



Our privacy commitment to you

The TELUS Privacy Code incorporates ten principles of the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information (CAN/CSA-Q830-96). These principles were published in March 1996 as a National Standard of Canada and form the basis of all applicable privacy legislation in Canada, including the Part 1 of the Personal Information Protection and Electronic Documents Act (Statutes of Canada 2000).

The TELUS Privacy Code was originally published in 1998 as part of our long-standing commitment to the protection of our clients' and employees' personal information. It was updated in September 2000 to reflect changes associated with the implementation of the federal privacy legislation referred to above, and subsequently updated to comply with applicable provincial privacy legislation where applicable.



Table of contents

Table of contents	2
Introduction	3
Summary of principles	4
■ Principle 1 – Accountability	4
■ Principle 2 – Identifying purposes for collection of personal information	4
■ Principle 3 – Obtaining consent for collection, use or disclosure of personal information	4
■ Principle 4 – Limiting collection of personal information	4
■ Principle 5 – Limiting use, disclosure, and retention of personal information	4
■ Principle 6 – Accuracy of personal information	4
■ Principle 7 – Security safeguards	4
■ Principle 8 – Openness concerning policies and practices	4
■ Principle 9 – Client and employee access to personal information	4
■ Principle 10 – Challenging compliance	4
Scope and application	5
Definitions	6
The TELUS Privacy Code in detail	7
■ Principle 1 – Accountability	7
■ Principle 2 – Identifying purposes for collection of personal information	7-8
■ Principle 3 – Obtaining consent for collection, use or disclosure of personal information	8-9
■ Principle 4 – Limiting collection of personal information	9
■ Principle 5 – Limiting use, disclosure, and retention of personal information	9-10
■ Principle 6 – Accuracy of personal information	11
■ Principle 7 – Security safeguards	11
■ Principle 8 – Openness concerning policies and practices	12
■ Principle 9 – Client and employee access to personal information	12-13
■ Principle 10 – Challenging compliance	13-14

Introduction

TELUS is Canada's second largest telecommunications company and provides a full range of advanced communication services and products connecting Canadians with the world. For TELUS, client privacy is a high priority. We have a long-standing policy of protecting the privacy of clients in all of our business operations. The TELUS Privacy Code is a formal statement of principles and guidelines concerning the minimum requirements for the protection of personal information provided by TELUS to its clients (subject to the **exception** noted below) and employees. The objective of the TELUS Privacy Code is to promote responsible and transparent practices in the management of personal information, in accordance with the provisions of the Personal Information Protection and Electronic Documents Act and other applicable provincial privacy legislation. TELUS will continue to review its Privacy Code to ensure it is relevant and remains current with changing technologies and laws. Most importantly, TELUS wants to ensure it continues to meet the evolving needs of our clients and employees.

Exception: This code does not apply to personal information provided by or about clients of Emergis Inc. or of any TELUS subsidiary (or operating division within any TELUS subsidiary) that previously operated as Emergis Inc. The principles and guidelines governing the collection, use and disclosure of such personal information are included in the "Emergis Corporate Privacy Policy Protecting Personal Information."



Summary of principles

Principle 1 – Accountability

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

Principle 2 – Identifying purposes for collection of personal information

TELUS 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 client or employee are required for the collection, use, or disclosure of personal information, except where inappropriate.

Principle 4 – Limiting collection of personal information

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

Principle 5 – Limiting use, disclosure, and retention of personal information

TELUS 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. TELUS 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

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

Principle 8 – Openness concerning policies and practices

TELUS shall make readily available to clients and employees specific information about its policies and practices relating to the management of personal information.

Principle 9 – Client and employee access to personal information

TELUS shall inform a client 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 client or employee shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Principle 10 – Challenging compliance

A client or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for TELUS' compliance with the TELUS Privacy Code.

Scope and application

The ten principles, which form the basis of the TELUS Privacy Code, are interrelated and TELUS shall adhere to the ten principles as a whole. Each principle must be read in conjunction with the accompanying commentary. As permitted by the Personal Information Protection and Electronic Documents Act and other provincial privacy legislation where applicable, the commentary in the TELUS Privacy Code has been tailored to reflect personal information issues specific to TELUS.

