### **Privacy Policies**

CIK Telecom Inc. and/or a related CIK company ("CIK"), are committed to protecting the privacy of customers and users of our services and website. We have therefore created this policy statement (the "Policy") to explain our privacy practices and procedures, including:

- 1. Information we collect
- 2. Our use of personally identifiable information
- 3. Disclosure of personally identifiable information
- 4. Customer Proprietary Network Information ("CPNI")
- 5. Security and data integrity
- 6. Our use of "cookies"
- 7. Our use of Web beacons
- 8. Our use of banner ads
- 9. Checking account and preferences information for accuracy
- 10. Enforcement
- 11. Updating of our Policy

We believe that you should know what information we collect from you, as well as understand how we use, disclose, and protect that information. We believe that you should be able to communicate with us easily to limit the disclosure of any of your personally identifiable information, where practicable, and to address any questions or concerns that you may have. To this end, we will not disclose information to third parties except as provided in this Policy.

CIK will revise and update this Policy as CIK changes its practices, adds new services, or changes existing services. You should refer back to this page for the latest information.

This Policy applies to CIK's services and its website, which are intended for the use of persons residing in Canada (including its territories, provinces and possessions), and for delivery of services within Canada.

### 1. INFORMATION WE COLLECT

We collect a variety of personally identifiable information about users of our services and visitors to our website in order to ensure an enjoyable user experience and seamless communications. When we use the term "personally identifiable information," we mean information that is directly associated with, or could be used to identify, a specific person. Such information includes a name, address, telephone number, email address, or information about activities directly linked to that person which would permit the physical or online contacting of that person.

Our definition of personally identifiable information does not include "aggregate information" - data we collect about a group or category of services or users or customers and from which individual user or customer identities have been removed. Aggregate data - for example, a report that indicates that a certain number of our customers reside in a particular province or region of Canada, or a report on how many of our customers visited particular pages of our website - aids us in understanding trends and customer needs so that we can better consider new services or tailor existing services to customer preferences.

Our definition of personally identifiable information also does not include your Internet protocol ("IP") address, unless you have registered with us in the "Preferences" section of our website, in which case your IP address is linked to your personally identifiable information.

We collect the following types of personally identifiable information through use of our website and telephone calls to CIK customer service:

- Information You Give Us: We collect information you give us such as your name, billing address, telephone number, email address, and/or credit card number when you purchase or use a service, participate in a promotion, or register with us in the "Preferences" section on our website.
- Information We Collect Automatically: We automatically collect certain types of information whenever you interact with us. For example, when you visit CIK's website, our systems automatically provide us with your IP address to tell us what type of web browser you use, which may be linked to personally identifiable information if you have registered with us in the "Preferences" section of our website. When you visit CIK's website by clicking an advertisement on a third-party website, CIK automatically collects information about the website you were visiting when you clicked on CIK's advertisement, including the IP address of the website and the date and time that you clicked on CIK's advertisement.
- Information We Obtain from Other Sources: We may obtain information about you from outside sources and add it to, or combine it with, your personally identifiable information, including information such as:
  - Credit information, which allows us to complete transactions for the purchase of CIK services, and
  - Commercially available demographic and marketing information from third parties, which aids us in serving you and informing you of services that may be of interest to you.

To see how we use, disclose, and protect the personally identifiable information that we collect, please review the rest of this Policy.

# 2. OUR USE OF PERSONALLY IDENTIFIABLE INFORMATION

**Our Internal Use**: In general, we use personally identifiable information to serve our existing and prospective customers and to enhance and extend our customer relationships.

By understanding how you use our services and our website, we are able to customize and personalize our interactions with you. More specifically:

- We use personally identifiable information for billing purposes, to provide services or complete transactions you have requested, to anticipate and resolve problems with your services, and to create and inform you of products or services from CIK or others that better meet your needs.
- CIK uses email, telemarketing, and direct mail to inform you about CIK products or services we think will interest you. If you do not wish to receive these types of communications, you can send email to CIK. The contact information is provided in www.cikbusinesssolutions.com.

