

## **SSi Privacy Policy**

### ***Introduction***

- SSi is committed to protecting your privacy and we take all reasonable steps to ensure that your personal information is safe and secure in compliance with applicable privacy laws and regulations.

### ***What does this Privacy Policy cover?***

- This Privacy Policy explains SSi's commitment to protecting the Personal Information of our Customers.
- "Personal information" means information about an identifiable individual. It includes information that you provide us in order to enable us to provide you with the Services, including credit information. It also includes information that we might develop in the course of providing you with Service, such as records of the Services and Devices you obtain from us; billing records; and any recorded complaints. Personal information does not include aggregated information that cannot be associated with a specific individual.
- Our commitment to protecting your personal information continues after you cease to be a Customer of SSi, as explained below.
- The scope and application of the Privacy Policy are as follows:
  - The Privacy Policy applies to personal information about SSi's Customers that is collected, used or disclosed by us;
  - The Privacy Policy applies to the management of personal information in any form whether oral, electronic or written;
  - The Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by us:
    - (i) information that is publicly available; or
    - (ii) the name, title or business address or telephone number of an employee of an organization.

### ***What is the legal basis of SSi's commitment to protecting Customer privacy?***

- Many of the principles, guidelines and other components of SSi's Privacy Policy have been drawn and inspired from Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA"), and the Canadian Standards Association Model Code for the Protection of Personal Information (the "CSA Code"), which was largely incorporated into PIPEDA.

- The ten principles within the Privacy Policy work together, and the accompanying commentary reflects how SSi implements the principles.
- The application of the Privacy Policy is subject to the requirements or provisions of any applicable legislation, regulations, tariffs or agreements, or the order or determination of any court or other lawful authority, including any applicable regulations, orders or determinations of the Canadian Radio-television and Telecommunications Commission.

### **Details and Principles of SSi's Privacy Policy**

#### **Principle 1 - Accountability**

- We are responsible for personal information under our control and will designate one or more persons to be accountable for compliance with the Privacy Policy.

#### ***How does SSi ensure Accountability?***

1.1. Responsibility for ensuring compliance with the provisions of the Privacy Policy rests with SSi senior management, and one or more persons will be designated to be accountable for compliance with the Privacy Policy. Other individuals within SSi may be delegated to act on behalf of the designated person(s) or to take responsibility for the day-to-day collection and processing of personal information.

1.2. SSi has designated a Chief Privacy Officer to oversee compliance with the Privacy Policy. The Chief Privacy Officer can be contacted at:

Chief Privacy Officer  
SSi Micro Ltd.  
356B Old Airport Road  
Yellowknife, NWT X1A-3T4  
Phone: 1-877-686-2888  
Fax: 1-867-669-7510  
Email: [privacy@ssimicro.com](mailto:privacy@ssimicro.com)

1.3. SSi is responsible for personal information in our possession or control, including information that has been transferred to a third party for processing. We shall use appropriate means to provide a comparable level of protection for information being processed by a third party (see Principle 7).

1.4. SSi has implemented policies and procedures to give effect to the Privacy Policy, including:

- a) Implementing procedures to protect personal information and to oversee our compliance with the Privacy Policy;
- b) Establishing procedures to receive and respond to inquiries or complaints;
- c) Training and communicating to staff about the SSi policies and practices; and
- d) Developing public information to explain our policies and practices.

## Principle 2 - Identifying Purposes for Collection of Personal Information

- SSi will identify the purposes for which personal information is collected at or before the time the information is collected.

### ***Why does SSi collect personal information?***

2.1. We collect personal information for the following purposes:

- To establish and maintain responsible commercial relations with Customers and to provide ongoing service;
- To provide a positive Customer experience, and provide tailored service to you;
- To understand your needs and make customized information available regarding Services, Devices and products offered by SSi;
- To deliver and collect payment for Services, Devices and other products, and to manage and develop SSi's business and operations;
- To perform analytics, administer surveys, or request feedback to improve and manage our relationship with you;
- To ensure our network is functioning properly and protect network integrity of our network;
- To confirm or authenticate your identity and ensure your information is correct and up-to-date;
- To obtain credit information or provide it to others on a lawful basis; and
- To meet legal and regulatory requirements.

The purposes listed in this section are referred to below as the "identified purposes".

