



## SHAW COMMUNICATIONS INC. PRIVACY POLICY

Privacy Policy last revised on April 15, 2021

If you have any questions regarding our Privacy Policy, please contact [shaw.privacy@sjrb.ca](mailto:shaw.privacy@sjrb.ca) or use the contact information shown on any of Shaw's websites.

### 1- Our commitment to you

Shaw is an enhanced connectivity provider. Our Consumer division serves consumers with broadband Internet, Shaw Go WiFi and digital phone. The Business Network Services division provides business customers with Internet, data, WiFi, telephony and video.

Shaw has always been and will continue to be committed to protecting Personal Information. Shaw 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

Shaw relies on these ten principles to protect the Personal Information collected from its Customers and Web Site Users. Shaw has established its Privacy Policy in accordance with *The Personal Information Protection and Electronic Documents Act* ("PIPEDA")

### 2- Definitions

**"Shaw", "we" or "our":**

Means Shaw Communications Inc. and each of its subsidiaries and affiliates as they may exist from time to time.

**"Customer", "you" or "your":**

Means an individual who: (a) has an account with Shaw; (b) subscribes for, uses, has used, or applies to use Shaw's products and/or services; (c) corresponds with Shaw; (d) is a Web Site User; and/or (d) enters a contest sponsored or administered by Shaw.

**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 MAC address or IP address), if Shaw can link such numbers to the individual. It does not include aggregate information that cannot be associated with a specific individual.

**Web Site User:**

Means a user of a website owned, controlled or managed by Shaw from which Shaw collects Personal Information.

### 3- Frequently asked questions

#### 3.1 What type of Personal Information does Shaw collect?

##### 3.1.1 Customer's Personal Information:

- General:  
If you wish to obtain any of Shaw's products and/or services, Shaw will collect information about you when you subscribe for any of these products and/or services. The type of information we collect varies based on the service you have requested. The Personal Information most often collected and maintained in a Customer file may include (but is not limited to) name, address for service, mailing address, phone number(s), a piece of acceptable identification, alternate contact information, banking information for payment, non-Shaw email address (i.e. if you are an eBill user or if you are a Shaw Direct customer subscribing to one of our newsletters), credit card information for payment, credit rating/score. In order to conduct credit checks, we will collect one or more of the following: driver's license number, Social Insurance number, credit card number and/or date of birth. If we need to know about your credit history we may also receive information from third parties.
- Collection and Use of Television Set-Top Box Data:  
Certain digital set-top boxes used by Customers who subscribe for video services, and the FREERANGE TV mobile app, automatically collect raw household tuning data (the "Tuning Data"). Tuning Data is used for billing purposes, diagnostic purposes, for the tuning of recommendation engines and to measure television viewership. Shaw creates a database of anonymized and/or aggregated viewing behaviour by pairing Tuning Data with non-sensitive information in Customer files. This helps Shaw understand Customer reactions to television content and advertising. The collection of Tuning Data is critical to operating our video services and cannot be disabled. However, you can choose to opt-out of Shaw's use of Tuning Data in an anonymized and aggregated database by using the process described in Subsection 3.3 below. You can also disable the delivery of recommendations via your set-top-box settings.
- Collection and Use of Personal information in connection with Shaw Go WiFi:  
In order to access Shaw Go WiFi, you will be requested to provide your Shaw User ID, password and certain other information that may be requested from time to time. Shaw will also 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 Shaw Go WiFi service, monitor and improve network traffic, improve your Customer experience and for research and statistical purposes. Shaw may from time to time use the Device Information to deliver advertising to the browser you are using to access the Internet as outlined in our Terms of Use for Shaw Go WiFi. In certain instances, Shaw will rely on a third party to deliver Shaw Go WiFi

services at a specified location (for example, certain airports, universities or other locations). The relationship with the third party is governed by strict privacy provisions, in compliance with PIPEDA. As part of the delivery of the Shaw Go WiFi services, the third party may have access to the Device Information, which can only be used for limited network monitoring and improvement purposes.

### 3.1.2 Web Site User Personal Information

The Personal Information that may be collected in relation to Web Site Users through an online form typically includes (but is not limited to) name, phone number, email address.

