Comcast's Privacy Commitments

November 2019

Comcast Privacy Commitments

Our customers have a right to privacy. It's essential.

Here are our Privacy Commitments:

1. **Where you go on the Internet is your business, not ours.**
   As your Internet Service Provider, we do not track the websites you visit or apps you use through your broadband connection. Because we don't track that information, we don't use it to build a profile about you, and we have never sold that information to anyone.

2. **We do not sell information that identifies who you are to anyone.**

3. **We do not sell your location data.**
   We don't sell, and have never sold, your location data when you use our Xfinity Mobile service.

4. **We believe that strong cybersecurity is essential to privacy.**
   We help protect you with multiple layers of security that automatically detect and block hundreds of thousands of cyber events every second and a team of security experts who work to protect you 24 hours a day, 365 days a year.

5. **We give you tools and support to help you stay safe online.**
   We provide Internet customers with free security software and tools, like multifactor authentication, and give you access to free online tips and advice and an Xfinity security and privacy team to help protect you and your family from cyber threats.

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The Comcast Privacy Program

The Comcast Privacy Program is in place to help us support our Privacy Commitments. It builds on our great track record and ensures we are doing the right things when handling, managing and sharing Personal Information and continuing to build customer trust.

As part of the Program, we have made important updates to our policies, processes and tools that we all need to be aware of. Here are the most important things to know:

1. We are launching the Xfinity Privacy Center (**xfinity.com/privacy**) – a new, easy-to-use online resource where anyone can learn more about our approach to privacy and security, and customers can access and manage their information with us if they wish to do so. We all need to know how to direct consumers to this website.

2. The definition of "Personal Information" is expanding to include almost anything we collect that can be linked to a customer or household. This is in part due to advancements in technology and because there is so much more consumer data out there. And new laws are coming into place to enhance consumer privacy rights and protections that broaden the scope of what's considered Personal Information. Consumers will be able to request access to, and in some cases delete this information. We have updated our data collection and handling policies to reflect this.

3. Remember! Respect our customers when it comes to what we write or say about them in our tools and communications.

4. Anytime we consider a new collection or use of Personal Information, we must consider the potential benefits and risks. This is not "our" information, but information our customers entrust to us.

5. Be Cyber Savvy! Strong cybersecurity is essential to privacy and we provide many resources to customers to help them stay protected.

Please complete your Comcast's Commitment to Privacy Integrity Training on Xfinity Partner Portal.

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For the Use of Intended Recipients Only

2019-11-11 Privacy Commitments and Program Huddle Deck_BUSPART_201

Xfinity Privacy Center

The Xfinity Privacy Center is a new, easy-to-use online resource for consumers to:

- Learn about Comcast's approach to privacy and security.

- Review an interactive version of the Xfinity Privacy Policy.

- Get answers to frequently asked questions.

- Manage privacy settings.

