

## PRIVACY POLICY

### PURPOSE AND SCOPE

Cooptel, telecommunication co-op and its subsidiaries (collectively, the «**Cooptel**» or «**us**») attaches great importance to respect for your privacy and the protection of personal information, that is to say any information concerning a person and whether, taken alone or in combination with other available information, it can be identified.

Cooptel is a cooperative incorporated under the laws of Quebec whose telecommunications activities are subject to the Personal Information Protection and Electronic Documents Act (L.C. 2000 c.5).

This Privacy Policy (the «**Policy**») describes the manner in which we collect, use, disclose, retain or otherwise deal with personal information in the course of our business activities, including the provision of our products and services (collectively, the «**Services**») and the operation of the website [www.cooptel.ca/](http://www.cooptel.ca/) (the «**Site**»).

By accessing, subscribing or using our Services or the Site, you consent to the collection, use, disclosure and processing of your personal information by Cooptel in accordance with this policy.

The Site may contain links to other sites published by other providers. These other sites are not under our control and we are not responsible for the collection and use of your information by these sites. We recommend that you read the privacy policies of each site you visit and use.

### CONSETEMENT

Cooptel collects, uses or discloses personal information with the consent of the individuals concerned, except as permitted or required by law.

If you choose not to provide us with certain information that is necessary to provide our Services to you, Cooptel may no longer be able to provide or continue to provide any of our Services, as the case may be.

### RESPONSABILITY

Cooptel is responsible for the personal information it collects or holds, including personal information disclosed to third parties for processing and for administrative purposes in accordance with this Policy.

### DETERMINATION OF THE PURPOSES AND LIMITATIONS OF COLLECTION TO USE AND COMMUNICATION

#### (A) COLLECT

Cooptel determines the purposes for which it collects personal information, before the collection or at the time of collection. In the course of its business, Cooptel collects personal information for the purposes of granting access and delivering the Services, as well as complying with its legal obligations.

The collection of personal information by Cooptel is limited to what is necessary for the purposes indicated or clearly implicit at the time of collection. It is also possible that Cooptel may collect and use information about you from a third party where permitted by law and with your consent in all other cases.

For example, we may ask you for the following information when providing our Services:

- your name;
- your address;
- your email address;
- your payment information;
- the information required for the purposes of paying rebates and issuing tax receipts;
- the information required to carry out a verification of your credit file;

Cooptel uses chat and social media applications to increase its Internet presence. Social media accounts are public and are operated by third parties. If you choose to contact Cooptel through these media, we recommend that you read the applicable terms of service and privacy policies. The personal information we may collect through social media is subject to this policy.

## (B) USE AND CONSERVATION

Cooptel does 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 or permitted by law.

Cooptel collects personal information for the following purposes :

- To enable the persons concerned to avail themselves of Cooptel's Services and other offers, including:
  - In order to proceed and to allow the processing of orders and to ensure the delivery of the Services;
  - To bill and process payments for our Services;
  - To recover amounts for which payment is overdue;
- To answer questions, comments and other requests for information from customers or users of the Site;
- For administrative or marketing purposes, such as sending out newsletters, announcements and other publications or correspondence, in accordance with the applicable law regarding commercial electronic messages;
- For statistical purposes to enable us to better understand our customer base, habits and preferences and to adjust the Services and the Site accordingly;
- In order to apply the Terms of Use of this Site;
- In order to comply with its legal obligations.

This information may also be used to send you updates on continuing education topics offered online by Cooptel or other events, to communicate with you about the services of the Site, or to send you emails to maintenance of the Site or updates.

If you voluntarily provide us with personal information, by email or by form, we use only the information required to enable us to respond to your message or to respond to your request.

Cooptel retains personal information as long as it reasonably needs it for the purposes for which it was collected or as required by law. Subsequently, this information is anonymized or destroyed in a secure manner.

## (C) COMMUNICATION TO THIRD PARTIES

Cooptel is committed to limiting disclosure and access to personal information only to those who need it for specific purposes. Cooptel may share personal information with trusted partners or suppliers acting as subcontractors for the following purposes:

- To subsidiaries, representatives or subcontractors, to fulfill an order or outsource one or more of the Services offered by Cooptel, or to provide customer service;
- Payment service providers online, to process transactions made on the Site;
- To service providers in the field of data processing and hosting, to enable Cooptel to use, analyze, store, secure or otherwise process the information in its custody or control in accordance with this policy, or to administer this Site;
- To suppliers of physical or electronic mail services, to make a delivery or to send e-mail or by mail to communicate with you

- To external consultants, in order to analyze our Services and the Site with regard to the needs of our customers in order to improve our Services or the Site or to create new ones;
- In the context of a commercial transaction, if this is necessary to make the decision to proceed with the transaction and in accordance with the applicable legal requirements.
- To accomplish any of the purposes set out in this Policy and any other purpose that Cooptel will report, no later than at the time the information is collected.

