

**GOSFIELD NORTH COMMUNICATIONS  
CO-OPERATIVE LIMITED  
("GOSFIELD")**

**PRIVACY POLICY**

**1. Introduction**

Gosfield provide a broad range of telecommunications services to customers. Gosfield is committed to maintaining the privacy, confidentiality, security and accuracy of customer and employee personal information.

This Privacy Policy ("Privacy Policy") is a formal statement of principles and guidelines concerning the minimum requirements for the protection of personal information provided by the Gosfield to its customers and employees. The objective of the Privacy Policy is responsible and transparent practices in the management of personal information, in accordance with the *Personal Information Protection and Electronic Documents Act (Canada)* (the "PIPEDA")

**2. Summary of Principles**

*Principle 1 - Accountability*

Gosfield is responsible for personal information under its control and shall designate one or more persons who are accountable for compliance with the following principles.

*Principle 2 - Identifying Purposes for Collection of Personal Information*

Gosfield shall identify the purposes for which personal information is collected at or before the time the information is collected.

*Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information*

The knowledge and consent of a customer or employee is required for the collection, use or disclosure of personal information, except where inappropriate.

*Principle 4 - Limiting Collection of Personal Information*

Gosfield shall limit the collection of personal information to that which is necessary for the purposes identified. Gosfield shall collect personal information by fair and lawful means.

*Principle 5 - Limiting Use, Disclosure and Retention of Personal Information*

Gosfield shall 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 by law. Gosfield shall retain personal information only as long as necessary for the fulfillment of those purposes.

*Principle 6 - Accuracy of Personal Information*

Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

*Principle 7 - Security Safeguards*

Gosfield shall protect personal information by security safeguards appropriate to the sensitivity of the information.

*Principle 8 - Openness Concerning Policies and Practices*

Gosfield shall make readily available to customers and employees specific information about their policies and practices relating to the management of personal information.

*Principle 9 – Customer and Employee Access to Personal Information*

Gosfield shall inform a customer or employee of the existence, use and disclosure of his or her personal information upon request and shall give the individual access to that information. A customer or employee shall be able to challenge the accuracy and completeness of the information and to have it amended as appropriate.

*Principle 10 - Challenging Compliance*

A customer or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for the Gosfield's compliance with the Privacy Policy.

### **3. Scope and Application**

The ten principles that form the basis of the Privacy Policy are interrelated and Gosfield shall adhere to the ten principles as a whole. Each principle must be read in conjunction with the accompanying commentary. As permitted by PIPEDA, the commentary in the Privacy Policy has been tailored to reflect personal information issues specific to Gosfield.

The scope and application of the Privacy Policy are as follows:

- a) The Privacy Policy applies to personal information about customers and employees of Gosfield that is collected, used or disclosed by Gosfield.
- b) The Privacy Policy applies to the management of personal information in any form whether oral, electronic or written.
- c) The Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by Gosfield:
  - i. information that is publicly available, such as a customer's name, address, telephone number and electronic address, when listed in a directory or made available through directory assistance; or
  - ii. the name, title or business address or telephone number of an employee of an organization.

The application of the Privacy Policy is subject to the requirements or provisions of any applicable legislation, regulations, tariffs or agreements, or the order or determination of any

court or other lawful authority, including any applicable regulations, orders or determinations of the Canadian Radio-television and Telecommunications Commission.

#### **4. Definitions**

Collection - the act of gathering, acquiring, recording or obtaining personal information from any source, including third parties, by any means

Consent - voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing but is always unequivocal and does not require any inference on the part of Gosfield. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

Customer - an individual who uses, or applies to use, Gosfield's products or services or otherwise provides personal information to Gosfield in the course of Gosfield's commercial activities

Disclosure - making personal information available to a third party

Employee - an employee of Gosfield Company

Personal information - information about an identifiable individual, but not aggregated information that cannot be associated with a specific individual. For a customer, such information includes a customer's credit information, billing records, service and equipment, and any recorded complaints. For an employee, such information includes information found in personal employment files, performance appraisals and medical and benefits information, but does not include the employee's name, title, business address or business telephone number.

Third party - an individual other than the customer or his agent or an organization other than Gosfield

Use - the treatment, handling, and management of personal information by Gosfield.

#### **5. Privacy Policy in Detail**

##### *Principle 1 - Accountability*

Gosfield is responsible for personal information under their control and shall designate one or more persons who are accountable for compliance with the following principles.

1.1 Responsibility for ensuring compliance with the provisions of the Privacy Policy rests with the senior management of Gosfield, which shall designate one or more persons to be accountable for compliance with the Privacy Policy. Other individuals within Gosfield may be delegated to act on behalf of the designated person(s) or to take responsibility for the day-to-day collection and processing of personal information.

