

## Policy Applies to Bell Aliant

The Bell Aliant Privacy Policy applies to Bell Aliant Regional Communications, LP and its successors, assigns, divisions and subsidiaries.

In addition to the Bell Aliant Privacy Policy, Bell Aliant 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 or your organization does business with us, 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 Bell Aliant 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 Bell Aliant. The *Bell Aliant 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 Bell Aliant Customer Privacy Policy (the Policy) that you are reading is intended as a less formal summary of the approach of Bell Aliant to customer privacy, including the *Bell Aliant Code of Fair Information Practices*.

## Employees and Agents

*The Bell Aliant 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 have been trained on the handling of such information. New employees receive training on privacy as a fundamental part of their initial company training.

## 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

Bell Aliant 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 Bell Aliant's business and operations, including personnel and employment matters; and
- to meet legal and regulatory requirements.

Calls received from or placed to customers may be recorded or monitored for quality assurance. Any recordings would be used solely for ensuring quality service by Bell Aliant representatives.

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

## Other Parties with Whom Bell Aliant May Share Personal Information

While our general policy is not to provide personal information to any party outside of Bell Aliant, 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

- **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.
- **An agent acting on behalf of Bell Aliant**, such as a company hired to perform installation or maintenance on our behalf or to conduct marketing or research activities to better understand your needs and develop, enhance, market or provide our products and services.

Personal information is usually stored and processed in Canada. However in limited cases, personal information collected by Bell Aliant may be stored or processed with service providers outside of Canada, and may therefore be subject to the legal jurisdiction of these countries. These service providers are given the information they need to perform their designated functions, and we do not authorize them to use or disclose personal information for their own marketing or other purposes. The information is also protected with appropriate security safeguards.

## The Bell Aliant 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.

## Links to Third-Party Sites

Our site contains links to other third party sites that are not governed by this privacy policy. Although we endeavor to only link to sites with high privacy standards, our privacy policy will no longer apply once you leave Bell Aliant sites. We do not control these third party sites and are not responsible for their availability, content, or delivery of service. Operators of linked sites may collect your personal information, including information generated through the use of cookies. We encourage you to be aware when you leave our site and to read the privacy policies of those sites to learn how your information may be collected, used, shared, and disclosed.

## Use of 'Cookies'

During 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 ascertain 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 consent.

You will find that most major sites use cookies and most major browsers are set up to accept them. You have control over cookies. You can modify your browser preferences either to notify you when a cookie is received, or to refuse to accept cookies. If you would like to browse Bell Aliant sites, you may do so without accepting cookies. However, you should understand that if you choose not to accept cookies, some sites may not function properly or optimally and you will not be permitted to access certain secured sites. For example, if you would like to browse Aliant.net you will be required to accept the cookies that have been engineered to sustain session integrity and enhanced security before proceeding.

If you are concerned about having your browser enabled to accept cookies while you are surfing other websites, we recommend that you enable your browser to notify you when it is receiving a cookie. This gives you the ability of accepting or rejecting any cookie presented by the site you are visiting.

## Privacy Enhancing Services Offered By Bell Aliant

Bell Aliant offers a number of services to help balance the privacy interests of customers and the people they call. Information about the services offered by Bell Aliant is available in the introductory pages of the telephone directory, or by visiting [www.BellAliant.ca](http://www.BellAliant.ca). Digital wireless services such as Call Display will provide additional privacy for your wireless calls.

## Questions or Concerns

If you have questions or concerns about your privacy, you can contact us using one of several methods outlined on our [website](#) or by calling us at the number shown on your bill. Our customer service representatives will assist you in resolving the situation. Should you identify incorrect or outdated information to us, we will make the necessary changes promptly.

## Bell Aliant Privacy Manager

If you still have unresolved concerns with respect to the treatment of your personal information by Bell Aliant, you may address these concerns, in writing, to the Bell Aliant Privacy Manager, who has overall responsibility for the companies' compliance with this policy and applicable privacy restrictions. You should write or email to:

The Privacy Manager  
Bell Aliant  
3rd Floor , Fort William Building  
P.O. Box 2110  
St. John's, NL A1C 5H6  
[PrivacyManager@bellaliant.ca](mailto:PrivacyManager@bellaliant.ca)

# Further Complaint Procedure

If the Bell Aliant Privacy Manager does not resolve the issue to your satisfaction, you may file a complaint with the Privacy Commissioner of Canada by writing to:

The Privacy Commissioner of Canada  
112 Kent Street  
Ottawa, ON K1A 1H3  
[Info@privcom.gc.ca](mailto:Info@privcom.gc.ca)

# Bell Aliant Code of Fair Information Practices

## Summary of Principles

**Accountability:** Bell Aliant is responsible for personal customer information under our control and has designated the Bell Aliant Privacy Manager as accountable for compliance by Bell Aliant with the principles.

**Identifying purposes for collection of customer information:** Bell Aliant 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:** Bell Aliant will limit the collection of personal information - by fair and lawful means - to that which is necessary for the purposes identified by the Company.

**Limiting use, disclosure and retention of customer information:** Bell Aliant 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 Company 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:** Bell Aliant will protect personal information by security safeguards appropriate to the sensitivity of the information.

**Openness concerning policies and practices:** Bell Aliant 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, Bell Aliant 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 Bell Aliant Privacy Manager.