

## Shaw Privacy Policy

If you have any questions regarding Shaw's Privacy Policy please contact: [privacy@shaw.ca](mailto:privacy@shaw.ca) or use the contact information shown on any of Shaw's websites.

### **1- Our commitment to you**

Shaw's core business is providing broadband cable television, Internet services, digital phone services, direct-to-home satellite television and such other products and services that Shaw may provide from time to time. Shaw has always been and will continue to be committed to protecting Personal Information. Shaw has established its Privacy Policy using the ten principles set out in the National Standard of Canada entitled Model Code for the Protection of Personal Information. These ten principles are the following:

- 1 - Being accountable
- 2 - Identifying the purposes for Personal Information collection
- 3 - Obtaining consent
- 4 - Limiting the collection of Personal Information
- 5 - Limiting the use, disclosure and retention of Personal Information
- 6 - Keeping Personal Information accurate
- 7 - Safeguarding Personal Information
- 8 - Being open about policies and practises
- 9 - Providing access to Personal Information
- 10- Listening to our customers' feedback and suggestions

Shaw relies on these ten principles to protect the Personal Information collected from its Customers, Employees and Web Site Users. Shaw has established its Privacy Policy in accordance with *The Personal Information Protection and Electronic Documents Act*.

### **2- Definitions**

**"Shaw"**, **"we"** or **"our"**: Shaw Cablesystems G.P. and Shaw Satellite G.P., including their respective partners, associates, affiliates and subsidiaries, as they may exist from time to time.

**"Customer"**, **"you"** or **"your"**: Means an individual who: (a) has an account with Shaw; (b) subscribes for, uses, has used, or applies to use Shaw's products and/or services; (c) corresponds with Shaw; (d) is a Web Site User; and/or (d) enters a contest sponsored or administered by Shaw.

**Employee**: Any individual who works for, or provides labour to Shaw or one of its subsidiary companies in exchange for wages or salary.

Personal Information: Information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization.

Web Site User: User of a website owned, controlled or managed by Shaw from which Shaw collects Personal Information.

### **3- Frequently Asked Questions**

- 3.1 What type of Personal Information does Shaw collect?**
- 3.2 Why does Shaw collect Personal Information?**
- 3.3 How does Shaw obtain your consent?**
- 3.4 When and how does Shaw disclose Personal Information?**
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- 3.6 How does Shaw safeguard your Personal Information?**
- 3.7 How do I access Shaw's Policies and Procedures?**
- 3.8 How do I obtain access to my Personal Information?**
- 3.9 How can I challenge compliance and offer suggestions?**

#### **3.1 What type of Personal Information does Shaw collect?**

3.1.1 If you wish to obtain any of Shaw's products and/or services, Shaw will collect information about you when you apply for any of these services. The type of information we collect varies based on the service you have requested. The Personal Information most often collected and maintained in a Customer file may include (but is not limited to) name, address for service, mailing address, phone number(s), a piece of acceptable identification, alternate contact information, banking information for payment, non-Shaw email address (for instance if you are an eBill user or if you are a Shaw Direct customer subscribing to one of our newsletters), credit card information for payment, and credit rating/score. In order to conduct credit checks, we will collect one or more of the following: driver's license number, Social Insurance number, credit card number and/or date of birth. If we need to know about your credit history we may also receive information from third parties.

3.1.2 The Personal Information most often collected and maintained in an Employee file may include (but is not limited to) name, address, phone number(s), emergency contact information, date of birth, Social Insurance number, banking information, past employment information, earnings information, performance reviews/letters, dependant and beneficiary information.

3.1.3 The Personal Information most often collected in relation with Web Site Users may include (but is not limited to) name, phone number, email address.

### 3.2 Why does Shaw collect Personal Information?

3.2.1 Shaw collects Customer's Personal Information for the following purposes, to:

- 1) establish and maintain a responsible commercial relationship with you;
- 2) understand your needs as a Customer and your eligibility for products and services;
- 3) recommend particular products, services and opportunities to its Customers;
- 4) provide information to you about developments and new products;
- 5) develop, enhance and market products and service and/or provide products and services to its Customers;
- 6) process billing and collection of the fees for the Shaw products and services you have purchased and/or subscribed to;
- 7) perform or order credit checks;
- 8) deliver its products and/or services to its Customers; and 9) meet Shaw's legal and regulatory requirements.

