

# **Equitable Internet Initiative Neighborhood Network Privacy Policy**

*Current as of 1/25/2018*

## High-Speed Internet Service Privacy Policy

The Goal of the Equitable Internet Initiative (EII) is to ensure that more Detroit residents have the ability to leverage digital technologies for social and economic development. It will increase Internet access; increase Internet adoption; and increase pathways for youth into the opportunities of Detroit's burgeoning Innovation District. EII has adopted this policy in the furtherance of that goal.

### **What information do we collect?**

We collect information from you when you sign up for Internet service.

When calling or registering with a community coordinator, as appropriate, you may be asked to provide your: name, e-mail address, mailing address, and phone number. You may, however, visit our website anonymously.

### **What do we use your information for?**

Any of the information we collect from you may be used in one of the following ways:

- To maintain a record of who is accessing the service
- To maintain a record of where network equipment is installed
- To send periodic emails about network features, planned or unplanned network outages, or other issues. The email address you provide when you sign up will only be used to send you information and updates pertaining to your Internet service.

Note: If at any time you would like to unsubscribe from receiving future emails, you may inform a Digital Steward or Community Coordinator who will remove you from the list.

Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company or organization for any reason whatsoever, without your consent, other than for the express purpose of delivering the service requested.

### **How do we protect your information?**

We implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information.

We offer the use of secure servers. All supplied sensitive information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Database to be only accessed by those authorized with special access rights to our systems, and who are required to keep the information confidential.

After any communications, your private information will be kept on file for up to 60 days in order to process any maintenance or service requests.

### **Do we use cookies?**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information.

We use cookies to help understand and save your preferences for future visits, compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies via your browser settings. Like most websites, if you turn your cookies off, some of our services may not function properly.

### **Do we disclose any information to outside parties?**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. We may be required to release your information when we believe release is appropriate to comply with the law, enforce Acceptable Use policies, or protect our or other's rights, property, or safety.

### **Record Retention**

Identification of Internet Protocol Addresses:

- Some network equipment obtains an IP address using a dynamic system known as DHCP (Dynamic Host Configuration Protocol). EII maintains its dynamic IP address log files for a period of from zero to fourteen days. If asked to make an identification based upon a dynamic IP address that was used more than 14 days prior to records request, EII will not have information to provide.
- Due to the network architecture, EII allocates Static IP addresses to network subscribers. These network addresses are considered semi-permanent, in that the address does not change without EII technician intervention. As a result, all requests for subscriber information linked to a specific IP address are specific to a single subscriber. As noted above, we may be required to release subscriber information under certain circumstances.
- Record Retention Timeline  
The following retention policies generally apply to frequently sought records:
  - Dynamic IP Assignment Logs: 0-7 Days
  - Static IP Assignment Logs: Indefinite
  - Preservation Requests: 90 Days

## **Customer Notification Policy**

For civil legal process – It is EII's policy to notify residents upon receipt of a civil subpoena demand of their account information. There is a two week wait period before disclosure of information.

EII will advise the resident that the information will be disclosed unless EII is in receipt of a document seeking a court approved protective order prior to the date on which EII must legally comply with the demand. EII will notify residents upon receipt of legal process.

Fee for Civil Subpoena Processing: EII charges a fee for the processing of civil subpoenas.

For criminal legal process – EII will notify residents upon receipt of criminal legal process seeking information about their accounts unless prohibited by law.

If and when EII receives any indefinite sealed legal process precluding notifying an EII resident, including a national security letter gag, EII will and does invoke statutory procedures to have a judge review.

Please note: If due to emergency threat to life, or legal process prohibits notification, EII will notify Resident after emergency has ended, or once suppression order expires.

### User Content:

EII will not provide user content without a U.S. search warrant.

### Required Information to be submitted:

- Subpoena, Court Order or Warrant  
and,
- Subscriber IP  
and/or,
- Email Address  
and/or,
- Telephone Number  
and,
- Date/Time & Time Zone
- What responsive information is required

### **Cost Reimbursement** (Authorized under 18 U.S.C. § 2706)

EII reserves the right to require payment in advance, to withhold delivery of information until payment is received and to seek enforcement of charges. Non-binding estimates can be provided to the requesting parties. However, entities that fail to pay charges must serve process by the registered agent within the appropriate state and requests for expedited response will not be granted.

Cost Reimbursement Fees: (Authorized under 18 U.S.C. § 2706)

EII will provide an estimate upon request. Please e-mail all required documentation and state in subject, "Estimate Request".

Civil Subpoenas:

- \$25.00 per resident or IP notification and processing fee and \$125.00 hourly fee. One hour minimum per resident or IP.

Criminal Subpoenas:

- \$125.00 hourly fee. One hour minimum per response.

Please Note: No charge for matters relating to child pornography or child endangerment investigations and investigations involving harassing or abusive calls, if documented when requested and unless expedited response is sought.

\* Requests based on IP addresses must include date and time information including time zone.

**Third party links**

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

**California Online Privacy Protection Act Compliance**

Because we value your privacy we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act. We therefore will not distribute your personal information to outside parties without your consent.

**Children's Online Privacy Protection Act Compliance**

We are in compliance with the requirements of COPPA (Childrens Online Privacy Protection Act), we do not collect any information from anyone under 13 years of age. Our website and services are all directed to people who are at least 18 years old or older.

**Terms and Conditions**

Please also visit our Terms and Conditions section establishing the use, disclaimers, and limitations of liability governing the use of our website at:

<https://detroitcommunitytech.org/eii/newcc/network>

## **Network Neutrality**

EII believes in the importance of Network Neutrality. For this reason, EII will adhere to the following guidelines:

- No Blocking: EII will not block access to legal content, applications, services, or non-harmful devices.
- No Throttling: EII will not impair or degrade lawful Internet traffic on the basis of content, applications, services, or non-harmful devices.
- No Paid Prioritization: EII will not favor some lawful Internet traffic over other lawful traffic in exchange for consideration – in other words, not create “fast lanes.” EII will also not prioritize content and services of from partners or affiliates.

## **Changes to our Privacy Policy**

If we decide to change our privacy policy, we will post those changes on this page, send an email notifying you of any changes, and/or update the Privacy Policy modification date below.

## **Contacting Us**

If there are any questions regarding this privacy policy you may contact us using the information below:

North End Woodward Community Coalition (NEWCC)

<https://www.northendwoodward.org/>

7700 2nd Ave Ste. 500

Detroit, MI 48202

[internet@wnuc.org](mailto:internet@wnuc.org)

313-236-4591 or 313-265-3431

**To report any issues:** call or text our NEWCC EII Help Desk at 586-315-8881, or email

[help@newcceii.on.spiceworks.com](mailto:help@newcceii.on.spiceworks.com).