

# At TELUS we respect our customers' privacy and value their trust

We believe that an important part of respecting our customers' privacy is to be clear about how we handle personal information. To help you better understand our privacy practices and our commitment to safeguarding customer personal information, we have published a list of Frequently Asked Questions (FAQs). The questions below have been asked by our customers, and we use specific examples to be clear and transparent about our collection, use and disclosure of customers' personal information. We will continue to update this page as technology and customers' interests evolve, and we will endeavor to promptly answer any additional questions you pose to us by phone or email.

Please take a moment to familiarize yourself with our privacy practices.



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#### Frequently asked questions

#### 1. Why do we collect personal information?

TELUS collects and uses personal information about you and your use of the products and services we provide, primarily in order to serve you better. This information is kept only as long as it's required for business purposes, such as billing and continued service, or as required by law. More specifically, we collect and use personal information for various reasons, including:

- To establish and maintain a responsible commercial relationship with you and to provide ongoing service.
  - When you apply for a service we collect information that allows us to confirm your identity and, if necessary, to conduct a credit check. We also use some personal information to confirm your identity when you contact us. For example, when you call us, we may need personal information to verify it's actually you and not someone trying to access your account without authorization.
  - For billing purposes, we collect records of the telephone numbers, times, dates and durations of incoming and outgoing cellular calls and billable home phone calls (i.e., long-distance calls).
  - If you sign up for our Future Friendly Home services (i.e., Internet, TV, home phone) we use your address to provide service to your home.
  - We also record your Optik TV channel subscriptions in order to know which channel signals to transmit to your TV set-top box.
- To understand your needs and preferences.
  - At your discretion, we may also collect credit card or bank account information if you prefer the convenience of pre-authorized payments.
  - We have an automated system that analyzes your Optik TV viewing preferences in order to suggest shows or channels you may be interested in; for example, through the on-screen suggestions in our Optik On Demand service or directly from a customer service representative.
- To develop, enhance, market or provide products and services.
  - We may examine your wireless calling patterns in order to recommend a new monthly plan that saves you money.
  - We may analyze your use of our products and services to better understand your preferences, and to help us develop or enhance our products and services.
  - We may note that you have phone and Internet and offer you discount if you bundle with TV and/or wireless service.
  - We might recommend a new service or TELUS app that we think you'll enjoy based on your existing services with us. Customers may choose to be removed from our marketing lists at any time.
- To manage and develop our business and operations.
  - We analyze how many customers use our wireless sites at what times of the day to help us plan new infrastructure.



- We may use video surveillance to monitor and/or record the activity that occurs around TELUS stores, premises or infrastructure, including wireless sites. We may also use unmanned air vehicles (drones) to inspect our remote wireless or network sites (i.e., cell towers). This information is used to maintain our networks or for security and investigation purposes to protect us from theft, vandalism or damage to our property.
- We may look at usage data on our high-speed Internet network to help us improve reliability and stability.
- We also monitor activity on our networks to detect and prevent fraud, and in turn protect our customers.
- To meet legal and regulatory requirements
  - For example, responding to a court order or to provide regulated telecommunications services to you.

#### 2. What personal information do we collect?

The types of information we collect from our customers generally fall into one of the following categories:

- To establish and maintain a responsible commercial relationship with you and to provide ongoing service, which includes:
  - When you apply for services, we collect information such as name, address, date of birth, preferred language, TELUS account number(s), any other authorized users, unique account security PIN(s) and email address, as well as credit card or bank information for pre-authorized payments.
  - In order to confirm your identity and/or conduct a credit check, we may also ask for your social insurance number, driver's license or other acceptable identification.
  - If you use a TELUS application such as our My Account app, our Optik TV mobile apps or Network Experience app, we collect the information necessary to authenticate you and provide the service.
  - For billing purposes, we collect records of the services you use, such as movies watched; telephone numbers, times, dates, and durations of incoming and outgoing cellular calls; and billable home phone calls.
- To understand your needs and preferences, which includes:
  - Details of the products and services you receive from us, such as your wireless device rate plan;
    Optik TV channel subscriptions or high-speed Internet rate plan.
  - Your wireless device information, such as telephone number, SIM card number, operating system, network type, manufacturer, model and make, and IMEI serial number.
- To develop, enhance, market or provide products and services, which includes:
  - Records of the services you use, to serve you better or to develop and market new ones.
  - Analysis of location data to provide new or enhanced products and services. For example, if we notice you are roaming outside of the TELUS network with your wireless cell phone, we may offer you a roaming package.



