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HOW WE MANAGE YOUR PRIVACY

Introduction

At Rogers, we are committed to protecting the privacy of your personal information. It is important that you understand what information we have about you, why we have this information, where we obtain your information, what we do with it, and how we safeguarded it.

Our [Privacy Policy](#) is our privacy commitment to you, but we know that sometimes consumers want to know more, and it is important that you have access to the details about how we manage your privacy. That is why we are sharing details and examples of how your personal information is managed, used, and secured by us.

The Rogers [Privacy Policy](#), along with this document, incorporates all our regulatory requirements mandated by the Personal Information Protection & Electronic Documents Act (PIPEDA) and any applicable Canadian Radio-Television and Telecommunications Commission (CRTC) privacy regulations.

Scope

Our privacy practises apply to your use of all products, services, websites and apps offered by Rogers Communications and other members of the Rogers Communications Inc organization. These include our wireless services (Rogers, Fido, Chatr, Cityfone and its branded entities), Rogers' Media brands (for a full list click [here](#)), our Connected Home services (TV, Internet, Home Phone and Smart Home Monitoring), and Rogers for Business (R4B). This does not apply to customers of Rogers Bank or your interactions with the Toronto Blue Jays.

Definitions

Personal Information- information collected by Rogers that can be used to determine the identity of a customer or a user. It includes your name, phone number, address, or email address.

Aggregate Information - When customer or user information is combined into an anonymous group, to a size large enough where it can be reasonably accepted that individuals cannot be identified.

Anonymous Information- Information that cannot directly identify you.

Customer - Anyone who purchases or uses our products and services.

Mobile Application - A software application that operates on a smartphone, tablet or other device such as smart watch that allows users to access our services and information.

User- Anyone who visits or uses a website or digital property operated by Rogers.

Relevant Advertising - This is when aggregated audience segments are created based on personal information that does not identify customers and users (for example, age, income range, or interests) to display advertising that is relevant to an audience segment. Online behavioural

advertising is one example of relevant advertising, where information such as the number of times you have visited a certain page of a Rogers Communications website (but not your name, address, email or other personal information), is used to present you with advertising.

What information we have about you?

The personal information we have about you includes things like who you are, how you pay for your services, how you use our products including our websites, network use and information gathered from third parties, such as credit bureaus.

Account Information - this includes your name and address, email, the ID used to create your account, your credit history, as well as payment information such as your credit card or bank details. It may include a PIN, password, security questions, or biometric authentication. We have information about how much you pay us for our services, and details on when you contact us. We also have information from any survey you have filled out/responded to.

Technical Information - the provision of our services, as a communications provider, means that we have information about how you use our networks, services, products and websites. For example:

- **Network use information.** This is information related to the operation and use of equipment, services, and applications on our networks. It includes location of your wireless device and the IP address (the unique numbering label, which identifies your device and enables it to communicate over the internet) that we assign to you for the provision of Internet services. It also includes records of the number of texts sent and received, voice minutes used, as well as the amount of data consumed.
- **Device information.** We collect device related information including your IMEI (a mobile device identification number), your MAC address (media access control address), your mobile phone number, make and model of your device, device operating system, data and time of your use of our mobile apps, and location based on cell site data.

Some smartphones and IOT devices also have a global positioning system (GPS) function. This is separate to our network and is something Rogers does not control. GPS is used for a variety of location-based services. If you do not want to share your location via GPS, this setting can be turned off, although it may affect the provision of services that depend on knowing your location. Refer to the settings of your mobile device to turn-off.

- **Web browsing and mobile application information.** This includes IP addresses, URLs, data transmission information, as well as the time you spend on websites, what advertisements you follow, and your time on and use of our apps.

TV Viewing Information - . In order to deliver TV services to you, our systems automatically generate data related to which programs, channels and advertisements are viewed and for how long. It may also include information about the use of set-top boxes, remote controls, and programme guides.

How we collect your information

Directly from you: We primarily collect information about you from you. We do this when you sign-up for new products or services, when you make changes to your account, when you get in touch with us by phone, email or chat, when you visit one of our stores, when you visit our websites or apps, when you fill out a survey or enter a competition, when you participate in our online forums, or when use our network. If we would like to use your personal information for a purpose other than what we disclosed to you at the time of collection, we will always obtain your consent for this.

It is automatically collected: When you use a product or service that we supply to you. **For example,** when you use your mobile phone our network will collect your location information.

From technology used at our retail stores or other company premises: When you visit our stores, we may collect your information via a range of methods, including point of sale tools, or video. **For example,** there may be video surveillance around Rogers' buildings, stores or other premises, such as tower sites. This is for security purposes, including to aid investigations.