- Collection and Use of anonymous web information through the use of Cookies:

During a Web Site User's interaction with one of Shaw's websites, Shaw may use a browser feature called a "cookie" to collect information anonymously and track user patterns on Shaw's websites. A cookie is a small text file containing a unique identification number that identifies a Web Site User's browser – but not the Web Site User personally – to Shaw's computers each time a Web Site User visits one of the Shaw websites using cookies. Cookies tell Shaw which pages of its websites are visited and how many people visited each web page. This helps Shaw understand consumer interests and enhance the on-line experience of visitors to the Shaw websites. Cookies also serve to identify your computer so that your preferences can be saved for future visits and advertising displayed based on your previous interaction with the site. and Shaw works with third parties that use these cookies to help us with such traffic management, research and analytics.

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on Shaw's websites.

Third Party Cookies and Advertisements: Some of the advertisements you see on the Shaw websites are delivered by third party advertisers, Internet advertising companies that work on Shaw's behalf or ad networks. These third parties may use cookies or other technology to help deliver ads that are tailored to your interests and track their performance. This is commonly known as "behavioural" or "interest-based advertising".

You can 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](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.

## 3.2 Why does Shaw collect and use Personal Information?

### 3.2.1 Customer Personal information

Shaw collects and uses Customer's Personal Information for the following purposes, to:

- a) establish and maintain a responsible commercial relationship with you;
- b) for research and statistical purpose, to understand your needs as a Customer and your eligibility for products and services;
- c) recommend particular products, services and opportunities to you.
- d) provide information to you about developments and new products; develop, enhance and market products and services and/or provide products and services to its Customers;
- e) process billing and collect fees for the Shaw products and services you have purchased and/or subscribe to;
- f) perform or order credit checks;
- g) deliver to you the products, services and third-party applications included in your subscription, including providing you with the programming content and advertising corresponding to your postal code;
- h) to administer and manage our business and operations, including the protection of the security and integrity of our services and our website;
- i) provide customer support; and
- j) meet Shaw's legal and regulatory requirements.

### 3.2.2 Web Site Users Personal Information

Shaw collects and uses Web Site User's Personal Information for purposes generally identified on the Shaw website at the time of collection. These purposes may include to:

- a) send you information, updates you've requested, or answer your questions;
- b) register your participation to a contest; and
- c) register you in an encrypted secure zone.

3.2.3 When Shaw chooses to use Personal Information for a purpose not previously identified, Shaw will identify the new use. Unless such new use is required or permitted by law, in accordance with PIPEDA, the consent of the Customer or Web Site User is required before the Personal Information can be used for that new purpose.

### 3.3 How does Shaw obtain your consent?

Consent is generally required for the collection of Personal Information and the subsequent use or disclosure of the Personal Information. Consent can be either express or implied. The form of consent sought by Shaw may vary, depending upon the circumstances and the type of Personal Information. In determining the form of consent to use, Shaw takes into account the sensitivity of the information and your reasonable expectation, so that you understand the nature, purpose and consequences of the collection, use and/or disclosure of Personal Information. Shaw generally seeks express consent when the Personal Information is likely to be considered sensitive. Implied consent is typically appropriate when the Personal Information is less sensitive.

In addition, in exceptional circumstances, as permitted by law, Shaw may collect, use and/or disclose Personal Information without a Customer's or Web Site User's knowledge or consent.

Consent may be obtained in any one of the following ways:

- an application form may be used to seek consent, collect Personal Information and inform the Customer of the use that will be made of the Personal Information. By completing and signing the form, the Customer is giving consent to the collection and the specified uses;
- a check-off box may be used to allow the Customer to request that their names and addresses are not given to other organizations. Customers who do not check the box are assumed to consent to the transfer of their information to other organizations;
- orally when information is collected over the telephone; or
- at the time a Customer uses a product or service.

In general, the use of products and services by a Customer, or a Web Site User's use of a Shaw website will constitute implied consent required by Shaw to collect, use and/or disclose Personal Information for the purposes identified in this Privacy Policy.