The scope and application of the TELUS Privacy Code are as follows:

- The Code applies to personal information about TELUS' clients (subject to the exception noted below) and employees that is collected, used, or disclosed by TELUS.
- The Code applies to the management of personal information in any form whether oral, electronic or written.
- The Code does not impose any limits on the collection, use or disclosure of the following information by TELUS:
 - A client's name, address, telephone number and email address, when listed in a directory or available through directory assistance
 - An employee's name, title, business address (including email address) or business telephone or fax number
 - Other information about the client or employee that is publicly available and is specified by regulation pursuant to the Personal Information Protection and Electronic Documents Act and other provincial privacy legislation, where applicable.
- The Code does not apply to information regarding TELUS' corporate clients; however, such information is protected by other TELUS policies and practices and through contractual arrangements.
- The application of the TELUS Privacy Code is subject to the requirements and provisions of Part 1 of the Personal Information Protection and Electronic Documents Act, and the regulations thereunder, provincial privacy legislation (where applicable), and any applicable regulations of the Canadian Radio-television and Telecommunications Commission.

Exception: This code does not apply to personal information provided by or about clients of Emergis Inc. or of any TELUS subsidiary (or operating division within any TELUS subsidiary) that previously operated as Emergis Inc. The principles and guidelines governing the collection, use and disclosure of such personal information are included in the "Emergis Corporate Privacy Policy Protecting Personal Information."

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. Depending on the circumstances and the province where the personal information is collected, used or disclosed, consent can be either express (mandatory in certain provinces) 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 TELUS. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

Client – An individual who uses, or applies to use, TELUS' products or services, where such individual is a residential client or an individual carrying on business alone as a sole proprietorship or in partnership with other individuals.¹

Disclosure – Making personal information available to a third party.

Employee – An employee of TELUS.

Personal information – Information about an identifiable client or employee, but does not include aggregated information that cannot be associated with a specific individual. For a client, such information includes a client'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 (including email address) or business telephone or fax numbers. Information about sole proprietors or partners is only considered to be "personal information" for purposes of the TELUS Privacy Code if it is information about the individuals themselves, as distinct from information about their businesses. The latter is protected by other TELUS policies and practices and through contractual arrangements.

TELUS – TELUS Corporation and its subsidiary companies, as they may exist from time to time. These include, without limitation, the subsidiaries which carry on business under the following names: TELUS, TELUS Communications Company, TELUS Mobility, TELUS Internet Services, TELUS Québec, and Emergis Inc. (or operating division within any TELUS subsidiary that currently operates or previously operated as Emergis Inc.). "TELUS" does not include independent dealers and distributors of TELUS products and services.

Third party – An individual or organisation outside TELUS.

Use – The treatment, handling, and management of personal information by and within TELUS.

¹ For greater certainty, an individual, if any, who uses or applies to use products and services of Emergis Inc. (or operating division within any TELUS subsidiary companies that currently operates or previously operated as Emergis Inc.) should refer to the "Emergis Corporate Privacy Policy Protecting Personal Information" for a description of the guidelines and principles governing the collection, use and disclosure by Emergis of such information.

The TELUS Privacy Code in detail

Principle 1 – Accountability

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

1.1

Responsibility for ensuring compliance with the provisions of the TELUS Privacy Code rests with the senior management of TELUS, which shall designate one or more persons to be accountable for compliance with the Code. Other individuals within TELUS 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

TELUS shall make known, upon request, the title of the person or persons designated to oversee TELUS' compliance with the TELUS Privacy Code.

1.3

TELUS is responsible for personal information in its possession or control. TELUS 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

TELUS shall implement policies and procedures to give effect to the TELUS Privacy Code, including:

- Implementing procedures to protect personal information and to oversee TELUS' compliance with the TELUS Privacy Code
- Establishing procedures to receive and respond to inquiries or complaints
- Training and communicating to staff about TELUS' policies and practices
- Developing public information to explain TELUS' policies and practices.

Principle 2 – Identifying purposes for collection of personal information

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

2.1

TELUS collects personal information only for the following purposes:

- To establish and maintain responsible commercial relations with clients and to provide ongoing service
- To understand client needs and preferences
- To develop, enhance, market or provide products and services
- To manage and develop TELUS' business and operations, including personnel and employment matters
- To meet legal and regulatory requirements.

Further references to “identified purposes” mean the purposes identified in this Principle.

The TELUS Privacy Code in detail

2.2

TELUS shall specify orally, electronically or in writing (as determined by the applicable privacy legislation) the identified purposes to the client 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 TELUS who shall explain the purposes.

2.3

Unless required by law, TELUS 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 client or employee.

2.4

Telephone calls to or from TELUS service representatives may be monitored or recorded for quality assurance purposes.

Principle 3 – Obtaining consent for collection, use or disclosure of personal information

The knowledge and consent of a client or employee are required for the collection, use, or disclosure of personal information, except where not required by applicable privacy legislation. In certain circumstances personal information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, TELUS may collect or use personal information without knowledge or consent if it is clearly in the interests of the individual and consent can not be obtained in a timely way, such as when the individual is seriously ill or mentally incapacitated.

TELUS 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.

