

Videotron Ltd.¹

Code for the protection of Personal Information ("Privacy Code")

This Privacy Code was developed pursuant to the Personal Information Protection and Electronic Documents Act, S.C. 2000, ch. 5, whose purpose is to facilitate the circulation and exchange of information while establishing rules governing the collection, use and disclosure of Personal Information in a manner that recognizes the right of privacy of individuals with respect to their Personal Information and the need of organizations to collect, use or disclose Personal Information for purposes that a reasonable person would consider appropriate in the circumstances, and pursuant to the Telecommunications Act, R.S.C. 1993, ch. 38.

¹ For the purpose of this document, Videotron Ltd. also includes *CF Câble TV Inc.* (collectively, "Videotron").

Videotron Ltd.

Privacy Code

PART 1

Processing Personal Information - General principles

Videotron Ltd.

Privacy Code - General principles

1. INTRODUCTION

The federal government passed the Personal Information Protection and Electronic Documents Act, the purpose of which is to complete the laws in Canada governing the protection of Personal Information and the rights of individuals to access their Personal Information. This Act, which is completed by the Telecommunications Act and applicable provincial legislation (collectively, the "Law"), establishes the principles governing the collection, use and disclosure of Personal Information in Canada. At Videotron, we know how important it is to protect your Personal Information. With this in mind, we developed a Privacy Code that complies with current legislation on the protection of Personal Information, including the rules established by the Canadian Radio-television and Telecommunications Commission (CRTC).

Videotron' Code for the protection of Personal Information (also called the "Code", "Privacy Code" or "Videotron code") is a statement designed to establish responsible and transparent practices for the management of Personal Information.

Summary versions of the Code will be made available to customers upon request and on the company's corporate Web site. The full and final version of the Code is available on our Web site at www.videotron.com/privacy or can be obtained by e-mailing our Customer Service at serviceclient@videotron.ca or calling the number appearing on your regular invoice.

2. DEFINITIONS

"Agent(s)" – employees, representatives, subcontractors, services providers, consultants or other agents duly authorized by Videotron to act for or on behalf of Videotron.

"Collection" or "to collect" – the act of collecting, acquiring, recording or obtaining Personal Information from any source whatsoever, including from Third Parties, and by any means whatsoever.

"Consent" – a voluntary acquiescence to the Collection, Use and Disclosure of Personal Information for purposes that have been identified. Depending on the circumstances, consent may be express or implied and can be given directly by the individual or through an authorized representative.

"Disclosure" or "to disclose" – the act of communicating Personal Information to a Third Party.

"Personal Information" – in the case of a subscriber, means all information kept by Videotron regarding such subscriber, other than the subscriber's name, address and listed telephone number and in the case of any other individual, any information about an identifiable individual, with the exception of the name and title of a Videotron employee and address and phone number of his or her workplace. Personal Information includes such things as credit information, billing files, service and equipment statements, as well as any complaints documented in a file.

An appendix to the Code that lists all of the Personal Information kept by Videotron is available upon request.

“Third Party” – a person other than Videotron, its Agents or the person specified in the Personal Information.

“Use” – the processing, handling and management of Personal Information by Videotron and its Agents.

3. ACCOUNTABILITY

Videotron is responsible for the Personal Information under its control and shall designate one or more individuals to ensure compliance with the principles stipulated in this Code. At the time of publication, the designated person was Normand Vachon, Vice-president, Human Resources, Videotron Ltd., 300. Viger Ave. E, Montreal, QC H2X 3W4.

Anyone seeking more information about Videotron's commitment to protect Personal Information can get in touch with Videotron at the phone number appearing on their regular invoice, via the www.videotron.com Web site or by e-mailing serviceclient@videotron.ca.

4. IDENTIFYING THE PURPOSES FOR WHICH PERSONAL INFORMATION IS COLLECTED

Videotron, through its Agents, collects Personal Information for specified and legitimate purposes, including without limitation, the purposes set out under parts 2, 3 and 4 of this Code.

When asked to do so, the Agents who are gathering Personal Information shall explain the purposes for doing so or instruct the person in question to contact Videotron's designated person for more information.