From other sources:

In order to obtain information about your credit history to create and manage your account and assess your eligibility for Rogers' products and services we may provide and share your credit information with others including credit bureaus, credit grantors and collection agencies. **For example,** we collect customer information from credit agencies at time of initial application, and we may also collect information from credit agencies periodically during your relationship with us.

From our digital channels like our websites and mobile apps: We collect your personal information when you interact with us via our websites, mobile applications, social media, email, or online advertising. This may include cookies, or web beacons. The information helps us understand how you use our services and allows us to improve how we serve you. **For example:**

- The Rogers Ignite TV app may collect your location to ensure the provision of relevant content.
- The Rogers Smart Home Monitoring app allows you to access images and receive alerts when your home's doors or windows are opened.
- Our websites collect your information to serve you relevant Internet-based advertising.
- Our IOT apps may collect information to provide services to you. We will be transparent about when we do this, and it will be based on your consent.

If you want to know more about the technologies we use:

A **'Cookie'** is a small text file sent to your internet browser's files for our reference. No one else can read this file. Cookies allow us to recognize your computer when you return to our websites, so you do not have to re-register. Cookies allow us to retain any preferences you may have given us and to deliver content specific to your interests. If you do not wish to receive cookies, most browsers allow you to be alerted when a cookie is sent to your computer, so you can decide whether to accept it.

For example:

- We use cookies to identify whether you are a customer of ours or just browsing one of our digital channels.
- We use cookies to save your password, so you don't have to enter it each time you visit one of our websites.
- We use cookies to estimate the number of people who visit our website.

A **'Web Beacon'** is a small image placed on your computer that contains information about you, for example it may contain your IP address. It lets us understand your online behaviour by showing what parts of a website you visit, or what emails you open.

Our digital channels may contain links or embedded pages. For example, the store location finder application available on our websites has a Google map embedded into the page. Rogers is not responsible for the privacy practices of third parties. Our privacy commitment only extends to data collected by Rogers on our digital channels.

Why do we collect your information?

We collect your information for the following reasons:

To establish and manage a commercial relationship with you and to deliver our products and services. For example:

- To confirm or authenticate your identity when you contact us.
- To ensure accurate billing, we collect a record of the services that we provide you including the duration of calls made, and the amount of data consumed.
- To communicate with you on updates or changes to products or services or to inform you of an interruption in your services.
- To conduct a credit check, we will obtain information about you from credit rating agencies.
- To deliver services to you, for example if we provide you with any residential services we will collect your home address.
- To manage credit and business risks or to collect an outstanding debt.

To understand your needs and make customized information available regarding other products and services offered by Rogers and our agents, dealers and related companies, or trusted third parties that may be of interest to you. For example:

- We may collect your current and historical personal location information associated with any device you use under your agreement(s) with us to provide geo-location services to send you offers and promotions from Rogers. We will always obtain your express consent for this.
- We may use your browsing history on our websites to serve up suggestions of new products or services.
- On our Ignite TV platform, we may make program recommendations based on your viewing history.

To provide tailored service to you. For example:

- We may use your account information to improve your interactions with us.
- We may collect details on how many devices you have on your account to evaluate your eligibility for other Rogers' products and services, or to assist other Rogers' companies such as Rogers Bank to assess your eligibility for their products or services.
- We maintain a record of the products and services we provide to you, including your usage, this allows us to suggest different price plans. If we see that you use your mobile device for roaming, we may offer you promotions related to roaming.
- We may use information related to how you use our website to deliver targeted advertising to you.
- We may use machine learning and artificial intelligence to generate product and service suggestions for you.

To undertake market research. We use your personal information to perform data analytics to improve the products and services we offer you. We use this information in an aggregated format, where your personal information is removed or masked. For example:

- We may analyse calling patterns into our customer care centre to identify and resolve customer irritants.
- We may use information about how often you visit our website to measure the effectiveness of our marketing.
- We may review your purchase history including the location of purchase or payment method used to help research and develop new products.

To manage our business & operations. For example:

- We may analyse customer usage related to our wireless network to aid future network planning.
- We may review usage data on our internet network to improve network quality and stability.
- We may collect information or monitor activity to prevent, manage, and investigate fraud, cyber threats, nuisance calling, other unauthorized or illegal activity. We may also use it to investigate violations to our Terms of Service and Acceptable Use policies or other service restrictions.
- We record interactions between you and Rogers' agents for training and quality assurance purposes.
- We may validate contact information with credit agencies to collect an outstanding debt.
- We may use your feedback from a customer experience survey to improve our service experience and key customer metrics.