- To manage and develop our business and operations, which includes:
  - Records of the telephone numbers, times, dates, and durations of incoming and outgoing cellular calls, and billable home phone (i.e., long distance) calls.
  - Records associated with calls made on our cellular network including location data (i.e., locations of the cell towers that handled the communications). This helps us plan future infrastructure investment.
  - Records associated with text and multimedia messages, which includes the date and time of sent and received messages, as well as the associated phone numbers and cell towers.
  - IP addresses and port numbers that our customers are assigned, have connected to or attempted to connect to. This allows us to continue offering Internet connectivity.
  - Information about visits to our own websites (such as www.telus.com) to optimize our TELUS web properties and for security purposes.
- To meet legal and regulatory requirements, which includes:
  - Your wireless device location for specific purposes, such as when you dial 911 and we provide GPS and triangulation data to the 911 operations centre.

#### 3. What are some examples of personal information we do not collect?

Some things we don't collect:

- Content of telephone conversations made across our networks, except for voicemails (so we can deliver them), or calls made to our call centers where we may monitor and/or record your telephone conversation to confirm our discussions with you. We may use these recordings for training purposes to ensure we provide you with optimal customer service.
- Content of the applications you use.
- Satellite GPS location of customers. However, if a customer's wireless device has GPS capability, we may be able to determine the location of that device in real time. For example, we may access this information in response to a court order or when you call 911 in order to help first responders locate you in an emergency.
- Content of text or multimedia messages.

#### 4. How do we protect personal information?

As a core commitment of TELUS, all members of the TELUS team are accountable for protecting the privacy of our customers and team members, and all team members play a role in earning and maintaining our customers' trust. Whether we are developing products and services, interacting directly with our customers in their homes or in a call centre, marketing our products and services, supporting our technology infrastructure or designing security solutions, part of our "Customers First" philosophy is putting customers' privacy first. Not only is this part of our privacy commitment to our customers and team members, this is part of our commitment to integrity in all that we do, every day.

TELUS has robust training and awareness programs, including annual mandatory Integrity training that is provided to 100% of employees, including contractors with access to TELUS information systems.



We safeguard customer data through:

- Appropriate administrative, physical and technical security controls.
- Regular security and data-handling practice reviews.
- Appropriate and rigorous incident detection and response procedures.
- Established de-identification standards.
- Limiting access to data.
- Using Privacy by Design principles when developing our products and services.

#### 5. Will TELUS share your personal information with third parties?

We only share a customer's personal information with third parties in limited circumstances, in accordance with our service terms and our customer Privacy Commitment. Even when we do share information, we share only what is required for the specific purpose. We do not disclose or sell personal information to marketers of third-party products and services either to enable targeted advertising, or for any other purpose, unless you have expressly opted into such a service.

Examples of when we may share a customer's personal information include:

- With another telecommunications company, for the efficient and cost-effective provisioning of telecommunications services, such as when you are roaming outside of the TELUS network.
- With a company involved in supplying a customer with telecommunications or directory-related services, currently Yellow Pages Group, when your residential telephone number is published in the telephone directory.
- With credit bureaus to evaluate a customer's creditworthiness, for monthly reporting purposes on the status of your payment history with TELUS, or to collection agencies to collect an account if your account has been referred to collection.
- With our suppliers, agents or other organizations contracted to TELUS that require the information to assist us in serving you.
- With a law enforcement agency or other government agency, if required to meet legal and regulatory requirements; for example, if TELUS is required to provide records to law enforcement in response to a court order.