While you may choose not to receive marketing information from us, you will continue to receive bills, customer service-related notifications, and other similar information from us electronically or otherwise. You will also continue to receive communications directly related to each service you purchase or subscribe to.

**Our Customer Surveys**: Periodically, you may be able to participate in our surveys to help us improve our services. Any personally identifiable information that we may collect from you in a survey will ONLY be used internally by CIK. And unless otherwise explained in the instructions for a particular customer survey, any personally identifiable information you provide to us for purposes of that survey will be used in accordance with this Policy.

**Third-Party Use**: CIK does not disclose personally identifiable information to third parties.

# 3. DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION

Because information about our existing and prospective customers is one of our most important business assets, we seek to protect it and keep it confidential. We do not share personally identifiable information with unaffiliated third parties except as detailed below.

**Business Transfers**: Information about our users and customers, including personally identifiable information, may be disclosed as part of any merger, acquisition, or sale of company assets. It may also be disclosed in the unlikely event of an insolvency, bankruptcy, or receivership in which personally identifiable information would be transferred as one of the business assets of CIK.

**Protection of CIK and Others**: We release personally identifiable information when we believe release is appropriate to do one of the following:

- Comply with the law (i.e. court order or lawful subpoena).
- Enforce or apply our agreements to sell services to you;
- Bill and collect for services; or

• Protect our rights or property (e.g., allegations or concerns about fraudulent activity on your CIK account).

# 4. CUSTOMER PROPRIETARY NETWORK INFORMATION

In the normal course of providing telecommunications services to its users and customers, CIK collects and maintains certain customer proprietary network information ("CPNI"). Your CPNI includes the types of telecommunications services you currently purchase or subscribe to, how you use those services (for example, your calling records), and billing information related to those services. Your CIK telephone number, name, and address do not constitute CPNI.

CIK does not sell, trade, or otherwise share your CPNI with anyone outside of CIK or with anyone who is not authorized to represent us to offer our services or to perform functions on our behalf except as the law may require or you may authorize.

Federal law generally permits us to use CPNI in our provision of telecommunications services you purchase or subscribe to, including billing and collections for those services. We are permitted to use or disclose CPNI to offer communications services of the same type that you already purchase from us. We may also use or disclose your CPNI for legal or regulatory reasons such as to respond to a court order, to investigate fraud, to protect our rights or property, to protect against the unlawful use of our services, or to protect other users.

### 5. SECURITY AND DATA INTEGRITY

We maintain a variety of physical, electronic, and procedural safeguards to guard your personally identifiable information and CPNI. Specifically, we use commercially accepted procedures and systems to protect against unauthorized access to our systems. We restrict access to your personally identifiable information and CPNI to those employees and contractors - all of whom are covered by this Policy - who need to know that information to provide services to you or otherwise assist you. We protect the security of your personally identifiable information during transmission via the CIK website by using Secure Sockets Layer ("SSL") software, which encrypts information you input, so that no one else can read it as it is transmitted over the Internet. And we use an SSL connection to enable you to view, enter, and change the information in the "Preferences" section securely on our website.

You can take additional steps on your own to safeguard your personally identifiable information. For example, you should sign off when finished using a shared computer. And you should always log out of any website, including the CIK website, after viewing personal account information, such as the "Preferences" section of our website.

Please be advised that CIK has no control over the security of other sites on the Internet you might visit, interact with, or from which you might buy products or services.

#### 6. OUR USE OF "COOKIES"

CIK uses "cookies" to enhance your use of our website. "Cookies" are small text files placed on your computer's hard drive by a website when you visit that website. These files identify your computer and record your preferences and other data about your visit to a website so that when you return to that site, the site operator knows who you are and can personalize your visit. For example, cookies enable a website shopping cart to function so that you only have to check out once. Consequently, cookies are often tied to the use of personally identifiable information while using our website. If you choose not to accept the use of cookies, your use of our website may be impaired.

Cookies allow us to do the following:

- Complete transactions you have requested;
- Collect information to determine which services and sections of our website are most and least popular;
- Personalize our website and make recommendations to you based on services you have used in the past; and
- Improve the ease of use of our website, sometimes in conjunction with web beacons.

