

Privacy Policy for Bell's Finder Services & Business Tracking Services

Wireless telephone services provide special opportunities for Bell Mobility customers in the form of Bell's Finder services and Business Tracking Services. However, Bell Mobility knows that you may have some concerns about the privacy of your information in connection with such services. For this reason, Bell Mobility has created this special *Privacy Policy* for all Bell Finder Services and Business Tracking Services.

This special privacy policy applies to all Finder services and Business Tracking Services offered by Bell Mobility, in addition to the basic privacy safeguards applicable to Bell Mobility subscribers. All subscribers are already protected by the *Bell Privacy Policy* and the *Bell Code of Fair Information Practices*, which spell out the commitments of the Bell companies and the rights of customers regarding personal information. All of these documents also reflect the legislative requirements of the *Personal Information Protection and Electronic Documents Act*, as well as the regulatory requirements of the Canadian Radio-television and Telecommunications Commission.

Personal information collected through Bell's Finder Services and Business Tracking Services may be stored and processed in Canada or the United States and may be subject to the legal jurisdiction of these countries.

The Promise of Wireless Technology

In order to provide wireless telephone service, Bell Mobility's network knows the general location of your wireless phone whenever it is turned on. When it is first turned on, and periodically thereafter, your phone sends a signal to nearby radio towers, so Bell Mobility knows where to direct and bill for calls that you make and receive. If the network did not know your general location, mobile wireless communication, including roaming, would not be possible.

While necessary for the provision of basic wireless telephone service, this location information can also be used to provide you with a variety of innovative and helpful services that can quickly direct key support services to you in the event of an emergency, or save you time and make your personal and business arrangements more convenient, by identifying to you, at your request, nearby people, businesses and services and providing driving and walking directions to reach them.

In support of the next phase of Canada's Enhanced 911 (e9-1-1) services, Bell Mobility also offers several wireless phones with an embedded Assisted Global Positioning System (Assisted GPS) chip. GPS is a satellite-based worldwide

radio-navigation system that allows a user's geographic location to be accurately identified. Although this Assisted GPS chip is not necessary to provide basic wireless telephone service today, it is enabled in most wireless phones in preparation for future enhancements to Canada's e9-1-1 services, which will enable emergency services to quickly locate wireless users making emergency calls. The Assisted GPS technology can also be used, at your request, to provide you with innovative and helpful services.

The Bell Commitment to Privacy

Bell Mobility recognizes that information concerning your location is important to you. That's why the collection and use of this information is subject to strong privacy protection, as set out in the *Bell Code of Fair Information Practices* and *Bell Privacy Policy*, including physical, electronic and procedural safeguards.

We take all of the necessary precautions to ensure the safeguarding of your information, whether it is stored electronically or in paper format. In all cases, information is retained in secure facilities, protected from unauthorized access and kept only as long as is reasonably required. For example, our electronic files are backed up for redundancy, password protected and accessible only by authorized employees, on a need-to-know basis.

Your Location Information

When we offer you optional Finder Services or Business Tracking Services that require use or disclosure, or both, of your wireless phone's location, your wireless phone number, or a list of the services that you have subscribed to, we will **first obtain your express consent** before using or disclosing this information. In addition, you are in **full control** of the times at which your location will be available to Bell Mobility and Bell Mobility's service providers through an online Privacy Profile. Your Privacy Profile is a simple, password-protected, privacy management tool that allows you to choose whether Bell's Finder Services or Business Tracking Services can locate you, and if so, at what times of the day and on which days of the week. You may review and change these preferences at any time. Your online Privacy Profile can be accessed today by registering for Bell online self-service. Please be aware, however, that use or disclosure of this information is necessary to provide some Finder Services or Business Tracking Services.

For your convenience, Bell Mobility will retain a record of your last location so that Bell Mobility's service providers may re-access this information to provide you with the described services. Your last location is retained for a maximum of 2 hours.