2.2. SSi will specify orally, electronically or in writing the identified purposes to the Customer at or before the time personal information is collected. Upon request, persons collecting personal information will explain these identified purposes or refer the individual to a designated person within SSi to explain the purposes.

2.3. Unless required by law, SSi will not use or disclose for any new purpose personal information that has been collected without first identifying and documenting the new purpose and obtaining the consent of the Customer.

2.4. As members of the public browse SSi Websites, advertising cookies may be placed on the users' computers so that SSi can understand consumer interests. "Cookies" are small information packets that a website creates which are stored on the hard drive of a user's computer by the user's browser software. SSi may use cookies to track and collect information relating to use of the SSi Websites by the public.

### **Principle 3 - Obtaining Consent for Collection, Use or Disclosure**

- The knowledge and consent of a Customer is required for the collection, use or disclosure of personal information, except where inappropriate. In this context, “inappropriate” includes circumstances where it is impractical or impossible to obtain consent.

#### ***How does SSi obtain a Customer’s consent for collection, use or disclosure?***

3.1. In obtaining consent, SSi will use reasonable efforts to ensure an individual is advised of the identified purposes for which personal information will be used or disclosed. We will state those purposes in a manner that can be reasonably understood.

3.2. Generally, we will seek consent to use and disclose personal information at the same time we collect the information. However, SSi will also seek consent to use and disclose personal information after it has been collected but before it is used or disclosed for a new purpose.

3.3. SSi will require Customers to consent to the collection, use or disclosure of personal information as a condition of the supply of a product or service only if such collection, use or disclosure is required to fulfill the identified purposes.

3.4. In determining the appropriate form of consent, SSi will take into account the sensitivity of the personal information and the reasonable expectations of our Customers.

3.5. In general, the use of Services, Devices and other products by a Customer constitutes implied consent for SSi to collect, use and disclose personal information for all identified purposes.

3.6. A Customer may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Customers may contact SSi for more information regarding the implications of withdrawing consent. For example, our ability to offer Services and Devices might be affected by withdrawing consent.

3.7. In certain circumstances, personal information can be collected, used or disclosed without the knowledge and consent of the individual. For example, SSi may collect or use personal information without knowledge or consent if it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is a minor, seriously ill or mentally incapacitated.

SSi may also collect, use or disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting the information such as in the investigation of a breach of an agreement or a contravention of a federal or provincial law.

SSi may also use or disclose personal information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.

SSi may disclose personal information without knowledge or consent to a lawyer representing SSi, to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required by law.

#### **Principle 4 - Limiting Collection of Personal Information**

- SSi will limit the collection of personal information to that which is necessary for the purposes identified. SSi will collect personal information by fair and lawful means.

##### ***How does SSi ensure that it limits the collection of personal information?***

4.1. We collect personal information directly from our Customers. We may also collect personal information from other sources including credit bureaus or other third parties that represent that they have the right to disclose the information.

#### **Principle 5 - Limiting Use, Disclosure and Retention**

- SSi will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. SSi will retain personal information only as long as necessary for the fulfillment of those purposes.

##### ***How does SSi limit use, disclosure and retention of personal information?***

5.1 In certain circumstances personal information can be collected, used or disclosed without the knowledge and consent of the individual (see Principle 3.7).

5.2. In addition, SSi may disclose a Customer's personal information to:

- Another telecommunications services provider for the efficient and effective provision of telecommunications services;
- An entity involved in supplying the Customer with communications or communications directory related services;
- Another entity for the development, enhancement, marketing or provision of any SSi Services, Devices or other products;
- An agent retained by SSi in connection with the collection of the Customer's account;
- Credit grantors and reporting agencies;
- A person who, in the reasonable judgment of SSi, is seeking the information as an agent of the Customer; and
- A third party or parties, where the Customer consents to such disclosure or disclosure is required by law.

5.4. Only those SSi employees who require access for business reasons, or whose duties reasonably so require, are granted access to personal information about Customers.

Unless you have expressly provided them with the information, SSi's CSPs and front-line customer service agents cannot see or review the telephone numbers you have called or texted, or that have called or texted you. If you have any questions concerning your call records, you will be directed to an SSi representative with appropriate authority.

5.5. SSi will keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a Customer, SSi will retain, for a period of time that is reasonably sufficient to allow for access by the Customer, either the actual information or the rationale for making the decision.

