

# NORTHWESTEL PRIVACY POLICY AND CODE



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## THE NORTHWESTEL COMMITMENT TO PRIVACY

At Northwestel, we know you are the reason we are in business. Our longstanding commitment to safeguarding your right to privacy is fundamental to those principles of our business.

Each year, we ensure that our employees review and acknowledge their adherence to our 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 ensure that our employees are trained to respect your privacy at all times.

The *Northwestel Privacy Policy* and the *Northwestel Code of Fair Information Practices* spell out the commitments of Northwestel and our affiliate, Northwestel Cable Inc. and the rights of customers regarding personal information. They also comply fully with the Personal Information Protection and Electronic Documents Act, which comes into effect on January 1, 2001.

## POLICY APPLIES TO NORTHWESTEL AND OUR AFFILIATES

The *Northwestel Privacy Policy* applies to Northwestel Inc. and its affiliate, Northwestel Cable Inc.

In addition to the *Northwestel Privacy Policy*, Northwestel Inc. and its affiliates are also subject to the requirements of applicable legislation, tariffs and regulations and the orders of any court or other lawful authority.

Any time you or your organization does business with this company, 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 NORTHWESTEL CODE OF FAIR INFORMATION PRACTICES

To ensure our commitment to your privacy is upheld, we have developed a formal privacy code setting out your rights and our obligations respecting the treatment of your personal information by Northwestel Inc. and its affiliates. The *Northwestel Code of Fair Information Practices* (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 *Northwestel Customer Privacy Policy* (the Policy) that you are reading is intended as a less formal summary of the approach of Northwestel and its affiliates to customer privacy, including the *Northwestel Code of Fair Information Practices*.

## EMPLOYEES AND AGENTS

The *Northwestel Code of Fair Information Practices* also governs the behavior of our employees and agents acting on our behalf. All of our employees who have access to personal information are being continually trained on the handling of such information. New employees receive training on privacy as a fundamental part of their initial company training. All of our employees must review and commit to the *Northwestel Code of Fair Information Practices* annually.

## 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, title and electronic address, is not considered to be personal information.

## COLLECTING INFORMATION HELPS US SERVE YOU BETTER

Northwestel 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, preferences and eligibility for products & services;
- to recommend particular products & services to meet your needs;
- to develop, enhance, market or provide products and services;
- to manage and develop our business and operations, including personnel and employment matters;
- to verify credit worthiness; and
- to meet legal and regulatory requirements.

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

## SHARING INFORMATION AMONG NORTHWESTEL AND ITS AFFILIATES WILL HELP US UNDERSTAND YOUR FULL NEEDS

The purpose for sharing information among Northwestel Inc. and Northwestel Cable Inc. 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 NORTHWESTEL INC. AND ITS AFFILIATES MAY SHARE PERSONAL INFORMATION

While our general policy is not to provide personal information to any party outside of Northwestel Inc. and Northwestel Cable Inc., 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 Northwestel 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 collection agency, for the express purpose of the collection of past due bills;
- Law enforcement agencies, in emergencies, for internal security matters, or where required by court order or search warrant; and
- Emergency services, in emergency situations.



## THE NORTHWESTEL 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.

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 Northwestel 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.

## PRIVACY-ENHANCING SERVICES OFFERED BY NORTHWESTEL

Northwestel offers a number of services to help balance the privacy interests of customers and the people they call. You can find information about Northwestel's services (e.g., Call Number Display, Call Blocking, Call Trace, Non-Published Numbers, etc.) in the introductory pages of the telephone directory, by calling our offices during business hours, or by visiting our websites at [www.nwtel.ca](http://www.nwtel.ca) or [www.theedge.ca](http://www.theedge.ca)

## QUESTIONS OR CONCERNS

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

## NORTHWESTEL PRIVACY REPRESENTATIVES

If you still have unresolved concerns with respect to the treatment of your personal information by Northwestel or its affiliates, you may address these concerns, in writing, to one of the following representatives who have overall responsibility for compliance with this policy and applicable privacy restrictions. You should write to:

Northwestel Inc.  
Attention: Regulatory Manager  
PO Box 2727  
Whitehorse YT  
Y1A 4Y4  
Telephone: 1-877-349-8222 (toll-free)

Northwestel Cable Inc.  
Attention: General Manager  
P.O. Box 1469  
Yellowknife NT  
X1A 2P1  
Telephone: 1-800-661-0834 (toll-free)



## FURTHER COMPLAINT PROCEDURE

If these representatives are unable to 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  
Email: [info@privcom.gc.ca](mailto:info@privcom.gc.ca)  
[www.privcom.gc.ca](http://www.privcom.gc.ca)

## CUSTOMER CHOICE

You may decide that you prefer us not to share your personal information among Northwestel Inc. and its affiliates to promote products and services. If this is the case, you may advise us by visiting one of our websites or by calling us at the number shown on your bill.

## OUR WEBSITES

- [www.nwtel.ca](http://www.nwtel.ca)
- [www.theedge.ca](http://www.theedge.ca)

## DISCLOSURE OF SUBSCRIBER LISTING INFORMATION

In accordance with CRTC requirements, Northwestel makes names, addresses and telephone numbers printed in our directories available to publishers of independent paper and electronic directories. Listings are also available on the Canada 411 Internet directory. This telephone directory is published by the Yellow Pages Group Co. Yellow Pages Group Co. makes available lists of names, addresses and telephone numbers printed in Northwestel directories to selected organizations for a fee. As a Northwestel residential customer, your name may be on Northwestel marketing lists and you may receive a call from one of our marketing employees.

These lists may result in unsolicited mail or phone calls at a customer's residence or place of business. The best way to remove your name from these lists is to request a non-published telephone number. A monthly charge applies. If you do not wish to request a non-published telephone number, you can ask to have your name removed from the lists indicated below. This will help you reduce the quantity of unwanted solicitation mail or number of phone calls, but will not necessarily stop them, as they may be derived from other sources. Please send your request with your name, address and telephone number to one or all of the following addresses. A new letter is required each time a telephone number is changed.

Canada 411 Webmaster  
20 Richmond Street East, Suite 600  
Toronto, ON M5C 3B5

Canadian Marketing Association  
P.O. Box 706, Don Mills, ON M3C 2T6

## NORTHWESTEL CODE OF FAIR INFORMATION PRACTICES - SUMMARY OF PRINCIPLES

**Accountability:** Northwestel and its affiliates are responsible for personal customer information under our control and have designated the specific representatives as accountable for compliance by the Northwestel and its affiliates with the principles.

**Identifying purposes for collection of customer information:** Northwestel and its affiliates will identify the purposes for collecting personal information at or before the time the information is collected.

**Obtaining consent for collection, use or disclosure of customer information:** We require the knowledge and consent of the customer for the collection, use, or disclosure of personal information, except where inappropriate or impractical (e.g., in emergency situations).

**Limiting collection of customer information:**

Northwestel and its affiliates will limit the collection of personal information - by fair and lawful means - to that which is necessary for the purposes identified by the Companies.

**Limiting use, disclosure and retention of**

**customer information:** Northwestel and its affiliates will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the customer or as required by law. The Companies will retain personal information only as long as necessary to fulfill those purposes.

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

**Security safeguards:** Northwestel and its affiliates will protect personal information by security safeguards appropriate to the sensitivity of the information.

**Openness concerning policies and practices:**

Northwestel and its affiliates will make readily available to customers' specific information about their policies and practices relating to the management of personal information.

**Customer access to customer information:** Upon request, Northwestel, or one of its affiliates, as the case may be, will inform a customer of the existence, use, and disclosure of his or her personal information and will give access to that information. A customer may challenge the accuracy and completeness of the information and have it amended as appropriate.

**Challenging compliance:** A customer may address a challenge concerning compliance with the above principles to the appropriate representative for the company involved.