We do not use cookies to store credit card information. CIK does, however, use cookies to store login information (including passwords) for customers who choose the option of storing such information on their computers.

We also use a session-based cookie to maintain continuity of navigation for you when viewing our website during a particular on-line session. After closing the browser, the session cookie simply terminates; it is not stored on your computer's hard drive thereafter.

In conjunction with web beacons (described below) CIK may also use cookies, but these cookies are not linked to your personally identifiable information.

You can enable cookies by doing the following:

- Internet Explorer: On your task bar menu, select "Tools" and "Internet Options." Then select the "Privacy" tab. Move the slider to any setting other than "High" or "Block All Cookies." Then click "OK."
- Mozilla Firefox: On your task bar menu, select "Tools" and "Options." Select the "Privacy" tab and place a tick mark in the box for "Accept Cookies from Sites." Then click "OK."
- Netscape Navigator/Communicator: On your task bar menu, select "Edit" and "Preferences." Select "Advanced" and click "Accept All Cookies." Then click "OK."

#### 7. OUR USE OF WEB BEACONS

CIK uses web beacons on its website. A web beacon (sometimes called a "web bug" or "clear GIF") is a tiny graphic image (usually a 1-by-1 pixel) displayed in a web page, web-based document, or email message, but it is usually invisible, as it is usually the same color as the background of the web page, document, or email message. When the user's web browser reads the HTML code for the web beacon to retrieve the image, it can pass along the IP address of the user's computer, the time the web beacon was viewed and for how long, and the type of browser used. Web beacons can also be linked to a user's cookies and any personally identifiable information that may be stored in them.

CIK uses web beacons to gather aggregate information, as described above in the "INFORMATION WE COLLECT". CIK does not use web beacons that link to cookies or to personally identifiable information on unaffiliated third-party websites. And it does not permit unaffiliated third parties to place such web beacons in advertisements on CIK's website.

For its web beacons, CIK uses Omniture to analyze use of CIK's website. For further information on how Omniture collects and uses information, you should refer to the Omniture Products and Services Privacy Statement at <a href="http://www.omniture.com/privacy/product">http://www.omniture.com/privacy/product</a>.

#### 8. OUR USE OF BANNER ADS

We may use third-party advertising companies to place advertisements about CIK products and services on other websites. These advertising companies may use cookies, web beacons, or other technologies to measure the effectiveness of our ads. The advertising companies may use anonymous information about your visits to our and other websites in order to measure advertising effectiveness and offer selective ad content. But they use anonymous identifiers, such as a number, to identify you. They do NOT link to or collect any personally identifying information. The use of such cookies, web beacons, and other technologies is subject to the advertising companies' privacy policies, not the Policy of CIK. If you would like more information about the advertising companies we use and their privacy practices, or would like to prevent them from sending and reading cookies on your computer, see "OUR USE OF "COOKIES"."

# 9. CHECKING ACCOUNT AND "PREFERENCES" INFORMATION FOR ACCURACY

You can review or change the information in the "Preferences" section of our website, or by telephoning or writing to Customer Service. For Customer Service contact information, please see www.cikbusinesssolutions.com. As noted in the "INFORMATION WE COLLECT" above, we may also use updated address information obtained from other sources to update our records.

#### 10. ENFORCEMENT

CIK regularly reviews its compliance with this Privacy Policy. Please direct any questions or concerns regarding this Privacy Policy or CIK's treatment of personal information by contacting us. When we receive formal written complaints, it is CIK's policy to contact the complaining customer or user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personally identifiable information that cannot be resolved between CIK and an individual.

### 11. UPDATING OF OUR POLICY

CIK will revise or update this Policy if our practices change, as we change existing services, add new services, or develop better ways to inform you of services we think will interest you.

The change proposal will be provided to you at least thirty (30) days but no more than ninety (90) days before the date on which the amendment shall take effect. Upon such amendment, you have the option of either terminating this Agreement or retaining the existing agreement unchanged. Your continued use of the site after changes have been posted constitutes agreement to the updated terms and conditions. You should refer back to this page for the latest information and the effective date of any changes.