

ALITER TECHNOLOGIES 3CIS

# Privacy Policy

May 2025

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# Aliter Technologies 3CIS

## Personal Information Protection Policy

Aliter Technologies 3CIS (AT 3CIS) is committed to safeguarding the personal information entrusted to us by our customers. We manage your personal information in accordance with Alberta's Personal Information Protection Act and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to AT 3CIS. The policy also applies to any person providing services on our behalf.

A copy of this policy is provided to any customers on request.

### What is personal information?

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, etc.

### What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our customers, including personal information needed to:

- Communications on projects and information on the services
- Notify customers of upcoming events of interest

We normally collect customer information directly from our customers. We may collect your information from other persons with your consent or as authorized by law.

We inform our customers, before or at the time of collecting personal information, of the purposes for which we are collecting the information. However, we don't provide this notification when a customer volunteers information for an obvious purpose.

### Consent

We ask for consent to collect, use or disclose customer personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

In cases where we collected personal information before January 1, 2004, we assume your consent to our use and, where applicable, disclosure for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask customers to provide their consent orally (by telephone), in writing (by signing a consent form, by checking a box on a form, or electronically (by clicking a button).

A customer may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose customer personal information without consent only as authorized by law. For example, in an emergency that threatens life, health or safety, or when the personal information is from a public telephone directory.

#### How do we use and disclose personal information?

We use and disclose customer personal information only for the purposes for which the information was collected, except as authorized by law. For example, we may use customer contact information to deliver goods. The law also allows us to use that contact information for the purpose of collecting a debt owed to our organization, should that be necessary.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent.

#### How do we safeguard personal information?

We make every reasonable effort to ensure that customer information is accurate and complete. We rely on our customers to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible.

In some cases, we may ask for a written request for correction.

We protect customer personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We will notify the Office of the Information and Privacy Commissioner of Alberta, without delay, of a security breach affecting personal information if it creates a real risk of significant harm to individuals.

We retain customer personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

We render customer personal information non-identifying, or destroy records containing personal information once the information is no longer needed.

We use appropriate security measures when destroying customer personal information, including shredding paper records and permanently deleting electronic records.

### Access to records containing personal information

Customers of AT 3CIS have a right to access their own personal information in a record that is in our custody or under our control, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual. Organizations are authorized under the Act to refuse access to personal information if disclosure would reveal confidential business information. Access may also be refused if the information is privileged or contained in mediation records.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to Name or position title of individual in your organization designated to ensure compliance with PIPA. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. For personal information collected before January 2004, if we do not have a record of disclosures, we will provide information about any disclosure of your information that is likely to have occurred.

You may also request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.

## Questions and Complaints

If you have a question or concern about any collection, use or disclosure of personal information by AT 3CIS, or about a request for access to your own personal information, please contact Jay Candy, VP of Wireless, designated to ensure compliance with PIPA in the first instance:

Jay Candy, VP of Wireless

AT 3CIS

(780) 433 3752

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta

Suite 2460, 801 - 6 Avenue, SW

Calgary, Alberta T2P 3W2

Phone: 403-297-2728

Toll Free: 1-888-878-4044

E-mail: [generalinfo@oipc.ab.ca](mailto:generalinfo@oipc.ab.ca)

Website: [www.oipc.ab.ca](http://www.oipc.ab.ca)



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