TELUS will challenge information requests from the courts, a law enforcement agency or other government agency if we believe the query goes beyond what is lawful. For example, we will challenge any request or court order that we believe goes beyond what a judge is authorized to order under applicable legislation, such as the Criminal Code, and we will only release confidential customer information when we are satisfied it is appropriate to do so. When necessary, we will take an issue to court, as demonstrated by a challenge we launched in early 2014, to a court order that would have required TELUS to disclose to a law enforcement agency the names, addresses, phone numbers and billing information of more than 9,000 TELUS wireless customers who happened to be using their wireless devices in the vicinity of certain TELUS towers during specific periods of time. TELUS believed that the order was unnecessarily broad in scope, and therefore unlawful. The issue was resolved early in 2016, with the Ontario Superior Court ruling



that the request was indeed unlawful. We were grateful that the ruling both focused on the protection of our customers' privacy and provided greater clarity about how much information police can request about Canadians in "tower dump" cases.

#### 6. Will TELUS transfer or store your personal information outside of Canada?

Personal information collected by TELUS may be stored and processed in Canada or another country. In either case, the information is protected with appropriate security safeguards, but may be available to foreign government agencies under applicable law.

You should also note that while roaming outside Canada the storage, treatment and transfer of your personal information and data may be subject to laws or regulation different from those in Canada.

#### 7. Do we disclose or sell your personal information to third-party marketers?

No. Unless you provide your express consent, TELUS does not disclose or sell your personal information to marketers of third-party products either to enable targeted advertising or for any other purpose.

#### 8. Does TELUS use your personal information to conduct analytics?

Yes, TELUS conducts data analytics using customer data for internal purposes including managing and developing our business and operations; understanding your needs and preferences; and to develop, enhance, market or provide products and services to you. For example, we might examine your wireless calling patterns to recommend a new monthly plan that saves you money, or your TV viewing habits to suggest a channel we think you'll enjoy.

TELUS also analyzes aggregated network information, such as records of communications sent and received by our customers on our networks, in order to manage and develop our business and operations. For example, understanding calling patterns to wireless sites over time helps us identify where network congestion will occur in the future and allows us to plan our infrastructure investment to serve you better.

TELUS may also provide de-identified and aggregated data sets to third parties in order to identify trends and patterns, and gain insights that can be used to better understand and solve complicated problems. While these insights may be shared with third parties such as municipalities, provincial or federal government departments or agencies, corporations and tourism bureaus, your personal information will not be shared. For example, TELUS may use large sets of de-identified and aggregated cell tower data to analyze traffic flow patterns, helping a municipality identify areas of congestion to help them plan more effective transit routes.

To learn more about how TELUS protects your privacy using de-identified and aggregated data, visit the <u>privacy site</u>.

One of the choices we provide at TELUS is the opportunity for our mobility subscribers to opt-out of including their location information in de-identified form where the information or insights are intended to be disclosed to third parties to assist in research, planning, or product and service development, except where such sharing is required by law.

If you wish to opt-out, please click here and enter your mobile number.



#### 9. What choices does TELUS offer you about your personal information?

One of the many ways we put you first is to offer you choice in how your personal information is used. You can:

- Have your name removed from our marketing lists. However, this means that we will not inform you of relevant products, services and special offers that may be of interest to you.
- Exclude your name from directory listings (i.e., Yellow Pages).
- Refuse to provide personal information to us or withdraw consent previously provided, subject to legal or contractual restrictions and reasonable notice. Please note that doing so may limit our ability to serve you and may force us to cancel some or all of the services you receive from us.
  - If you want to exercise any of the above choices, you may contact us by \*611 from your TELUS mobile phone or by calling 1-866-558-2273.
- Opt-out of including your location information in de-identified form where the information or insights are intended to be disclosed to third parties to assist in research, planning, or product and service development, except where such sharing is required by law
  - If you wish to opt-out of these types of programs, please follow the instructions in Question 8.

