

2019 Transparency Report

Introduction

Rogers is proud to continue our open dialogue about customer personal information¹ disclosures to law enforcement and government agencies with the release of its 2019 Transparency Report.

We view our ongoing commitment to transparency as a continuation of Ted Rogers' drive to deliver a first-class customer experience, which began 60 years ago. He envisioned a business that connects people, businesses, and communities to each other and the world around them. Today, his vision is a reality and our networks serve as a critical lifeline that keep us connected to the things that matter most. We know our customers rely on us now more than ever and we take that responsibility very seriously.

At Rogers, we believe that respecting our customers' right to privacy is an important part of our commitment to service excellence. An important part of protecting privacy is to be clear about how we handle customers' personal information, and to make information about our approach easily accessible and understandable. We are committed to safeguarding customer information - we only disclose it when required by law (including in emergency situations) - and we actively take steps to defend privacy rights.

We also publicly release our personal information disclosure practices each year through our annual Transparency Report, which we have been publishing since 2013.

Increase in requests for Individual Access

Under the Personal Information Protection and Electronic Documents Act ("PIPEDA"), an individual has the right to request access to their data retained by organizations like Rogers. We work diligently to fulfil any such access requests when they are made by our customers to ensure that the information is released to them as quickly as possible.

In 2019, we saw an increase of 58% in individuals requesting access to their information as compared to the previous year. We view this as an indication of increased awareness of privacy rights, and we will continue to uphold our role in providing customers with access to their information.

Commitment to Ethical Corporate Citizenship

We are steadfast in our commitment to public safety and our role as a good corporate citizen in supporting this public policy goal. Open dialogue is the most productive way to find a reasonable balance between maintaining public safety and protecting our customers' privacy. This report reflects our commitment to respond as quickly and accurately as possible when we are compelled by law to provide information.

Our lawful access response team carefully analyses every request we receive for customer information and will only release confidential customer information when we are satisfied it is appropriate to do so. Consistent with our customer first philosophy, we will also work closely with the requesting agencies to amend and minimize the scope of specific requests when we feel it infringes on our customer's privacy.

Conclusion

Building trust in privacy practices has never been more important for our customers. As demonstrated in the Office of the Privacy Commissioner of Canada's 2018-19 Survey of Canadians on Privacy, 92% of Canadians are concerned about the protection of their privacy². We remain committed to protecting customer information, and to openly disclosing how often we release customer information to law enforcement and government agencies. If you have any questions about this report, please contact our Privacy Office at privacy@rci.rogers.com.

Sincerely,

Deborah Evans
Chief Privacy Officer
Rogers Communications

¹ Customer personal information (for the Rogers, Fido and Chatr brands) includes name, contact information such as mailing address, billing and payment records, information about the services received from Rogers and related usage.

² See https://www.priv.gc.ca/en/opc-actions-and-decisions/research/explore-privacy-research/2019/por_2019_ca/#fig05

Breakdown of 2019 Requests

■ Partially Fulfilled³
■ Not Fulfilled⁴
■ Fulfilled⁵

Requests from Law Enforcement and Government Agencies

Totals⁶



Court Order/Warrant ⁷

A court order or warrant includes production orders, summonses, subpoenas, and warrants issued by a judge or other judicial officer. These are issued under the Criminal Code of Canada. It compels us to provide customer information to police and other authorities, or to attend court or to provide evidence testimony about customer information



Government Requirement Letters

An order issued under legislation such as the Customs Act or Income Tax Act that compels us to provide customer information to the requesting agency



Foreign Requests

We don't respond directly to requests from foreign government agencies. We do advise them to have their national justice authority contact the Canadian Department of Justice. If a treaty or convention exists between the two countries, a request can be processed by Canadian authorities and an order issued by a Canadian court. In such a case, we are compelled to provide customer information to the authority in Canada that is conducting the investigation



Emergency Requests from Law Enforcement Agencies

We assist police services in emergencies, such as missing persons cases and individuals in distress



Emergency Responder Requests from 911

We assist emergency services in emergency situations, such as missing persons cases and individuals in distress



Tower Dumps⁸

Total tower dump production orders/warrants



Number of phone numbers released

Total 1,075,175

Actual name and address provided

Total 66,451

Customer Access Requests

Rogers is obliged under PIPEDA to provide customers with access to their personal information.

The most common request that our office receives relates to requests for a customer's call detail records. This information includes details of the time and date of numbers dialed and text messages sent, and the time and date of calls and texts received. Our system stores this information for 13 months. We do not store the contents of any calls or messages, nor do we provide details on the numbers associated with incoming calls or texts without a court order. This limitation is to protect the privacy of third parties.

Emergency Disclosure

We disclose customer information to law enforcement or public agencies when we believe a customer is a threat to themselves or someone else. We are obligated to notify the customer of that disclosure.

Total 111

Requests for call detail records (CDRs) - fulfilled

Customers looking for a combination of call, text or cell tower ID details.

Total 359

Requests for call detail records CDRs - not available

Customers seeking a combination of: i) content of emails, texts, and/or personal phone calls; ii) web history; iii) calls or texts delivered by 3rd party application; and, iv) call detail records that are more than 13 months old.

Total 322

Requests for call detail records (CDRs) - withdrawn

When requests are withdrawn by the requestor.

Total 216

³Fulfilled - We provided all the information requested.

⁴Not Fulfilled - There was no information available to provide, the number does not belong to Rogers, the form is filled in incorrectly, etc.

⁵Partially Fulfilled - Some information was not available and we provided what was available.

⁶We measure the total requests based on the number of impacted customers. For example, one Court Order that requests information on 10 customers counts as 10 requests. Emergency responder requests from 911 are not included in the total as we will always respond to these requests to the best of our ability. However, emergency requests from law enforcement agencies are included in the total because there is an interpretive role in such requests and there are instances where customer data is not provided.

⁷This total does not include the number of customers impacted by tower dumps.

⁸A tower dump is a technique used to identify all devices that were utilised in the coverage area of a cell site during a defined period.