

ADT SECURITY SERVICES CANADA, INC. PRIVACY POLICY

ADT Canada's Commitment to Your Privacy and Protecting Your Personal Information

At ADT Canada, we respect and are committed to your right to privacy. We believe that you should understand the way in which we collect, use, disclose and protect your personal information. We are responsible for your personal information that we collect, use and disclose.

Personal information is any information that identifies you, or by which your identity could be deduced. It does not include information contained in public records or the name or business address or telephone number of an employee of an organization or similar information that may typically appear on a business card.

We have policies, procedures and training within our organization to protect your privacy. ADT Canada's Privacy Policy is based on the Canadian Standards Association's Model Code for the Protection of Personal Information. This Privacy Policy outlines how we manage your personal information, safeguard your privacy and the principles that we follow when collecting, using, disclosing and protecting your personal information.

Who Are We?

ADT Security Services Canada, Inc. is a subsidiary of Tyco International Ltd., a public company listed on the New York Stock Exchange. ADT has been protecting homes and businesses since 1874. From the call boxes of the early 1900's to the interactive video surveillance of today, ADT has always been a recognized leader in electronic security innovation and technology. We are a leading supplier of electronic security solutions to the retail, commercial and industrial marketplaces, offering anti-theft, video surveillance, access control, electronic asset protection and security management systems, products and services to the Canadian marketplace.

This Privacy Policy governs ADT Security Services Canada, Inc. and its subsidiaries. ADT Canada, "we", "us" and similar terms as used throughout this Privacy Policy refer to ADT Security Services Canada, Inc. and its subsidiaries. ADT Canada may amend this Privacy Policy from time to time. Please visit www.adt.ca or write to **ADT Security Services Canada, Inc., 2815 Matheson Blvd. East, Mississauga, Ontario, L4W 5J8, Attn: Privacy Office**, for the most up to date version of this Privacy Policy.

Why Do We Collect Personal Information from You?

In serving your needs, it is important to have accurate information about you. We collect your personal information to:

- Establish your identity

- Understand your needs for, and determine your suitability for, products and services
- Provide services to you and process payments for your account
- Protect you and us from error and fraud, including verifying your identity to:
 - Establish your alarm account profile
 - Validate an alarm
 - Service your security system
 - Respond to your requests
 - Communicate with you concerning your account
- Notify you of ADT and third party new products and services, special offers, ADT events and general industry information
- Adhere to applicable legal requirements

How Do We Collect Your Personal Information?

We collect your personal information at the time you become a new customer of ADT Canada, at the time you acquire additional products and services from us and at other times when we communicate with you to administer your account with us. We may collect your personal information directly from you or from third parties with your consent (if required). We continue to collect and update personal information throughout our relationship with you. For example, we collect your personal information through:

- Our service agreements and written correspondence with you
- Your discussions with our sales representatives, service technicians, customer service centres and central monitoring centres (some of which may be recorded to ensure service quality and to maintain an accurate record of our communications with you)
- Your visits to our websites, including www.adt.ca, www.adtselect.ca, www.myadt.ca and other related websites

The type of information that we collect is based on our relationship with you.

How Do We Obtain Your Consent for the Collection, Use and Disclosure of Your Personal Information?

Where required, consent for the collection, use and disclosure of personal information may be obtained orally or in writing and may be expressly given or implied. Your express consent may be given in writing, verbally or through electronic means. Your implied consent may be given through an action you have taken, such as supplying your personal information for a specified purpose.

If you prefer that we not use or disclose your information for any of these purposes, you may notify us in writing at any time. If you do not notify us, we will consider you to have consented to our continued use and disclosure of your personal information. A notification that we not use or disclose your personal information for certain purposes may affect our ability to provide you with products and/or services.

There are exceptions where we may collect, use or disclose personal information without consent.

Third Party Services and Transactions. There are certain services supplied to us by third parties in Canada and the United States where the work involved requires the use of some of your personal information by the third party. Frequently but not exclusively, these third parties are our affiliates. For example, our affiliate, ADT Security Services, Inc., which provides ADT branded security services to customers in the United States, currently supplies some data storage services, some marketing services including the notification of new products and services special offers, some customer support services including the enrollment of new customers, processing of customer rebates and responding to customer inquiries and complaints, and some alarm monitoring and notification services to us to support our customer base. Third party service providers located in Canada and the United States that are not our affiliates also supply services to us. For example, these unrelated service providers currently supply some marketing and customer support services similar to those provided by ADT Security Services, Inc., and other services regarding our compliance with applicable legal requirements and protection of you and us from fraud and interference with our commercial relationship. In order to provide some of these services to our customers, personal information is required by ADT Security Services, Inc. and unrelated service providers. Whenever we engage a third party service provider to do work for us, we confirm that its privacy and security standards meet our requirements.

