



EH!tel Privacy Policy

At EH!tel, we know you are the reason we are in business. Our commitment to safeguarding your right to privacy is taken seriously.

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 ensure that our employees are trained to respect privacy at all times.

The *EH!tel Privacy Policy* spells out the commitments of the EH!tel and the rights of customers regarding personal information. They also comply fully with the *Personal Information Protection and Electronic Documents Act*.

Policy Applies to FibreXpress Network Builders

FibreXpress is EH!tel's exclusive installation and repair contractor. EH!tel's privacy policy applies to FibreXpress Network Builders.

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

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 public directory listing of your name, address, telephone number, electronic address, is not considered to be personal information.

Should you identify incorrect or outdated information to us, we will make the necessary changes promptly.

Collecting Information Helps Us Serve You Better

EH!tel collects 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 & services to meet your needs;
- To develop, enhance, market or provide products and services;
- To manage and develop EH!tel's 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 consent.

Other Parties with Whom the EH!tel Companies May Share Personal Information

While our policy is not to provide personal information to any party outside of EH!tel companies, 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 EH!tel**, such as a company hired to perform Customer billing, installation and maintenance on our behalf;
- **Another communications service provider**, in order to offer efficient and effective communications services (e.g., to provide wireless service 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 service**, in emergency situations.

The EH!tel commitment to privacy

We take all 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 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 email address without your 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 EH!tel 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.

Questions or Concerns

If you have questions or concerns about your privacy, you can contact us through the EH!tel company or call us at the number shown on your bill. Our customer service representatives will assist you in resolving the situation.

EH!tel Privacy Office

If you still have unresolved concerns with respect to the treatment of your personal information by one of the EH!tel companies, you may address these concerns, in writing, to the EH!tel Privacy Office, who has overall responsibility for the companies' compliance with this policy and applicable privacy restrictions.

You should write to:
EH!tel Privacy Office
392058 Grey Road 109
Holstein, ON, N0G 2A0
tpeeters@ehtel.ca

Further Complaint Procedure

If the EH!tel Privacy Office 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 St.
Ottawa, ON
K1A 1H3
privcan@fox.nstn.ca

Summary of Fair Information Principles

- **Accountability:** EH!tel is responsible for personal and 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:** EH!tel shall identify the purposes for which personal information is collected at or before the time the information is collected.
- **Obtaining consent for collection, use or disclosure of personal information:** The knowledge and 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:** EH!tel shall limit the collection of personal information to that which it is necessary for the purposes identified. EH!tel shall collect personal information by fair and lawful means.
- **Limiting use, disclosure and retention of personal information:** EH!tel shall not use or disclose personal information for purposes other than those for which it is collected, except with the consent of the individual or as required by law. EH!tel shall retain personal information only as long as necessary for the fulfillment 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:** EH!tel shall protect personal information by security safeguards appropriate to the sensitivity of the information.
- **Openness concerning policies and practices:** EH!tel 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:** EH!tel 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 shall be able to challenge the accuracy and completeness of the information and 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 EH!tel's compliance with the Code.