis, and website use information collected on an aggregate basis as you and others browse our website.

You may also be required to provide certain personal information to us when you elect to use certain products or services by: (a) registering for an account, (b) entering a sweepstake or contest sponsored by us or one of our partners, (c) signing up for special offers from selected third parties, (d) sending us an email message, and (e) submitting your credit card or other payment information when ordering and purchasing products and services.

We will use your information for, but not limited to, communicating with you in relation to services and/or products you have requested from us. Venture Communications uses information about customers in defined and responsible ways in order to manage, provide, and improve its products, services, and operations for its customers. This information will be used for internal purposes only and will not be shared with any third party. It shall not be used for any improper or unlawful purpose.

Venture Communications retains customer information for such periods of time as required by law or regulation or as reasonably necessary to provide services.

## Sharing Information with Third Parties

Venture Communications does not share customer information with third parties, except at the customer's request, with the customer's consent, or as described below. Venture Communications does not sell, rent, or lease its customer lists to third parties.

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Venture Communications may share allowable tracked information with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. This information will not include personal information. All such third parties are prohibited from using your personal information except to provide these services to the company, and they are required to maintain the confidentiality of your information.

Representative third-parties include:

**Vendors:** Venture Communications may provide information to our vendors who help us do things like provide services features, monitor website activity, maintain databases, and assist us in hosting; and where they may observe information about you in the same way as described herein. We also use third party vendors to provide services related to hosting the website, providing technical support, updating records in our database, and sending or coordinating the sending of marketing communications on our behalf.

**Marketing:** The information you provide on the website may also be used by Venture Communications for marketing purposes, such as when you subscribe to receive marketing communications or newsletters. Your information will not be provided to third parties for any third-party marketing purposes. You may choose to stop receiving our marketing communications at any time by opting out by following the unsubscribed instructions included in those communications, or you can contact us at [Venturecomm@venturecomm.net](mailto:Venturecomm@venturecomm.net).

**Third Party Support:** While not routine, Venture Communications may provide your information to persons or entities in connection with our own business operations, such as to our auditors or counsel, or in connection with a major change in our business (such as an acquisition). In these instances, the company will ensure that such persons or entities are subject to obligations to keep the information confidential and use the information only for the purpose we provided it to them.

Venture Communications may disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on the company or the site; (b) protect and defend the rights or property of the company; and/or (c) act under exigent circumstances to protect the personal safety of users or the public.

## Tracking User Behavior

Venture Communications may keep track of the websites and pages our users visit within Venture Communications to identify trends among Venture Communications services. Venture Communications may use this data to deliver customized content and advertising to customers whose behavior indicates that they are interested in a particular subject area.

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## Automatically Collected Information

As you navigate through and interact with our website, we may use automatic data collection technologies to collect allowable tracked information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our website, including traffic data, location data, logs, and other communication data, and the resources that you access and use on the website.
- Information about your device and internet connection, including your IP address, operating system, domain names, access times, and browser type.

Venture Communications uses this allowable tracked information to operate the website, maintain the quality of the website, and assess website usage.

## Use of Cookies

The website may use “cookies” to personalize your online experience. Cookies are small pieces of data that are stored by a user’s web browser on the user’s hard drive. One of the primary purposes of cookies is to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you personalize website pages or register with our website or services, a cookie helps Venture Communications to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, etc. When you return to the same website, you can easily retrieve the information you previously provided.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Venture Communications services or our website.

## Links

This website contains links to other sites. Please be aware that Venture Communications is not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects Personally Identifiable Information.

## E-mail Communications

From time to time, Venture Communications may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other

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general communication. In order to improve our services, we may receive a notification when you open an email from Venture Communications or click on a link therein.

If you would like to stop receiving marketing or promotional communications via email from Venture Communications, you may opt out of such communications by clicking the “Unsubscribe” button at the bottom of the email.

If you choose to correspond with us through email, we may retain the content of your email messages along with your email address and our responses. We also may send automated messages to you pertaining to your account, such as billing invoices and other notices. We provide the same protections for these electronic communications that we employ in the maintenance of information received by mail or telephone. We ask that you not provide us with confidential information such as social security through unsecured email.

## Children Under Thirteen

Venture Communications does not provide services to children. Accordingly, our website is not intended for children under thirteen years of age. Venture Communications does not collect personal information from children under the age of thirteen, does not sell any personal information, and only uses personal information for internal purposes.

For more information about this policy, please visit: [www.venturecomm.net/contact-us/](http://www.venturecomm.net/contact-us/).

## Security of Your Personal Information

All Venture Communications employees are responsible for safeguarding individual customer communications and information.

- Venture Communications takes reasonable precautions to protect personal information against unauthorized access. Venture Communications requires all personnel to protect the privacy of all forms of customer communications as well as individual customer records.
- Venture Communications secures all customer personal information from unauthorized access, use, or disclosure with Secure Sockets Layers protocol (SSL)
- Venture Communications uses SSL protocol to protect your personal information when you interact with a third-party website (such as when making a payment). Once the data is transmitted, the third party’s policies will govern the protection of your personal information.

We strive to take appropriate commercially acceptable security measures to protect against unauthorized access to or alteration of your personal information. While we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations

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inherent to the Internet that are beyond Venture Communication's control; and (b) security, integrity, and privacy of information and data exchanged between you and us through this website cannot be guaranteed; and (c) ***no method of transmission over the internet, or method of electronic storage is one hundred percent secure***. Any transmission of information over the internet is at your own risk. Venture Communications is not responsible for the circumvention of any privacy settings or security measures contained on the website by any person or entity.

## Changes to Our Privacy Policy

Venture Communications reserves the right to change, modify, or update this Privacy Policy at any time without notice. In the event of any modification, we will post the changes in this Privacy Policy so that you will always know what information we are gathering and how we might use that information. However, if such changes are material, we will either announce the change on the home page of the site or take such other action as we deem appropriate under the circumstances. Accordingly, you should periodically visit this page to determine the current Privacy Policy to which you are bound.

## Contact Information

Venture Communications welcomes your questions or comments regarding this Privacy Policy. If you believe that Venture Communications has not adhered to this Statement, please contact Venture Communications at:

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