

## Privacy Policy

This policy explains how Empire Communications of Toronto Inc. (ECI) collects, uses, discloses and safeguards the personal information you provide to us. By providing personal information to us, you signify your consent to our collection, use and disclosure of your personal information in accordance with this privacy policy.

### Information Collection, Use and Disclosure

We respect your personal privacy. We believe that ensuring the security of your personal information is an important part of our job. We strive to protect any personal information you give to us via the website located at [www.empire-team.com](http://www.empire-team.com) (the “Site”) or otherwise and as such, we will not collect, use, and/or disclose your personal information without first obtaining your consent to do so.

For purposes of this privacy policy, “personal information” shall mean any information that can identify an individual directly or through other reasonably available means. Personal information will not include an individual’s business address or business telephone number.

### Basic Principles of Handling Your Personal Information

As part of our commitment to treat your personal information with respect, we operate in accordance with the following ten principles (the “Principles”):

#### Principle 1 – Accountability

We will maintain and protect the personal information under our control. We have designated an individual or individuals who is/are accountable for compliance with the Principles.

#### Principle 2 – Identifying Purposes

The purposes for which personal information is collected by us will be identified to you before or at the time the information is collected.

#### Principle 3 – Consent

Except where required or permitted by law, your informed consent is required for our collection, use or disclosure of your personal information.

#### Principle 4 – Limiting Collection

The personal information collected by us shall be limited to those details necessary for the purposes identified to you.

#### Principle 5 – Limiting Use, Disclosure and Retention

We will only use or disclose your personal information in accordance with the purposes for which it was originally collected unless you have otherwise consented, or when it is required or permitted by law. We will retain your personal information only for so long as is required to fulfill the purpose for which it was collected or as required by law.

### **Principle 6 – Accuracy**

We shall make every reasonable effort to ensure your personal information is maintained in an accurate, complete and up-to-date form.

### **Principle 7 – Safeguarding Customer Information**

We shall utilize no less than industry standards security safeguards to protect your personal information.

### **Principle 8 – Openness**

You are entitled to a copy of our privacy policy. If you are unable to print off a copy of this privacy policy from our Site, we would be more than happy to provide a hard copy of this privacy policy to you. If you have any questions regarding this privacy policy, we are more than happy to discuss them with you.

### **Principle 9 – Customer Access**

Upon your request, we shall inform you of: (i) the type of personal information we have collected from you; (ii) how we have used your personal information in the past, and how we may use your personal information in the future; and (iii) whether or not we have disclosed your personal information to any third parties (and, if so, to whom). Individuals may verify the accuracy and completeness of their personal information, and, if warranted, may request that it be amended.

### **Principle 10 – Handling Customer Complaints and Suggestions**

You may direct any questions or enquiries with respect to the Principles or about our information handling practices by contacting:

Ann-Marie Belanger, President

Phone: 519-624-9134

Email: [ann@empire-team.com](mailto:ann@empire-team.com)

### **Purpose for Collection**

Prior to collecting information from you, we will always inform you of the purpose(s) for which we are collecting such information. Generally speaking, the following are the main purposes for which we collect personal information:

- We may collect and use your personal information in order to that we can provide the telecommunications and/or long distance and Internet products and services (collectively, the “Service”) that you request and to which you subscribe. We will also use the information to contact you regarding your subscription and for purposes of processing your payment obligations for the Service.
- We use personal information, your e-mail or mailing address to reply to e-mails and questions or requests you send to us
- If you subscribe to the Service online, we only request the information needed to complete the processing of your orders and billing. We may also share your personal information with our affiliates and credit card processing

companies in order to bill and process your subscription, but we do not provide any more information than necessary for these purposes.

- We may use emails and other correspondence (or pieces thereof) and/or images given to us, on our Site and for publicity purposes.
- We also use the personal information you have provided to us to communicate with you and safeguard your interests. We will send you important notices, and respond to any special needs or enquiries you may have. We may also send you information about other products and services in which we believe you may be interested.
- We may use your personal information to target specific sponsor-greetings that will be more geared towards your interests.
- We may want to contact you with other internet or telecom services and/or products that we have to offer you.
- We may contact you to offer other products and services.

We only use personal information for the purposes that we have disclosed to you. If for any reason your information is required to fulfill a different purpose, we will obtain your consent before we proceed.

### **Types of Information We Collect**

The type of personal information we may ask for depends on and is related to the reason (or purpose) such personal information was provided to us. The following is a description of the type of personal information that we may ask for: (i) contact information, (ii) billing information (including, without limitation, credit card information and (iii) responses to 3-4 demographic print/radio media and internet telecom questions.

The choice to provide us with your personal information is always yours. However, your decision to withhold particular information may result in limiting our ability to provide you with the Service you have requested.

### **The Site**

When you visit the Site, information is not collected that could identify you personally unless you choose to provide it voluntarily. You are welcome to browse the Site at any time anonymously and privately without revealing any personal or financial information about yourself.

