

CUSTOMER PRIVACY POLICY

INTRODUCTION

With more than 1,600 employees from coast to coast, Eastlink delivers world-class video entertainment, internet and telephone services to residential, business and public-sector customers across Canada over its state-of-the-art fibre optic network. In order to provide, maintain and enhance the services available to our customers, Eastlink must collect, use, and disclose customers' personal information. At the same time, Eastlink recognizes the importance of respecting and protecting our customers' privacy. That is why we have developed the Eastlink *Customer Privacy Policy* (the "*Policy*") and the Eastlink *Code of Fair Information Practices* (the "*Code*"). These documents detail our commitment to safeguarding the privacy of our customers' personal information.

Eastlink's *Code* and *Policy* were developed to be fully compliant with the federal government's privacy legislation, the *Personal Information Protection and Electronic Documents Act* ("*PIPEDA*"). The *Code* governs the behaviour of our employees and agents with respect to customers' personal information. The *Policy* is designed to inform customers about our privacy practices, and is intended as a less formal summary of Eastlink's approach to customer privacy.

Eastlink will continue to stay current on the critical issue of privacy. In doing so, we may modify the *Code* and *Policy* when we feel it is appropriate to do so. If we change our *Code* or *Policy*, we will post those changes on our web site in a timely manner. You may determine when this *Policy* was last updated by referring to the date found at the bottom left hand corner of each page.

For complete information, this *Policy* should be read in conjunction with the *Code*, a copy of which is available on our web site.

WHAT IS PERSONAL INFORMATION?

Personal information is "information about an identifiable individual". For Eastlink customers, this may include your name, address, phone number, credit information, billing and payment records and information about your service subscriptions and usage.

Once information is publicly available, such as a white pages listing of your name, address and telephone number, it is no longer considered to be personal information.

The policies and procedures outlined herein do not apply to information regarding Eastlink's corporate customers. However, such information is protected by other Eastlink policies and procedures and through contractual arrangements.

WE COLLECT AND USE INFORMATION TO SERVE YOU BETTER

Eastlink collects, uses and discloses customers' personal information primarily for the purpose of providing Eastlink products and services to our customers (i.e., to set up and maintain your account and to effectively deal with issues concerning your service).

In addition, we may collect, use and disclose personal information to:

- (a) provide better customer service (e.g., by keeping customers informed of new products, services and promotions);
- (b) help us better understand your communications needs and preferences so that we can develop, enhance, market and provide products and services (e.g., we may analyze your use of our products and services to help us provide better product recommendations and special offers that we think will interest you); and
- (c) manage and develop our business operations.

Personal information collected by Eastlink may be stored and processed in Canada or another country. In either case, the information is protected with appropriate security safeguards, but may be available to government agencies under applicable law.

DISCLOSURE OF PERSONAL INFORMATION IN CERTAIN CIRCUMSTANCES

While our general policy is not to provide personal information to any party outside of Eastlink without your consent, there are certain limited circumstances in which it is necessary to do so. When we provide personal information to third parties, we provide only that information that is required in the circumstances. In turn, information provided to third parties is used only for the purposes stipulated and is subject to strict terms of confidentiality.

Third parties to whom Eastlink provides personal information include:

- (a) an agent or supplier who assists us in the development, enhancement, marketing or provision of any Eastlink products or services (e.g., a contractor who installs or repairs Eastlink products and services);
- (b) another communications service provider, in order to offer efficient and effective telecommunications services (e.g., customers' information may be provided to another service provider in order to set up related services such as long distance);
- (c) a credit reporting or collection agency;
- (d) law enforcement agencies and other parties with a court order;
- (e) investigative bodies and legal counsel;
- (f) a financial institution or credit grantor (e.g., where a customer has opted to pay their bills via pre-authorized chequing or pre-authorized credit card withdrawals);
- (g) emergency services;
- (h) a person who, in the reasonable judgment of Eastlink, is seeking the information as your authorized agent; and
- (i) a third party or parties, where the customer consents to such disclosure or disclosure is required by law.

YOUR RIGHT TO REFUSE OR WITHDRAW CONSENT

We are required to have your implied or express consent for the collection, use and disclosure of your personal information. You may refuse to provide personal information to us or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. However, refusal or withdrawal of consent may affect our ability to provide you with products and services.

We want every Eastlink customer to be fully aware of new and existing products, services and promotions that will save you time and money. From time to time, we may send you this information by mail, telephone or other means. We also want to be sure that our products and services are consistent with your needs and expectations. Accordingly, we may contact you to inquire about ways that we could improve our products and services. If you do not wish to be contacted for marketing or market research purposes, simply tell us and we'll respect your preference.

If you wish to withdraw your consent, please visit www.eastlink.ca or contact Eastlink Customer Care. If you withdraw your consent to being contacted for marketing and market research purposes, you will continue to be contacted as necessary to service your account, and you may receive marketing information included with your regular account mailings.

NON-PUBLISHED ADDRESSES AND TELEPHONE NUMBERS

The names, addresses and telephone numbers of Eastlink Telephone customers are included in the telephone directory and are provided to third party directory publishers and directory assistance services (in accordance with the requirements of the Canadian Radio-television and Telecommunications Commission). Non-published number service is available for a fee to customers who do not want their information to appear in these directories/services. Non-published numbers are included in the 911 database.

Customers who do not opt for a non-published number can choose how their name and address will appear in the directory (i.e., have the option of omitting part of their name and/or street address from their listing).

For more information on both of these options, contact Eastlink Customer Care.

COOKIES

Like most commercial websites, Eastlink's websites use cookies.

Cookies are small text files that identify your computer to a website. Cookies do not:

- contain computer programs, viruses or malware, or
- reveal the individual identity of any site user.

Some cookies only last for the duration of your current visit to a website, while others are stored on your computer so that the site can recognize the computer on your next visit.

Eastlink's websites use cookies for the following purposes:

- for basic site functionality (certain types of cookies may be necessary to the basic functioning and security of a site),
- to improve your browsing experience (e.g., by customizing the site to suit your device/browser),
- to remember your preferences (e.g., language, province/community) so that you do not need to re-enter that information on your next visit to the site,
- to allow you to access secure areas of the site (e.g., billing and payment information) and remember your login information as you move through the site,
- to provide enhanced site functionality such as “click to chat” or the ability to share information from the site to your social media account,
- certain of our sites contain ads for third party services that are displayed using a cookie, and
- for generating anonymous statistics regarding how our sites are used to:
 - ❖ ensure they are easy to use and compatible with common browsers/devices,
 - ❖ measure how many visits the sites and individual pages receive, as well as the effectiveness of the sites, marketing offers, and links leading to our sites, and
 - ❖ track and resolve any errors that users experience when browsing the site.

Most websites use cookies and browsers are generally set to accept them. You can change the options on your browser to tell you when you have received one, or to refuse to accept them altogether (though this may affect your ability to visit certain websites).

QUESTIONS OR CONCERNS

If you have questions or concerns about your privacy, please contact Eastlink Customer Care. Our customer service representatives will be pleased to help you.

If you still have unresolved concerns, you may address these concerns to the Eastlink Privacy Officer at:

Eastlink
Attn: Privacy Officer
P.O. Box 8660, Station A
6080 Young Street, 8th Floor
Halifax, NS
B3K 5M3
e-mail: privacy@corp.eastlink.ca