

## **Privacy Policy**

Last Revised April 23, 2019

COMsolve Inc. (“**COMsolve**”) operates several divisions: a communications infrastructure deployment division; a communications infrastructure testing division, an infrastructure planning and consulting division, and is the Canadian Numbering Administrator.

COMsolve is committed to protecting the privacy of Personal Information. We take all reasonable steps to ensure that this information is safe and secure, including putting in place rigorous policies and procedures to fully comply with all Canadian privacy laws and regulations. COMsolve’s Privacy Policy is based on 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:

- Being accountable
- Identifying the purposes for Personal Information collection
- Obtaining consent
- Limiting the collection of Personal Information
- Limiting the use, disclosure and retention of Personal Information
- Keeping Personal Information accurate
- Safeguarding Personal Information
- Being open about policies and practices
- Providing access to Personal Information
- Challenging Compliance

COMsolve has established its Privacy Policy in accordance with The Personal Information Protection and Electronic Documents Act (“PIPEDA”)

COMsolve’s Privacy Policy applies to all Personal Information collected from COMsolve customers, employees and web site users.

### **Q. What is Personal Information?**

Personal information is information collected by COMsolve about an identifiable individual but does not include aggregated information that cannot be associated with a specific individual.

### **Principle 1 – Accountability**

#### **Q. How can I get more information about how COMsolve handles my personal information?**

COMsolve’s privacy practices comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and where applicable with the privacy rules established by the Canadian Radio-television and Telecommunications Commission (CRTC). Our corporate and online Privacy Policies are available at [COMsolveInc.com/privacy](http://COMsolveInc.com/privacy). We also review our privacy policies and practices on a regular basis to ensure they remain current and meet our customers’

expectations. Additionally, COMsolve employees receive privacy training and must comply with COMsolve privacy practices as a condition of employment.

**Q. Who is responsible for COMsolve's privacy policy?**

COMsolve has appointed a Chief Privacy Officer who oversees COMsolve's privacy compliance.

**Principle 2 – Identifying Purposes**

**Q. What type of personal information about me does COMsolve collect?**

Personal and account information for our customers may include, but is not limited to name, e-mail address, mailing address, phone number, payment information, service requests and any recorded complaints.

**Q. Why does COMsolve collect my personal information?**

Your relationship with COMsolve means that we collect and use account and personal information about you. This information helps COMsolve manage our business operations for the following reasons:

- To deliver you the products and services you have purchased from us, and to bill you and collect payment for those products and services.
- To understand your needs and make customized information available regarding other products and services offered by COMsolve, or trusted third parties that may be of interest to you.
- To provide tailored service to you. For example, we may use account information about you to improve your interactions with us or provide a positive and personalized customer experience.
- To perform analytics, administer surveys, or request feedback to improve and manage our relationship with you.
- To comply with legal obligations and regulatory requirements.

We may also collect personal information about you for other purposes from time-to-time, or as permitted or required by law. We will always identify any additional purpose prior to or at the time of collection.

**Principle 3 – Consent**

**Q. How does COMsolve collect information about me, or obtain my consent to use or disclose that information?**

COMsolve collects information about you primarily from you, but from time to time we may also collect information about you from third parties. For example, we may collect information about you from government agencies, or publicly available information or other public sources.

Your consent to the collection, use, or disclosure of your personal information may be implied or express. We may obtain your express consent to the collection, use, and disclose your information in one of the following ways:

- in writing; or
- by electronic confirmation via the internet; or
- verbally, where an audio recording of the consent is retained by us; or
- through other methods, as long as a record of your consent is created by you, by us, or by a third party acting on COMsolve's behalf.

The choice to provide COMsolve with your consent to the collection, use, and disclosure of your personal and account information is always yours, however, your decision to withhold such consent may limit our ability to provide you with certain products, services, or offers.

#### **Principle 4 – Limiting Collection**

##### **What types of personal information does COMsolve not collect?**

COMsolve does not collect content (voice or data) that may be transmitted or received over the communications infrastructure that we install for you.

##### **Q. Does COMsolve use cookies, web beacons, or other web technologies to collect information?**

Yes, but we limit the types of technologies and the information such technologies will collect about you.

Our websites may use cookies to deliver content specific to your interests, to save your password, to find your account information in our database when you access a service so you do not need to log in at every visit.