5.6. SSi will maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous.

#### **Principle 6 - Accuracy**

- Personal information will be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

##### ***How does SSi ensure accuracy?***

6.1. Personal information used by SSi will 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. SSi will update personal information about Customers as and when necessary to fulfill the identified purposes or upon notification by the individual.

#### **Principle 7 - Security Safeguards**

- SSi will protect personal information by security safeguards appropriate to the sensitivity of the information.

##### ***What security safeguards has SSi put in place?***

7.1. SSi will protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures. SSi will protect the information regardless of the format in which it is held.

7.2. SSi will protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

7.3. All SSi employees with access to personal information will be required as a condition of employment to respect the confidentiality of personal information.

## **Principle 8 - Openness**

- SSi will make readily available to Customers specific information about our policies and practices relating to the management of personal information.

### ***How will SSi implement the principle of openness?***

8.1. SSi will make information about our policies and practices easy to understand, including:

- The title and address of the person or persons accountable for SSi's compliance with the Privacy Policy and to whom inquiries or complaints can be forwarded;
- The means of gaining access to personal information held by SSi; and
- A description of the type of personal information held by SSi, including a general account of its use.

8.2. SSi will make available information to help Customers exercise choices regarding the use of their personal information and the privacy-enhancing services available from us.

## **Principle 9 – Individual Access to Personal Information**

- SSi will inform a Customer of the existence, use and disclosure of his or her personal information upon request and will give the individual access to that information. A Customer will be able to challenge the accuracy and completeness of the information and to have it amended as appropriate.

### ***How will SSi ensure Customers access to their personal information?***

9.1. Upon request, SSi will afford to a Customer a reasonable opportunity to review the personal information in the individual's file. Personal information will be provided in understandable form within a reasonable time and at minimal or no cost to the individual.

9.2. In certain situations, SSi may not be able to provide access to all of the personal information that we hold about a Customer. For example, SSi may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual.

Also, SSi may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law.

If access to personal information cannot be provided, SSi will provide the reasons for denying access upon request.

9.3. Upon request, SSi will provide an account of the use and disclosure of personal information and, where reasonably possible, shall state the source of the information. In providing an account of disclosure, SSi will provide a list of organizations to which it may have disclosed personal information about the individual when it is not possible to provide an actual list.

9.4. In order to safeguard personal information, a Customer may be required to provide sufficient personal information (for instance, identification) to permit SSi to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.

9.5. SSi will promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness will be noted in the individual's file. Where appropriate, the SSi will transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

9.6. A Customer can obtain information or seek access to his or her individual file by contacting a designated representative toll-free at (877) 686-2888 or by sending an email containing such a request to [customercare@ssimicro.com](mailto:customercare@ssimicro.com).

## **Principle 10 - Challenging Compliance**

- A Customer will be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for SSi's compliance with the Privacy Policy.

### ***How can SSi's Customers challenge our compliance with this Privacy Policy?***

10.1. SSi will maintain procedures for addressing and responding to all inquiries or complaints from our Customers about SSi's handling of personal information.

10.2. We will inform our Customers about the existence of these procedures as well as the availability of complaint procedures.

10.3. The person or persons accountable for compliance with the Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.



10.4. SSi will investigate all complaints concerning compliance with the Privacy Policy. If a complaint is found to be justified, SSi will take appropriate measures to resolve the complaint including, if necessary, amending our policies and procedures. A Customer will be informed of the outcome of the investigation regarding his or her complaint.

For inquiries, complaints or more information contact:

Chief Privacy Officer  
SSi Micro Ltd.  
356B Old Airport Road  
Yellowknife, NWT X1A-3T4  
Phone: 1-877-686-2888  
Fax: 1-867-669-7510  
Email: [privacy@ssimicro.com](mailto:privacy@ssimicro.com)

The Office of the Privacy Commissioner of Canada oversees SSi's personal information handling practices. If your privacy concerns are not addressed to your satisfaction by us you may contact the Office of the Privacy Commissioner of Canada for further guidance:

Website: [www.priv.gc.ca/en](http://www.priv.gc.ca/en)  
Phone: 1-800-282-1376

Account Number:
Signature:

**\*\*\* End of SSi's Terms of Service \*\*\***