

Effective as of November 14, 2017

Purpose and Application

This privacy policy (the "Privacy Policy") applies to Freedom Mobile Inc. ("Freedom Mobile", "us" or "we"). Freedom Mobile is very sensitive to the privacy concerns of our customers, potential customers and visitors to our website, so we have developed this Privacy Policy to:

- describe what types of Personal Information (as described below) we collect from customers, potential customers and visitors to our website and stores;
- set out the purposes for which we use Personal Information;
- identify the third parties to whom we disclose Personal Information;
- describe how we safeguard Personal Information;
- set out what rights you have regarding Personal Information; and
- let you know how to contact us if you have questions or concerns.

Freedom is committed to protecting Personal Information and has established its Privacy Policy using the ten principles set out in the National Standard of Canada entitled Model Code for the Protection of Personal Information. These ten principles are the following:

1. Being accountable
2. Identifying the purposes for Personal Information collection
3. Obtaining consent
4. Limiting the collection of Personal Information
5. Limiting the use, disclosure and retention of Personal Information
6. Keeping Personal Information accurate
7. Safeguarding Personal Information
8. Being open about policies and practices
9. Providing individual access to Personal Information
10. Challenging Compliance

Freedom Mobile relies on these ten principles to protect the Personal Information collected from its customers, potential customers and visitors to our website. Freedom Mobile has established this Privacy Policy in accordance with The Personal Information Protection and Electronic Documents Act ("PIPEDA")

This Privacy Policy does not apply to independent retailers of our products and services, except to the extent they provide us with your Personal Information to enable us to deliver services to you.

Personal Information and Collection

In this Privacy Policy, "Personal Information" means information about an identifiable individual, for example an individual's name, account number, e-mail address, payment information, user logs or certain numbers associated with that individual's equipment (for example a wireless phone number) if Freedom Mobile can link such numbers to the individual. It does not include aggregate information that cannot be associated with a specific individual. We only collect Personal Information when you voluntarily submit it to us, when you authorize us to collect it from third parties or when third parties have the right to provide us your Personal Information.

Use of Information

Freedom Mobile and its affiliates may use Personal Information for the following purposes:

- to conduct marketing research;
- to send you marketing and other communications;
- to understand your needs and preferences and your eligibility for our products & services;

- to develop and enhance our products and services;
- to provide you products and services, including sending and receiving confirmations, communications and bills, validating your identity, providing you support, authorizing and processing payments or performing credit checks;
- to respond to specific requests from you;
- to administer and manage our business and operations, including the protection of the security and integrity of our services and our website; and
- to meet legal and regulatory requirements.

We will only use your Personal Information for the purposes for which it was collected, and will only retain your Personal Information only as long as we require it for such purposes. Our general retention guideline is a 7-year period, which extends to all our corporate records including our customer & billing database. This allows us to meet our financial accountability and SOX audit obligations. Outside of the 7-year period, retention is defined based on length of time information is needed to meet the purpose(s) for which it has been collected and takes into account the sensitivity of the personal information. For example, we keep call records for 2 years, and IP logs for 180 days.

Freedom Wi-Fi

Freedom Mobile will automatically collect certain information such as Device location, Device type, and general usage information associated to the Media Access Control (“MAC”) address associated with your Device (the “Device Information”). The Device Information is used to deliver the Freedom Wi-Fi service, monitor and improve network traffic, improve your Freedom Wi-Fi experience and for research and statistical purposes. In certain instances, Freedom Mobile will rely on a third party to deliver Freedom Wi-Fi services at a specified location (for example, certain airports, universities or other public buildings). The relationship with the third party is governed by strict privacy provisions, in compliance with PIPEDA. As part of the delivery of the Freedom Wi-Fi services, the third party may have access to the Device Information, which can only be used for limited network monitoring and improvement purposes.

Use of Cookies

Freedom Mobile uses cookies on the freedommobile.ca website and the Freedom Mobile My Account mobile application.

What are cookies?

Cookies are small pieces of text containing unique identification numbers that identify a user's browser – but not the user personally – sent by their web browser by the websites they visit. A cookie file is stored in the user's web browser and allows websites to recognize the user anonymously to assist in making their next visit to the website more useful for them.

How Freedom Mobile uses cookies

When you use and access the Freedom Mobile website, we may place a number of cookies files in your web browser.

We use cookies for the following purposes:

- To enable certain functions of our site
- To provide analytics
- To store your preferences

We use different types of cookies:

- **Essential cookies.** We may use essential cookies to authenticate users and prevent fraudulent use of user accounts.
- **Preferences cookies.** We may use preferences cookies to remember information that changes the way the website behaves or looks, such as the "remember me" functionality of a registered user.
- **Analytics cookies.** We may use analytics cookies to track information how the website is used so that we can make improvements. We may also use analytics cookies to test new promotions, pages, features or new functionality of the website to see how our users react to them.

Third-party cookies

In addition to our own cookies, we may also use various third-parties cookies to report usage statistics of the website and remarket our advertisements on other websites.

