

Privacy Policy

Personal Information Protection Policy

At Caylix, the privacy of your personal information has always been an important aspect of how we operate. On January 1, 2004, the Government of Canada implemented the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA) that applies to all organizations and businesses that collect, use and disclose personal information in the course of business. As such, Caylix has developed the following Privacy Policy in order to ensure compliance with PIPEDA, as well as to inform our customers of our continuing commitment to the protection of their personal information. These policies apply to all companies that may become or are controlled by Caylix.

Furthermore, the purpose of this privacy policy is to explain to customers what types of information we will collect and how that information is used. In most cases, we collect this information to ensure network integrity and filter reliability and that we continue to provide you with the most relevant content/filtering and best possible service that suits your needs. In some cases, we are required by law to collect personal information about customers. Except where the law requires otherwise, we undertake to protect the confidentiality of such data.

What is Personal Information?

“Personal Information” includes any factual or subjective information, recorded or not that identifies you as a specific individual. It does not include the sort of general information that could be found in a business or a telephone directory. This legislation establishes rules and principles for the collection, use and disclosure of personal information based on ten privacy principles. Our Personal Information Protection Policy sets out these principles in simple terms. It explains how we ensure that your privacy and the confidentiality of your personal information are protected.

At times, Caylix will collect certain personal information about customers and visitors to websites hosted by us and customers who use our filter. Such information will include both identifiable personal data, as well as non-identifiable personal information. Identifiable personal information will be collected when you sign a contract for service with us, or use our website for a transaction or subscription service. Non-identifiable information is gathered automatically when you visit our website, visit those websites hosted by us, use our filter or if you access data stored for use in our system.

The Ten Privacy Principles Followed by Caylix are as follows:

Principle #1: Our Accountability for the Collection, Use or Disclosure of Personal Information

We are responsible for maintaining and protecting your personal information while it is under our control. This includes any personal information that may need to be disclosed to third parties. To help ensure the confidentiality of your personal information, policies and procedures have been established. We have designated a Privacy Officer who is responsible for compliance with the ten privacy principles. If you have any questions or inquiries about how your personal information is stored, or when it may need to be disclosed to others, our Privacy Officer is available to assist you and explain our policies.

Principle #2: Identifying Our Purpose for the Collection, Use or Disclosure of Personal information

Caylix will collect only the information that is necessary for your telecommunication/filtering services and will share information with third parties on a “need to know” basis. Your personal information will only be disclosed to third parties with your express consent or when necessary for legal reasons. We will ensure that customer confidentiality is maintained regardless of the technology used to communicate personal information. If you have any questions about these purposes, our Privacy Officer will be pleased to explain them to you.

Principle #3: Obtaining Your Consent for the Collection, Use or Disclosure of Personal Information

Caylix will make every reasonable effort to ensure that our customers or the customer’s authorized representative understand and consent to how their personal information will be used. Seeking consent may also be impossible or inappropriate when the customer is a minor, seriously ill or mentally incapacitated. Written requests and consents to release information will be kept in the customer’s records. We will disclose personal information to third parties only with your express consent, or when necessary for legal, audit or regulatory reasons. We will ensure that customer confidentiality is maintained regardless of the technology used to communicate personal information.

Principle #4: Limiting Our Collection of Personal Information

The collection of personal information will be limited to that which is necessary to provide the necessary telecommunication/filtering services to our customers. We will always collect personal information by fair and lawful means. Caylix reserves the right to monitor user and network traffic for site/filter security and integrity purposes and prevent any unauthorized attempts to tamper with our site/filter or cause damage to our property.

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

Personal information will not be used or disclosed for purposes other than for which it was collected, except with your consent or as permitted or required by law. Caylix reserves the right to disclose information about customers where required in good faith, to do so by law or to exercise our legal rights or defend ourselves against legal claims. Caylix further reserves the right to share information with law enforcement to investigate or prevent illegal activities being committed over our network. Caylix may on occasion use your personal information to contact you about promotional offers; advise you of matters relevant to service provision and in some cases, solicit your feedback.

Principle #6: Keeping Your Personal Information Accurate

Caylix will ensure that personal information is as accurate, current and complete as is necessary for the purposes for which it was collected. If you have any questions about the accuracy and completeness of the personal information we have collected or retained, please do not hesitate to discuss this with our Privacy Officer.

Principle #7: Safeguarding Your Personal Information

Personal information will be protected by the security safeguards appropriate to the sensitivity of the information. Caylix will maintain adequate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of personal information collected and retained. As part of these precautions, we will restrict access to personal information to those employees or third parties that require access to the information in order to fulfill our responsibilities in providing your telecommunications services. As a condition of their employment, our employees with access to personal information are required, in writing, to respect the confidentiality of personal information. If an employee misuses the personal information to which they have access, this will be considered a serious offence. In the case of an employee, disciplinary action will be taken which, depending upon the degree of misuse, may include termination of employment.

Principle #8: Openness Concerning our Privacy Policies

Caylix pursues a policy of openness about the procedures it uses to manage personal information. We will make specific information about our policies and practices relating to the management of personal information available through the Privacy Officer. Caylix reserves the right to make changes to this privacy policy or update it. When a major change is made, customers will be informed by e-mail notification or through a notice on our website. Customers and site visitors bear the responsibility to ensure that they have read the changes or updates as the case may be.

Principle #9: Access to Personal information

Caylix will inform its customers of the existence, use and disclosure of their personal information upon request and provides access to that information. Our customers are able to challenge the accuracy and completeness of their personal information and have it amended as appropriate. In certain exceptional situations, we may not be able to provide you with access to all of the personal information we hold. Exceptions may include information that contains references to other individuals. Customers can obtain information or seek access to their individual customer records by contacting our designated Privacy Officer at the address below.

Principle #10: Challenging Compliance

A customer has the right to challenge our compliance with the above principles by contacting the Privacy Officer accountable for our compliance with the policy. Caylix maintains strict procedures for addressing and responding to all inquiries or complaints from its customers about its handling of personal information. We inform our customers about our privacy practices as well as availability of complaint procedures, if necessary. Our Privacy Officer will investigate all complaints concerning compliance with the privacy policy. If a complaint is found to be justified, we will take appropriate measures to resolve the complaint including the amendment of our policies and procedures. In exceptional circumstances, the Privacy Officer in compliance with our privacy policy may seek external legal advice where appropriate before providing a final response to individual complaints. If complainants are not satisfied with the response from our Privacy Officer they have the right to register their complaint with the Office of the Privacy Commissioner of Canada.

For Further Information, please contact our Privacy Officer:

+1 (877) 792-6563

privacy@caylix.com