Bell Finder Services and Business Tracking Services may also be personalized and augmented using data that you input into your wireless phone or an application. Like network location information, we use this information solely to provide you with the described services, and we safeguard this information in accordance with the *Bell Code of Fair Information Practices*, and *Bell Privacy Policy*.

The details of your Bell Finder services usage and Business Tracking Services usage is provided in your monthly account statement and can also be viewed through [Bell online self-service](#).

Bell Mobility Roadside Assistance Information

When you subscribe to Roadside Assistance service by Bell Mobility, you are in **full control** of the times at which your location will be available to Bell Mobility's service provider, beyond what is required to provide you with network connectivity and service billing. Similar to our other location services, you may turn the Assisted GPS chip in your wireless phone 'off,' or may review or choose privacy preferences at any time, by accessing your online *Privacy Profile*. It is not recommended that you configure any privacy preferences for this service. If our roadside assistance provider is unable to locate you, Bell Mobility will be unable to provide you with support services. Your online *Privacy Profile* can be accessed today by registering for [Bell online self-service](#).

When you dial our Roadside Assistance support number, you will be made aware, through the Automated Attendant, when we may need to find your location. Select the option to have Bell Mobility's service provider locate your wireless phone and we will use either the Assisted GPS chip in your wireless phone, or our cell towers to locate your wireless phone. If you prefer not to use the Assisted GPS or cell tower location feature, or are calling from a landline phone, you have to option to advise the operator of your location.

If you decline to release your location, Bell Mobility's service provider will be unable to automatically locate you in order to provide you with support services. Similarly, if you decline to release your wireless phone number or a list of the services that you have subscribed to, Bell Mobility's service provider will be unable to provide you with the appropriate level of service.

Bell Mobility's service provider will retain information about each service call, some of which may be personal information such as your wireless phone number, a record of your wireless phone's location at the time of service, the year, make, model and colour of the serviced vehicle, the type of service that was required and your corresponding service activation date. This information is

collected by Bell Mobility's service provider to manage their business and operations and is retained only as long as required by the statute of limitations of the applicable jurisdiction.

Bell Mobility MapMe Information

When you download and use Bell Mobility's MapMe™ service, you're in full control of the times at which your location is available to Bell Mobility's MapMe service provider (beyond what is required to provide you with network connectivity and service billing). Similar to the other location services, you may turn the Assisted GPS chip in your wireless phone 'off,' and you can review or choose privacy preferences at any time by accessing your online Privacy Profile. If Bell Mobility's MapMe provider is unable to locate you, MapMe won't be able to generate a map based on your current location, although you may still use the service by manually entering your location. Your online Privacy Profile can be accessed today by registering for Bell online self-service.

If you choose "Find My Location" from the MapMe options, Bell Mobility will use either the Assisted GPS chip in your wireless phone, or our cell towers to locate your wireless phone. If you prefer not to use this capability, you can manually enter your location, either by selecting a city and clicking on the map or by entering your address.

Your privacy is maintained in that you must consciously choose to follow a series of steps before your location information can be shared with Bell Mobility's MapMe service provider. First you must download the MapMe application either through your handset, or Bell Mobility's Downloads Website. Second, you must choose to run the application from your handset (once it has been downloaded). Finally, you must click on "Find My Location" under the "Options" available to the application. It is only after following all three steps that your location will be temporarily shared with Bell Mobility's MapMe service provider for the sole purpose of generating a map of your location to be displayed on your handset only.

Bell Mobility's MapMe service provider does not retain any information about your specific requests, other than your agreement to the end user license agreement (EULA), and will ensure that personal information, such as your wireless phone number, is not retained. General information that cannot be linked to specific users will be collected to monitor system performance, technical difficulties and overall usage patterns and levels.

MapMe is a trade-mark of Bell Mobility Inc

Bell Mobility Seek & Find and GoTrax Information

When you subscribe to **Seek & Find** or **GoTrax** services by Bell Mobility, you are in full control of how and when your wireless phones or devices on your account are located, beyond what is required to provide you with network connectivity and service billing.