To meet legal & regulatory requirements. For example:

- To comply with statutory obligations such as financial reporting requirements.

We may also collect personal information about you for other purposes from time-to-time, or as permitted or required by law. We will always identify any additional purpose prior to, or at the time of collection.

When do we share your information?

Unless we have your consent or pursuant to a legal power, we will only disclose your personal information to organizations outside the Rogers organization without your consent in the following circumstances:

To enable the provision of services to you, we may share your information with third parties. For example:

- To a person who, in our reasonable judgement, is seeking the information as your agent.
- To another telephone company, when the information is required for the provision of home phone service and disclosure is made confidentially.
- To a service provider or third party that is performing administrative functions for us to manage our customer accounts.
- To suppliers or agents who provide products and services on our behalf to you.
- To a contest administrator working on our behalf to contact selected participants.
- Third parties that Rogers' advertises with in order to serve you advertisements online.

- To third party partner platforms when the information is required for the provision of services such as accessing YouTube, or Netflix via the Ignite TV platform.

For credit relates purposes. For example:

- To a service provider or other agent retained by us, such as a credit-reporting or debt collection agency, for account management, the collection of past due bills on your account, to evaluate your creditworthiness or to target you with retention offers.

To aid in an investigation. For example:

- To another organisation for fraud prevention, detection or investigation if seeking consent from you would compromise the investigation. Any such disclosures of information would be done in accordance with our legal requirements.

To a law enforcement agency or a public authority. For example:

- If we have reasonable grounds to believe that you have knowingly supplied us with false or misleading information or are otherwise involved in unlawful activities.
- If it appears that, there is imminent danger to life or property, which could be avoided or minimized by disclosure of the information.

Your personal and account information may also be shared with other Rogers' companies or affiliates, such as Rogers Bank, to provide you with other offers that we think are relevant.

We do not sell your personal information to another organisation or person, except for the sale or transfer of any part of our business, as permitted by PIPEDA.

How we protect your information

Rogers protects your information with appropriate safeguards and security measures. These include technical, physical and procedural controls. When we work with third parties, your privacy is protected through contractual obligations.

Access to private, sensitive and confidential information, including your personal information, is restricted to only those authorized employees or service providers with a legitimate business need to access the information.

Customer authentication

We take the protection and security of your information very seriously. We have measures in place to ensure that your information isn't disclosed to third parties. For example, when you call us, we require you to provide a range of details to confirm that you are the account holder. To further protect your account there are certain services that can only be performed in person or via self serve through your online account. This may mean it takes a bit more time to confirm your identity when you interact with us. Given the growing trend in fraudulent and illegal practices related to social engineering and unauthorised account access, we need to take these additional steps to keep your personal and account information secure.

How we manage de-identified, aggregated or anonymized personal information

We de-identify, aggregate or anonymize personal information to identify trends, manage our business, derive statistical information, understand how we are performing, or develop relevant products, services, offers or new business opportunities. This information may be shared with trusted third parties for commercial or other analytical purposes but will not personally identify any individual and is not subject to our Privacy Policy. We follow industry best practise when it comes to de-identification, aggregation, and anonymization.

Except as otherwise permitted or required by law, we only retain your personal information for so long as it is reasonably necessary to fulfil the purposes for which it was collected, or for enough time to allow you access to the information if it was used to make a decision about you, your account, or your relationship with Rogers. Once we no longer require your personal information, it will be destroyed or de-identified, as per our retention policy. Your personal information may be stored or processed in or outside Canada and will be protected with appropriate safeguards. If your personal information is stored outside of Canada, it may be subject to the laws of the jurisdiction where it is held.

Everyone at Rogers has a role to play in protecting your privacy. We have annual mandatory privacy training for all employees to ensure they have the right skills and knowledge when it comes to protecting customer information.

Managing your information with Rogers

Providing Rogers with your information is a choice you make when you do business with us. We engage with you based on your consent to collect, use and disclose your personal information for the purposes that we have identified to you.

You can withdraw consent from email marketing from any of the Rogers brands. Depending on the brand, you can do this in the subscription preferences section at the bottom of our individual branded websites.

The choice to provide Rogers with your consent is always yours, however, your decision to withhold such consent may limit our ability to provide you with certain products, services, or offers.

You can also review the information we hold about you and challenge its accuracy. You are encouraged to ensure your information is up to date, for example, ensuring the people you have listed as authorised users on your account remains current.

Questions?

It is important to us that you are informed and aware of how we manage your personal information. If you have further questions about how we manage your privacy, please email us at privacy@rci.rogers.com

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