

PRIVACY POLICY

PURPOSE:

The Canadian Standards Association's "Model Code for the Protection of Personal Information" (the "CSA Model Code") has been adopted by Quadro as the basis for our Privacy Code. It sets out the principles that govern the collection, use and disclosure of our customers' personal information. The CSA Model Code also forms the basis for the federal government's privacy legislation, the "Personal Information Protection and Electronic Documents Act".

Providing telephone service requires that we collect personal information about our customers. Quadro takes measures to maintain the confidentiality of that information. Quadro's privacy policy governs the behaviour of our employees with regard to the collection, use and disclosure of our customers' personal information.

IMPACT:

Policy applies to all staff and directors.

POLICY:

Personal Information Definition:

It is information about an individual. This includes information about usage of products and services. Publicly available information, such as a directory listing of a customer's name, address and telephone number, is not considered personal information.

Why Quadro collects personal information:

- 1. To establish and maintain a commercial relationship with customers and to provide ongoing service.** For example, when customers apply for service, we collect information that allows us to confirm a customer's identity so that we can accurately bill and collect for the products and services provided. We may collect credit card or bank account information, if customers utilize pre-authorized payment for services.
- 2. To understand customer needs and preferences.** We maintain a record of the products and services utilized by a customer enabling us to recommend other suitable products and services.
- 3. To manage and develop our business and operations.** For example, we analyze customer usage of our facilities to help us manage them efficiently.
- 4. To meet legal and regulatory requirements.** We may collect information in response to a court order, or to satisfy a request by the Canadian Radio-television and Telecommunications Commission (the "CRTC") for information about a customer complaint and how it was resolved.

Process of Safeguarding Information:

1. Quadro will take all necessary precautions to ensure the safeguarding of customer information, whether stored electronically or in paper format.
2. Information should be stored in secured facilities. Facilities should be locked or password protected if stored electronically.
3. Information should be protected from unauthorized access. Electronic information should be stored behind firewalls. Only those authorized to see the information should have access.
4. Information should be kept as long as reasonably required. When disposing of hard copies of information, information should be shredded.
5. Quadro will only disclose information to or allow changes made by authorized account holders or an authorized agent of the account holder.
6. Quadro employees must take steps to be reasonably assured that the person they are speaking to is the account holder or an authorized agent of the account holder.

When does Quadro disclose personal information:

There is a variety of circumstances where we may need to disclose some personal information about our customers. Here are some examples:

1. We may disclose a customer's personal information to a person who, in the reasonable judgment of Quadro, is seeking the information as an agent of the customer. For example, we may provide information about a customer's account to the customer's legal representative if we are satisfied that that individual is requesting the information on behalf of the customer.
2. Subject to CRTC regulations, we may disclose a customer's personal information to an agent used by Quadro to collect any outstanding balance on customer's disconnected account. Any such disclosure of a customer's personal information outside of Quadro is made on a confidential basis with the information to be used only for the purpose for which it was disclosed.
3. Quadro may disclose a customer's personal information to a public authority or agent of a public authority, if in the reasonable judgment of Quadro, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information.
4. If a customer calls 911, we will provide the customer's name, address and telephone number to the emergency agency.

How does Quadro protect personal information:

In order to protect customers personal information and customers right to privacy, Quadro:

1. Will not collect, use or disclose personal information for any purpose other than those identified above,
2. Will protect personal information with appropriate security safeguards;
3. Will protect the confidentiality of personal information when dealing with other companies;
4. Will honour any request made by customers for access to their personal information.

Privacy and Telephone service

Quadro offers a number of services to help balance the privacy interests of customers and the people they call:

1. Call Display: Customers who subscribe to Call Display will see the name and number of most callers, including those who subscribe to non-published service.
2. Private Name: A customer's name may be replaced with "private name" when calling someone with Call Display service.
3. Private Number: To ensure the phone number is not seen by the party a customer is calling, a customer must enter *67 before dialing.
4. Permanent Blocking: This option is currently available only to shelters for victims of violence, public law enforcement agencies, social service agencies, crisis lines, and victims and potential victims of violence.

*****Call blocking does not block a telephone number on calls to 9-1-1 emergency services*****

Privacy and the Internet

When customers browse Quadro's website, they do so anonymously. Personal information – including e-mail addresses – is not collected. Parts of our website may, however, request that customers voluntarily supply us with personal information, including e-mail address and account number, for the purpose of correspondence.

Quadro believes that strong electronic privacy is crucial for the ongoing success of the Internet as a service or commercial medium. To this end, unless customers designate otherwise, the information entered will be known to only two parties: the customer and Quadro Communications Co-operative Inc. Quadro pledges that we will not release customer personal data to anyone without customer consent.