Unless authorized to do so by Law, the Agents will not Use or Disclose previously collected Personal Information for a new purpose without obtaining the prior Consent of the concerned individual.

5. CONSENT TO THE COLLECTION, USE OR DISCLOSURE OF PERSONAL INFORMATION

Where required by Law, the Agent shall ensure that the individual from whom they are collecting Personal Information Consents to the Collection, Use and Disclosure of their Personal Information.

When determining the appropriate method of seeking Consent, the Agent shall consider the sensitivity of the Personal Information, the reasonable expectations of the individual and the criteria established by Law, as the case may be.

In certain circumstances, Videotron may Collect, Use or Disclose Personal Information without the knowledge or Consent of the person in question, for example:

- When it is clearly in the interest of the person in question and it is impossible to obtain the person's Consent within an appropriate time frame;

- When asking for the individual's Consent risks compromising the accuracy of the Personal Information, for example in cases of a breach of contract or a violation of a federal or provincial law;
- In emergencies, when the life, health or security of the individual is threatened;
- For the purpose of collecting a debt or complying with a subpoena, warrant or other court order or when required to do so by Law.

An individual may withdraw Consent at any time, subject to legal or contractual restrictions and provided such withdrawal is reasonable under the circumstances. The individual may contact Videotron for more information on the implications of such a withdrawal.

6. LIMITATION ON THE COLLECTION OF PERSONAL INFORMATION

The Agent shall primarily Collect Personal Information from the concerned individual, although the Collection may occasionally be done otherwise where authorized by Law. For example, the Agent may Collect Personal Information from credit agencies or from Third Parties authorized to disclose the Personal Information. Videotron's files shall indicate the source of the Personal Information.

7. RETENTION OF PERSONAL INFORMATION

Videotron only retains Personal Information as long as necessary or useful for its intended purposes or in accordance with the requirements of the Law. Depending on the circumstances, when Personal Information was used to make a decision about an individual, Videotron will retain the reasons for its decision for a reasonable period of time to allow that individual to have access to those reasons.

Videotron shall implement reasonable and systematic control measures, time frames and practices regarding the retention and destruction of Personal Information and files that are no longer needed nor relevant for their intended purposes, or that are no longer required by Law. Such Information shall be destroyed, erased or made anonymous.

8. ACCURACY OF PERSONAL INFORMATION

Videotron will update the Personal Information as necessary for its intended purposes or upon request by the concerned individual.

The accuracy and completeness of Personal Information that is being kept by Videotron regarding an individual can be contested by such individual who can have the Personal Information amended as appropriate.

Videotron shall promptly correct or complete any Personal Information that is deemed to be inaccurate or incomplete. Any unresolved dispute with respect to the accuracy or completeness of Personal Information must be recorded in the file of the concerned individual. Where applicable, Videotron shall communicate all amended Personal Information to Third Parties who have access to the Personal Information or inform them of the existence of an unresolved challenge.

9. SAFEGUARDS

Agents shall be required to protect the confidential nature of the Personal Information. Personal Information kept by Videotron shall only be accessed by Agents whose normal duties require them to have access to it.

Videotron shall protect the Personal Information against specific risks, such as the loss, theft or unauthorized access, disclosure, copying, use, modification or unauthorized destruction thereof, by taking security measures commensurate with the Personal Information's level of sensitivity and ensuring that its Agents put in place or undertake to put in place, as the case may be, adequate safety measures.

Methods used to destroy or ensure that all copies of the Personal Information are made anonymous shall be thorough and based on retention periods that comply with the Code.

10. TRANSPARENT POLICIES AND PRACTICES

Upon request, Videotron shall provide the concerned individual with a list of the Personal Information on file regarding that individual, together with details of its Personal Information management practices.

From time to time, Videotron shall disseminate information to help individuals learn, exercise and protect their rights with respect to their Personal Information.

Videotron encourages its Agents to be vigilant and to report to the person designated for Code compliance any situation that seems to be at odds with the Privacy Code. No reprisals shall be taken against an Agent for reporting an irregularity regarding this Code.

