

## **Principle 1** Accountability

*The Ethnic Television Network Company is responsible for personal information under their possession and shall designate one or more persons who are accountable for compliance with the following principles.*

- 1.1 Ethnic Television Network Company will implement policies and practices to give effect to the principles, including:
  - 1.1.a Implementing procedures to protect personal information;
  - 1.1.b Establishing procedures to receive and respond to complaints and inquiries;
  - 1.1.c Training employees and communicating to them information about Ethnic Television Network Company's policies and practices;
  - 1.1.d Developing methods to explain Ethnic Television Network Company's policies and procedures.
- 1.2 Accountability for Ethnic Television Network Company's compliance with the principles rests with the senior management of Ethnic Television Network Company and the person or persons designated by senior management.

## **Principle 2** Identifying Purposes for Collection of Personal Information

*Ethnic Television Network Company shall identify the purposes for which personal information is collected at the time of the collection or before the information is collected.*

- 2.1 Personal information is any information that is used to identify the customer, or by which customer's identity can be deduced. Personal information that Ethnic Television Network Company collects from customers includes:
  - 2.1.a Customer's name and address and other contact information;
  - 2.1.b Credit and reference information, such as date of birth, telephone numbers, email address and bank information requested for pre-authorized payments;
  - 2.1.c Information about current Internet usage;
- 2.2 Ethnic Television Network Company collects personal information only for the following purposes:
  - 2.2.a For provision of service(s) and/or products to its customers;
  - 2.2.b For maintenance of commercial relations and to communicate with its customers (which will include, but not be limited to: billing, collection, advertising, promotion, account verification);
  - 2.2.c identification customer needs and/or preferences;
  - 2.2.d For administration and management of its business operations
  - 2.2.e To meet legal and regulatory requirements;

- 2.3 Individuals collecting personal information will be able to explain to customers the purposes for which the information is being collected, or will refer the person to a designated individual at Ethnic Television Network Company who will explain the purposes.

### **Principle 3** Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of a customer or employee are required for the collection, use or disclosure of personal information, except where inappropriate.

- 3.1 In certain circumstances, personal information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical or security reasons may make it impossible or impractical to seek consent. Moreover, Ethnic Television Network Company may provide personal information to its lawyer or agent to collect a debt, comply with a subpoena, warrant or other court order, government institution requesting the information upon lawful authority, or as may be otherwise required by law.
- 3.2 Ethnic Television Network Company will generally seek consent for the use or disclosure of personal information at the time of collection. In certain circumstances, consent of use or disclosure of personal information may be sought after the information has been collected but before use (for example, when Ethnic Television Network Company wants to use information for a purpose not previously identified).
- 3.3 An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Ethnic Television Network Company will inform the individual of withdrawal implications. In order to withdraw consent, an individual must provide notice to Ethnic Television Network Company in writing or other.
- 3.4 Ethnic Television Network Company will make ensure that the individual is informed of the purposes for which the information would be used. The purposes will be stated in a comprehensible manner that the individual can reasonably understand how the information will be used or disclosed.
- 3.5 Under the condition of supply of the product or service, Ethnic Television Network Company will not require an individual to consent to the collection, use, or disclosure of information beyond that requirement to fulfill the specified and legitimate purposes.

### **Principle 4** Limiting Collection of Personal Information

*Ethnic Television Network Company shall limit the collection of personal information, necessary for the purposes identified. Ethnic Television Network Company shall collect personal information by fair and lawful means.*

- 4.1 Ethnic Television Network Company shall collect personal information from its customers for the purposes described in Principle #2
- 4.2 Due to connection with Internet provider business, Ethnic Television Network Company may use a 'Cookie' to collect certain information to track user patterns

on its web site. A Cookie is a text file containing a unique identification number that identifies a user's browser, but not a particular individual. A Cookie *does not* identify an individual. Ethnic Television Network Company does not use Cookies in combination with other information to obtain any personal information. If an individual does not wish to use Cookies, he or she can re-set their browser to either provide notification or refuse to accept Cookies.