1.2 Gosfield shall make known, upon request, the title of the person or persons designated to oversee Gosfield's compliance with the Privacy Policy. Gosfield has designated the Privacy Ombudsman to oversee compliance with the Privacy Policy. The Privacy Ombudsman can be contacted at:

Privacy Ombudsman  
Gosfield North Communications Co-operative Limited  
128 County Road 34 West  
Box 130  
Cottam, Ontario N0R 1B0  
Fax: (519) 839-5505  
Email: [gosfield@gosfieldtel.ca](mailto:gosfield@gosfieldtel.ca)

1.3 Gosfield is responsible for personal information in its possession or control, including information that has been transferred to a third party for processing. Gosfield shall use appropriate means to provide a comparable level of protection while information is being processed by a third party (see Principle 7).

1.4 Gosfield has implemented policies and procedures to give effect to the Privacy Policy, including:

- a) implementing procedures to protect personal information and to oversee Gosfield's compliance with the Privacy Policy;
- b) establishing procedures to receive and respond to inquiries or complaints;
- c) training and communicating to staff about Gosfield's policies and practices; and
- d) developing public information to explain Gosfield's policies and practices.

#### *Principle 2 - Identifying Purposes for Collection of Personal Information*

Gosfield shall identify the purposes for which personal information is collected at or before the time the information is collected.

2.1 Gosfield collects personal information only for the following purposes:

- a) to establish and maintain responsible commercial relations with customers and to provide ongoing service;
- b) to understand customer needs;
- c) to develop, enhance, market or provide products and services;
- d) to manage and develop its business and operations, including personnel and employment matters; and

- e) to meet legal and regulatory requirements.

Further references to "identified purposes" mean the purposes identified in this Principle 2.1.

2.2 Gosfield shall specify orally, electronically or in writing the identified purposes to the customer or employee at or before the time personal information is collected. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within Gosfield who shall explain the purposes.

2.3 Unless required by law, Gosfield shall not use or disclose, for any new purpose, personal information that has been collected without first identifying and documenting the new purpose and obtaining the consent of the customer or employee.

### *Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information*

The knowledge and consent of a customer or employee is required for the collection, use or disclosure of personal information, except where inappropriate.

3.1 In certain circumstances personal information can be collected, used or disclosed without the knowledge and consent of the individual. For example, Gosfield may collect or use personal information without knowledge or consent if it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is a minor, seriously ill or mentally incapacitated.

Gosfield may also collect, use or disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting the information such as in the investigation of a breach of an agreement or a contravention of a federal or provincial law.

Gosfield may also use or disclose personal information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.

Gosfield may disclose personal information without knowledge or consent to a lawyer representing Gosfield, to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required by law.

3.2 In obtaining consent, Gosfield shall use reasonable efforts to ensure that a customer or employee is advised of the identified purposes for which personal information will be used or disclosed. Purposes shall be stated in a manner that can be reasonably understood by the customer or employee.

3.3 Generally, Gosfield shall seek consent to use and disclose personal information at the same time they collect the information. However, Gosfield may seek consent to use and disclose personal information after it has been collected but before it is used or disclosed for a new purpose.

3.4 Gosfield will require customers to consent to the collection, use or disclosure of personal information as a condition of the supply of a product or service only if such collection, use or disclosure is required to fulfill the identified purposes.

3.5 In determining the appropriate form of consent, Gosfield shall take into account the sensitivity of the personal information and the reasonable expectations of their customers and employees.

3.6 In general, the use of products and services by a customer, or the acceptance of employment or benefits by an employee, constitutes implied consent for Gosfield to collect, use and disclose personal information for all identified purposes.

3.7 A customer or employee may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Customers and employees may contact Gosfield for more information regarding the implications of withdrawing consent.

#### *Principle 4 - Limiting Collection of Personal Information*

Gosfield shall limit the collection of personal information to that which is necessary for the purposes identified. Gosfield shall collect personal information by fair and lawful means.

4.1 Gosfield shall collect personal information primarily from their customers or employees.

4.2 Gosfield may also collect personal information from other sources including credit bureaus, employers or personal references, or other third parties that represent that they have the right to disclose the information.

#### *Principle 5 - Limiting Use, Disclosure and Retention of Personal Information*

Gosfield shall 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 by law. Gosfield shall retain personal information only as long as necessary for the fulfillment of those purposes.

5.1 In certain circumstances personal information can be collected, used or disclosed without the knowledge and consent of the individual (see Principle 3.1).