3.2.2 Shaw collects Employee's Personal Information for the following purposes, to:

- 1) administer payroll and benefits;
- 2) administer personnel and employment programs;
- 3) document an Employee's file in the normal course of the employment relationship (i.e. performance reviews, etc.); and
- 4) provide references regarding current or former employees in response to requests from prospective employers.

3.2.3 Shaw collects Web Site User's Personal Information for purposes generally identified on the Shaw website at the time of collection. These purposes may include to:

- 1) send you information, updates you've requested, or answer your questions;
- 2) register your participation to a contest; 3) register you in an encrypted secure zone; and 4) assess your job application.

3.2.4 When Shaw chooses to use Personal Information for a purpose not previously identified, Shaw will identify the new use. Unless such new use is required by law, the consent of the Customer, Employee or Web Site User is required before the Personal Information can be used for that new purpose.

**Use of Cookies:** During a Customer's interaction with one of Shaw's websites, Shaw may use a browser feature called a "cookie" to collect information anonymously and track user patterns on Shaw's websites. A cookie is a small text file containing a unique identification number that identifies a Customer's browser – but not the Customer personally – to Shaw's computers each time a Customer visits one of the Shaw websites using cookies. Cookies tell Shaw which pages of its websites are visited and how many people visited each web page. This helps Shaw to enhance the on-line experience of visitors to the Shaw websites. Cookies also serve to identify your computer so that your preferences can be saved for future visits, and Shaw works with third parties that use these cookies to help us with such traffic management, research and analytics. .

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on Shaw's websites.

**Third Party Cookies and Advertisements:** Some of the advertisements you see on the Shaw websites are delivered by third party advertisers, Internet advertising companies that work on Shaw's behalf or ad networks. These third parties may use cookies or other technology to help deliver ads that are tailored to your interests and track their performance. This is commonly known as "behavioural" or "interest-based advertising".

You can opt-out of several third party ad servers' and networks' cookies simultaneously using a tool created by the Network Advertising Initiative located at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp). Opting out of a network does not mean you will no longer receive online advertising. It does mean that the network from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

### **3.3 How does Shaw obtain your consent?**

Consent is required for the collection of Personal Information and the subsequent use or disclosure of the Personal Information. Consent can be either express or implied. The form of consent sought by Shaw may vary, depending upon the circumstances and the type of Personal Information. In determining the form of consent to use, Shaw takes into account the sensitivity of the information and the reasonable expectations of the Customer, Employee or Web Site User. Shaw generally seeks express consent when the Personal Information is likely to be considered sensitive. Implied consent is typically appropriate when the Personal Information is less sensitive.

In exceptional circumstances, as permitted by law, Shaw may collect, use or disclose Personal Information without a Customer, Employee or Web Site User's knowledge or consent.

Consent may be obtained in any one of the following ways:

- (a) an application form may be used to seek consent, collect Personal Information and inform the Customer of the use that will be made of the Personal Information. By completing and signing the form, the Customer is giving consent to the collection and the specified uses;
- (b) a check-off box may be used to allow the Customer to request that their names and addresses are not given to other organizations. Customers who do not check the box are assumed to consent to the transfer of their information to third parties;
- (c) orally when information is collected over the telephone; or (d) at the time the Customers uses a product or service.

In general, the use of products and services by a Customer or a Web Site User's use of a Shaw website, after we have notified you of a change, or the acceptance of employment

or benefits by an Employee, will constitute implied consent required by Shaw to collect, use and/or disclose Personal Information for the purposes identified in this Privacy Policy.

