



# Archtop Fiber Privacy Policy

Effective March 1, 2024

Please [click here](#) for a printable PDF version of this notice.

## About Archtop

Archtop Fiber is an Internet service provider committed to bringing affordable, competitive multi-gig Internet access to under-served communities. Our goal is to provide simple, world class, reliable, and responsive service to our valued customers.

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### Scope of this Policy

This privacy policy applies to:

Archtop Fiber LLC (“Archtop”) and all of Archtop Fiber’s products and services (collectively the “Services”) and Archtop’s online properties (including our websites such as <https://archtopfiber.com/> and social media pages).

This Policy applies when you interact with us as a customer using our Services or a visitor interacting with our online properties. It also applies anywhere our website is linked. It does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked to from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

We may change this Policy from time to time. If we do, we will notify you by posting an updated version on our website.

### Information We Collect

We collect information from you directly, from the devices you use to interact with us and our Services, and from third parties. We may combine information from the Services together and with other information we obtain from our business records. We may use and share information that we aggregate (compile to create statistics that cannot identify a particular individual) or de-identify (strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

### *Information you give us*

You may provide the following information to us directly:

- Contact information, including name, email address, telephone number, and, for business customers, professional information such as job titles and company name and size.
- Demographic information.
- Payment information, including credit card information.
- Content you may include in survey responses.
- Information contained in your communications to us, including call recordings of customer service calls.

- Information you make available to us via a social media platform.
- Any information or data you provide by interacting in our online forums and chatrooms. Please note that these comments are also visible to other users of our Services.
- Information you submit to inquire about or apply for a job with us.
- Any other information you submit to us.

### Information we collect automatically

We and partners working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following information from the device you use to interact with our Services. We also create records when you make purchases or otherwise interact with the Services.

- *Device information*, including IP address, device identifiers, and details about your web browser.
- *Analytical information*, including details about your interaction with our website, app, and electronic newsletters.
- *Diagnostic information*, including web traffic logs.
- *Activity information*, including internet and voice usage or other electronic network activity when you interact with our Services.
- *Advertising information*, including special advertising and other unique identifiers that enable us or third parties working on our behalf to target advertisements to you. Please be aware that our advertising partners may collect information about you when you visit third-party websites or use third-party apps. They may use that information to better target advertisements to you on our behalf.
- *Business record information*, including records of your purchases of products and services.

The following is a list of our partners who collect the information described above. Please follow the links to find out more information about the partner’s privacy practices.

Partner	Information Type Collected
Meta Pixel	<ul style="list-style-type: none"> <li>• <b>Http Headers</b> – Anything that is generally present in HTTP headers, a standard web protocol sent between any browser request and any server on the internet. This information may include data like IP addresses, information about the web browser, page location, document, referrer, and person using the website.</li> <li>• <b>Pixel-specific Data</b> – Includes Pixel ID and the Facebook Cookie.</li> <li>• <b>Button Click Data</b> – Includes any buttons clicked by site visitors, the labels of those buttons and any pages visited as a result of the button clicks.</li> <li>• <b>Optional Values</b> – Developers and marketers can optionally choose to send additional information about the visit through Custom Data events. Example custom data events are <a href="#">conversion value</a>, <a href="#">page type and more</a>.</li> <li>• <b>Form Field Names</b> – Includes website field names like <b>email</b>, <b>address</b>, <b>quantity</b>, etc., for when you purchase a product or service. We don't capture field values unless you include them as part of <a href="#">Advanced Matching</a> or optional values.</li> </ul>

<a href="#">Google Analytics</a>	Number of users, Session statistics, Approximate geolocation, Browser and device information
Google Tag Manager	Google Tag Manager may collect some aggregated data about tag firing. This data does not include user IP addresses or any measurement identifiers associated with a particular individual. Other than data in standard HTTP request logs, all of which is deleted within 14 days of being received, and diagnostics data noted above, Google Tag Manager does not collect, retain, or share any information about visitors to our customers' properties, including page URLs visited. Learn more about our use of Google Tag Manager data in our <a href="#">terms of service</a> .
<a href="#">HubSpot</a>	Tracks interactions with our emails and website. Website traffic includes source, device type, IP address, country, page visits, etc.
<a href="#">Plume</a>	Analytics and marketing, traffic analysis, network optimization, and firmware updates

### *Information We Collect From Other Sources*

We may collect the following information about you from third-party sources.

- Subscription registration information.
- Contact information, demographic information, and information about your interests and purchases, from consumer data providers.
- Information about your credit history from credit reporting agencies.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Information about your interaction with advertisements on our Services, or ads that we place on third party websites, from online advertising companies.
- If you decide to invite others to the Services, we will collect your and the other person's names, email addresses, and/or phone numbers to send an email or text message and follow up with the other person. You agree that you will obtain the other person's consent before giving us his or her contact information. You also agree that you will not send us the contact information of a minor. We will inform any other person you invite that you gave us his or her information in the invitation email.

### **How We Use Your Information**

We may use any of the information we collect for the following purposes.

- **Service functionality:** To provide you with our products and services, including to take steps to enter a contract for sale or for services, process payments, fulfill orders, send service communications (including service-related messages and reminders), and conduct general business operations, such as accounting, recordkeeping, and audits.
- **Service improvement:** To improve and grow our Services, including to develop new products and services and understand how our Services are being used, our customer base and purchasing trends, and the effectiveness of our marketing.
- **Personalization:** To offer you recommendations and tailor the Services to your preferences.
- **Advertising and marketing:** To send you marketing communications, personalize the advertisements you see on our Services and third-party online properties, and measure the effectiveness of our advertising.