- Request access to – and in some cases, request to delete – the Personal Information we have about them.
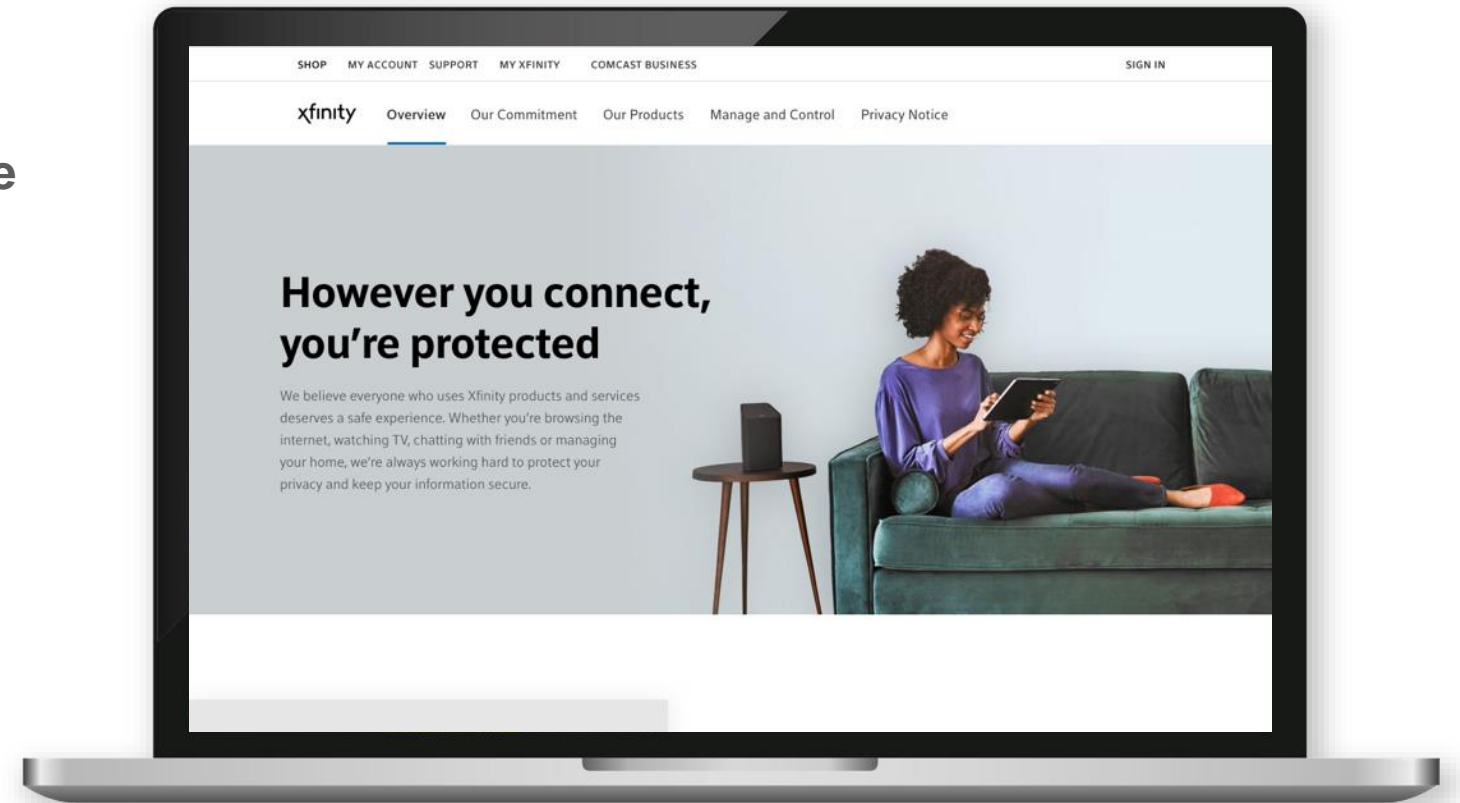
IMPORTANT REMINDERS:

- No matter what role you play – whether you are a call center agent, a technician, an engineer, or an accountant, it's important we all know about the Xfinity Privacy Center. **If anyone wants to know about the Personal Information Comcast collects and how it's used or shared, direct them to the Xfinity Privacy Center or our toll-free number.**

Go online to xfinity.com/privacy in December or call us.

What Is "Personal Information"?

The definition of "Personal Information" (PI) is expanding to include almost anything we collect that can be linked to a customer or household and we have updated our collection and handling policies to reflect this.

"Personal Information" is *any* information that identifies, relates to, describes, or can be reasonably linked to a person, a household, or even a device.

- First and last name

- Address

- Phone number

- Account number

- Account password, secret questions and answers

- Type of home or dwelling

- Preferred language

- Things customers say in our Voice Remote

- Recorded calls and chat exchanges

- Email messages

- Household ID

- Demographic and interest information we purchase from third parties

- Inferences we make, such as whether a customer is likely to upgrade service or move to a competitor

- Geographic coordinates of home or dwelling

What Are Our Data Collection and Handling Policies?

Here are a few key highlights:

Anyone working for or on behalf of Comcast must limit their collection, use and sharing of Personal Information to what is [explained and] disclosed or otherwise obtain permission from the Comcast Legal Privacy team. All uses and sharing of Personal Information must align with the published privacy policies and the law.

Only collect the Personal Information Comcast stated it would collect in Comcast's public privacy policies, and then only collect what is needed for your approved business purpose.