Consent may be withdrawn by Customers and Web Site Users at any time, subject to legal or contractual restrictions and upon providing Shaw reasonable notice. If you wish to withdraw your consent to certain collection, retention, use or disclosure of Personal Information, please contact Shaw at [shaw.privacy@sjrb.ca](mailto:shaw.privacy@sjrb.ca). Please note that if you refuse or withdraw your consent, we may not be able to provide you with a particular product or service. We will explain the impact on you at the time, to help you with your decision.

### **3.4 When and how does Shaw disclose Personal Information?**

Internally, only Shaw Employees with a business need to know, or whose duties reasonably so require, are granted access to Personal Information of Shaw's Customers and Web Site Users.

#### **3.4.1 Customer Personal Information**

Shaw may disclose Customer's Personal Information to:

- a) third parties who are acting on Shaw's behalf as our agents, suppliers or service providers who are subject to confidentiality requirements;
- b) a company who will be involved in supplying the Customer with communications or communications directory-related products and/or services;
- c) a company or individual who is acting on Shaw's behalf for the development, enhancement, promotion, marketing, sale or provision of any of Shaw's current products and/or services or for any new products and/or services of Shaw, including authorized resellers and sales agents, etc. subject to confidentiality requirements;
- d) in conjunction with special offers or programs to program partners, or third party agents responsible for administering such offers or programs. Any such disclosure is made on a confidential basis;
- e) an agent used by Shaw to evaluate the Customer's credit worthiness or to collect the Customer's account;
- f) a credit reporting agency; and
- g) a third party, where the Customer has given Shaw consent to such disclosure or if disclosure is permitted or required by law, in accordance with PIPEDA.

#### **3.4.2 Web Site User Personal Information**

Shaw may disclose Web Site User's Personal Information to:

a third party or parties, where the Web Site User has given Shaw consent to such disclosure or if disclosure is permitted or required by law, in accordance with PIPEDA.

### Disclosure of Personal Information to government organizations, including law enforcement agencies:

Shaw routinely receives requests from government organizations, including law enforcement agencies. These requests are individually and carefully vetted internally by a team of experts. Shaw will only disclose Personal Information in response to these requests when permitted by law, in accordance with PIPEDA.

For more details and to view Shaw's Transparency Report, please click on the following link: [Shaw 2019 Transparency Report](#)

### **3.5 Who does Shaw share Personal Information with?**

Shaw does not sell Personal Information about its Customers and/or Web Site Users. Shaw may share Customers' Personal Information with its partners, associates and third-party service providers as provided in Subsection 3.4, in order to fulfill the purposes identified in Subsection 3.2. In such cases, the relationship with the partner, associate or third party is governed by strict confidentiality standards and policies to ensure the Customer's Personal Information is secure and treated in accordance with PIPEDA and with the utmost care and respect.

Except as required or permitted by law, when disclosure is made to a third party other than a Shaw partner or associate, or a third-party service provider, 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 Shaw. 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.

In the event that a third-party service provider is located in a foreign country, Customer 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. Whenever Shaw engages a third-party service provider, we require that its privacy and security standards adhere to this Privacy Policy and applicable Canadian privacy legislation.

### **3.6 How does Shaw safeguard your Personal Information?**

The nature of the safeguards varies depending on the sensitivity of the Personal Information, the scope of the Personal Information, and the method of storage of that information. More sensitive types of Personal Information will be safeguarded by a higher level of protection, including encryption. Personal Information is predominantly stored in Canada and the United States, under strict confidentiality standards, as per Section 3.5. Data is routed domestically and may be routed outside of Canada for service provision purposes as described in Section 3.5

### **3.7 How long does Shaw retain your Personal Information?**

We retain your personal information for as long as it is needed to fulfill the purpose(s) for which it has been collected. 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 records of IP address leases for 1 year after a lease expires, while shaw.ca email mailbox contents are not kept more than 60 days after an account is closed.

### **3.8 How do I access Shaw's policies and procedures?**

Shaw makes available to Customers and Web Site Users specific information about its policies and procedures relating to the management of Personal Information, on our corporate and community websites.

Shaw is open about its policies and procedures with respect to the management of Personal Information. Customers and Web Site Users are able to inquire about Shaw's privacy policies and procedures and obtain an account of the Personal Information Shaw holds about them at a minimal cost and without unreasonable efforts on their part. This information is available to Customers and Web Site Users by writing to Shaw, to the attention of the Privacy Officer at 630-3rd Ave S.W., Calgary, AB, T2P 4L4.