We may share your information with business partners, online advertising partners, and social media platforms for this purpose.

- **Spam, virus, and malware prevention.** To help prevent and block "spam" emails, viruses, spyware, malware, and other harmful or unwanted communications and programs from being sent and received over our Services. We do not read your outgoing or incoming email, file attachments, video mail, private chat, or instant messages. However, we (along with our service providers, see below) use software and hardware tools. To help protect you and the Services against these harmful or unwanted communications and programs, these tools may automatically scan your emails, video mails, instant messages, file attachments, and other files and communications. We do not use these tools for marketing or advertising.
- **Security:** To protect and secure our Services, assets, network, and business operations, to ensure a secure online environment, and to detect, investigate, and prevent theft and other activities that may violate our policies, infringe the rights of others, or be fraudulent or illegal.
- **Legal compliance:** To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements.

## How We Share Your Information

We may share any of the information we collect with the following recipients.

- **Affiliates:** We share information with other members of our group of companies, WVT Fiber, Hancock Fiber and GTel.
- **Service providers:** We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract to use information that we share only for the purpose of providing these business functions, which include:
  - *Supporting Service functionality*, such as vendors that support customer service and customer relationship management, billing, repair and maintenance, [IP address assignment], [DMCA and] regulatory compliance, order fulfillment, list cleansing, and communications (postal, email, texting).
  - *Auditing and accounting firms*, such as firms that assist us in the creation of our financial records.
  - *Professional services consultants*, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
  - *Analytics and marketing services*, including entities that analyze traffic on our online properties and assist with identifying and communicating with potential customers.
  - *Network optimizations and firmware updates*, including managing access, security and confidentiality policies, blocking content identified as inappropriate, improving market and audience segments, identifying and analyzing trends and creating better advertising campaigns.
  - *Security vendors*, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
  - *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
  - *Marketing vendors*, such as entities that support distribution of marketing emails.
- **Business partners:** From time to time, we may share your contact information with other organizations for marketing purposes.
- **Online advertising partners:** We partner with companies that assist us in advertising our Services, including partners that use cookies and online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising.

- **Social media platforms:** If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- **Government entities/Law enforcement:** We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our customers, or other individuals.
- **Other businesses in the context of a commercial transaction:** We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this policy.

## Security

We follow industry-standard practices to secure the information we collect to prevent the unauthorized access, use, or disclosure of any personal information we collect and maintain about you. We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

## Your Options and Rights Regarding Your Information

**Your Account:** Please visit your account on our portal to update your account information at <https://archtopfiber.cdgportal.com>.

**Email Unsubscribe:** If you do not wish to receive marketing information from us or wish to opt out of future email promotions from us, please contact us. Please note that all promotional email messages you receive from us will include an option to opt out of future email communications.

**Ad Choices:** You have options to limit the information that we and our partners collect from interacting with our website for online advertising purposes.

- You may disable cookies in your browser or mobile device using their settings menus. Your mobile device may give you the option to disable advertising functionality. Because we use cookies to support Service functionality, disabling cookies may also disable some elements of our online properties.
- The following industry organizations offer opt-out choices for companies that participate in them: the [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), and the [European Interactive Digital Advertising Initiative](#).
- You may use our cookie settings menu.
- You may contact us directly.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized. Nor will exercising these options prevent other companies from displaying personalized ads to you.

If you delete your cookies, you may also delete your opt-out preferences.

**Do Not Track:** Your browser or device may include “Do Not Track” functionality. Our information collection and disclosure practices and the choices that we provide to you will continue to operate as described in this privacy policy regardless of whether a Do Not Track signal is received.

## **Additional Provisions for Telephone Customers**

If you subscribe to our telephone service, federal law provides additional protections with respect to information known as “customer proprietary network information” or “CPNI.” CPNI refers to the quantity, technical configuration, type, destination, location, and amount of your use of a telecommunications service that is made available to us solely by virtue of our relationship with you as a telephone customer. CPNI also includes information in your bills pertaining to your telephone service. CPNI does not include subscriber list information, such as your name, address, and telephone number.

We have a duty to protect your CPNI. For your protection, we will not disclose your call detail records over the phone to an inbound caller, and we require the use of a password to log into accounts where you can view your CPNI online. We may use, disclose, or permit access to CPNI to provide you with the services to which you subscribe; to bill and collect for communications services; to protect our rights or property, or to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services; to provide inside wiring installation, maintenance, or repair services; as required by law; as expressly authorized by the customer; and to market service offerings within a category of service to which you already subscribe. Although federal law permits us to use CPNI for certain other marketing with your permission, we have elected not to use CPNI for such marketing. We do not provide or sell your CPNI to any third party for marketing activities.

## **Special Information for Job Applicants**

When you apply for a job with us, we may collect information from you, including:

- Information you provide in connection with your application.
- Information that you make available in your social media accounts.
- Information about you that is available publicly.
- Information that you authorize us to collect via third parties, including former employers or references.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

## **Other Important Information**

### *Data retention*

We may store information about you for as long as we have a legitimate business need for it.

### *Information about children*

We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 13, we will delete that information. Please contact us with any concerns.

### *Sensitive Information*

We may collect sensitive information including social security numbers to access credit history to establish Services and/or bank card information to process account payments. We may also work with third party vendors to process this sensitive information.

### **Contact information, submitting requests, and our response procedures**

#### *Contact*

Please contact us if you have questions or wish to take any action with respect to information to which this privacy policy applies.

*Email:* [info@archtopfiber.com](mailto:info@archtopfiber.com)

*Telephone:* (855)-272-4867

*Mail:* 300 Enterprise Drive, Kingston, NY 12401