

Yellow Pages Group Personal Information Privacy Policy

Accountability

Yellow Pages Group Co. and its affiliates (collectively “YPG”, “we”, “us”) has a firm commitment to protecting the personal information of the individuals we deal with. Information which can identify an individual (“personal information”), is often required to provide our directory services, our classified publications, for business transactions, for customer relationship management purposes and in managing our business. This Policy applies to the personal information we collect about our clients and suppliers in Canada and describes how we use and share this information. It also describes how we maintain and secure personal information and how the individual concerned may request access to it. This Policy does not apply to YPG employee personal information or to information that does not qualify as “personal information” under applicable legislation in Canada.

Information Collection

YPG collects personal information that may include:

- contact information, which typically includes such information as an individual’s name, address, telephone numbers, e-mail address, and fax number. However, the name, address and telephone number of an individual that appears in a telephone directory that is available to the public (where such individual can refuse to have such information appears in such directory) does not fall under the scope of “personal information as it is publicly available information. In some circumstances, some of this information may be business information which is not covered by this Policy;
- business information, which typically includes business contact information (such as name, telephone number, address). To the extent that this information is personal information under applicable legislation, it is governed by this Policy;
- financial information, which includes information such as account payment history and status and credit information; and
- other information provided by our individual customers or suppliers, including such information as an individual provides to participate in a contest offered by us, in response to a survey we may conduct, in subscribing to receive information from a website operated by YPG (a “Website”) or in contacting us to obtain information on our services.

We collect personal information primarily from the individual concerned; however, we also collect contact information from our affiliates and from third parties, such as telecommunications companies who provide the individuals concerned with telecommunications services and credit bureaux and reporting agencies (which provide us with business and credit-related information).

Use and Disclosure of Information

YPG will generally collect and use personal information for the following purposes:

- To evaluate and fulfil a request for our products, programs and services;
- To enable our customers to obtain directory advertising for publication purposes or for posting on our Websites, such as yellowpages.ca, mtsyellowpages.ca, trader.ca, Canada411.ca, PagesJaunes.ca, MontrealPlus.ca, QuebecPlus.ca, CalgaryPlus.ca, OttawaPlus.ca, VancouverPlus.ca and EdmontonPlus.ca.
- To prepare and produce advertising to be posted in our directories, on third party search engines and on our partners' websites (the "Partner Sites") and to post such advertising;
- To administer participation in contests, promotions and reward programs we offer, evaluate and analyze responses to surveys we conduct and understand our customers' responses, needs and preferences;
- For the distribution of our directories;
- To pay invoices from and manage payments to our suppliers;
- To respond to inquiries for information about YPG and our services and to respond to and settle requests by our customers and meet their needs;
- To ascertain and verify creditworthiness and share credit information with credit rating agencies;
- To administer, service and collect on accounts;
- In certain circumstances, to grant access to our customers to information on their own accounts;
- To process requests for the removal or correction of information from our files;
- For customer relationship management purposes and to generally manage our business;
- To better understand our customers' or suppliers' needs and how we may improve our products and services; and
- To meet legal, regulatory, security and processing requirements, and otherwise as required or permitted by law.

YPG may also use contact information or business information to contact our customers or suppliers with marketing or promotional materials regarding our products, programs and services or to assist our front-line staff in providing tailored sales offers to our customers. We may exchange or merge personal information with data obtained from third parties for the same purposes. If an individual does not want us to use his/her contact information for marketing purposes, this person should exercise his/her option to opt out of this use by indicating his/her wishes by contacting privacy@ypg.com.

Personal information may be shared with agents or contractors of YPG in connection with services that these individuals or entities perform for YPG. Our written agreements with such agents and contractors ensure that personal information can only be used for the purposes for which it was shared with the agents and contractors, and that the agents and contractors handle the personal information in accordance with this Policy. Some of our agents/contractors are located outside of Canada and, as such, are subject to foreign laws, including laws that may require disclosure of personal information to government agencies in those countries.

In a context where all or part of YPG's assets or business are or may be sold, financed, insured, securitized, assigned or otherwise disposed of, we may also disclose personal information to the companies involved in such a transaction, for the purposes of allowing those companies to decide whether to proceed with the transaction and, where applicable, to provide the products, programs and services that YPG would otherwise provide and generally to carry on the YPG business.

As part of our commitment to enhance our business services, YPG may identify other uses and disclosures for personal information in the future. In that event, we will seek the consent of the individuals concerned where required.

Collection of Information Online

We do not automatically gather any personal information from our customers and Websites visitors online. Personal information is only obtained online if an individual supplies it voluntarily, usually through contacting us via e-mail, applying online for a contest, answering online surveys, submitting a posting to a blog, forum, or review or registering for services. Individuals are not required to supply this information to view the content of the Websites. Individuals should be aware that when they share personal information in public areas on our Websites, this information may be seen and used by others users. We urge any user of our Websites to exercise good judgment when sharing personal information in these areas.