In the event that a third party service provider is located in the United States or another foreign country, certain of your personal information may be processed and stored in the United States or such other foreign country, and the governments, courts or law enforcement or regulatory agencies of that country may be able to obtain disclosure of your information through the laws of the foreign country.

In addition, we may be involved, from time to time, in transactions to sell parts of our business or assets or merge with other businesses. Since our customer information may be part of such transactions, we may use or disclose this information to other parties involved in the transaction.

When Required or Permitted by Law. From time to time, we may be compelled by legal action to release information. In certain circumstances, we may also be permitted by law to collect, use or disclose information without the consent of the individual concerned. For example, we may disclose personal information without consent if it is to be used in an emergency that threatens the life, health or security of the individual, or when collecting unpaid amounts owed or owing to us.

We protect your information.

We limit access to your personal information, through physical, electronic and procedural safeguards, to those persons who require it to provide our services and products. The location and manner of storage and access depends on the nature of the information, which may be stored or accessed electronically or in hard copy in Canada or in other countries. Such information is subject to the laws of the country in which it is accessible or stored. When we provide access to your personal information, it is for a legitimate business purpose or reason and in accordance with this Privacy Policy. Our employees and outside suppliers that have access to your personal information are governed by standards and policies to ensure the security and confidentiality of your personal information.

If you think someone is impersonating ADT, that there has been a breach of your privacy or you believe that you are the victim of fraud with respect to an ADT matter, please call us as soon as possible at *1-800-567-5675*.

Accessing and Keeping Your Personal Information Accurate.

We make every effort to ensure the information in our records is accurate. We also rely on you to provide any updates to your information. You have the right to access your personal information held by us. Whenever you want to review, verify or correct your personal information, write or contact your local ADT office or call us at *1-800-567-5675*. Please be as specific as possible with your request. There is no charge for verifying or correcting your information but, depending on the circumstances, there may be a charge if you want hard copies of records. We will let you know at the time of your request if there is a charge.

Resolving your questions and concerns.

If there are any misunderstandings or you feel that your concerns regarding your privacy have not been resolved justly or you have questions about our Privacy Policy, please contact our privacy office at *ADT Security Services Canada, Inc., 2815 Matheson Blvd. East, Mississauga, Ontario, L4W 5J8, Attn: Privacy Officer* or by emailing privacy@adt.ca.

Our Web Sites.

Each time you visit our web pages, such as www.adt.ca, we gather the date, time, browser type, name of the visitor's Internet service provider, the site that referred the visitor to us, any pages that are requested, the navigation history and IP address of the visitor. The foregoing information does not generally contain anything that can identify users personally. If you object to this gathering of information, you should not use or access our web pages. We use this information for our internal security audit log, trend analysis and system administration, and to gather broad demographic information about our user base for aggregate use. This information may be shared with third parties in order to provide services to us or to analyze, store or aggregate the information.

Each time you provide any personal information such as your name, address, telephone number or other identifying information to us through our web pages, you consent to the collection, use and disclosure of this personal information in accordance with this Privacy Policy. We treat and safeguard personal information collected through our web pages the same way as personal information that we collect through other means, such as customer contracts.

Our web pages may employ the use of "cookies". A "cookie" is a small line of data that is sent to your Internet browser from a web server and stored on your computer's hard drive. Cookies can track how and when you use a site, and which site you visited immediately before. A cookie does not damage your system and identifies your browser, not you personally. We use cookies to identify which areas of our network you have visited, so the next time you visit those pages may be readily accessible. If you do not wish to receive a cookie, please set the options in your web browser accordingly. Although such changes to your web browser may provide you with enhanced anonymity, they make it very difficult to offer you customized services.

To the extent that our web sites contain links to other sites, the owners of those sites are responsible for the privacy practices or content of those other sites. We do not endorse and will not be responsible for the privacy practices on third party websites.

Changes to this Privacy Policy.

This Privacy Policy was last updated on May 1, 2010. We will occasionally update this Privacy Policy and revise the "last updated" date appearing in this paragraph.