

Privacy Policy for Videotron Customers

At Videotron, we know that the security and confidentiality of your Personal Information are important to you. Keeping this objective in mind, we have drafted this Policy, which establishes responsible and transparent practices governing the collection, use, retention, disclosure and protection of your Personal Information.

This Policy is based principally on the Personal Information Protection and Electronic Documents Act (S.C. 2000, c. 5), but it is also aimed at meeting the regulations of the Canadian Radio-television and Telecommunications Commission (CRTC).

This Policy applies to your Personal Information that we collect, use or disclose in the course of our business relationship with you.

We invite you to read this Policy attentively, and we also suggest you refer to it regularly to keep updated.

Similarly, if as a customer you wish to visit or use our websites, we invite you to consult during your visits the **Policy on Processing of Personal Information collected from visitors and users of Videotron Web sites** (available online at <http://corpo.videotron.com/site/modalites-utilisation-en.jsp?locale=en>).

Table of Contents

Definitions 4

Principle 1 – Accountability 5

Principle 2 – Identifying Purposes 5

Principle 3 – Consent 6

Principle 4 – Limiting Collection 6

Principle 5 – Limiting Use, Disclosure and Retention 7

Principle 6 – Accuracy 8

Principle 7 – Safeguards 8

Principle 8 – Openness 8

Principle 9 – Individual Access 9

Principle 10 – Challenging Compliance 9

Definitions

For the purposes of this Policy and subject to any explicit derogation, the words and expressions set out hereinafter are defined as follows:

- **Customer** means a person who uses, has used or requests to use Videotron products or services.
- **Policy** means this Privacy Policy, as amended, modified, complemented or replaced from time to time, a copy of which: (i) is made available to the Customers on our website (at the following address: <http://corpo.videotron.com/site/secure-confidentialite-en.jsp?locale=en>; or (ii) is made available by addressing our Customer Service by email (at serviceclient@videotron.ca).
- **Credit Information** means any Information pertaining to the credit of a current or prospective Customer, such as their names, date of birth, current and previous workplaces, estimated income, payment habits, amount of current debt and cost of living obligations.
- **Applicable Legislation or Law** means all the rules applicable in Quebec and in any other province where Videotron services, goods or products are provided, including federal legislation, including the Applicable Legislation relating to protection of Personal Information, consumer protection, e-commerce and information technology, and any other rule or standard established by the Canadian Radio-television and Telecommunications Commission (CRTC).
- **Personal Information or Information** pertains to any information about an identifiable individual and, in particular, your name, your address, your telephone number, your email address, specific unique identifier (I.P. address, IMSI/IMEI, MAC address), your Credit Information, and information regarding your age, your sex, your family situation, your opinions, etc.
- **Authorized Representative** means any successor, assign, agent, tutor, advisor, curator, legal counsel or other representative.
- **Third Party** means any natural or legal person who is not the Customer or the customer's Authorized Representative and any organization that is not part of Videotron.
- **Carrier** means any other third-party owner of a network through which Videotron's services are provided to you, as applicable.

Principle 1 – Accountability

1. Videotron is responsible for Personal Information under its control. An officer has been designated who is accountable for Videotron’s compliance with the Privacy Policy:
Chief Privacy Officer
Videotron
612 Saint-Jacques St, 17th floor, Montreal, Quebec H3C 4M8.
Infovieprivee@videotron.com
- 1.1. Videotron is responsible for Personal Information in its possession or custody, including Information that has been transferred to a Third Party for processing. Videotron does not disclose its Customers’ Personal Information to Third Parties, unless they process this information on its behalf, according to its instructions and pursuant to service agreements. Videotron undertakes to use contractual or other means to provide the Information disclosed to the Third Party with a comparable level of protection.
- 1.2. Videotron has implemented policies and practices to give effect to its Privacy Policy, including:
 - a) Implementing procedures to protect Personal Information and ensure that Videotron complies with its Privacy Policy;
 - b) Establishing procedures to receive complaints and inquiries;
 - c) Training its employees and communicating information about Videotron’s procedures to them; and
 - d) Developing information to explain the policies and procedures.

Principle 2 – Identifying Purposes

2. Videotron identifies the purposes for which Personal Information is collected before collecting it.
 - 2.1. Videotron collects Personal Information for the following purposes, without limitation:
 - a) Creating, developing and maintaining business relationships with its Customers;
 - b) Knowing the interests, needs, expectations and preferences of its Customers in order to enhance its products and services and offer new products and services;
 - c) Detecting and preventing potential fraud or illegal, inadequate or inappropriate use of Videotron’s products and services by ensuring that it has efficient, reliable and secure systems in place;
 - d) Providing the products and services requested by the Customer, billing for these products and services and collecting payment of invoices;
 - e) Assessing the financial risk to Videotron of accepting the subscription request by the Customer and periodically controlling such financial risk throughout the contractual relationship;
 - f) Complying with laws and regulations.
 - 2.2. Videotron will ensure, by every means of communication, that the purposes of collecting Personal Information are specified to the Customer, prior to or concomitantly with such collection. Videotron will provide details on the purposes of the collection to the Customer who requests it, or will refer the Customer to a person able to answer their questions.