If an individual decides not to provide us with personal information online, no material consequences will result, although this individual may be unable to participate in certain promotions, receive product information, or use portions of our Websites that require personalized information or applications.

Our Websites provides users the opportunity to opt-out of receiving communications from us at the point where we request contact information about you. Individuals also have the ongoing option of removing their contact information from our database so that they will not receive future communications or no longer receive service offered through our Websites

We may use software that receives and records the Internet Protocol (IP) address of the computer that has contacted our Websites. We make no attempt to link these addresses with the identity of individuals visiting our Websites.

Our Websites may use cookies to track user traffic patterns. A cookie is a small data file that certain websites write to your hard drive when you visit them. A cookie file can contain information such as a user ID that the site uses to track the pages you have visited, but the only personal information a cookie can contain is information you supply yourself. A cookie can not

read data from your hard disk or read cookie files created by other websites. YPG does not correlate this information with data about individual users, nor does it share this information or sell it to any third party. We use this data to tailor the visitor's experience at our Websites, showing them content that we think they might be interested in, and displaying the content according to their preferences, to measure the use of our Websites and to improve the content of our Websites. If you prefer not to receive cookies from our Websites, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser. This could affect the areas of the Websites that are accessible to you.

We may also use service providers to serve third party's advertisements on our Websites or YPG advertisements on other websites. In serving advertisements these providers may place cookies on your browser computer and may collect certain anonymous information about your visits to other websites or on our Websites. This information may include browser type, IP address, domain name and the name of the web page from which you entered our Websites, web activity and time of day. This information is used to better understand and optimize the online advertising campaigns. From time to time, we analyze traffic and use our Websites to determine which features and services people like and do not like so that we can improve what we do. To opt-out of these cookies review the privacy policies of those web sites and follow the instructions thereon. We prepare aggregated user statistics or information summaries in order to describe our services to third parties such as prospective business partners and advertisers and for other lawful purposes.

There are links on our Websites which take you to other websites beyond our service. Any links provided to third party websites are provided solely for your convenience or to provide you with resources which are designed to assist and inform you with buying and selling various products and services. YPG is not responsible for the privacy practices or the content of such websites. The operation and content of such third party websites is beyond our control. We do not endorse, in any manner whatsoever, or accept any responsibility for the information, content or other material which may be contained on such websites.

Your Consent

By providing us with your personal information, you consent to our collection, use and disclosure of that information as described in this Policy as amended from time to time or as described at or before the time of collection, use or disclosure, as the case may be. If you do not want your personal information to be collected, used or disclosed in this manner, then please either (1) do not submit your personal information to us, (2) exercise opt-out procedures described above or as may be offered at the time of collection, or (3) refrain from exercising opt-in procedures described above or as may be offered at the time of collection. If you have submitted personal information to us and wish to withdraw your consent to its retention, use or disclosure, please send an e-mail to privacy@ypg.com. You may withdraw your consent, subject to legal or contractual restrictions and reasonable notice. If you withdraw your consent, we may not be able to provide some products or services to you.

Where permitted or required by law, YPG may collect, use or disclose your personal information without your consent, for example, to collect a debt you owe us, to comply with a legally permitted inquiry by a government agency, or to comply with a court order.

Information Safeguards and Retention

YPG will establish files containing personal information for the purposes outlined in this Policy. We use physical, organizational and technological safeguards to protect your personal information against theft, loss or unauthorized access, use, modification, disclosure or disposal. Authorized employees and agents of YPG have access to this information, which will be accessible at our premises and those of our agents.

Generally speaking, you can visit our Websites without revealing personal information. However, given that electronically submitted data is not 100% secure, we make no warranties as to the security of any personal information you submit online, which you do at your own risk.

If links are provided from our Websites to websites of third parties, YPG is not responsible for these third parties' policies or how they treat information about their users. We therefore encourage you to review the privacy policies of these Websites before disclosing your information to any third party.

Policy Changes

We reserve the right to change and update the Policy and these changes will be made when appropriate, in a timely manner. We encourage you to examine our Policy from time to time to ensure you are aware of any changes we may have made.

Access and Correction

We attempt to keep files containing personal information as complete, up-to-date, and accurate as necessary for the identified purposes. Upon written request, YPG will provide you access to your personal information, subject to certain exceptions as provided by the applicable legislation. If you notice any errors or omissions in your personal information, please advise us in writing and we will promptly correct them where appropriate.

Contact

If you have questions or complaints regarding our Policy, the security of your personal information or our compliance with the applicable personal information protection legislation, or if you wish to request access to or correction of your personal information, please contact our Privacy Officer via e-mail at privacy@ypg.com or by sending a note explaining your request/complaint to the following address:

Privacy Officer
Yellow Pages Group
16 Place du Commerce
Ile des Soeurs
Verdun, Quebec, H3E 2A5

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