

INTRODUCTION – RESPECTING AND PROTECTING OUR CUSTOMERS’ PRIVACY

Your privacy is important to us. Hay Communications respects and protects the privacy of our customers. We carefully ensure the confidentiality of each customer’s account information. We recognize that, as the provider of telecommunications services, we must also ensure the privacy of each customer’s telephone calling information.

The Privacy Policy specifically requires compliance with legal requirements and company policies relating to the privacy of communications and the security and privacy of customer records.

THE SCOPE OF THE PRIVACY POLICY

The Privacy Policy addresses the privacy of Hay Communications retail customers and visitors to Hay Communications web sites in Canada. It identifies the type of data and information Hay Communications collects, how we use it and the steps taken to protect your privacy.

WHY WE COLLECT 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 the public directory listing of your name, address and telephone number, is not considered to be personal information.

If you are a Hay Communications customer, Hay Communications has some basic information about you. We understand that some of this information is private, which is why we collect personal information only for the following reasons.

1. **To establish and maintain a responsible commercial relationship with you and to provide ongoing service.** For example, when you apply for service, we collect information that allows us to confirm your identity and credit history so that we can accurately bill and collect for the products and services that you receive from us. We may collect credit card or bank account information, if you prefer the convenience of pre-authorized payment for services.
2. **To understand your needs and preferences.** We maintain a record of the products and services you receive from us, and we may ask for additional information so that we can serve you better.
3. **To develop, enhance, market or provide products and services.** For example, we look at how our customers use our products and services, so that we can understand how to improve them. From time to time, we may review and analyze your use of our products and services to help us provide better product recommendations and special offers that we think will interest you.
4. **To manage and develop our business and operations.** For example, we analyze customer usage of our networks and facilities to help us manage them efficiently and plan for future growth.
5. **To meet legal and regulatory requirements.** For example, 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.

WHEN DO WE DISCLOSE PERSONAL INFORMATION

There are 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 judgement of Hay Communications, 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 applicable CRTC regulations, customer information may be shared among Hay Communications business units to help us serve our customers better and to provide them with services which combine services from different parts of our organization.
3. We may disclose a customer's personal information to:
 - a. another telecommunications company for the efficient and cost-effective provision of telecommunications services;
 - b. a company involved in supplying the customer with communications or communications directory related services;
 - c. a company or individual employed by Hay Communications to perform functions on its behalf, such as research or data processing;
 - d. an agent used by Hay Communications to evaluate the customer's credit worthiness or to collect the customer's account.

Any such disclosure of a customer's personal information outside of Hay Communications is made on a confidential basis with the information to be used only for the purpose for which it was disclosed.

4. Subject to applicable CRTC regulations, we may disclose a customer's personal information to a credit-reporting agency.
5. We may disclose a customer's personal information to a public authority or agent of a public authority, if in the reasonable judgement of Hay Communications, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information. If a customer calls 911, we will provide the customer's name, address and telephone number to the emergency agency.
6. In conjunction with special offers or programs, we may disclose customers' personal information to our program partners, or to third-party agents responsible for administering such offers or programs. Any such disclosure is made on a confidential basis with the customer's express consent.

ACCURACY OF THE INFORMATION WE HOLD

We want the information we obtain and use about customers to be accurate. If your service information or your personal contact information changes or you see an inaccuracy on your Hay Communications bill, let us know so we can correct it.

SECURITY AND ACCOUNTABILITY

We have information systems that collect and store customer information in addition to systems that store our own business records. These systems have different types of security as appropriate for the information stored. Hay Communications requires employees to keep customer information confidential.

Providing Services To Enhance Your Privacy

Non-published numbers, Caller ID and Caller ID blocking services are among the privacy services Hay Communications offers to enhance your privacy.

WHAT INFORMATION WE COLLECT ONLINE AND HOW WE USE IT

Hay Communications appreciates that some individuals believe that special privacy concerns arise around information transmitted or collected over the Internet or through web sites. Below we describe our practices to address those concerns.

HOW ONLINE INFORMATION HAY COMMUNICATIONS COLLECTS IS USED:

Cookies: Some of Hay Communications Web sites may use "cookies" to improve our level of service and speed up the delivery of information to our visitors. Cookies are lines of text that are transmitted to your Web browser when you click on a site. They provide a way for a server to recall a previous request or previous registration, or to keep track of a transaction as it progresses, so that information does not have to be repeated. Your browser stores the information on your hard drive and when you return to that site later, the cookie is transmitted back only to the servers that originally sent it to you. To be notified when you are about to receive a cookie you can configure your browser to alert you when a site is attempting to send you a cookie and at that time you will have the option of refusing the cookie. You can check your hard drive for cookie files in a "cookies" folder for Internet Explorer, a "cookies.txt" file for Netscape, and under "magic cookies" on a Macintosh.

Generic Information -- To gauge the effectiveness of our Web sites, we do collect some non-individually-identifiable generic information about our visitors. Our Web servers automatically recognize a visitor's Internet service provider, the IP address, the domain name, the type of browser, and the operating system. And, also which pages are viewed on our sites, the Web page you were on when you link to our sites, how much time a visitor spends on each page and other information related to the operation and interaction of Hay Communications Web sites. This information does not reveal a visitor's identity. We aggregate this information and use it to evaluate and improve our Web sites.

Identifiable Information -- You can choose to provide individually-identifiable information to Hay Communications in a number of ways through our Web sites - by ordering a service from us, sending us email, registering to receive news or information, applying for a job, or entering a contest. When visitors supply information about themselves for a specific purpose, Hay Communications uses the information for that purpose (such as to provide the information the visitor has requested or to consider a visitor for a particular job). In addition, when visitors use our Web sites to order services, or to request information about our services, we may use the individually-identifiable information as we would use the same information obtained off-line - for example, to evaluate your service needs and contact you regarding additional services you may find useful.

A user may choose to provide us individually-identifiable information to customize a personal home page. We use this information to better understand and serve our customers, but we do not share that information outside of Hay Communications. This information may be compiled on an aggregated basis and shared with our advertisers or business partners but the user will be anonymous.

For our Internet customers - as part of our ongoing efforts to improve our service, we or someone acting on our behalf may monitor Internet activity. This means that a user's session may be tracked, but the user will be anonymous. This process does not capture or transmit any personally identifiable information and the anonymous or aggregated information may be provided to third parties for other purposes.

We treat information we collect on line similarly to that we collect off-line. We do not sell or disclose individually-identifiable information obtained on-line to non-Hay Communications entities except as described above (when Hay Communications is in a business relationship with an unaffiliated party and then under confidentiality restrictions) unless you specifically authorize it, it is required by law (including the service of subpoenas or court orders in either civil or criminal lawsuits), or disclosure is necessary to protect the safety of customers, employees or property.

The Hay Communications Web sites may contain links to other sites. We are not responsible for the content or privacy practices employed by other sites. Other Web sites may have different privacy policies or no policy. Users should review the privacy policies of any Web site before providing personal information.