#### 10. How can you inquire further about TELUS' privacy practices or access your personal information?

The TELUS Privacy Request Center is a specialized team to assist customers with privacy inquiries and accessing their personal information. You may contact them at:

#### **Privacy Request Centre**

310 1000 - Option 1 (Alberta and British Columbia)

1 800 567 0000 - Option 1

1 800 567 1450 Facsimile

Privacy@TELUS.com

#### Mailing Address:

TELUS Communications Company Privacy Request Centre PO Box 2590, Station M. Calgary, Alberta

Canada T2P 5J6

#### Centre de demandes de renseignements personnels

310-1000, Option 1 (Alberta et Colombie-Britannique)

1-800-567-0000, Option 1

1-800-567-1450 Télécopieur

vieprivee@telus.com

#### Adresse postale:

Société TELUS Communications Centre de demandes de renseignements personnels PO Box 2590, Station M

Calgary (Alberta) T2P 5J6

Canada



#### 11. What if you do not feel we have addressed your concern?

We care about your privacy and we want to make sure your concerns are addressed. We have a two-step process that allows you to escalate if you are not satisfied with the information we provide in response to your inquiries or concerns:

Step 1: Please start by contacting our Privacy Request Centre (contact information above).

Step 2: If the Privacy Request Centre cannot address your concern, they will refer your complaint to our Data and Trust Office who will work with you to resolve the matter.

If you are still not satisfied, you can contact the Office of the Privacy Commissioner of Canada, who is responsible for investigating complaints under the *Personal Information Protection Documents Act* (PIPEDA):

Mail: The Office of the Privacy Commissioner of Canada 30 Victoria Street Gatineau, Quebec K1A 1H3

**Telephone:** 1-800-282-1376

**Fax:** 613-947-6850

Website: <a href="https://www.priv.gc.ca/en/">https://www.priv.gc.ca/en/</a>

# 12. How is personal information defined under the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA)? How is personal information defined by TELUS?

Personal information is defined in PIPEDA as any information about an identifiable individual, other than the name, title or business address (including business email address) or business telephone or fax numbers of an employee of an organization.

TELUS uses the same definition. Generally, we are dealing with information about customers or employees such as a customer's credit information, billing records, service and equipment, and any recorded complaints. Personal information does not include de-identified or aggregated information that cannot be associated with a specific individual.

Information about sole proprietors or partners is only considered to be "personal information" if it is information about the individuals themselves, as distinct from information about their businesses. The latter is protected by other TELUS policies and practices and through contractual business arrangements.

## 13. How can you obtain more information about federal legislation on privacy (PIPEDA)?

The Privacy Commissioner of Canada's website is an excellent source of information on privacy.



### 14. How do you control your privacy when using the apps on your smartphone or device?

In most circumstances, by installing a third-party application on a mobile device or clicking on a banner ad within an existing application on the device, the user is allowing the application to access their personal information. Such personal information could include the user's phone book, location, contacts, browsing history and phone number. TELUS has no involvement in this process as we have no control over the use of third-party applications. It is very important to review the service terms and privacy policies associated with third-party applications to understand how your personal information will be collected, used and disclosed.

#### 15. Where can you obtain more information about protecting your privacy online?

Offered free-of-charge, TELUS WISE® (Wise Internet & Smartphone Education) engages Canadians of all ages in a discussion about Internet and smartphone safety to help keep ourselves, our families and communities safer from online criminal activity such as financial fraud and cyberbullying.

To book an in-person session for your school, parent group, community group or seniors group visit us at <a href="www.telus.com/wise">www.telus.com/wise</a> or email us at <a href="wise@telus.com">wise@telus.com</a>.

For more information, please visit the links below:

- TELUS WISE Helping our kids use their smartphone safely guide
- TELUS WISE Privacy matters guide
- TELUS WISE seniors guide
- TELUS WISE tip sheets also available in French, Chinese, Punjabi and Spanish

Visit us at www.telus.com/wise to learn more.

#### 16. How can you contact us?

We encourage you to let us know if you have questions or concerns about your privacy. You may contact the Privacy Request Centre at **1-800-567-0000** or write us at privacy@telus.com.

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