Principle 3 – Consent

3. The knowledge and consent of any Customer are required for the collection, use or disclosure of their Information, except where inappropriate or unnecessary.
 - 3.1. In some situations, the Applicable Legislation allows Videotron to collect, use or disclose its Customers' Personal Information without Videotron having obtained the Customer's prior consent, in particular:
 - a) In an emergency, when the life, health, or safety of a Customer or of other persons is threatened;
 - b) If the Personal Information is required by Law or under an order of a court or a body with jurisdiction to compel disclosure;
 - c) If requesting the Customer's consent could compromise the accuracy of the Personal Information that Videotron must obtain in order to prevent fraud, to comply with the Law or in connection with a breach of an agreement;
 - d) If the Personal Information is necessary to collect a debt;
 - e) If it is in the Customer's interest for Videotron to obtain this Personal Information and the Customer cannot give consent to Videotron in a timely manner.
 - 3.2. Videotron will not require a Customer, as a condition of the supply of a product or service, to consent to the collection, use or disclosure of Information beyond that required to fulfill the purposes stated in this Privacy Policy. However, in connection with your relationship with Videotron, it may happen that Videotron will request Personal Information from its Customers to know your interests, needs, expectations and preferences in order to enhance its products and services and offer new products and services. It is also possible that such Information will be disclosed or collected by the Authorized Representatives or by trusted partners of Videotron, namely companies that offer Videotron market research and analysis services, advertising services and other similar services. However, the Customer may refuse to provide this Personal Information and continue to receive the services.

The form of the consent sought by Videotron varies according to the sensitivity of the Personal Information and the Customer's reasonable expectations. Consent may be express, when the Customer expresses his/her oral or written permission to provide his/her Personal Information to Videotron. It may be implied, when the Customer performs (or does not perform) acts allowing Videotron to determine reasonably that the Customer has given their consent to the collection, use or disclosure of Personal Information.
 - 3.3. The Customer may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Videotron will inform the Customer of the implications of such withdrawal.

Principle 4 – Limiting Collection

4. The collection of Personal Information shall be limited to that which is necessary for the purposes identified by Videotron and this Information shall be collected by fair and lawful means.
 - 4.1. Videotron collects Information mainly from its Customers. However, Videotron may also collect this Information from credit rating agencies or Third Parties, including its trusted partners, with the Customer's consent or when permitted by Law.

Principle 5 – Limiting Use, Disclosure and Retention

5. Videotron will not use or disclose Personal Information for purposes other than those for which it was collected, except with the Customer's consent or if the Law so requires.
 - 5.1. Unless express consent is given by the Customer or disclosure is permitted by Law or otherwise required by a court, all the Personal Information Videotron holds about a Customer, except for the Personal Information already accessible to the public, is confidential, and Videotron may not disclose it to anyone other than:
 - The Customer;
 - A person who, in Videotron's reasonable opinion, is seeking this Information as your Authorized Representative;
 - Another telephone company or Carrier, provided that the Customer's Information is required for the efficient and cost-effective delivery of the telephone service, that the disclosure is made on a confidential basis and that the Customer's Information will be used only for that purpose;
 - A company that provides the Customer with services related to the telephony, internet or cable distribution services offered by Videotron or the telephone directories, provided that your Information is required for that purpose, that the disclosure is made on a confidential basis and that the Customer's Information will be used only for that purpose;
 - An agent of Videotron whose services have been retained to obtain payment of the account, provided that the Information is required and is to be used only for this purpose;
 - A person or body with jurisdiction to compel us to disclose your Information and that requires this Information in the performance of its duties;
 - A body responsible by Law for the prevention, detection or repression of crime or statutory offences requiring us to provide your Information, acting in such capacity, when your Information is necessary in order to prosecute an offence under an applicable Law;
 - A public authority or its agent, for the purposes of public emergency alerts, if the public authority has determined that there is an imminent danger that threatens the life, health or safety of any person and that such danger could be avoided or minimized by disclosing the Information.
 - 5.2. Videotron may also disclose some of your Personal Information to affiliates if they provide the Customers with telecommunications or broadcasting services, provided that this information is required and used only for providing their services and that the disclosure is made on a confidential basis.
 - 5.3. Videotron may use the services of third-party companies located outside of Canada. In these circumstances, Personal Information on its Customers may be stored or processed abroad and be subject to the laws of those countries. Therefore, even if Videotron requires (including through agreements) that these Third Parties safeguard the confidentiality and security of Personal Information according to the standards provided by Law, it is possible, in some cases, that the laws in force in these foreign countries allow the disclosure of Personal Information to judicial, quasi-judicial or governmental authorities.
 - 5.4. Videotron will retain Personal Information only for the period necessary or useful for the purposes determined or required according to the applicable laws. Videotron will retain the Personal Information used to make a decision a Customer long enough to allow the Customer access to the Information after the decision has been made.

