

FREEDOM MOBILE INC. - 2016 TRANSPARENCY REPORT

FREEDOM MOBILE'S COMMITMENT AND APPROACH

Freedom Mobile Inc. ("Freedom Mobile") is dedicated to bringing affordable wireless service to Canadians by offering value, fairness and transparency.

Freedom Mobile is committed to respecting the privacy of its customers and protecting their personal information, while at the same time contributing to our collective well-being by helping to ensure public safety. It's an important balance to strike.

As such, we respond to requests from government organizations such as law enforcement agencies, national security agencies and regulatory authorities ("Government Organizations"). However, we will only disclose customer information when permitted by law, including in emergency circumstances where a person's safety is at risk or where we have reasonable grounds to believe a crime is being committed. Each request for personal information or consideration of whether to release information voluntarily is carefully evaluated by a dedicated team of in-house experts to ensure that any release of such information is supported by the *Personal Information Protection and Electronic Document Act* ("PIPEDA").

In circumstances where Freedom Mobile believes requests for personal information are too broad or are not justified under the law (for example, in connection with broad cell tower record requests), we engage with the Government Organization that submitted the request to alert them of potential grounds for refusal and determine what additional steps can be taken.

In addition, Freedom Mobile has always been and remains involved in the broader privacy discussions that involve our customers' personal information. In particular, Freedom Mobile is following very closely the developments related to access to basic subscriber information by Government Organizations. We have attended a series of consultations and roundtables organized by the federal government on this issue, to ensure we have the ability to voice concerns when a proposal disrupts the checks and balances currently in place.

This Transparency Report has been prepared in a manner that is generally consistent with the Categories of Disclosures set out in the Transparency Reporting Guidelines ("Guidelines") published by Canada's Department of Innovation, Science and Economic Development.

2016 LAWFUL ACCESS REQUESTS AND DISCLOSURES



DATA TYPE	NUMBER OF REQUESTS	NUMBER OF DISCLOSURES**	NUMBER OF REQUESTS REJECTED OR CONTESTED
Voluntary disclosure at the request of a Government Agency	0-100*	0-100	0-100
Voluntary disclosure on the initiative of Freedom Mobile	0-100	0-100	0-100
Disclosures in emergency or exigent circumstances (including PSAP Support)	10,716	10,716	0-100
Disclosure made in compliance with federal or provincial law	0-100	0-100	0-100
Court ordered (warranted) Disclosures	4,310***	4,310	0-100
(e) Real-time interceptions	200****	200	0-100
Other Requests: Preservation demands and orders	0-100	Not Available	0-100

* *Transparency Reporting Guidelines, published by Innovation, Science and Economic Development Canada (ISED) at <http://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf11057.html>, provide that when reporting statistics in the categories set out below, figures between 1 and 100 should be represented in a band of "0–100" to protect the operational activities and capabilities of Canadian Government Organizations.*

** *Freedom Mobile did not report on number of persons/accounts with data disclosed in 2016.*

*** *Freedom Mobile counts as one request each individual Request made pursuant to a warrant.*

*****Include Tracking Warrants*

NATURE OF DISCLOSURE DESCRIBED ABOVE

Voluntary disclosures at the request of a Government Organization (including law enforcement):

These are made in circumstances where a warrant or court order is not required to obtain information, including information needed to locate and notify the next-of-kin of an injured, ill or deceased person, return stolen property or assist in the search for missing or lost persons.

Voluntary disclosures on the initiative of Freedom Mobile:

These are made for limited purposes set out in PIPEDA, including reporting a crime, without a request from a Government Organization.

Disclosures in emergency or exigent circumstances:

These are made in response to requests made to assist law enforcement agencies in situations involving serious or imminent harm to any person or property without application to a judge. The disclosures are governed by relevant provisions of the *Criminal Code*, including ss. 184.1, 184.4 and 487.11, other relevant statutes, and common law.

Disclosures in compliance with federal or provincial law:

These are made in response to compellable requests made by Government Organizations under the express authority of federal or provincial legislation, such as the *Customs Act* or *Income Tax Act*, for regulatory enforcement or other government purpose.

Court-ordered (warranted) disclosures:

These are made in response to production orders, court orders, summons, subpoenas, and search warrants issued by a judge or other judicial officer. This category includes a number of different types of orders, including court orders or warrants for basic identifying information, account information, tracking data, transmission data, stored communications content and other stored data, and real time interception.

Preservation demands and orders:

Refer to demands by peace or public officers, or orders by a justice or judge requiring a person to preserve computer data for either 21 or 90 days, depending on the circumstances. Preservation demands and orders simply compel a person to not delete data in their possession or control. No information is actually obtained by Government Organizations making preservation requests. This allows Government Organizations time to submit an appropriate request for a court-authorized production order with respect to the preserved information.