11. ACCESS TO PERSONAL INFORMATION

Subject to the exceptions provided for in the Law and upon request, Videotron shall inform an individual of the existence of Personal Information that concerns them, the Use that is being made and whether it was disclosed to Third Parties.

Subject to the exceptions provided for in the Law and upon request, Videotron shall allow the concerned individual to consult the Personal Information kept in his or her file. Personal Information shall be provided in a form that is generally understandable, within a reasonable time, and at minimal or no cost to the individual.

Between the request for access and the disclosure of Personal Information to the concerned individual, Videotron may revise the content of files solely to ensure that Personal Information on other individuals is not disclosed as a result. All changes made during this period will be done completely in compliance with the Law.

In certain situations, it may be impossible for Videotron to allow concerned individuals to consult all of their Personal Information. For example, Videotron cannot provide access to the Personal Information if disclosure would reveal confidential business information; if the Personal Information is protected by attorney-client privilege; if the Personal Information was obtained in the course of an official dispute-resolution process, or if the Personal Information was collected during an inquiry into a breach of contract or violation of a federal or provincial law. Upon request, Videotron shall specify the reason for denying access to Personal Information.

When providing a “Disclosure of Personal Information” statement, whenever it is not possible for Videotron to provide an exact list of Third Parties to whom it has disclosed Personal Information regarding an individual, Videotron shall provide a list of Third Parties to whom it *may have* disclosed Personal Information.

To ensure protection of the Personal Information, the concerned individual may be required to provide adequate proof of identification to enable Videotron to determine the existence, Use and Disclosure of Personal Information and authorize access to their file.

12. COMPLAINT FOR NON-COMPLIANCE WITH THE PRINCIPLES STIPULATED IN THE CODE

Any interested individual shall be entitled to address a complaint regarding non-compliance with the principles set out in the Code by communicating with the person designated for Code compliance within Videotron, in accordance with paragraph 3.

Videotron has put in place procedures to receive and respond to complaints and inquiries regarding the Code and its practices relating to the handling of Personal Information. The concerned individuals shall be informed of the procedures to be followed as soon as they express a desire to file a complaint.

Videotron shall investigate all complaints regarding compliance with the Code. If a complaint is found to be justified, Videotron shall take appropriate measures, including, if necessary, changes to its Code and practices. The concerned individual shall be informed of the result of the investigation into their complaint.

If an individual who lodged a complaint is not satisfied with the decision of the person designated to protect Personal Information at Videotron, the individual can refer the complaint to the Privacy Commissioner of Canada, 112 Kent Street, Ottawa, Ontario K1A 1H3.

Videotron Privacy Code

PART 2*

Processing of subscriber Personal Information

*** The following part applies specifically to Videotron's subscribers and completes the general rules stipulated in Part 1 of the Code.**

Videotron Ltd.

Privacy Code - Subscribers

When you become a Videotron subscriber, the Personal Information you disclose allows us to provide you with the products and services that best suit your needs. We only Collect the Personal Information that is strictly needed to provide our products and services. You can always choose not to provide your Personal Information to us. However, if you make that choice, we may not be able to provide you with the product, service or information you requested.

Unless you have given your express Consent or if disclosure is required by legal authorities or by Law, none of the Personal Information that Videotron (including its Agents) is keeping on you can be disclosed to anyone other than: (i) yourself; (ii) a person who, in Videotron's reasonable opinion, is seeking to obtain information while acting as your representative; (iii) a telephone company other than Videotron, provided the information is required for the efficient and cost-effective provision of telephone service and disclosure is made on a confidential basis with the information to be used only for that purpose; and, lastly, (iv) a company involved in supplying you with telephone or telephone directory related services, provided the information is required for that purpose and disclosure is made on a confidential basis with the information to be used only for that purpose.

At Videotron, we use your Personal Information for certain specific purposes, such as:

- approving your application to subscribe to Videotron services;
- maintaining communication with you;
- keeping you informed of current product and service offers and promotions, unless you object to us doing so;
- detecting and preventing possible fraud or the illegal, inadequate or inappropriate use of our products and services;
- evaluating your level of satisfaction with our products and services;
- complying with legislation, etc.