Consent may be withdrawn by Customers and Web Site Users at any time, subject to legal or contractual restrictions and upon providing Shaw reasonable notice. If you wish to withdraw your consent to certain collection, use or disclosure of Personal Information, please contact Shaw at [privacy@shaw.ca](mailto:privacy@shaw.ca). Please note that if you refuse or withdraw your consent, we may not be able to provide you with a particular product or service. We'll explain the impact on you at the time, to help you with your decision.

### **3.4 When and how does Shaw disclose Personal Information?**

Internally, only Shaw Employees with a business need to know, or whose duties reasonably so require, are granted access to Personal Information of Shaw's Customers and Employees.

3.4.1 Shaw may disclose Customer's Personal Information to:

- a) third parties who are acting on Shaw's behalf as our agents, suppliers or service providers who are subject to confidentiality requirements;
- b) a company who will be involved in supplying the Customer with communications or communications directory-related products and/or services;
- c) a company or individual who is acting on Shaw's behalf for the development, enhancement, promotion, marketing, sale or provision of any of Shaw's current products and/or services or for any new products and/or services of Shaw, including authorized resellers and sales agents, etc. subject to confidentiality requirements;
- d) in conjunction with special offers or programs to program partners, or third party agents responsible for administering such offers or programs. Any such disclosure is made on a confidential basis;
- e) an agent used by Shaw to evaluate the Customer's credit worthiness or to collect the Customer's account;
- f) a credit reporting agency; and
- g) a third party or parties, where the Customer has given Shaw consent to such disclosure or if disclosure is required by law, in accordance with *The Personal Information Protection and Electronic Documents Act*.

3.4.2 Shaw may disclose Personal Information about its Employees to:

- a) a third party or parties for payroll and benefits administration;
- b) a third party or parties to administer personnel and employment programs

- c) a person or a company in the context of providing references regarding current or former employees in response to requests from prospective employers; and
- d) a third party or parties, where the Employee has given Shaw consent to such disclosure or if disclosure is required by law, particularly in accordance with *The Personal Information Protection and Electronic Documents Act*.

3.4.3 Shaw may disclose Personal Information about Web Site Users to:

- a) a third party or parties, where the Web Site User has given Shaw consent to such disclosure or if disclosure is required by law, in accordance with *The Personal Information Protection and Electronic Documents Act*.

For more details and to view Shaw's Transparency Report, please click on the following link: [Transparency: Our Commitment and Approach](#).

### **3.5 Who does Shaw share Personal Information with?**

Shaw does not sell Personal Information about its Customers, Employees and/or Web Site Users. Shaw may share Customers' Personal Information with its partners, associates and third party service providers as provided in Subsection 3.4, in order to fulfill the purposes identified in Subsection 3.2. In such cases, the relationship with the partner, associate or third party is governed by strict confidentiality standards and policies to ensure the Customer's information is secure and treated in accordance with *The Personal Information Protection and Electronic Documents Act* and with the utmost care and respect.

Except as required or permitted by law, when disclosure is made to a third party other than a Shaw associate or affiliate, or a third party service provider, the consent of the individual shall be obtained and reasonable steps shall be taken to ensure that any such third party has personal information privacy procedures and policies in place that are at least comparable to those implemented by Shaw. Such third party service providers are provided only with such information as is necessary in the circumstances. Personal Information provided to third parties may be used only for the purpose stipulated and is subject to strict terms of confidentiality.

In the event that a third party service provider is located in a foreign country, Customer and Employee personal information may be processed and stored in such other foreign country. In such circumstances, the governments, courts or law enforcement or regulatory agencies of that country may be able to obtain access to your Personal Information through the laws of the foreign country. Whenever Shaw engages a third party service provider, we require that its privacy and security standards adhere to this Privacy Policy and applicable Canadian privacy legislation.

### **3.6 How does Shaw safeguard your Personal Information?**

The nature of the safeguards will vary depending on the sensitivity of the Personal Information that has been collected, the scope of the information, and the method of storage

of that information. More sensitive types of Personal Information will be safeguarded by a higher level of protection.

### **3.7 How do I access Shaw's policies and procedures?**

Shaw will make readily available to Customers, Employees and Web Site Users specific information about its policies and procedures relating to the management of Personal Information.