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

##### **Q. What can COMsolve do with my account and personal information?**

COMsolve uses your personal and account information to fulfill the purpose for which it was collected.

We will disclose information about your credit behaviour to credit reporting agencies or other parties collecting outstanding debt.

We do not sell customer information to third parties, and will only disclose your personal information to organizations outside of COMsolve without your consent in the following limited circumstances:

- To a person who, in our reasonable judgement, is seeking the information as your agent;
- To a service provider or other agent retained by us, such as a credit reporting agency, for account management, the collection of past due bills on your account, or to evaluate your credit history.
- To a service provider or third party that is performing administrative functions for us to manage employee benefits and/or programs provided the information is used only for that purpose.
- To a law enforcement agency whenever we have reasonable grounds to believe that you have knowingly supplied us with false or misleading information or are otherwise involved in unlawful activities.
- To a public authority or agent of a public authority if, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information.
- To a public authority or agent of a public authority, for emergency public alerting purposes, if a public authority has determined that there is an imminent or unfolding danger that threatens the life, health or security of an individual and that the danger could be avoided or minimized by disclosure of the information.
- To a third party who may be interested in buying COMsolve's assets, where personal customer and/or employee information must be shared in order to assess the business transaction.
- Personal Information, for example, contact information and authorization letters, retained by COMsolve's Canadian Number Administration division may be passed on to a successor Canadian Numbering Administrator to preserve continuity of number administration.

We will not make any other disclosure of your personal information unless we have your consent, or we are required to do so by law.

We may also de-identify or anonymize information about our customers to identify trends, manage our business, develop statistical information, understand how we are performing, or develop relevant products services or offers. Use of de-identified information may also be shared with third parties for other analytical purposes. De-identified or anonymized information will not personally identify any individual and therefore is not subject to this policy.

**Q. Will COMsolve use my information for direct mailings or other communications?**

COMsolve may send you information about other products or services that we, or our partners, offer that may be of interest to you. If you do not want to receive such communications, all you have to do is tell us, either online or through a customer service representative. If you have given permission and change your mind, you can ask to be removed from future promotional communication from us.

**Q. How long will COMsolve retain my personal information?**

COMsolve will only retain your account or personal information for as long as necessary to fulfill the purpose we collected the information. Once we no longer require your account or personal information it will be destroyed or de-identified.

**Principle 6 – Accuracy**

**Q. What if I disagree with the accuracy of my personal information COMsolve has about me?**

COMsolve ensures that customer information is accurate, complete and up-to-date. Customers can ask to review that information and have the opportunity to challenge its accuracy and completeness and request amendments, as appropriate, by contacting our Chief Privacy Officer.

**Principle 7 – Safeguards**

**Q. Where will my personal information be stored?**

Account and personal information about our customers may be stored or processed in or outside Canada. The information will be protected with appropriate safeguards but may be subject to the laws of the jurisdiction where it is held.

All customer records maintained by COMsolve's Canadian Number Administration division are maintained in Canada.

**Q. How will COMsolves ensure my personal information is kept safe?**

COMsolve has security and safeguard processes and procedures in place, to ensure that any account or personal information of our customers remains safe from theft, loss, or unauthorized access.

**Principle 8 – Openness**

**Q. How can I get more information about how COMsolve handles my personal information?**

COMsolve makes its privacy policy available online at [www.comsolveinc.com/privacy-policy](http://www.comsolveinc.com/privacy-policy) . We have also appointed a Chief Privacy Officer who is accountable for our privacy policy and can be contacted if you have any questions, concerns, or complaints about how we collect, use, or disclose your personal information.

## **Principle 9 – Individual Access**

**Q. How can I access my personal information that is retained by COMsolve?**

You can access your personal information retained by us by contacting our Chief Privacy Officer by email at [privacy@comsolveinc.com](mailto:privacy@comsolveinc.com) or in writing at:

Chief Privacy Officer,  
COMsolve Inc.  
70 East Beaver Creek Road Unit #19  
Richmond Hill, ON, L4B 3B2

## **Principle 10 – Challenging Compliance**

**Q. What are my options if I want more information about privacy?**

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

- Website: [www.privcom.gc.ca](http://www.privcom.gc.ca)
- By Phone: 1 800 282 1376 or 819 994 5444
- By Fax: 819 994 5424
- By TTY: 819 994 6591