- 5.5. Videotron establishes policies, guidelines or measures for the retention and destruction of the Customers' Personal Information that is no longer necessary or relevant for the purposes identified in this Privacy Policy or which is no longer required by Law. This Personal Information will be destroyed, deleted or anonymized.

Principle 6 – Accuracy

6. Personal Information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.
 - 6.1. The Personal Information used by Videotron shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate Information may be used to make a decision about a Customer.
 - 6.2. Videotron will ensure that Personal Information is updated when it is necessary to do so to fulfill the purposes for which it was collected, or at the Customer's request.

Principle 7 – Safeguards

7. Videotron protects its Customers' Information by security safeguards appropriate to its sensitivity.
 - 7.1. Videotron shall protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use and modification. For this purpose, Videotron will implement physical, electronic, technological, organizational, contractual and administrative measures in accordance with industry standards. These measures will be adapted to the media and the sensitivity of the Personal Information. Regardless of the efforts deployed, Videotron reminds you that any disclosure of Personal Information involves risks that it will be intercepted by Third Parties whose intentions are unknown.
 - 7.2. Videotron will sign agreements with the Third Parties to whom Information might be disclosed so that such Third Parties undertake to maintain the confidentiality and security of its Customers' Personal Information.
 - 7.3. Videotron will make its employees aware of the importance of maintaining the confidentiality of its Customers' Personal Information. The persons who access Personal Information shall do so on a need-to-know basis.

Principle 8 – Openness

8. Videotron makes readily available to individuals specific information about its policies and practices relating to the management of personal information.
 - 8.1. Videotron will ensure that any Customer can obtain information about its policies and practices concerning, without limitation:
 - a) The title and the address of the person who is accountable for the Privacy Policy and to whom complaints and inquiries can be forwarded;
 - b) The procedures for accessing the Personal Information Videotron holds about the Customer;
 - c) The description of the type of Personal Information held by Videotron, including a general account of its use.

Principle 9 – Individual Access

9. Upon request, Videotron will inform any Customer of the existence, use and disclosure of his or her Personal Information, and will give the Customer access to that Information. The Customer may challenge the accuracy and completeness of the Information and have it amended as appropriate.
 - 9.1. Upon request made to the person in charge of access to and protection of Personal Information in **Article 1** of this Policy, Videotron will inform any Customer of the source of the Personal Information, and will give the Customer access to that Information, while indicating the use Videotron is making or has made of the Personal Information and the Third Parties to which it has been or may have been disclosed. In the latter case, a list of the Third Parties may be sent.
 - 9.2. The Personal Information requested by the Customer will be made available in an understandable form, within a reasonable time, and, if applicable, at minimal cost to the Customer.
 - 9.3. Videotron may require the Customer to provide it with enough Information so that it is possible to inform the Customer about the existence, use and disclosure of the Personal Information. The Information thus provided shall be used only for this purpose.
 - 9.4. Videotron will make the necessary amendments, whether by correction, deletion or addition, to a Customer's Personal Information when the Customer successfully demonstrates the inaccuracy or incompleteness of his/her Personal Information to Videotron. These amendments will be brought to the attention of the Third Parties who have access to the relevant information.
 - 9.5. Moreover, any challenge that is not resolved to the Customer's satisfaction shall be recorded in the Customer's file and disclosed to the Third Parties who have access to the information in question.
 - 9.6. In some cases, it may be impossible for Videotron to provide the Customer with the Personal Information it holds about the Customer, and it will inform the Customer of the reasons why they are refused access to the Personal Information. These reasons may be, without limitation:
 - a) Accessing the Information would disclose confidential business information;
 - b) The Information is subject to solicitor-client privilege;
 - c) The Information relates to a litigious situation or has been obtained following a formal dispute resolution process;
 - d) The Information requested was obtained during an investigation of a contract dispute or of a violation of federal or provincial law;
 - e) Accessing the Information risks revealing Personal Information about another person or is likely to imperil another person's life or safety;
 - f) The Information is prohibitively costly to provide;
 - g) Any other reason provided by Law.

Principle 10 – Challenging Compliance

10. Any Customer shall be able to address a challenge concerning compliance with the principles set out in the Privacy Policy to the person accountable for Videotron's compliance.

- 10.1. Videotron has put procedures in place to receive and respond to complaints and inquiries about its policies and practices relating to the handling of Personal Information.
- 10.2. Videotron will inform the Customer who makes an inquiry or lodges a complaint with the person in charge of access to and protection of Personal Information (in **Article 1** of this Policy) of the existence of relevant complaint procedures.
- 10.3. Videotron will investigate each complaint and, if the complaint is found to be justified, Videotron will take appropriate measures, including, if necessary, amending its policies and practices.
- 10.4. Any Customer may file a complaint with the Privacy Commissioner of Canada or the Commission d'accès à l'information.