The services are supported by specially selected wireless phones and devices. Similar to our other location services, you may turn the Assisted GPS chip in your wireless phone or device “off” (through settings on your phone’s menu) and manage your privacy through the “Manage Account” section within the web-based application.

Your privacy is maintained in that you must consciously choose to subscribe to either service and follow a series of steps before your wireless phones or devices can be located. First, you must request that the service be added to each wireless phone or device on your account that you wish to locate. Each wireless phone or device is assigned a 4-digit pass code that is used to gain access to the web-based application. This 4-digit pass code is the key to allowing the service to locate your phone or device and can be used only once. When accessing the web-based application for the first time, you will be asked to create a new and unique password that only you will know.

Bell Mobility **Seek & Find** and **GoTrax** services also give you the option to grant permission for *others* to locate any of your wireless phones or devices on your account. However, your *express consent* is required before authorization will be given. The application will notify you when another Bell Mobility subscriber is requesting to add one of your wireless phone numbers to their Contact List or Roster. You may give your express consent at that time and grant permission or decline the request. To ensure that you maintain full control of who is able to locate your wireless phones or devices on your account, you will be able to view a list within the web-based application of all permissions you have granted and you will be able to revoke any of those permissions at any time and at your sole discretion.

Bell Mobility’s service provider will only be provided with information necessary for the operation of the web-based application and to provide the service such as your wireless phone number. For your convenience and protection, we will retain a record of all the locates requested on your wireless phones or devices on your account, including a date and time stamp, for only 7 days for **Seek & Find** subscribers and 30 days for **GoTrax** subscribers.

Bell Mobility’s Partners Solutions Information

When you choose to acquire to one of **Bell Mobility’s Partners Solutions**, you are in full control of how and when the location of your wireless phones or devices on your account are disclosed to your service provider.

These solutions are supported by specially selected wireless phones and devices. Similar to our other location services, you may turn the Assisted GPS chip in your wireless phone or device “off” (through settings on your phone’s menu) and manage your privacy through your online Privacy Profile.

Your privacy is maintained in that you must consciously come to terms of agreement with of Bell Mobility’s partners and follow a series of steps before your wireless phones or devices location is disclosed to your solution provider. First, you must request that Bell Mobility allow your solution provider access to each wireless phone or device on your account that you wish to locate. Second, you must request that your solution provider add each wireless phone or device on your account to your solution. Bell Mobility also provides you with your online Privacy Profile that allows you to choose whether your solution provider can locate you, and if so, at what times of the day and on which days of the week. Some solution providers may also offer your additional privacy options that are solely up to your discretion and to be agreed to between you and your solution provider.

For your convenience and protection, Bell Mobility will retain a record of your last location so that your solution provider may re-access this information to provide you with the described services. Your last location is retained for a maximum of 2 hours.

Bell Mobility encourages you to ask your solution provider to outline how your location information and personal information will be used and protected once disclosed to your solution provider.

Questions or Concerns

If you have questions or concerns about your privacy, you can contact us by calling 1 800 667-0123. Our knowledgeable customer service representatives will be pleased to assist you in resolving the situation.

Bell Privacy Ombudsman

If you still have unresolved concerns with respect to the treatment of your personal information by Bell Mobility, you may address these concerns, in writing, to the Bell Privacy Ombudsman, who has overall responsibility for the company's compliance with this policy and applicable privacy restrictions. You should write to:

The Office of the Bell Privacy Ombudsman
110 O’Connor Street, 14th Floor
Ottawa, Ontario K1P 1H1
privacy@bell.ca

Further Complaint Procedure

If the Bell Privacy Ombudsman does not resolve the issue to your satisfaction, you may seek advice by contacting the Office of the Privacy Commissioner of Canada at 1 800 282-1376 or info@privcom.gc.ca, and, if appropriate, filing a written complaint with the Office at:

Office of the Privacy Commissioner of Canada
112 Kent Street, Place de Ville
Tower B, 3rd Floor
Ottawa, Ontario K1A 1H3

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