What are your choices regarding cookies?

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

- For the Chrome web browser, please visit this page from Google: <https://support.google.com/accounts/answer/32050>
- For the Internet Explorer web browser, please visit this page from Microsoft: <http://support.microsoft.com/kb/278835>
- For the Firefox web browser, please visit this page from Mozilla: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- For the Safari web browser, please visit this page from Apple: https://support.apple.com/kb/PH21411?locale=en_US
- For any other web browser, please visit your web browser's official web pages.

You can also opt-out of several third party ad servers' and networks' cookies simultaneously using a tool created by the Network Advertising Initiative located at http://www.networkadvertising.org/managing/opt_out.asp. Opting out of a network does not mean you will no longer receive online advertising. It does mean that the network from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

Disclosure of Information

Freedom Mobile may share Personal Information it collects to independent contractors of Freedom Mobile, subsidiaries and affiliates of Freedom Mobile, consultants, business associates, authorized retailers, dealers, suppliers, service providers, roaming partners, directory listing providers and credit and collection agencies, if and to the extent the disclosure will enable that party to perform a function related to one of the purposes described above.

In the event that a third party service provider or roaming partner is located in a foreign country, Personal Information may be processed and stored in such other foreign country. In such circumstances, the governments, courts or law enforcement or regulatory agencies of that country may be able to obtain access to your Personal Information through the laws of the foreign country. When Freedom Mobile engages a third party service provider, we require that its privacy and security standards adhere to this Privacy Policy and applicable Canadian privacy legislation.

Except as required or permitted by law, when disclosure is made to a third party other than a Freedom Mobile associate or affiliate, a third party service provider or roaming partner, the consent of the individual shall be obtained and reasonable steps shall be taken to ensure that any such third party has Personal Information privacy procedures and policies in place that are comparable to those implemented by Freedom Mobile. Such third parties are provided only with such information as is necessary in the circumstances. Personal Information provided to third parties may be used only for the purpose stipulated and is subject to strict terms of confidentiality.

We may from time to time engage in transactions such as the sale or securitization of assets, the sale of shares in our company, amalgamations and similar transactions and will disclose Personal Information to other persons in connection with their review of such a transaction.

We will also disclose Personal Information as required to meet legal and regulatory requirements or to support emergency calls (for example 911 calls).

Safeguarding Personal Information

We maintain physical, electronic, and procedural safeguards designed to protect your Personal Information. We review such safeguards on a periodic basis and revise them if necessary. We take reasonable steps designed to limit access to Personal Information only to persons as provided for in this Privacy Policy.

Freedom Mobile primarily routes voice traffic on its wireless network internally and through domestic alternate carriers for back-up purposes. Voice traffic is routed outside of Canada when calls are made by Freedom Mobile customers to a non-Canadian destination or when a Freedom Mobile customer calls outside of Canada using their Device.

Your Rights

You may:

- refuse to provide us with your Personal Information;
- ask us for access to Personal Information that we hold about you;
- ask us for information about our policies and procedures relative to the management of Personal Information
- ask us for access to Personal Information that we hold about you;
- ask us to correct any inaccuracies or omissions in your Personal Information; or
- ask us to remove Personal Information we possess, subject to reasonable notice, existing legal or regulatory obligations and our reasonable business requirements

However, we may not be able to offer you some of our services or functions of our website if you do not provide us with certain Personal Information or ask for your Personal Information to be removed. Marketing communications will only be sent to you if you elect to receive them when you register on our website or when you sign up for our services. You may opt out of receiving marketing communications at any time by selecting the “unsubscribe” option (in the case of e-mail communications), visiting our website or contacting our call centre.

Transparency Report

Freedom Mobile complies with Canadian privacy law and take active steps to fully safeguard the information of our customers. At the same time we are compelled by law to respond to federal, provincial and municipal government and law enforcement agencies when they have a legally valid request - like a search warrant or court order. Our customers' privacy is important to us and that is why we have issued a Transparency Report. This report is designed to provide more details on the number and types of requests we received in 2016.

Download our 2016 Transparency Report at freedommobile.ca/transparency.

Links to other sites

Our website contains links to other third-party websites and online services. If you choose to visit another website or online service by clicking on a link, you will be directed to that third party's website or online service. The fact that we may link with a website or online service is not an endorsement of their privacy policy or information security policies or practices. We do not exercise control over these third parties and they may place their own cookies or other files on your computer and collect data or solicit Personal Information from you. Other sites and online services follow different rules regarding the collection, use and/or disclosure of Personal Information. We encourage you to read the privacy policies or statements of the other websites or online services you visit before providing any information or using such websites or services.

Contacting Us

If you have concerns or enquiries regarding your Personal Information or this Privacy Policy, please contact us through our website or call centre. If required, our customer service representatives will be happy to refer the matter to our Chief Privacy Officer. You may also contact our Chief Privacy Officer in writing at the following address:

Chief Privacy Officer

Privacy Policy



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