### **3.9 How do I access my Personal Information?**

You may access and verify your Personal Information held by Shaw by submitting a request in writing to Shaw's Privacy Officer at 630-3rd Ave S.W., Calgary, AB, T2P 4L4. A response will be mailed to the address on your account or file.

Shaw will respond to a Customer's or Web Site User's request within a reasonable period of time and at minimal or at no cost.

In certain circumstances, Shaw may not be able to provide access to all the Personal Information it holds, for example, when the disclosure would reveal confidential business information; if the Personal Information is protected by solicitor-client privilege, or if the Personal Information was collected during an inquiry into a breach of contract or violation of a federal or provincial law.

### **3.10 How can I challenge compliance and offer suggestions?**

A Customer or Web Site User of Shaw may direct any questions or inquiries with respect to the privacy principles outlined above or about Shaw's privacy practices described in its Privacy Policy to [shaw.privacy@sjrb.ca](mailto:shaw.privacy@sjrb.ca) or to Shaw's Privacy Officer at 630-3rd Ave S.W., Calgary, AB, T2P 4L4.

Shaw will investigate all complaints and respond to all questions asked by its Customers and/or Web Site Users. If a complaint is found to be justified, Shaw will take appropriate measures to resolve the complaint, which may include amending its policies and procedures.

If Customers or Web Site Users are not satisfied with Shaw's response, they may contact the Office of the Privacy Commissioner of Canada, at:

Toll-free: 1-800-282-1376

Phone: (613) 995-8210

Fax: (613) 947-6850

Mailing Address:

Office of the Privacy Commissioner of Canada  
30 Victoria Street

Gatineau, Quebec  
K1A 1H3

#### **4- Your role in protecting your Personal Information**

Please remember that Shaw's Privacy Policy and our use of your Personal Information only applies to the information you provide. We caution that if you disclose Personal Information or personally sensitive data through use of the Internet such as through chat rooms, communities, bulletin boards or other public online forums, this information is not collected by or for Shaw but may be collected and used by other persons or companies over which Shaw has no control. It is your responsibility to review the privacy statements of any person or company to whom you choose to link, from or through the use of any Shaw Internet services. Shaw is not responsible for privacy statements, privacy compliance or other content of any website not owned or managed by Shaw or its affiliate companies.

Shaw does its best to protect and safeguard Personal Information and we believe there are safeguards you should take as well. Do not share your Personal Information such as bank card numbers, credit card numbers, associated pin numbers or Social Insurance numbers unless you clearly understand the purpose of the request and you know with whom you are dealing. Do not keep sensitive Personal Information in your email inbox or on Webmail.

Provide Shaw with one acceptable piece of identification, pin number or passphrase that will be kept in your Customer account, so we can identify you when you call Shaw. If you are asked to assign passwords to connect you to your Personal Information, you should use a combination of letters (upper and lowercases), numbers and symbols and do not use words that can be easily associated with you (example: do not use the name of a family member or pet). We also suggest you change your password regularly. If you are suspicious of any telephone, mail or email promotional campaigns or you suspect fraudulent activity, please contact us at [shaw.privacy@sjrb.ca](mailto:shaw.privacy@sjrb.ca) to verify that the campaign is a legitimate Shaw activity.

#### **5- Updating this Privacy Policy**

Any changes to Shaw's Privacy Policy shall be acknowledged in this Privacy Policy in a timely manner. Shaw may modify or remove portions of this Privacy Policy when it feels it is necessary and appropriate. You may determine when this Privacy Policy was last updated by referring to the date found at the top of the first page of this Privacy Policy "Privacy Policy last revised on: "

#### **6- Shaw Mobile Privacy Policy**

Shaw Mobile is a brand operated by Freedom Mobile Inc., an indirect wholly owned subsidiary of Shaw Communications Inc., and the collection, usage and retention of personal information by Shaw Mobile is governed by Freedom Mobile's Privacy Policy, available at: <https://www.freedommobile.ca/en-CA/privacy-policy>.