



Privacy Policy

Internet Access Solutions Ltd ("IASL"), is committed to safeguarding the right of our customers and employees to privacy and the protection of their personal information. On January 1, 2004, the Government of Canada implemented the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA) that applies to all organizations and businesses that collect, use and disclose personal information in the course of business. As such Internet Access Solutions Ltd. has developed our Privacy Policy to ensure compliance with PIPEDA. These policies apply to Internet Access Solutions Ltd as well as any companies or divisions controlled by Internet Access Solutions Ltd. PIPEDA contains 10 principles that outline the responsibilities that private organizations should follow as it relates to personal information they are:

- Accountability
- Identifying purposes
- Consent
- Limiting collection
- Limiting use, disclosure, and retention
- Accuracy
- Safeguards
- Openness
- Individual access
- Challenging compliance

Personal Information includes any factual or subjective information, recorded or not about an identifiable individual. It does not include information that is publicly available such as that found in a business directory or telephone book.

Internet Access Solutions Policy

a) **Accountability**

IASL is responsible for all personal information under our control, this includes any personal information that may need to be disclosed to third parties. IASL will use contractual obligations or other means to ensure that a comparable level of protection is achieved. To ensure confidentiality of your personal information, policies and procedures have been established and we have designated a Privacy Office who will be responsible for ensuring compliance with 10 privacy principles. If you have questions or inquiries about how your personal information is stores or when it may be disclosed to others please contact privacy@iasl.com.

b) **Identifying the purpose for collection, use and disclosure of personal information**

IASL will identify to you the purpose for collecting personal information before, or at the time the information is collected. IASL will only collect personal information that is required for your telecommunications services and will only disclose that information to a 3rd party with your express consent or for legal reasons.

c) **Consent**

IASL will make every reasonable effort to ensure that our customers or the customer's authorized representative understand and consent to how their personal information will be used. Seeking consent may also be impossible or inappropriate when the customer is a minor, seriously ill or mentally incapacitated. Written requests and consents to release information will be kept in the customer's records. We will disclose personal information to third parties only with your express consent, or when necessary for legal, audit or regulatory reasons. We will ensure that customer confidentiality is maintained regardless of the technology used to communicate personal information.

d) **Limiting Collection of Personal Information**

IASL will only collect personal information that is required to provide telecommunication services to which you have subscribed. We will always collect personal information using fair and legal means.

e) **Limiting Use, Disclosure, and retention of Personal Information**

Personal information will not be used or disclosed for purposes other than for which it was collected, except with your consent or as permitted or required by law.

f) **Accuracy of Personal Information**

IASL will ensure that personal information is as accurate, current and complete as is necessary for the purposes for which it was collected

g) **Safeguarding your Personal Information**

IASL will ensure Personal information will be protected by the security safeguards appropriate to the sensitivity of the information. IASL will use appropriate safeguards to protect against risks such as data loss, theft, un-authorized access, copying, modification and deletion.

h) **Openness**

IASL will be open about the policies and procedures used to manager customer's Personal Information. Customers will have access to information about these policies and procedures and the language used will be easy to understand. IASL will make all reasonable efforts so that users are made aware of the location of policies.

i) **Access to Personal Information**

IASL will inform its customers of the existence, use and disclosure of their personal information upon request and provide access to that information. Customers are able to challenge the accuracy and completeness of their personal information and have it amended as appropriate. Certain exceptions may come up from time to time, where we may not be able to provide you with access to all of the personal information we hold. Exceptions may include information that contains references to other individuals. Customers can obtain information or seek access to their individual customer records by contacting our designated Privacy Officer at privacy@iasl.com

j) **Challenging Compliance to Privacy Policy**

IASL Customers may challenge IASLs compliance with our Privacy Policy. All customer challenges should be directed to our Privacy Office at privacy@iasl.com. IASL will make every effort to respond in a timely manner to all customer enquiries regarding the compliance of our Private Policy.

CRTC (2009-723) Customer Confidentiality Provisions

In addition to the IASL Privacy Policy above IASL applies the following Customer Confidentiality Provisions per Canadian Radio-television and Telecommunications Commission ("CRTC") Decision 2009-723:

Unless a customer provides express consent or disclosure is pursuant to a legal power, all information kept by the company regarding the customer, other than the customer's name, address, and listed telephone number, is confidential and may not be disclosed by the company to anyone other than

- the customer;
- a person who, in the reasonable judgment of the company, is seeking the information as an agent of the customer;
- another telephone company, provided the information is required for the efficient and cost-effective provision of telephone service and disclosure is made on a confidential basis with the information to be used only for that purpose;
- a company involved in supplying the customer with telephone or telephone directory related services, provided the information is required for that purpose and disclosure is made on a confidential basis with the information to be used only for that purpose;
- an agent retained by the company in the collection of the customer's account, provided the information is required for and is to be used only for that purpose;
- 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 information; or
- an affiliate involved in supplying the customer with telecommunications and/or broadcasting services, provided the information is required for that purpose and disclosure is made on a confidential basis with the information to be used only for that purpose.