

# Customer Privacy Policy of NorthernTel, Limited Partnership and its affiliates

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***NorthernTel***

1-800-360-8555  
[www.northerntel.ca](http://www.northerntel.ca)

## **The NorthernTel, Limited Partnership (“NorthernTel”) Commitment to Privacy**

At NorthernTel, we know you are the reason we are in business. Our longstanding commitment to safeguarding your right to privacy is important to us.

Every year, we ensure that our employees sign a Code of Business Conduct that requires the safeguarding and proper use of personal customer information.

We also place strict controls on the protection and use of personal information within our systems and web sites and ensures that our employees are trained to respect your privacy at all times.

The *Customer Privacy Policy of NorthernTel and Its Affiliates* and the *Code of Fair Information Practices of NorthernTel and Its Affiliates* spell out the commitments of NorthernTel and its Affiliates and the rights of customers regarding personal information. They also comply fully with the *Personal Information Protection and Electronic Documents Act*, which came into affect on January 1, 2001.

### **Policy Applies to NorthernTel and its Affiliates**

The Customer Privacy Policy of NorthernTel and its affiliates applies to NorthernTel, Centre d'interaction Proximédia inc., Câblevision du Nord de Québec inc., Télébec, Société en commandite

In addition to the Customer Privacy Policy, NorthernTel and its affiliates may also be subject to the requirements of applicable legislation, tariffs and regulations and the orders of any court or other lawful authority.

Any time you do business with any of these companies, or with anyone acting as an agent on our behalf, you are protected by the rights and safeguards contained in the *Policy* and *Code*.

### **The Code of Fair Information Practices of NorthernTel and its Affiliates**

To ensure our commitment to your privacy is upheld, we have updated our existing policies and developed a formal privacy code setting out your rights and our obligations respecting the treatment of your personal information by NorthernTel and its affiliates. The *Code of Fair Information Practices of NorthernTel and its Affiliates* (the Code) complies with the requirements of the *Personal Information Protection and Electronic Documents Act* as well as the *Canadian Standards Association Model Code for the Protection of Personal Information*. (A summary of the principles underlying the Code is included at the end of this privacy policy.) The Customer Privacy Policy of NorthernTel and Its Affiliates (the Policy) that you are reading is intended as a less formal summary of the approach of NorthernTel companies to customer privacy, including the *Code of Fair Information Practices of NorthernTel and its Affiliates*.

## **Employees and Agents**

The *Code of Fair Information Practices of NorthernTel and its Affiliates* also governs the behaviour of our employees and agents acting on our behalf. All of our employees who have access to personal information have been trained to handle such information. And, new employees receive privacy training as a fundamental part of their initial company training. All of our employees must review and commit to the *Code of Fair Information Practices of NorthernTel and its Affiliates* every year.

## **Personal Information**

Personal information is information about an identifiable individual. This includes information about your product and service subscriptions and usage. Publicly available information, such as a public directory listing of your name, address, telephone number, electronic address, is not considered to be personal information.

## **Collecting Information Helps Us Serve You Better**

NorthernTel and its affiliates collect personal information only for the following purposes:

- . to establish and maintain responsible commercial relations with you and provide you with ongoing service;
- . to understand your needs and eligibility for products & services;
- . to recommend particular products and services to meet your needs; . to develop, enhance, market or provide products and services;
- . to manage and develop NorthernTel business and operations, including personnel and employment matters; and
- . to meet legal and regulatory requirements.

Your personal information **will not be used for any other purpose** without your express consent.

## **Sharing Information Among the Companies of NorthernTel and its Affiliates Helps Us Understand All Your Needs**

The purpose of sharing information among NorthernTel and its affiliates is to help us identify your information, communication, and entertainment needs, and to provide you with relevant information, advice and solutions. Should you identify incorrect or outdated information to us, we will make the necessary changes promptly.

## **Other Parties with Whom NorthernTel and its Affiliates May Share Personal Information**

While our general policy is not to provide personal information to any party outside of NorthernTel and its affiliates, there are certain limited circumstances, outlined below, in which it is necessary to do so. When we do provide personal information to third parties, we provide only that information that is required in the circumstances. Information provided to third parties is used only for the purpose stipulated and is subject to strict terms of confidentiality.

Employees of the companies to whom we may provide information must adhere to our privacy standards. Third parties include:

**An agent acting on behalf of NorthernTel or its affiliates**, such as a company hired to perform installation or maintenance on our behalf;

**Another communications service provider**, in order to offer efficient and effective communications services (e.g. to provide wireless service while roaming in another company's coverage area);

**A company involved in supplying the customer with telephone or telephone directory related services;**

**An affiliate that offers telecommunications or broadcasting services;**

**Another person for the development, enhancement, marketing or provision of any of the products or services of NorthernTel and its affiliates;**

**An agent retained by the Company to evaluate the customer's creditworthiness or to collect the customer's account**, for the express purpose of the collection of past-due bills;

**A public authority or agent of a public authority, if in the reasonable judgment of the Company, it appears that there is imminent danger to life or property**, in emergencies, for internal security matters, or where required by court order or search warrant; and

**Emergency services**, in emergency situations.

## **NorthernTel and its affiliates' Commitment to Privacy**

We take all of the necessary precautions to ensure the safeguarding of your information, whether it is stored electronically or in paper format. In all cases, information is retained in secure facilities, protected from unauthorized access and kept only as long as is reasonably required. For example, our electronic files are backed up for redundancy, password protected and accessible only by authorized employees, on a need-to-know basis.