TELUS 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.

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

3.1

In obtaining consent, TELUS shall use reasonable efforts to ensure that a client 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 client or employee.

3.2

Generally, TELUS shall seek consent to use and disclose personal information at the same time it collects the information. However, TELUS 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.

The TELUS Privacy Code in detail

3.3

TELUS will require clients 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.

3.4

In determining the appropriate form of consent, TELUS shall take into account the sensitivity of the personal information and the reasonable expectations of its clients and employees.

3.5

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

3.6

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

Principle 4 – Limiting collection of personal information

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

4.1

TELUS collects personal information primarily from its clients or employees.

4.2

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

Principle 5 – Limiting use, disclosure, and retention of personal information

TELUS 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. TELUS shall retain personal information only as long as necessary for the fulfillment of those purposes.

5.1

TELUS may disclose a client's personal information to:

- A person who in the reasonable judgment of TELUS is seeking the information as an agent of the client
- Another telecommunications company for the efficient and cost-effective provision of telecommunications services

The TELUS Privacy Code in detail

- A company involved in supplying the client with communications or communications directory related services
- A company or individual employed by TELUS to perform functions on its behalf, such as research or data processing
- Another company or individual for the development, enhancement, marketing or provision of any of TELUS' products or services
- An agent used by TELUS to evaluate the client's creditworthiness or to collect the client's account
- A credit reporting agency
- A public authority or agent of a public authority, if in the reasonable judgment of TELUS, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information
- A third party or parties, where the client consents to such disclosure or disclosure is required by law to meet legal or regulatory requirements such as under a court order or to a government institution.

5.2

From time to time TELUS may sell parts of its business, sell or securitize assets, or merge or amalgamate part of all of its business with other entities. Since client and account information will normally be a part of such transactions, TELUS may use or disclose such information to other parties included in the transaction, as part of due diligence and/or completion of the transaction.

5.3

TELUS may disclose personal information about its employees:

- For normal personnel and benefits administration
- In the context of providing references regarding current or former employees in response to requests from prospective employers
- Where the employee consents to such disclosure or disclosure is required by law.

5.4

Only TELUS' employees with a business need to know, or whose duties reasonably so require, are granted access to personal information about clients and employees.

5.5

TELUS 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 client or employee, TELUS shall retain, for a period of time that is reasonably sufficient to allow for access by the client or employee, either the actual information or the rationale for making the decision.

5.6

TELUS 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.

The TELUS Privacy Code in detail

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 TELUS 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 client or employee.

6.2

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

Principle 7 – Security safeguards

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

7.1

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

7.2

TELUS 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 of TELUS' employees with access to personal information shall be required to respect the confidentiality of that information.

7.4

TELUS may store and process personal information in Canada or another country. In either case, the personal information is protected with appropriate security safeguards, but may be available to government agencies under applicable law.

The TELUS Privacy Code in detail

Principle 8 – Openness concerning policies and practices

TELUS shall make readily available to clients and employees specific information about its policies and practices relating to the management of personal information.

8.1

TELUS shall make information about its policies and practices easy to understand, including:

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

8.2

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

Principle 9 – Client and employee access to personal information

TELUS shall inform a client 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 client or employee shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

9.1

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

9.2

In certain situations, TELUS may not be able to provide access to all the personal information that it holds about a client or employee. For example, TELUS 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, TELUS 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, TELUS shall provide the reasons for denying access upon request.

The TELUS Privacy Code in detail

9.3

Upon request, TELUS 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, TELUS 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 client or employee may be required to provide sufficient identification information to permit TELUS 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

TELUS 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, TELUS 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

Clients can seek access to their personal information by contacting a designated representative at TELUS' business offices.

9.7

Employees can seek access to their personal information by contacting their immediate supervisor within TELUS.

Principle 10 – Challenging compliance

A client or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for TELUS' compliance with the TELUS Privacy Code.

10.1

TELUS shall maintain procedures for addressing and responding to all inquiries or complaints from its clients and employees about TELUS' handling of personal information.

The TELUS Privacy Code in detail

10.2

TELUS shall inform its clients 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 TELUS Privacy Code may seek external advice where appropriate before providing a final response to individual complaints.

10.4

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

10.5

A client or employee may seek advice from the Office of the Privacy Commissioner of Canada at 1-800-282-1376 or info@privcom.gc.ca or the provincial Privacy Commissioner having jurisdiction, and, if appropriate, file a written complaint with the Commissioner's office. However, the client or employee is encouraged to use TELUS' internal information and complaint procedures first.

For more information on TELUS' privacy practices, visit the TELUS Privacy Web site at www.telus.com and clicking on "Privacy" or call 1-800-567-0000.