You should know that we do not sell information on our subscribers to anyone under any circumstances, neither do we transmit information on our subscribers to organizations, including to our affiliated companies except, in the latter case: (i) with your consent, solely to allow them to offer you their own products or services; or (ii) if the affiliated company acts as Agent.

Certain services offered by Videotron may require specific measures, such as the confidentiality of the sites browsed by computer or interactive TV, the content of e-mails, the choice of televised programs, user-created usage profiles, items acquired via electronic transactions and the places where such items are acquired. Products and services may be associated with their own measures for protecting Personal Information that are specific to them and complement this Code. Subscribers acquiring such products and services will have access to the relevant policy.

Videotron Privacy Code

PART 3*

Processing of Personal Information collected from visitors and users of Videotron Ltd. Web sites

* The following part applies specifically to visitors and users of Videotron Web sites and completes the general rules stipulated in Part 1 of the Code.

Videotron Ltd.

Privacy Code – Web sites

When you communicate with Videotron via the Internet or carry out transactions on a Videotron site, we want you to feel as safe and confident as when we process your request by phone or in person.

That is why we have adopted a business code based on principles established jointly by the government, consumer associations and other businesses to promote security when surfing or conducting transactions via the Internet. Rest assured that you can browse our Web sites with complete security and confidentiality, whether for your own pleasure or to obtain communications services.

After reading the Code and more particularly this part, you will be better prepared to take informed decisions when you communicate with Videotron via the Internet.

1. WHICH OF VIDEOTRON'S INTERNET SITES ARE COVERED BY THIS PART?

The following sites are controlled by Videotron:

- www.videotron.com: corporate and transactional site;
- www.canalvox.com: community TV site;
- www.zonehautevitesse.com: Videotron High-speed Zone;
- www.vtl.ca: business division site.

2. IS IT POSSIBLE TO TRACK YOUR USE OF THE INTERNET AND STUDY YOUR HABITS?

Server logs:

Our servers keep a precise log of visits to our Internet sites, which facilitates the establishment and maintenance of your connection. From visitor IP (Internet protocol) addresses, these logs contain statistics on the time and duration of your visit, the pages viewed and your computer's operating system, among others. These statistics categorize visitors by area used, browser software and connection speed. Videotron may also use the IP address to present custom content to users of Videotron's Internet access services (dial-up access, cable-modem access, Wi-Fi access, etc.). Reports with aggregated data on the statistics gathered are used to improve our Internet sites and make the experience of Internet surfers more enjoyable.

Videotron reserves the right to share this aggregated data with partners for the purpose of proposing exclusive and promotional offers to Videotron customers. In all such cases, the information consists of aggregated data that does not contain any personal data.

Raw data that could be used to identify individuals is destroyed on a regular basis. Videotron does not use this Personal Information for its own commercial or other advantage or for that of others.

The logging of SSL-encrypted (secured socket layer) transactions in the secure zone requires users to authenticate themselves by means of a username or Videotron account number. Once they have been authenticated, users can have access to their Videotron account details, change services online, change their e-mail services, etc.

Cookies:

A cookie is a small, text-only file containing data—specifically, a unique identifier—that is transmitted by a Web site server to your browser and saved on your computer's hard drive. Cookies identify a computer during a session and are also used to save the user's preferences on the computer. A cookie cannot give access to your computer or obtain information other than what you have voluntarily transmitted to our Web site.

Most browsers automatically accept cookies. Consult your browser's user manual for information on how to restrict or disable the use of cookies.

If your browser does not accept cookies, you will still be able to access the publicly available information on the videotron.com site, although you will not be able to take advantage of the site's advanced features that require authentication.

We currently use cookies for the following reasons:

- to detect the user's language of communication;
- to detect the presence of FlashMedia ;
- to manage the user session with the application server for the site's advanced features that require authentication;
- to gather aggregated site viewing and browsing data.