### **When Information May be Disclosed to Outside Parties**

The following are the limited instances where we may disclose your personal information to third parties:

- to our affiliates and related parties to complete your subscription to the Service and for purposes of allowing you to make use of the Service and/or to respond to requests made by you.
- to investigate potentially fraudulent or questionable activities regarding your account(s) or the use of the Service;
- to offer you related products and services that might benefit you;
- in anticipation of and in the course of an actual or potential sale, reorganization, consolidation, merger or amalgamation of our business;

- to our sponsors of the Service who may contact you to offer other products and services; and when required or permitted by law.

The type of information we are legally required to disclose may relate to criminal investigations or government reporting requirements. In some instances, such as a legal proceeding or court order, we may also be required to disclose certain information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities which are making the request have legitimate grounds to do so.

We reserve the right to co-operate with local, national, or international law enforcement or other authorities in the investigation of improper or unlawful activities and this may require the disclosure of personal information. If such an investigation requires disclosure of personal information kept in our records, we may be required by law to cooperate. We also reserve the right to report improper or unlawful user activities on the Site, which may require the disclosure of personal information relating to those individuals conducting such improper or unlawful activities. There are some situations where we are legally permitted to disclose personal information such as employing reasonable and legal methods to enforce our rights or to investigate suspicion of illegal activities.

Except as specifically provided for in this privacy policy, we do not disclose any personal information to third parties.

### **Our Employees and your Personal Information**

In the course of daily operations, access to private, sensitive and confidential information is restricted to authorized employees who have a legitimate business purpose and reason for accessing it. For example, when you call us, our designated employees will access your information to verify who you are and to assist you in fulfilling your requests.

As a condition of their employment, all of our employees are required to abide by the privacy standards we have established. Employees are informed about the importance of privacy and they are required to abide by the Principles surrounding the information handling practices enumerated herein.

Unauthorized access to and/or disclosure of personal information by one of our employees is strictly prohibited. All employees are expected to maintain the confidentiality of personal information at all times and failing to do so will result in appropriate disciplinary measures, which may include dismissal.

### **How We Safeguard Your Information**

We use industry standard technologies and maintain current security standards to ensure that your personal information is protected against theft, loss, unauthorized access, disclosure, inappropriate alteration or misuse.

Electronic customer files are kept in a highly secured environment with restricted access. Paper-based files are stored in locked filing cabinets. Access is also restricted.

We manage our server environment appropriately and our firewall infrastructure is strictly adhered to. Our security practices are reviewed on a regular basis and we routinely employ current technologies to ensure that the confidentiality and privacy of your information is not compromised. While we make many efforts to ensure the security of your personal information, because of the nature of data transmission over the Internet, we cannot guarantee it and you transmit your personal information to us at your own risk.

## **Consent**

By accessing the Site and/or subscribing to and making you of the Service, you are hereby deemed to consent to our collection, use and disclosure of your personal information in accordance with this privacy policy. You may at any time, subject to any legal or contractual restrictions on our part, withdraw your consent to our collection, use and disclosure of your personal information in accordance with the provisions of this privacy policy by contacting our Privacy Officer (as set out below).

## **Accessing and Amending Your Information**

You have the right to access, verify and amend the information held in your personal files. You may access and verify any of your information by calling our customer contact centre at 1-888-618-8847.

To help us keep your personal information up-to-date, we encourage you to amend inaccuracies and make corrections as often as necessary. Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file(s), we will make the proper changes. Where appropriate, we will communicate these changes to other parties who may have unintentionally received incorrect information from us.

## **Questions, Concerns, Complaints and Withdrawing Consent**

If you have a question about the privacy policies stated on this site, please call us at 1-888-618-8847.

If you have a concern or complaint about privacy, confidentiality, our employees or service suppliers, please contact us at 1-888-618-8847 or [info@ecitech.ca](mailto:info@ecitech.ca).

Before we are able to provide you with any information or correct any inaccuracies, however, we may ask you to verify your identity and to provide other details to help us to respond to your request. We will endeavor to respond within an appropriate timeframe.

## **Updating this Privacy Policy**

Any changes to our privacy policy and information handling practices will be acknowledged in this privacy policy in a timely manner. We may add, modify or remove portions of this privacy policy when we feel it is appropriate to do so. You may determine when this policy was last updated by referring to the modification date found at the bottom of this privacy policy.

## **Commissioner for Complaints for Telecommunications Services (CCTS)**

CCTS is an independent agency whose mandate is to resolve complaints of individual and small business customers about their telecommunications services. If you have a complaint about your telephone service, you must first try to resolve it directly with your service provider. If you have done so and have been unable to reach a satisfactory resolution, CCTS may be able to help you, free of charge.

To learn more about CCTS, you may visit its website at [www.ccts-cprst.ca](http://www.ccts-cprst.ca) or call toll-free at 1-888-221-1687

*Last Modified January 13, 2023*