## **Principle 5** Limiting Use, Disclosure and Retention of Personal Information

*Ethnic Television Network Company shall not use or disclose personal information for purposes other than those for which it was collected except with the consent of the individual or as required by law. Ethnic Television Network Company shall retain personal information only as long as necessary for the fulfillment of those purposes.*

- 5.1 Ethnic Television Network Company may *collect, use or disclose* personal information without the individual's knowledge or consent in certain circumstances as described in Principle #3.1.
- 5.2 Ethnic Television Network Company may disclose a customer's personal information to:
  - 5.2.a Another telecommunication company for the provision of telecommunications services to that customer;
  - 5.2.b A company involved in providing communications directory services;
  - 5.2.c A person involved in the development, promotion, marketing or enhancement of Ethnic Television Network Company services;
  - 5.2.d A credit collections agency;
  - 5.2.e Emergency services in an emergency situation;
  - 5.2.f A person, who, in the reasonable estimation of Ethnic Television Network Company, is an agent of the customer;
  - 5.2.g Any other third party, upon receiving the consent of the customer or as required by law.
- 5.3 Certain Ethnic Television Network Company employees may be given access to customer personal information solely for business purposes.
- 5.4 Ethnic Television Network Company makes their employees aware of the importance of maintaining the confidentiality of personal information. Ethnic Television Network Company employees are governed by a non-disclosure agreement prohibiting disclosure or use of any confidential or personal information for any purposes other than the stated business purposes.
- 5.5 Personal information that is no longer required to fulfill the identified purposes will be destroyed, erased or made anonymous according to the procedures established by Ethnic Television Network Company

## **Principle 6** Accuracy of Personal Information

*Personal information shall be as accurate, complete, and up-to-date as it is necessary for the purposes for which it would be used.*

- 6.1 6.1 The extent to which personal information will be accurate, complete, and up-to-date will depend upon the use of the information, taking into account the interests of the individual. Information will be sufficiently accurate, complete, and up-to-date to minimize the possibility of inappropriate information use to make a decision about the individual.
- 6.2 Personal information that is used on an ongoing basis, including information that is disclosed to third parties, should be generally accurate and up-to-date, otherwise specified.

## **Principle 7 Security Safeguard**

*Ethnic Television Network Company shall protect personal information by security safeguards appropriate to the sensitivity of the information.*

- 7.1 7.1 Ethnic Television Network Company will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. The nature of the security will differ depending on the sensitivity of the information collected, the amount, distribution and format of the information, and the method of storage.
- 7.2 Ethnic Television Network Company's methods of protection include:
  - 7.2.a Physical measures, such as locking cabinets and restricted access to offices;
  - 7.2.b Organizational measures, such as security clearances and limiting access;
  - 7.2.c Technological measures, such as the use of passwords and encryption.
- 7.3 Ethnic Television Network Company will use safety measures in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information.

## **Principle 8 Openness Concerning Policies and Practices**

*Ethnic Television Network Company shall make readily available to customers specific information about its policies and practices concerning management of personal information.*

- 8.1 Ethnic Television Network Company will make its policies and practices concerning management of personal information easily comprehensible and accessible, by providing the following information upon request:
  - 8.1.a The name, title, and address of the Senior Manager responsible for Ethnic Television Network Company's policies and practices and to whom complaints or inquiries may be addressed;
  - 8.1.b A description of the type of information held by Ethnic Television Network Company, including a general account of its use.
- 8.2 Ethnic Television Network Company will make this Privacy Policy available online, by mail, or in a brochure format at its place of business. Ethnic Television Network Company's Customer Services Representatives will be trained to answer any requests or complaints at Ethnic Television Network Company customer service telephone number.

## **Principle 9** Customer and Employee Access to Personal Information

*Ethnic Television Network Company shall inform a customer of the existence, use and disclosure of his or her personal information upon request. A customer shall be able to challenge the accuracy and completeness of its disclosure and to have it amended as appropriate.*

- 9.1 When an individual successfully demonstrates the inaccuracy or incompleteness of disclosure of personal information, Ethnic Television Network Company will amend the information as required. Depending upon the nature of the information challenged, amendment involves the correction, deletion or addition of information. Where appropriate, the amended information will be transmitted to third parties.
- 9.2 When a conflict is not resolved to the satisfaction of the individual, Ethnic Television Network Company will record the substance of the unresolved conflict. When appropriate, the existence of the unresolved conflict will be transmitted to third parties.
- 9.3 All personal information Ethnic Television Network Company collects about its customers is available through the customer portal <http://www.etvnet.ca>. Customers can log in to the site, review and edit personal information. If there are problems accessing the site customers contact our support center.

## **Principle 10** Challenging Compliance

*A customer shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for the Ethnic Television Network Company's compliance with the Code.*

- 10.1 Ethnic Television Network Company will respond accordingly to received complaints or inquiries about its policies and practices relating to the use and disclosure of personal information. Ethnic Television Network Company will make ensure that its procedures are easily accessible and simple to use.
- 10.2 Ethnic Television Network Company will inform individuals who make inquiries or complaints of the existence of relevant complaint procedures.
- 10.3 The person(s) accountable for compliance with this Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.
- 10.4 Ethnic Television Network Company will investigate all complaints and take appropriate measures. If a complaint is justified, Ethnic Television Network Company will act accordingly, including, if necessary, amending its policies and practices.