Cooptel will ensure that all third parties with whom it does business and to whom it provides personal or confidential information, also guarantee at least equivalent to Cooptel, the confidentiality, security and integrity of the information they hold on behalf of Cooptel.

## **EXACTITUDE**

Cooptel makes reasonable efforts to ensure that the personal information it collects and holds is as accurate and complete as is necessary for the purposes for which it is used. Please note that a request for rectification will only be considered if it is made in writing in accordance with this Policy.

## **SECURITY, HOSTING AND STORAGE**

Cooptel undertakes to enforce and require its subcontractors to apply adequate physical, technological and administrative security measures, in order to maintain the confidentiality of personal information and protect them against theft, loss and, disclosure or unauthorized access.

The level of protection granted to personal information depends on the degree of sensitivity of the personal information, the quantity, distribution and format of the information and the method of preservation.

Access to information system infrastructures and servers is secured by appropriate procedures and controls. Only duly authorized persons may have access to it. They undertake to respect the confidentiality of personal information.

Backups of our documents, including those containing personal information, are performed at regular intervals. At the end of the legal retention period, the data is deleted in accordance with the legal provisions in force.

In addition, we use contractual and other means to ensure that third parties provide a level of protection similar to the personal information they process.

No method of transmitting or storing electronic data is infallible and therefore we can not guarantee the security of information transmitted or stored by through the Services. Cooptel can not therefore guarantee the absence of any intrusion into the Website or guarantee the absence of infringement of the confidentiality, the integrity or the availability of your documents by another user or any other person.

The personal information collected or stored by Cooptel will be hosted and may be transferred or processed through equipment or facilities located in Canada or in the jurisdiction we will specifically indicate to you regarding the use of our services. Services.

## **TRANSPARENCY AND MODIFICATIONS**

This policy outlines Cooptel's personal information management policies and practices.

Cooptel reserves the right to modify this Policy. In the event that Cooptel modifies this Policy, any change will be brought to the attention of the users of the Site and the customers of the Services. The effective date of this version of the Policy appears at the beginning of the Policy.

## **ACCESS**

Subject to the relevant laws, on receipt of a request from an individual to this effect, made in writing in accordance with this Policy, and subject to the validation of the identity of the person concerned, Cooptel will verify and indicate to the person concerned if they have personal information about them. Upon receipt of a written request to this effect, Cooptel will pro-

vide access or provide a summary of the use that has been or is being made of the information.

Cooptel may deny an individual access to his information in accordance with the relevant laws, in which case he shall give reasons for refusing it, except where prohibited by law.

## **COMPLAINTS**

An individual in respect of whom Cooptel has personal information may complain of non-compliance with this Policy. Please note that a complaint may be considered only if it is made in writing in accordance with this Policy.

If an individual is dissatisfied with Cooptel's response to a complaint, or with Cooptel's policies and practices regarding the handling of personal information, it may file a complaint with the Office of the Privacy Commissioner of Canada [https:// www.priv.gc.ca/](https://www.priv.gc.ca/)

## **NON-PERSONAL INFORMATION**

### **USE OF COOKIES AND INFORMATION EXCHANGED AUTOMATICALLY**

Some information is collected by means of cookies, commonly known as «cookies» (small text files placed on your computer that store information about you and can be viewed by the Site). a cookie does not allow us to identify you. In general, it records information relating to the navigation of your computer on our Site (the pages you have visited, the date and time of the consultation, etc.) that our system will be able to read during your subsequent visits.

We inform you that you can configure your browser to avoid the registration of cookies. Most browsers provide instructions for disabling them in the «Help» section of the toolbar. Please note that if you refuse our cookies, features and functions of the Site may not work properly.

In addition, certain information may be entered when you access the Site or an application. The information exchanged may include the following:

- the domain name of your Internet Service Provider;
- your IP address (the unique number assigned to your computer when connected to the Internet)
- the type of browser (Explorer, Safari, Firefox, etc.) and operating system (Windows, Mac OS, etc.) that you use to access the Site;
- the date and time of access to the Site
- the pages you visit ;
- the address of the referring site, if you access the Site from another site.

This information is kept and exploited by Cooptel for technical and statistical purposes, in particular to record the number of visits, the most frequented pages, the technology used by visitors, referring sites and the geographical origin of the visits.

## **QUESTIONS**

If you have any questions, comments or complaints about this policy or our privacy practices, or to exercise your rights in this regard, we invite you to contact us <https://www.cooptel.ca/contact/>