

**HART TELEPHONE COMPANY**  
**IDENTITY THEFT PREVENTION PROGRAM – COMPLIANCE REPORT**  
December 1, 2022

In compliance with the FTC’s Red Flag rules, this report is provided annually to the Board of Directors, an appropriate committee of the Board, or a designated employee at the level of senior management of Hart Telephone Company (“Hart”). It addresses specific issues related to Hart’s Identity Theft Prevention Program including: 1) the effectiveness of the policies and procedures of Hart in addressing the risk of identity theft in connection with the opening of covered accounts and with respect to existing covered accounts; 2) service provider arrangements; 3) significant incidents involving identity theft and management’s response; and 4) recommendations for material changes to the Program.

Following is Hart’s compliance report for 2022:

**I. Effectiveness of the Program**

Hart’s Identity Theft Prevention Program (“Program”) has been effective in addressing the risk of identity theft in connection with the opening of both covered accounts and existing covered accounts and has helped to minimize the foreseeable risk of identity theft to Hart’s customers. To date, Hart has experienced no incidents of identity theft.

Hart’s senior management has maintained oversight of the implementation of the Program and provided training to employees concerning Hart’s Program specifically to:

- Identify relevant patterns, practices, and specific forms of activity that are indicative of “red flags” signaling possible identity theft;
- Detect potential instances of identity theft as they relate to the “red flags” that have been detailed in Hart’s Identity Theft Prevention Program in connection with the opening of covered accounts and existing covered accounts;
- Respond appropriately to any red flags that are detected in both new and existing accounts;
- Verifying the validity of an address change when receiving a notice of a change of address for an existing account and also receiving a request for an additional or replacement card for the same account within a short period of time; and
- Follow Hart procedures to provide a confirmed accurate address to a Consumer Reporting Agency (“CRA”) when a notice of address discrepancy is received from a CRA.

**II. Service Provider Arrangements**

At such time that Hart engages a service provider to perform an activity in connection with one or more covered accounts, Hart will take appropriate steps to ensure that the activity of the service provider is conducted in accordance with reasonable policies and procedures designed to detect, prevent, and mitigate the risk of identity theft. Hart may require the service provider to execute a contract that specifies the service provider’s obligations to have policies and procedures to detect relevant red flags that may arise in the performance of the service provider’s activities, and report the red flags to Hart or take other appropriate steps to prevent or mitigate identity theft.

Hart currently maintains service provider arrangements with the entities listed below who perform an activity in connection with one or more covered accounts. Hart has taken appropriate steps to ensure the activity of the service provider(s) is/are conducted in compliance with Hart's Identity Theft Prevention Program and are designed to detect, prevent, and mitigate the risk of identity theft. [List service providers below and any other relevant data, *i.e.* – information concerning any communication from a service provider attesting to their compliance with the Red Flag Rules, including letters, emails, copies of identity theft policies, *etc.*]

1. Calix, Inc.: Calix Support Cloud
2. Laser Print Plus: Bill Statement Printing
3. National Information Solutions Cooperative (NISC): Enterprise Software
4. National Rural Telecommunications Cooperative (NRTC): NeoNova & Security Coverage for Managed Services

### III. Significant Incidents Involving Identity Theft

Hart has experienced no significant incidents involving identity theft for the reporting period.

### IV. Recommendations for Material Changes to the Program

Based on the success of Hart's Program in 2022, including the fact that no significant incidents of identity theft have been experienced, Hart's Identity Theft Compliance Officer is offering no recommendations for material changes to the program at this time.

Date: 12/01/2022