

FREEDOM MOBILE INC. - 2019 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.

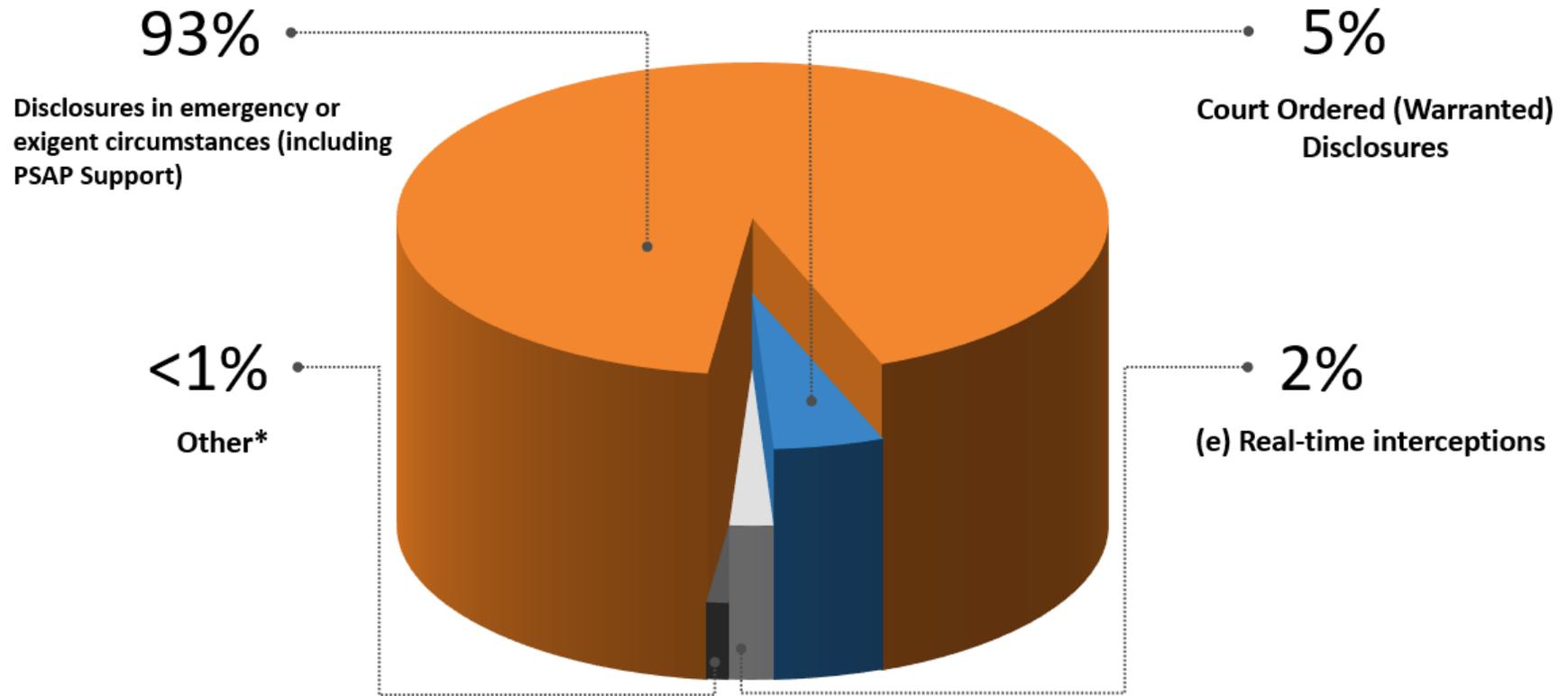
Freedom Mobile is committed to respecting the privacy of its customers and protecting their personal information, while at the same time contributing to our collective well-being by helping to ensure public safety. It's an important balance to strike. In addition, Freedom Mobile has always been and remains involved in the broader privacy discussions that involve our customers' personal information.

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 Documents 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 to refine the request.

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.

2019 Disclosures



** Includes voluntary disclosures at the request of a Government Agency or on the initiative of Freedom Mobile, disclosures made in compliance with Federal or Provincial Law, or other requests including Preservation Demands and Orders. Definitions of these categories may be found on page 6 of this Transparency Report.*

Disclosures in Emergency or Exigent Circumstances

Disclosures in emergency or exigent circumstances 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.

Number of Requests	Number of Disclosures ¹	Number of Requests Rejected or Contested	Number of Persons/ Accounts with Data Disclosed
16348	16348	0-100 ²	16684 ³

¹ The number of disclosures in response to a request for information from a Government Organization include those requests that require Freedom Mobile to obtain additional information from the Government Organization prior to disclosure or if a request is partially fulfilled.

² 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.

³ Circumstances may occur in which the number of disclosures or persons or accounts whose data is disclosed exceeds the number of requests because requests apply to one or more persons or accounts.

Court Ordered (Warranted) Disclosures

Court Ordered (Warranted) Disclosures 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, and stored communications content and other stored data. Real-Time Interceptions are tracked separately and are not included in this category.

Number of Requests	Number of Disclosures	Number of Requests Rejected or Contested	Number of Persons/ Accounts with Data Disclosed
864	864	0-100	18339 ⁴

⁴ Circumstances may occur in which the number of disclosures or persons or accounts whose data is disclosed exceeds the number of requests by Government Organizations because requests apply to one or more persons or accounts.

Court Ordered Disclosures - Real-Time Interceptions

Real time interception (obtained via wiretap warrant; governed by Part VI of the *Criminal Code* and other relevant statutes): refers to private communications intercepted by means of any electro-magnetic, acoustic, mechanical or other device.

Number of Requests	Number of Disclosures	Number of Requests Rejected or Contested	Number of Persons/ Accounts with Data Disclosed
312 ⁵	312	0-100	5895 ⁶

⁵ Includes Tracking Warrants.

⁶ Circumstances may occur in which the number of disclosures or persons or accounts whose data is disclosed exceeds the number of requests because requests apply to one or more persons or accounts.

Voluntary Disclosures at the Request of a Government Organization (Including Law Enforcement):

Voluntary disclosures at the request of a Government Organization 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:

Voluntary disclosures on the initiative of Freedom Mobile are made for limited purposes set out in PIPEDA, including reporting a crime, without a request from a Government Organization.

Disclosures in Compliance with Federal or Provincial Law:

Disclosures in compliance with federal or provincial law 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.

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.

The number of requests, disclosures, requests rejected or contested and persons or accounts with data disclosed was between 0-100 for each of the categories indicated above.