If a project requires to collect new or sensitive types of data, like a person's image or voice, or if Comcast need to use Personal Information that we've already collected for a different purpose, then Comcast has to evaluate potential benefits and risks BEFORE Comcast collect or use it. Comcast does this through a Privacy Impact Assessment or PIA, conducted by the Comcast Legal Privacy team. A PIA is also required before sharing any Personal Information with a new vendor, consultant, or other third party.

Keep data only as long as it's needed to serve its approved business purpose, and then properly and securely delete or dispose of it at the end of the retention period, unless it is subject to a legal hold.

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Think Twice Before You Write

We should always respect customers when it comes to what we write or say about them in our tools and communications.

Here are some things to keep in mind:

- Anytime we consider a new collection or use of Personal Information, we must consider the potential benefits and risks. This is not "our" information, but information our customers entrust to us. Comcast's practices will be disclosed to the public and customers will be able to access the Personal Information we maintain about them.

- Always follow proper policies regarding content permissible for account notes and any other customer relationship management tools.

- If you write a comment about a customer in Einstein, or you describe a potential customer in a CRM tool, the consumers you are writing about may be able to request access to those notes. So, please think twice before you write!

- If you need to share a customer's Personal Information with teammates, never include information such as the customer's social security number, password, or payment card information.
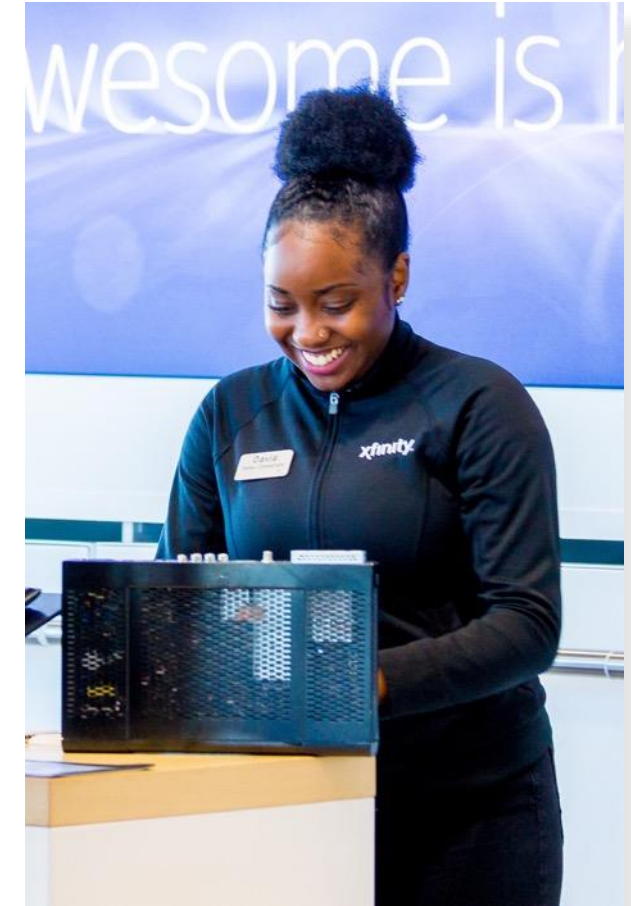
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Be Cyber Savvy!

- Cybersecurity is essential to privacy. Partners at all levels also play a role in protecting customer and company data and infrastructure from cyber threats.

- Through awareness and conscientious security habits, we can all help protect Comcast and our customers from ever-present cyber threats.

- Not only that, strong cybersecurity hygiene is important to our reputation and our business success – and it's the right thing to do.

