

Wireless DNA - Privacy Policy

I. INTRODUCTION

Thank you for your interest in the website of Wireless DNA Inc. ("Wireless DNA"/"we"/"us"/"our" hereinafter). We welcome you/user/customer to our website ("Website" hereinafter) and our Privacy Policy. Terms of Use of our Website are available at: <https://wirelessdna.ca/termsfuse>.

Our goal is to protect the confidentiality of your personal information. Keeping our Privacy Policy up to date will ensure that you are completely informed. Please check this Privacy Policy frequently to see what has changed. "Personal Information" refers to data that can be used to identify you and is legally protected. Our Privacy Policy, amongst other things, will help you understand:

- i. how and when your informed consent will be required (with some exceptions);
- ii. how you can view your Personal Information;
- iii. how to get in touch with us if you have questions or issues about your privacy; and
- iv. how and why we collect, use, and sometimes share your Personal Information.

In order to provide you with our products and services, we must collect, utilize, and disclose Personal Information. Your name, address, phone number, email address, payment card information, information about how you use your devices, and billing history are just a few examples of the data that could be included and be part of your Personal Information.

Our Privacy Policy is based on our commitment to your privacy. However, your name, address, and phone number might not always be regarded as protected Personal Information if they are publicly accessible (for example, in a directory listing). We created this Privacy Policy to keep you informed on how your Personal Information is handled when you use our products and services. You may have a commercial interest and/or you may have a non-commercial interest in your dealings with us. Regardless of the nature of your interest as aforesaid, our Privacy Policy will be applicable to you.

Additional details about particular products and services may also be provided as needed. Examples include the Terms of Use for our cellular and wireline products and services, our Website's Terms of Use, our mobile app's, and our frequently asked questions.

II. YOUR PERSONAL INFORMATION AND CONSENT

- **How and when does Wireless DNA collect my Personal Information?**

We may get or collect your Personal Information through a few different ways. For example:

- i. during an activation, inquiry, or purchase of a product or service (including transactions made by you through our sub dealers, retailers and other service representatives);

- ii. when your purchase our products or services through our other service channels including technical support or during the warranty, repair claims and service process;
 - iii. from third parties, like credit reporting agencies, or other third parties with whom you have had a payment relationship;
 - iv. when you speak with someone in our call centre, use our products or services, visit our Website or use our apps.
- **Does Wireless DNA require my consent to collect, use or disclose my Personal Information?**

Yes, however this is subject to certain limited exceptions and limitations. You will be deemed to have given your consent when using our products or services. In some cases, we may specifically ask for your express permission before collecting, using, or disclosing your personal information. For instance, we may ask for your express approval verbally, by ticking a box, signing an agreement, or taking another affirmative action, if your Personal Information is extremely sensitive and is needed for a new purpose/reason.

You may also be able to withdraw your consent which you provided to us earlier either expressly or by implication, if it isn't necessary for the product or service you are using. For instance, you can choose not to receive any of our marketing communications, including commercial emails and SMS messages, by visiting us online at <https://wirelessdna.ca/communicationpreferences> or by visiting your profile.

Should it be necessary for us to collect and use your Personal Information in order to provide you with the products or services you requested or the safety and security of our network, then we will be unable to provide you with opt-out option since it is a mandatory condition of service. The only option in such cases is to terminate your product or service with us.

The privacy law also enables certain exceptions to obtaining consent, including the following:

- i. if it protects you in any way (like a medical emergency or a threat to your safety);
- ii. if a court orders it or if it is in compliance with a warrant issued by a competent authority;
- iii. if it helps in or aids in collection of funds owed legally;
- iv. if a law is breached or there is a breach of an agreement is committed and the purpose is to investigate such a breach of law or agreement (for example piracy in breach of the Copyright Act);
- v. if it is the the purpose of investigation, suppression or prevention of fraud and/or is required to secure our networks; or
- vi. if it is otherwise legally permitted, required or allowed.

When it is appropriate or necessary, we could rely on one of the above.

- **What is De-identification of Personal Information and does Wireless DNA use De-identified Personal Information?**

The demand for government-held data is increasing. This requires corporations and institutions including Wireless DNA to employ effective processes and techniques for removing personal information from the data collected. An important tool in this regard is deidentification. “De-identification” is the process of removing personal information from a record or a data set. De-identification protects your privacy because once deidentified, a data set is considered to no longer contain your personal information. If a data set does not contain your personal information, its use or disclosure cannot violate your privacy. Therefore, the privacy protection provisions of the Freedom of Information and Protection of Privacy Act (FIPPA) and the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) do not apply to de-identified information. De-identification would not reduce the risk of re-identification of a data set to zero. However, the process produces data sets for which the risk of re-identification is very little.

Yes, Wireless DNA uses de-identified information to improve its operations, products, services and available offers, to provide social benefits, and to develop analytic marketing reports. To better educate us, de-identified data may also be integrated with statistical data, including data from public sources and third-party data aggregators.