## **Use of 'Cookies'**

During user interaction with one of our Internet sites, we may use a browser feature called a 'cookie' to collect information anonymously and track user patterns on our web sites. A cookie is a small text file containing a unique identification number that identifies your browser - but not you to our computers each time you visit one of our sites that uses cookies. Cookies tell us which pages of our sites are visited and by how many people. This helps us to enhance the on-line experience of visitors to our sites. Unless you specifically advise us, we will not know who you are, even though we may assign your computer a cookie. We cannot use cookies, by themselves, to disclose the individual identity of any site user, and we never combine information gathered by a cookie with personally identifiable information like your name, telephone number, or even your e-mail address without your express consent. You will find that most major web sites use cookies and most major browsers are set up to accept them. If you wish, you can reset your browser either to notify you when you have received a cookie, or to refuse to accept cookies. You do not need cookies to visit NorthernTel and its affiliates sites. However, if you refuse to accept cookies, you may not be able to use some of the features available on our sites such as personalization features.

## **Protection of Children On-Line**

As an added protection for children, on any of our commercial web sites or online services directed to children under 13 years of age, we will obtain, as an additional protection measure, the permission of a parent or legal guardian before collecting, using or disclosing any personally identifiable information about a child, e.g., for participation in contests or promotions.

## **Privacy-Enhancing Services Offered by NorthernTel and its Affiliates**

NorthernTel and its affiliates offer a number of services to help balance the privacy interests of customers and the people they call. You can find information about the NorthernTel services (e.g.: Call Display, Private Name Display, Call Blocking, etc.) in the introductory pages of the telephone directory, by visiting **[www.northerntel.ca](http://www.northerntel.ca)**. or by visiting a NorthernTel Store. NorthernTel Mobility offers digital wireless service and Call Display to provide additional privacy for your wireless calls. More information is available at **[www.northerntel.ca](http://www.northerntel.ca)**.

## Questions or Concerns

If you have questions or concerns about your privacy, you can contact us through one of the NorthernTel websites listed below or call us at the number shown on your bill. Our customer service representatives will assist you in resolving the situation.

**Our web site [www.northerntel.ca](http://www.northerntel.ca)**

## NorthernTel Privacy Ombudsman

If you still have unresolved concerns with respect to the treatment of your personal information by NorthernTel or its affiliates, you may address these concerns, in writing, to the NorthernTel Privacy Ombudsman, who has overall responsibility for the companies' compliance with this policy and applicable privacy restrictions.

You should write to:

NorthernTel Customer Services, c/o Privacy Ombudsman  
PO Box 1110  
Timmins, Ontario, P4N 7J4  
[ombudsman@ntl.sympatico.ca](mailto:ombudsman@ntl.sympatico.ca)

## Further Complaint Procedure

If the NorthernTel Privacy Ombudsman does not resolve the issue to your satisfaction, you may file a complaint with the Privacy Commissioner of Canada by calling 1 800-282-1376 or writing to:

The Privacy Commissioner of Canada  
112 Kent Street  
Ottawa ON  
K1A 1H3  
<http://www.priv.gc.ca>

## Customer Choice

You may decide that you prefer us not to share your personal information among the companies of NorthernTel and its affiliates to promote products and services. If this is the case, please send us written instructions to that effect to NorthernTel, Customer Services, PO Box 1110, Timmins, Ontario, P4N 7J4, or by filling up the e-mail form under "Contact us" on the website: [www.northerntel.ca](http://www.northerntel.ca). "

## **Code of Fair Information Practices of NorthernTel and its Affiliates**

### **Summary of Principles**

**Accountability:** NorthernTel and its affiliates are responsible for personal customer information under their control and shall designate one or more persons who are accountable for compliance with the following principles.

**Identifying purposes for collection of customer information:**

NorthernTel and its affiliates shall identify the purposes for which personal information is collected at or before the time the information is collected.

**Obtaining express consent for collection, use or disclosure of personal information:** The knowledge and express consent of a customer or employee are required for the collection, use, or disclosure of personal information, except where inappropriate.

**Limiting collection of personal information:** NorthernTel and its affiliates shall limit the collection of personal to that which is necessary for the purposes identified. NorthernTel and its affiliates shall collect personal information by fair and lawful means.

**Limiting use, disclosure and retention of personal information:** NorthernTel and its affiliates shall not use or disclose personal information for purposes other than those for which it was collected, except with the express consent of the individual or as required by law. NorthernTel and its affiliates shall retain personal information only as long as necessary for the fulfilment of those purposes.

**Accuracy of personal information:** Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

**Security safeguards:** NorthernTel and its affiliates shall protect personal information by security safeguards appropriate to the level of confidentiality of the information.

**Openness concerning policies and practices:** NorthernTel and its affiliates shall make readily available to customers and employees specific information about its policies and practices relating to the management of personal information.

**Customer and employee access to personal information:** NorthernTel and its affiliates shall inform a customer or employee of the existence, use and disclosure of his or her personal information upon request and shall give the individual access to that information. A customer or employee has the right to challenge the accuracy and completeness of the information and to have it amended as appropriate.

**Challenging compliance:** A customer or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for the compliance of NorthernTel and its affiliates with the Code.