

# Privacy Information for TELUS Business Customers

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## Introduction and scope

TELUS offers a wide range of solutions to organizations of all sizes in the business, government and non-profit spaces (“business customers”). When providing these services, TELUS may have access to, store, or otherwise handle (“process”) business customers’ end-users’ personal information (“customer personal information”), that is information that can be linked to those identifiable end-users and is provided by business customers, their end-users or a third party, on behalf of business customers.

The following describes, for prospective and existing business customers, TELUS’ data management practices relating to customer personal information that TELUS processes in its capacity as a service provider or “data processor” to business customers. The manner in which TELUS handles personal information of consumers or other individuals who interact directly with us (e.g. website visitors, marketing prospects, employees of business customers who use TELUS’ Employee Assistance Program services) is not in scope of this document (please refer to the relevant privacy commitment or notice). In the event of a conflict between contractual terms agreed to by business customers and TELUS and the information contained in this document, the contractual terms will prevail.

Throughout this document, the words “we”, “us”, “our” or “TELUS” refer to TELUS Corporation and its wholly-owned subsidiaries.

This document should be read in conjunction with the *TELUS Privacy Management Framework*.



## Accountability

Protecting privacy is an integral part of our services. Core to our commitment to “putting customers first” is ensuring that the customer personal information entrusted to TELUS is safeguarded and that end-users’ privacy is respected.

TELUS’ privacy practices are aligned with major privacy frameworks and are designed to assist our business customers meet their own privacy compliance obligations.

As a service provider, TELUS processes customer personal information based on business customers’ instructions as per our agreement, and on those customers’ behalf. When we do so, we act as a “data processor”, a term often used in privacy laws, while business customers act as “accountable organizations”, or “data controllers”. As such, under the same laws, business customers are ultimately responsible for deciding how customer personal information is used, and identifying and complying with applicable privacy requirements, such as obtaining consent of their employees or other end-users. For example, a business customer who purchases TELUS mobility services for its employees is responsible for obtaining their employees’ consent where required in order to enable the provision of the service by TELUS.

## What customer personal information we process and for what purposes

We receive customer personal information directly from our business customers, from their end-users or from other entities or individuals on behalf of those business customers, to provide products and services to business customers and their end-users. We also gather customer personal information generated through the use of our products and services. We may provide access to all end-user customer personal information to our business customers. In all cases, we will use this information in order to address technical problems, maintain safety and security, investigate and resolve incidents and end-user and customer complaints or disputes, and to meet contractual, legal, and regulatory requirements.

From time to time, subject to contractual terms and as permitted by law, TELUS may also process customer personal information to understand needs and preferences, and to develop and enhance products and services. We may also de-identify personal information for a variety of reasons, including to safeguard it, or to conduct analytics that do not require personal information.



We require business customers to ensure that they have the necessary authority to process and disclose their customer personal information, and that they have provided end-users with all necessary notices. We ask that business customers restrict their sharing of end-users' personal information with TELUS to information that is lawfully obtained and necessary for TELUS to provide the services.

## With whom we share and to whom we disclose customer personal information

To help deliver products and services to our business customers, we may transfer customer personal information to third-party service providers. These service providers, or sub-processors, are held to terms that are substantially equivalent to the contract entered into between TELUS and its business customers.

We disclose customer personal information pursuant to the terms of the contract with the business customer, or as required or permitted by applicable law. For example, we may disclose customer personal information for emergency purposes as defined in applicable law.

## Where we transfer customer personal information across borders

Unless otherwise set out in contract, we may transfer customer personal information to TELUS entities and third parties who process personal information outside of the jurisdiction where the business customer or end-users are located. These cross-border data transfers vary depending on the service, product, or features the customer is using.

We implement safeguards required under applicable law and by contract to enable these cross-border transfers. For example, we may rely on standard contracts, or seek authorization from the relevant supervisory authorities.

In particular, for transfers outside of the European Economic Area, we rely on the European Commission's approved Standard Contractual Clauses ("EU Standard Contractual Clauses"), which can be accessed [here](#). For transfers from the United Kingdom, we rely upon the International Data Transfer Addendum to the EU Standard Contractual Clauses, which can be accessed [here](#).

## How TELUS assists business customers with end-users' privacy-related requests

Unless we specifically contract to do so as part of the provision of services to a business customer, TELUS will not generally respond directly to privacy-related requests or inquiries of our business customers' end-users, such as access, deletion or correction requests. We will instead redirect the end-users to the appropriate party, and provide reasonable support to our business customers to respond to these requests.

## How long we retain customer personal information

TELUS retains customer personal information as long as necessary for TELUS to perform the services, in accordance with the terms of the contract or written instructions of the customer, unless otherwise required to meet legal or regulatory requirements. After such time, TELUS returns or destroys customer personal information in accordance with applicable law and the terms of the contract with the customer.

## How we protect customer personal information

TELUS is committed to protecting the security of the personal information our business customers entrust to us. We use a variety of security technologies and procedures to help protect customer personal information from unauthorized access, use, or disclosure. For example, we store our customer personal information on limited access computer servers that are located in controlled facilities, and we protect certain sensitive customer personal information through encryption in transfer and at rest.

### *Incident Management*

TELUS has established practices and procedures for incident readiness and response designed to identify the cause, extent and nature of an incident involving customer personal information and to allow timely reporting to business customers in accordance with applicable law and the terms of the contract with our business customers.

In the case of an incident resulting from a breach of TELUS' security safeguards that affects the data of a business customer's end-users to whom the service is provided directly by TELUS, TELUS will notify the affected business customers without undue delay so that they can take the necessary steps, such as notifying affected end-users and/or



reporting the incident to regulatory authorities or other parties. TELUS will provide reasonable and timely assistance to our business customers to investigate and assist them in meeting their obligations.

## How to contact us

If you have any questions or concerns about our privacy practices, please email [data&trustoffice@telus.com](mailto:data&trustoffice@telus.com).