5.2 In addition, Gosfield may disclose a customer's personal information to:

- a) another telecommunications services provider for the efficient and effective provision of telecommunications services;
- b) an entity involved in supplying the customer with communications or communications directory related services;

- c) another entity for the development, enhancement, marketing or provision of any of the products or services of Gosfield;
- d) an agent retained by Gosfield in connection with the collection of the customer's account;
- e) credit grantors and reporting agencies;
- f) a person who, in the reasonable judgment of Gosfield, is seeking the information as an agent of the customer; and
- g) a third party or parties, where the customer consents to such disclosure or disclosure is required by law.

5.3 Gosfield may disclose personal information about their employees:

- a) for normal personnel and benefits administration;
- b) in the context of providing references regarding current or former employees in response to requests from prospective employers, to the extent that such references are granted at all; or
- c) where disclosure is required by law.

5.4 Only those employees of Gosfield who require access for business reasons, or whose duties reasonably so require, are granted access to personal information about customers and employees.

5.5 Gosfield shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a customer or employee, Gosfield shall retain, for a period of time that is reasonably sufficient to allow for access by the customer or employee, either the actual information or the rationale for making the decision.

5.6 Gosfield shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

#### *Principle 6 - Accuracy of Personal Information*

Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

6.1 Personal information used by Gosfield shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a customer or employee.

6.2 Gosfield shall update personal information about customers and employees as and when necessary to fulfill the identified purposes or upon notification by the individual.

*Principle 7 - Security Safeguards*

Gosfield shall protect personal information by security safeguards appropriate to the sensitivity of the information.

7.1 Gosfield shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures. Gosfield shall protect the information regardless of the format in which it is held.

7.2 Gosfield shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

7.3 All employees of Gosfield with access to personal information shall be required as a condition of employment to respect the confidentiality of personal information.

*Principle 8 - Openness Concerning Policies and Practices*

Gosfield shall make readily available to customers and employees specific information about their policies and practices relating to the management of personal information.

8.1 Gosfield shall make information about their policies and practices easy to understand, including:

- a) The title and address of the person or persons accountable for Gosfield's compliance with the Privacy Policy and to whom inquiries or complaints can be forwarded;
- b) The means of gaining access to personal information held by Gosfield; and
- c) A description of the type of personal information held by Gosfield, including a general account of its use.

8.2 Gosfield shall make available information to help customers and employees exercise choices regarding the use of their personal information and the privacy-enhancing services available from Gosfield.

*Principle 9 - Customer and Employee Access to Personal Information*

Gosfield shall inform a customer or employee of the existence, use and disclosure of his or her personal information upon request and shall give the individual access to that information. A

customer or employee shall be able to challenge the accuracy and completeness of the information and to have it amended as appropriate.

9.1 Upon request, Gosfield shall afford to a customer or an employee a reasonable opportunity to review the personal information in the individual's file. Personal information shall be provided in an understandable form within a reasonable time and at minimal or no cost to the individual.

9.2 In certain situations, Gosfield may not be able to provide access to all of the personal information that they hold about a customer or employee. For example, Gosfield may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Gosfield may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law. If access to personal information cannot be provided, Gosfield shall provide the reasons for denying access upon request.

9.3 Upon request, Gosfield shall provide an account of the use and disclosure of personal information and, where reasonably possible, shall state the source of the information. In providing an account of disclosure, Gosfield shall provide a list of organizations to which it may have disclosed personal information about the individual when it is not possible to provide an actual list.

9.4 In order to safeguard personal information, a customer or employee may be required to provide sufficient identification information to permit Gosfield to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.

9.5 Gosfield shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, Gosfield shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

9.6 A customer can obtain information or seek access to his or her individual file by contacting a designated representative at (519) 839-4734, or by sending an email containing such a request to [godfield@godfieldtel.com](mailto:godfield@godfieldtel.com).

9.7 An employee can obtain information or seek access to his or her individual file by contacting his or her immediate supervisor.

*Principle 10 - Challenging Compliance*

A customer or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Gosfield's compliance with the Privacy Policy.

10.1 Gosfield shall maintain procedures for addressing and responding to all inquiries or complaints from their customers and employees about Gosfield's handling of personal information.

10.2 Gosfield shall inform their customers and employees about the existence of these procedures as well as the availability of complaint procedures.

10.3 The person or persons accountable for compliance with the Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.

10.4 Gosfield shall investigate all complaints concerning compliance with the Privacy Policy. If a complaint is found to be justified, Gosfield shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A customer or employee shall be informed of the outcome of the investigation regarding his or her complaint.

For inquiries, complaints or more information contact:

Privacy Ombudsman  
Gosfield North Communications Co-operative Limited  
128 County Road 34 West  
Box 130  
Cottam, Ontario N0R 1B0  
Fax: (519) 839-5505  
Email: [gosfield@gosfieldtel.ca](mailto:gosfield@gosfieldtel.ca)