- Small things can make a big difference:
    - Be aware of common phishing techniques
    - Report suspicious behavior
    - Use strong, unique passwords
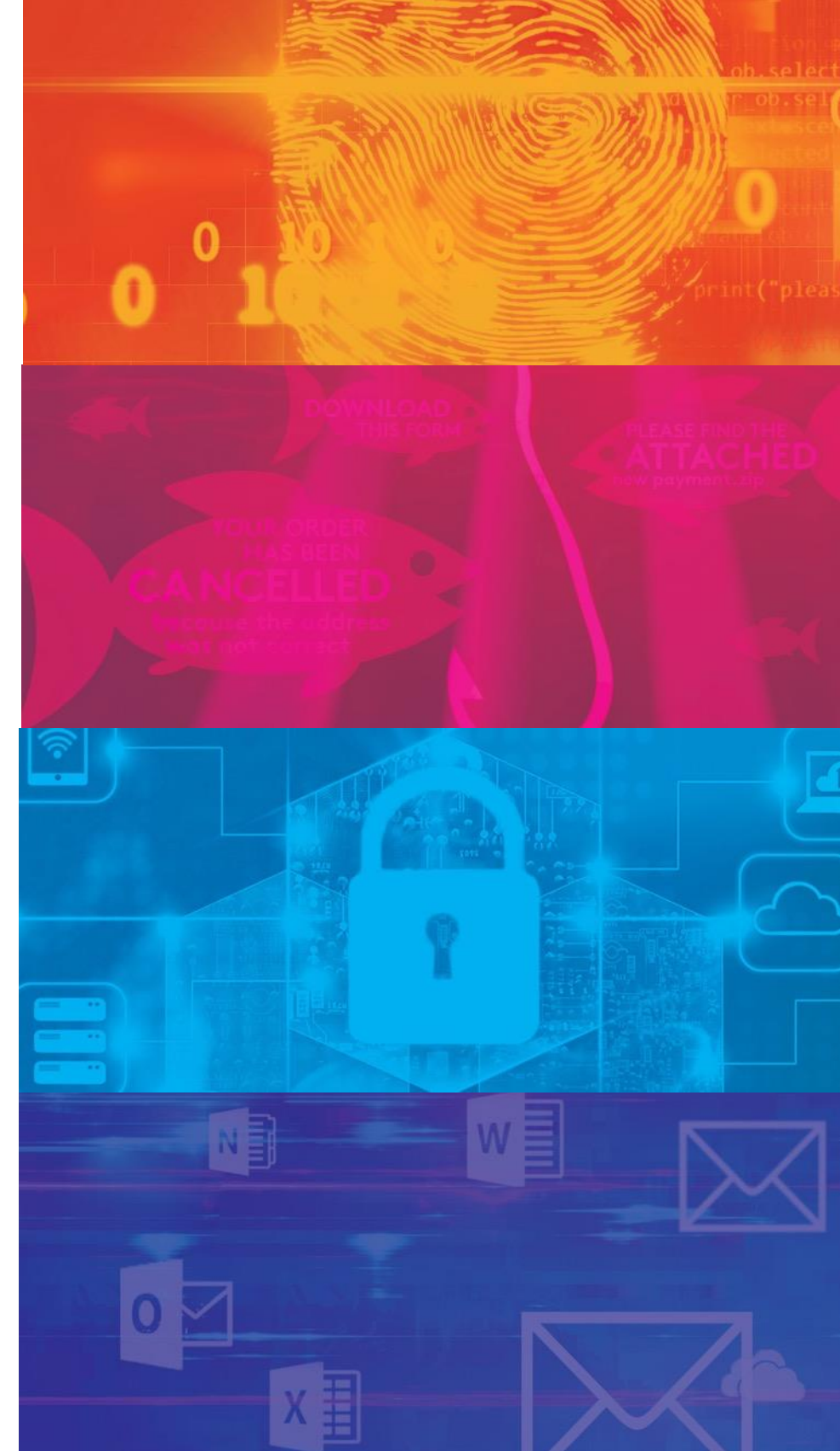
Calls to Action – Functions

☑ **If you support customers over the phone, face to face, or digitally:**

- Use tools like Einstein360, Tech360, and Retail360 to make sure you're following approved operational processes.

- If anyone wants to know about the Personal Information we collect and how it's used or shared, direct them to the Xfinity Privacy Center.

- From Einstein360, agents can quickly and easily send customers an SMS text or email with a link to our Xfinity Privacy Center.

- If customers need help requesting Personal Information, warm transfer them to our Privacy Center of Excellence.

☑ **If you support a Comcast Business customer that collects Personal Information:**

- While business entities are not included in the scope, it's possible Comcast Business customers may receive requests from *their consumers/customers*. For example, Dunkin' has stores in California and their customers there can request the Personal Information Dunkin' has about them. If we maintain any of Dunkin's customers' Personal Information, we will share that information with Dunkin' so they can respond to requests they receive from their customers. We are establishing a process to manage these requests from our Comcast Business customers.

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