Cookies may possibly be used for other purposes:

- When you visit one of our sites, we use cookies to determine what browser you are using; to customize the page you are viewing to your interests if you have chosen to use that option; and to recognize you so that you are not obligated to make repetitive entries or enter your password each time you complete a transaction or attempt to gain access to a restricted zone.
- When you buy an article or service, one or more cookies are used to record how you navigated the Videotron site during your visit and the information you voluntarily entered, even if you switched to another page. In certain cases, a cookie allows you to be recognized and makes a link with your account if you are using a service. Cookies also allow us to generate aggregated data and statistics that show how our visitors interact with our sites. We are then able improve our sites to serve you better. The series of pages visited is always recorded anonymously in a cookie of this type. This type of cookie expires 30 minutes after you leave our site or if there hasn't been any activity on your computer during that period.
- Cookies are also currently used for counting. They enable us to find out how many times you have visited our site or one of our Web pages. We can then estimate the size of our audiences. This cookie is never used to identify you.

These browser cookies come with a one-year lifetime and you can delete them at any time.

- If you click on a banner displayed by Videotron on one of its sites, a cookie may occasionally be added to your browser's cache. The purpose of this cookie is to calculate the commission that we charge or pay our partners, especially when sales result from your visit via a Videotron site. This cookie only contains the identity of our partner and an expiration date. Other than this, Videotron does not try to link the identities of Web surfers with their online activities. Our partners agree to our strict measures aimed at protecting your privacy, as described in Videotron's Code.

Clear or invisible GIFs:

Clear or invisible GIFs, often called web bugs or 1-pixel GIFs, are very small graphic images with a unique identifier used to count the number of times a Web page has been visited. Videotron may also use clear GIFs in HTML-based e-mails to track the number of e-mails that were actually opened and read. This helps Videotron improve its Videotron.com Web pages and the e-mails sent to customers. However, please note that clear GIFs are not linked to the users' Personal Information.

Stealth website loggers:

Web surfers should only download programs from sites they trust because a small program may be hidden in these downloads that sends its author a list of visited sites and viewed advertising.

Videotron does not use these types of surveillance applications.

Data collection by third-party companies:

Videotron uses the services of Omniture, a third-party company, to track and analyze how our customers and visitors are using our site, but without the possibility of identifying individuals. This helps Videotron improve the quality of its Internet site on an ongoing basis. All of the data collected by Omniture on behalf of Videotron belongs to and is used by Videotron and only contains aggregated data on the activities of our customers and visitors.

On Videotron's behalf, Omniture uses cookies to track visitor behaviour that are saved within the 207.net domain. You can consult Omniture's privacy policy on its www.omniture.com web site.

3. COLLECTION OF YOUR PERSONAL INFORMATION

Videotron does not collect your Personal Information on its Internet sites without your consent. All of the Personal Information that you communicate to us is provided voluntarily. If we require Personal Information in order to provide you with a service, we only gather the minimum information needed to deliver that service with the quality you expect over the requested time period.

In general, the Personal Information required on our Internet sites is used to:

- enable us to answer your questions, which includes providing technical support;

- process an online purchase order;
- register you in the encrypted secure zone;
- receive your entry in a contest;
- study your job application if you submitted your CV to us;
- send you information on the services offered by Videotron; and
- send you a bill for Videotron services that you used.

4. HOW DOES VIDEOTRON USE THE PERSONAL INFORMATION THAT YOU COMMUNICATE TO IT VIA THE INTERNET?

Sending of communications and promotional materials:

Videotron may have cause to use the e-mail address, telephone number or postal address you communicated to us for the following reasons:

- to communicate technical information about Videotron's network or products (major incidents, Internet security, etc.);
- to communicate information about your account (billing, subscription, change of your profile, etc.);
- to communicate information about Videotron's products, services and special offers.

You can contact Customer Service at serviceclient@videotron.com at any time to change your communication preferences for receiving information from Videotron on its products, services and special offers

Unless you should specifically state otherwise, Videotron deems that you agree to the communication preferences mentioned in the preceding paragraph.

Videotron does not send promotional material by any means whatsoever to children under 16 years of age. Should such a situation occur, please contact us so that we can correct it.

During a transaction:

When it is possible to make a credit card payment on a Web site for which Videotron is responsible at the point in the transaction where you provide your credit card number, Videotron uses a system that scrambles the traces of the relationship between the card number and your identity.

