

## Human Resources

### Northwestel Canada's Anti-Spam Law (CASL)<sup>1</sup> Policy

Policy Number:

Issue Date: November 1, 2019

---

Revision History:

---

#### Introduction

This policy explains how Northwestel complies with [Canada's Anti-Spam Law \(CASL\)](#) to respect any consumer's choice not to receive Commercial Electronic Messages (CEMs) from us or our agents.

#### CEMs

In order for a communication to be considered a CEM, it must satisfy the following requirements:

- (i) Be an electronic message – such as a text or email.
- (ii) Be sent to an electronic address – such as an email, instant messaging or other account where electronic messages can be sent and received; and
- (iii) At least one of the message's purposes is to promote or encourage the purchase or sale of a product or service, which could be included in the CEM's content, such as hyperlinks, contact information, its re-line and subject line.

Our sales agents and contractors are committed to being fully compliant with CASL by following the four core CASL requirements relating to: Identification; Contact Information; Prior Consent; and Unsubscribe/Opt out of receiving future CEMs.

#### Identification Information

We are transparent about identifying ourselves as the sender of a CEM to ensure the recipient knows we sent it. We do this by including our business names and sometimes our brand names in all communications. In circumstances where CEMs are sent on behalf of another organization, we accurately identify ourselves as the sender and identify the other organization as the party on whose behalf we are sending the CEM.

---

<sup>1</sup> CASL is the short form name for: *An Act to promote the efficiency and adaptability of the Canadian economy by regulating certain activities that discourage reliance on electronic means of carrying out commercial activities, and to amend the Canadian Radio-television and Telecommunications Commission Act, the Competition Act, the Personal Information Protection and Electronic Documents Act and the Telecommunications Act.*

## Contact Information

Our CEMs also provide contact information for the recipient to get in touch with us with questions or comments. This information consists of a valid mailing address and one of the following additional current pieces of information:

- (i) Telephone number with access to an agent or voice mail system.
- (ii) Email address.
- (iii) Web address.

Each of these contact options must be valid for at least 60 days after the day on which the CEM was sent.

## Sending CEMs with Recipients' Prior Express or Implied Consent

Subject to CASL's exceptions, we will only send CEMs in situations where we have the prior consent of the recipient to receive them. Consent can be express or implied. When seeking express consent, we will do so in compliance with the CASL requirements, typically providing the prospective recipient with the opportunity to tick a blank box indicating that they wish to receive the type of CEMs indicated. In situations where we are relying on implied consent, we will generally do so only where:

- (i) The recipient is in an "existing business relationship" (EBR) with us by currently subscribing to our products or services or having made a purchase from us within the two-year period before the CEM was sent.
- (ii) We respond to an inquiry or application from the recipient and we send the CEM within 6 months from the date we received the inquiry or application.
- (iii) We send a CEM that is relevant to the recipient's business role or function when the recipient has published their email address (i.e. in a published directory) without anything accompanying their listing indicating they object to receiving such CEMs.
- (iv) We send a CEM that is relevant to the recipient's business role or function when the recipient gave us their email address (i.e. by way of handing us their business card) – again without indicating any objection to receiving such CEMs.
- (v) We send a CEM to an employee of a recipient organization that we have some sort of pre-existing relationship with and the CEM relates to the activities of the recipient.

## Unsubscribe/Opt-outs

We include an unsubscribe mechanism in our CEMs that is written in plain language, easy to use and understand, and free of charge. This unsubscribe mechanism will be valid for at least 60 days from the date the CEM was sent. Opt-outs take effect no more than 10 business days from the date we receive them. We scrub our lists and where applicable, take steps to ensure our third-party agents scrub theirs, to avoid sending CEMs to recipients who have opted out. Consumers, customers and recipients can [manage their communications preferences](#) through the Northwestel website.

## **Training**

We provide ongoing training to our sales representatives about these rules. We also conduct random audits of interactions between our representatives and consumers to ensure they're respecting these rules and consumers' wishes to be placed on our unsubscribe lists. Team members or our agents who fail to abide by these rules are subject to sanctions, up to and including dismissal.

Questions or comments regarding these rules should be directed as follows:

The Office of the Privacy Ombudsman  
160 Elgin Street  
Ottawa, Ontario K2P 2C4  
[privacy@bell.ca](mailto:privacy@bell.ca)