Shaw will be open about its policies and procedures with respect to the management of Personal Information. Customers, Employees and Web Site Users will be able to enquire about Shaw's privacy policies and procedures at minimal cost and without unreasonable efforts on their part. This information is available to Customers and Web Site users by writing to Shaw, to the attention of the Privacy Officer at 630-3<sup>rd</sup> Ave S.W., Calgary, AB, T2P 4L4, and to Employees by writing to the attention of the HR Department at 630-3<sup>rd</sup> Ave S.W., Calgary, AB, T2P 4L4.

### **3.8 How do I access my Personal Information?**

You may access and verify your Personal Information held by Shaw by submitting a request in writing to Shaw's Privacy Officer at 630, 3<sup>rd</sup> Ave S.W., Calgary, AB, T2P 4L4. A response will be mailed to the address on your account or file.

Shaw will respond to a Customer, Employee or Web Site User's request within a reasonable period of time and at minimal or no cost.

In certain circumstances, Shaw may not be able to provide access to all the Personal Information it holds, for example, when the disclosure would reveal confidential business information, if the Personal Information is protected by solicitor-client privilege, if the Personal Information was collected during an inquiry into a breach of contract or violation of a federal or provincial law.

### **3.9 How can I challenge compliance and offer suggestions?**

A Customer or employee of Shaw may direct any questions or inquires with respect to the privacy principles outlined above or about Shaw's practices described in its' Privacy Policy to [privacy@shaw.ca](mailto:privacy@shaw.ca) or to Shaw's Privacy Officer at 630-3<sup>rd</sup> Ave S.W., Calgary, AB, T2P 4L4.

Shaw will investigate all complaints and respond to all questions asked by its Customers and/or Employees. If a complaint is found to be justified, Shaw will take appropriate measures to resolve the complaint, which may include amending its policies and procedures if necessary.

If Customers are not satisfied with Shaw's response to a complaint or inquires about compliant procedures they may contact the office of the Privacy Commissioner of Canada, at:

Toll-free: 1-800-282-1376

Phone: (613) 995-8210

Fax: (613) 947-6850

#### **4. Your role in protecting your Personal Information:**

Please remember that Shaw's Privacy Policy and our use of your Personal Information only applies to the information you provide and we caution that if you disclose Personal Information or personally sensitive data through use of the Internet such as through chat rooms, communities, bulletin boards or other public online forums, this information is not collected by or for Shaw but may be collected and used by other persons or companies over which Shaw has no control. It is your responsibility to review the privacy statements of any person or company to whom you choose to link, from or through the use of any Shaw Internet services. Shaw is not responsible for privacy statements or compliance or other content of any website not owned or managed by Shaw or Shaw's group of companies.

Shaw does its' best to protect and safeguard Personal Information and we believe there are measures you should take as well. Do not share your Personal Information such as bank card numbers, credit card numbers, associated pin numbers or Social Insurance numbers with others unless you clearly understand the purpose of their request and you know with whom you are dealing. Do not keep sensitive Personal Information in your email inbox or on Webmail. Provide Shaw with one acceptable piece of identification that will be kept in your Customer file, so we can identify you when you call us. If you are asked to assign passwords to connect you to your Personal Information, you should use a combination of letters and numbers and do not use words that can be easily associated with you (example: do not use the name of a family member or pet), we also suggest you change your password regularly. If ever you are suspicious of any telephone, mail or email promotional campaigns or you suspect fraudulent activity, please contact us at [privacy@shaw.ca](mailto:privacy@shaw.ca) to verify that the campaign is a legitimate Shaw activity.

#### **5. Updating this Privacy Policy**

Any changes to Shaw's Privacy Policy shall be acknowledged in this Policy in a timely manner. Shaw may modify or remove portions of this Privacy Policy when it feels it is necessary and appropriate. You may determine when this Privacy Policy was last updated by referring to the date found at the top right-hand corner of the first page of this Privacy Policy "*Privacy Policy last revised on: \_\_\_\_\_*".