Videotron is not responsible for transactions carried out by Webdoxs or any other potential billing service provider.

Technical Support:

We may ask you for information about your computer and its configuration when you communicate with our Technical Support department. Our staff is trained to keep only the minimum of information needed to meet your needs.

Curriculum vitae:

When you use our sites to seek employment with Videotron, your Personal Information is received directly by our Human Resources department and is only shared with qualified staff as needed. This information is stored in a secure manner and is destroyed on a regular basis.

5. DISCLOSURE OF YOUR PERSONAL INFORMATION TO OTHER COMPANIES OR ORGANIZATIONS

In certain cases, contests may be posted on our Web sites. If you participate, you may be asked for Personal Information. Personal Information given voluntarily can be communicated to the partners who set up the contest. Consequently, you may receive communications from one or more of Videotron's partners who set up the contest. With all contests on a Videotron site, you have the option of choosing not to receive any communications from Videotron's partners.

6. WHAT SECURITY MEASURES ARE USED BY VIDEOTRON TO PROTECT YOUR PERSONAL INFORMATION?

Videotron makes every reasonable effort to protect the Personal Information that you have transmitted to it. SSL technology encrypts your Personal Information so that it is practically impossible to intercept and decrypt it. We require our partners to do likewise. As a rule, you'll see a closed padlock or an entire key on your browser during a secure connection. Moreover, the web page address will start with https instead of http.

Videotron also uses hardware and software to take other measures that protect your privacy.

Although Videotron takes reasonable steps to make this site secure, please remember that, when you disclose Personal Information on the Internet, it may be intercepted by people whose intentions are unknown. This is especially true in chat rooms or discussion forums such as newsgroups but may also occur with e-mail messages. Videotron is not nor may it be held liable for the interception of any information that you have transmitted.

Use of a shared computer

When you use a computer that is shared by several people (library, Internet café, etc.), please remember to close your secure session on the Videotron site by clicking on the "End session" button. Videotron cannot identify who is using your computer or the computer that you just finished using if you haven't properly closed your session.

7. LINKS WITH SITES THAT ARE NOT UNDER VIDEOTRON'S CONTROL

Using links to navigate from one site to another makes surfing more enjoyable. Videotron's sites contain links to a large number of other sites. We try to distinguish between sites belonging to us for which we are responsible and those that are not under Videotron's control.

As in other matters, Videotron cannot assume any responsibility for privacy outside of the sites under its control.

Videotron Privacy Code

PART 4*

Processing of Videotron Ltd. employees' Personal Information

* The following part applies specifically to Videotron employees and completes the general rules stipulated in Part 1 of the Code.

Videotron Ltd.

Privacy Code - employees

Videotron offers its employees the training that may be necessary for them to fulfill their responsibilities with regard to the Collection, Use and Disclosure of Personal Information under this Code according to the nature of their duties.

Through its Agents, Videotron collects Personal Information concerning its employees to:

- efficiently manage its human resources;
- establish and maintain a relationship with its employees that is based on trust;
- understand employee needs, where applicable;
- efficiently manage its operational and commercial activities, including reasonable enquiries related to the hiring of employees; and
- comply with legal and administrative requirements.

As a general rule, an employee who accepts a position or who is granted employee benefits implicitly Consents to the Collection, Use and Disclosure of their Personal Information that may be needed for the legitimate purpose of hiring and employment.

Videotron may collect Personal Information about its employees from Third Parties, including employers or personal references, or from any other Third Party authorized to disclose this Personal Information.

Videotron can disclose Personal Information about its employees for purposes of personnel management and employee benefits.

In certain situations, it may be impossible for Videotron to allow employees to consult all of the Personal Information that it has on them. For example, Videotron may not provide access to the Personal Information if the communication thereof would reveal confidential business information; if the Personal Information was obtained in the course of an official dispute-resolution process; or if the Personal Information was gathered during an inquiry into a breach of contract or violation of a federal or provincial law. Upon request, Videotron shall specify the reason for refusing access to the Personal Information.