

Customer Privacy Notice

Ohio Information Technology Centers (“ITCs”) provide IT shared services to Ohio K-12 schools and libraries (“Customers”). The ITCs provide their Customers with two services governed by Section 222 of the Communications Act of 1934 (the “Communications Act”) – Broadband Internet access (“Internet Service”) and telephony services (Telephony Service”). In addition to these services, the ITCs provide services including accounting, payroll, library automation, EMIS, network management, student information systems, video, remote distance learning, electronic resources, computerized grade book, parental access, Web conferencing, web and email filtering, firewall and Web security, Web hosting, server hosting, and a data-driven decision report (collectively these services, along with Internet Service and Telephony Service, shall be referred to as the “Services”).

The following Customer Privacy Notice (“Notice”) applies to Customers of the Services provided by the **Western Ohio Computer Organization (“WOCO”)**. We use the words “Customer,” “you” or “your” to refer to any Customer of the Services. As part of the provision of the Services, we obtain information about you and your use of the Services. **WOCO** is committed to securely maintaining our Customers’ information. This Notice will identify our policies regarding the collection, retention, use and disclosure of that information. To be clear, this Notice only applies to information obtained through **WOCO’s** provision of the Services.

We may update this Notice from time to time as we deem appropriate and will post any updates on our website. You can access the most recent version of this Notice by visiting [www.woco-k12.org].

Customer Information

When a Customer uses the Services, **WOCO** may transmit, store and/or maintain information, on the Customer’s behalf. This information may come directly from the Customer or through a Customer’s use of the Services. Some of the information may be “personally identifiable information” (“PII”), meaning information that identifies an individual or can be reasonably used to identify an individual. Examples of personally identifiable information include names, street addresses, telephone numbers, taxpayer identification numbers (“TIN”), social security numbers or email addresses. It could also include information that is linked or associated with a particular individual. Personally identifiable information does not include de-identified, anonymous, or aggregate data that does not identify an individual. For example, information regarding an individual’s age would only be considered personally identifiable information if it was linked or combined with an individual’s name, address or other identifying information.

When you utilize our Services, you may transmit or provide us with both PII and non-PII. This information includes, but is not limited to: name, physical address, billing address, telephone numbers, social security numbers, taxpayer identification numbers, driver’s license numbers, user IDs, email addresses, and credit card numbers. In addition, you may provide us with information regarding Customer demographics, billing history, payment history, service history, equipment type, equipment serial number, equipment settings, equipment configuration, and software information.

WOCO also receives information known as “customer proprietary network information” or “CPNI.” CPNI generally relates to the quantity, technical configuration, type, destination, location and amount of your use of our Services that we receive by virtue of your relationship with us as an Internet Service or Telephony Service Customer. CPNI also includes information in your bills related to your Service.

Internet Service

As part of the provision of Internet Service, **WOCO** may receive and maintain certain information pertaining to the service, which may include a customer device’s media access control (“MAC”) addresses, Internet Protocol (“IP”) addresses, uniform resource locator (“URL”) history, date and time of connections, volume of data transmitted and received, network activity, network traffic, data transmission rates and latencies, location information, security characteristics, and other Internet performance information. **WOCO** also may collect information regarding bandwidth, usage, transmissions and content for purposes of protecting the integrity of the network. That information, when linked to identifying information such as a name, physical address or telephone number, may be considered CPNI. We will take reasonable, good faith steps to protect any such information that may be considered CPNI.

Telephony Service

We provide Telephone Service utilizing facilities-based “voice over Internet protocol” (“VoIP”). As part of the provision of Telephone Service we may be provided information from our Customers such as names, physical addresses and telephone numbers. We also collect information about the quality, configuration, location, and use of your Telephone Service and information regarding your level of Service and features that you use. That information, when linked to identifying information such as your name, physical address or telephone number is considered CPNI.

Information Use and Disclosure

WOCO collects and maintains the information described herein for the purpose of implementing, managing, and improving the services provided by **WOCO**. We may use such information to monitor for, detect, and protect against unauthorized use of the Services.

The information described herein *is considered the Customer’s property, not WOCO’s property*. As such, **WOCO** will not sell customer’s information to any person or entity for any purpose. **WOCO** may use, disclose or permit access to your PII, CPNI or other information it collects and maintains with another entity: (1) when necessary for the purposes of conducting a business activity related to your Service; (2) to protect our rights or property; (3) to protect users of our Services from fraudulent, abusive, or unlawful use of the Services; (4) as required by law, including, but not limited to, Ohio’s public record laws; or (5) with your approval.

As part of the provision of the Services, **WOCO** may have access to or acquire student information protected by the Family Educational Rights and Privacy Act (20 U.S.C. 1232 and its regulations) and Ohio Revised Code Section 3319.321. **WOCO** will abide by the applicable requirements for disclosure of any information regulated by these statutes.

Additionally, **WOCO** may be required to disclose PII to governmental entities or comply with formal legal requests for information from non-governmental entities. In these instances, **WOCO** may be required to disclose PII pursuant to a court order or with your consent.

Securing Your Information

WOCO follows industry-standard practices to protect against the loss, misuse or unauthorized access to your PII or CPNI. However, we cannot guarantee that our practices will prevent every unauthorized attempt to access, use or disclose such information.

Customer Access to Information

You may check the accuracy of personal information in your account by contacting us directly at [937-498-2161]. You may make a more thorough examination of the records containing your PII at our office during business hours and at your own cost and upon reasonable prior notice to us. If you wish to examine these records, please contact our office.

Retention

All information obtained shall be stored in accordance with industry standard practices and in accordance with the appropriate, current Ohio Administrative Code which defines ITC operations. **WOCO** shall maintain all information related to E-Rate discounts for ten years after the latter of the last day of the applicable funding year, or the service delivery deadline for the funding request. In cases where an E-rate discount is subject to review by the Federal Communications Commission or the Universal Service Administrative Company, **WOCO** will retain information related to the discounted Service for the required document retention period. Information obtained for Services provided outside of the E-rate program shall be maintained in **WOCO**'s regular business records as long as you are a Customer or until no longer needed for business, tax, or legal purposes.

Enforcement of Your Rights

Federal law (including 47 U.S.C. §222) limits the information a telephony and broadband provider may collect, maintain, use and share. You may enforce your rights concerning our collection, maintenance, use and any unauthorized sharing of your CPNI or PII. Among your remedies is the right to seek damages and reasonable costs and attorneys' fees.

Questions Regarding This Policy

If you have any questions about this Notice, please contact us at [937-498-2161].