III. YOUR PERSONAL INFORMATION: COLLECTION, USE, DISCLOSURE

- **How does Wireless DNA use my Personal Information?**

We utilize your Personal Information, including sharing information with our affiliates, licensors, licensees, officers, authorised agents and employees in order for us to:

- i. provide you with our products and services, including provision of our products and services through other channels like third-party suppliers;
- ii. meet our legal and regulatory obligations and to respect the privacy laws;
- iii. meet your needs and to better understand your requirements, needs and preferences;
- iv. promote our products and services that you might find useful or be interested in;
- v. ascertain if you are eligible for given products and services and to suggest or offer products and services to you;
- vi. continue to have ethical business dealings with you;
- vii. create and improve the entire range of our products and services;
- viii. effectively manage our business operations;
- ix. maintain and secure our networks and to find, stop, or prevent fraud.

We use industry-leading data analytics tools to inform and enhance the aforementioned purposes.

- **When is your Personal Information disclosed?**

When permitted or required by law, we may disclose your personal information with your permission, including the following:

- i. to a person acting as your agent or authorised by you, such as a legal representative or authorized user, for household accounts or accounts with multiple devices;
- ii. If it's deemed reasonable to do so in order to verify your identification, look into a possible violation of the law or an agreement, or to identify, stop, or suppress fraud and protect our networks, we may divulge your information to a government agency or other organization;
- iii. as permitted or mandated by law;
- iv. to third parties, such as credit reporting agencies or other businesses with which you have had a payment arrangement, in order for them to determine your creditworthiness;
- v. requesting delivery companies to send you the goods and/or services you've requested;
- vi. to a telephone directory service provider or another communications service provider in order to provide effective and efficient communications services, for instance: to offer roaming services when you travel within the coverage area of another carrier;
- vii. to third-party collection companies in order to recover past-due sums owed to us;
- viii. If you've previously granted your permission to us or a third party, for example a provider of smart home devices, financial institution, insurance provider, social media network, or other web sites;
- ix. in an emergency scenario when there is an immediate threat to life or property to the competent public authority.

IV. CORRECTING AND SAFEGUARDING YOUR PERSONAL INFORMATION

- **How is your Personal Information protected?**

Depending on how sensitive the Personal Information is, we employ the proper security measures to ensure that it is always protected and kept safe. All of our employees who have access to personal information are regularly trained and sensitised on how to you're your Personal Information private and safe. We have agreements with third parties that protect the Personal Information we give to them, including our suppliers and agents working on our behalf. You can also help protect your own Personal Information by following smart security practices, such as never using the same password across multiple accounts or websites, changing passwords on a regular basis, and selecting passwords that are difficult

to guess, because the security of your Personal Information in this digital age cannot be 100% guaranteed.

- **How can you review and correct your Personal Information?**

Contact the Wireless DNA Privacy Office to make an inquiry. Subject to certain limitations and exceptions, for which a reasonable fee may be charged, we will respond to your written request for access within a reasonable period of time. We shall advise you if we are unable to give you access to your personal information for instance, if doing so would require disclosing the personal information of another person or other secret or privileged information. Our aim is to maintain the accuracy, completeness, and correctness of the Personal Information we have on file for you. Please inform us of any errors you see on documents or your Personal Information, for example on the bill for your products and services, and we will correct the same.

- **How long do we keep your Personal Information?**

We will keep your Personal Information only for as long as it is reasonably necessary, pertinent, or required by law for the stated purposes. Even if you are no longer our customer or you have terminated your products and services with us, we could preserve some of your personal information for a while: For example, if it's necessary for security, fraud prevention, or business operations management or mandated by law. Your Personal Information is destroyed, erased, or de-identified once it is no longer reasonably necessary, relevant for the aforesaid objectives, or needed to be preserved by law.

- **Could your Personal Information ever be transferred, stored or processed outside of Canada?**

Yes, this may happen. Your Personal Information may occasionally be disclosed to our suppliers and agents based outside of Canada if appropriate security measures are taken. We have stringent procedures and rules governing how your Personal Information is handled for processing outside of Canada. However, the laws of other nations might apply to your personal information.

V. MODIFICATIONS, YOUR QUESTIONS AND UN ANSWERED QUESTIONS AND CONTACT INFORMATION

- **Can our Privacy Policy change?**

Yes, our Privacy Policy may change from time to time. The changes made will always be posted on our Website. We would request you to check our Website, should you be so interested. If you request us to update you on the changes, we may also be able to do that for you.

- **Questions or concerns about our privacy practices?**

Your personal information's security and privacy are very important. You can discover commonly asked concerns regarding the security of your personal information in a dedicated section on our Website dedicated to privacy <https://wirelessdna.ca/privacy>. If you have any further inquiries, you may email privacy@wirelessdna.ca or get in touch with us as follows:

Wireless DNA Inc.
Privacy Office
Suite 1109
4789 Yonge Street
Toronto Ontario
M2N 0G3

We investigate all privacy complaints and take appropriate steps to resolve them, including changing our practices where required.

- **Your unanswered questions and concerns after contacting the Wireless DNA Privacy Office?**

If we are unable to answer your concern to your satisfaction, you can contact:

Address:
Office of the Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Quebec
K1A1H3

Office of the Privacy Commissioner of Canada website:

<https://www.priv.gc.ca/en> (English)

<https://www.priv.gc.ca/fr> (Français)

Toll-free: 1-800-282-1376

Phone: (819) 994-5444

TTY: 819-994-6591