

RIM's Privacy Policy

Research In Motion Limited and its subsidiary companies and affiliates ("RIM") are committed to and have a long-standing policy of maintaining the privacy and security of your personal information which is information about an identifiable individual (as defined by applicable privacy or data protection laws).

This Privacy Policy explains RIM's practices with respect to the processing of your personal information which includes the collection, use, processing, transfer, storage or disclosure of your personal information, except where a RIM subsidiary or affiliate has published its own separate privacy policy. In addition, agreements or notices associated with a particular RIM product, service, software or website ("RIM Offering") may provide additional information about RIM's processing of your personal information ("Notice"). The application of this Privacy Policy remains subject to applicable laws including legislation, regulations and the orders of any courts or other lawful authorities, other lawful requests or legal processes. Where applicable, the data controller in respect of your personal information is the RIM entity with whom you have entered into an agreement.

1. RIM's accountability

RIM is responsible for personal information under its control, including the onward transfer of personal information to a third party for processing on RIM's behalf (i.e. its service providers).

2. RIM's purposes for using your personal information

When you use a RIM Offering, correspond with RIM, enter a contest sponsored by RIM or otherwise interact with RIM, RIM may process your personal information for the following purposes:

- to understand and meet your needs and preferences, and to provide you with RIM Offerings, e.g.:
 - for purposes related to the billing, activation, provision, maintenance, support, trouble shooting, resolving of disputes, deactivation, repair, refurbishment, replacement, upgrade or update of RIM Offerings;
 - to ensure RIM Offerings are technically functioning as intended and to help identify and troubleshoot issues;
 - to fulfill or enforce Notices applicable to a RIM Offering;
 - to manage or respond to your inquiries;
- to develop new and enhance existing RIM Offerings including to communicate with you about them using various means, e.g. to make available or send to you:
 - upgrades or updates, or notices of upgrades or updates of RIM Offerings or third party content or related products, services and software;
 - notices of promotions and upcoming events;
- to manage and develop our business and operations, e.g.:
 - to detect, monitor, investigate, mitigate or attempt to prevent fraud and technical or security issues or to protect RIM property;
 - to allow for business continuity and disaster recovery operations;
 - to enforce RIM's legal rights;
 - for statistical purposes;
- to meet legal and regulatory requirements and to respond to emergency situations, e.g.:
 - to respond to court orders, warrants or other lawful requests or legal processes;

- to provide emergency assistance in situations that may threaten the life or physical safety of you or others; or
- for any other purposes for which you have consented, such as those that may be set out in Notices, and other purposes as permitted or required by any applicable law.

3. **Your consent**

Before using RIM Offerings, you may be required to agree to an applicable Notice that may contain additional information regarding RIM's processing of your personal information. Your agreement to the Notice or use of RIM Offerings indicates your consent for RIM to process your personal information for RIM's identified purposes.

a) **When obtaining consent is not required**

In certain circumstances, your personal information may be processed without your consent depending on the jurisdiction and any applicable laws. For example, RIM may not seek consent:

- in the case of an emergency where the life, health or security of an individual may be threatened;
- when legal, medical, or security reasons make it impossible or impractical to seek consent;
- when information is necessary for the detection and prevention of fraud;
- when disclosure is to a lawyer representing RIM;
- to collect a debt;
- to comply with a subpoena, warrant or other court order, lawful request or legal process; or
- as may be otherwise required or permitted by law.

b) **Children**

RIM does not knowingly process personal information from individuals under the age of 13 without the consent of their parent or legal guardian.

c) **Aggregated or anonymous information**

RIM reserves the right to process, sell, trade or rent aggregated or anonymous information that is not associated with or linked to an identifiable individual.

4. **Types of information processed**

The types of information that RIM may process can vary. For example:

- a) **Account and membership information:** Information processed could include your name, postal address, email address, telephone number, BlackBerry ID, device identifier information such as your BlackBerry PIN, airtime service provider information, communications with RIM and any recorded complaints. RIM may also process your account credentials, passwords, profile information and other information you provide to facilitate the RIM Offerings you use.
- b) **Applications:** In some cases, RIM may process information about applications used on your device including Third Party Offerings (i.e. applications, products, services, software, websites or content provided by a third party, including an airtime service provider or application developer, that may be used in conjunction with RIM Offerings, but are not offered, operated or supported by RIM).

- Also, if you choose to use Third Party Offerings with your BlackBerry account or device, certain information may be collected and disclosed to the third party, or from the third party to RIM, in order to facilitate or improve the services and functionality provided.
- c) **Cloud-based or back-up data:** If you use a cloud-based or back-up and restore service provided by or on behalf of RIM, information from your device or account including contacts, email addresses, calendar, memo, tasks, display pictures, status messages, media files and other on-device information may be sent to RIM in order to facilitate or improve the use, remote access and restoration of that data on your device through the service provided.
 - d) **Cookies or similar technologies:** A cookie is a small text file or piece of data that is downloaded to and stored on your computer or device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes the cookie. As part of RIM's Offerings, RIM may use different types of cookies or similar technologies ("Cookies") from time to time. Certain Cookies are **necessary** to facilitate your use of RIM Offerings (such as when you use a shopping basket) or to protect both you and RIM when you sign-in to certain services (such as storing your credentials to make it easier whenever you want to use RIM Offerings or to confirm that you are logged in). Other Cookies are more **performance**-related such as for analytics or contextual purposes to help us understand how users engage with RIM Offerings so we can provide new and enhanced RIM Offerings (such as which pages or features are most popular). Some Cookies are more **function**-related and help personalize your experience and make RIM Offerings easier to use (such as your language or jurisdiction preferences), or to help RIM display personalized content to you. Other Cookies or similar technologies may be used for **targeted advertising** purposes (e.g. certain RIM Offerings may be supported by advertising revenue and display advertisements and promotions which may be targeted against non-personally identifiable attributes or aggregate data collected by RIM, and RIM or our service providers may place such advertising on RIM Offerings). Anonymized or aggregated information about usage of RIM Offerings may be provided in a form that does not personally identify you to our service providers as part of analytics services and to help manage online advertising. Most browsers are initially set to accept Cookies, but you can usually change your browser settings to refuse Cookies or to indicate when a Cookie is being sent. You can typically remove or block browser Cookies using the settings in your browser, but that may impact your ability to use certain RIM Offerings as they may not work well or at all with Cookies disabled. Choosing to continue without disabling Cookies indicates your consent to RIM's use of Cookies in accordance with this Privacy Policy. Please visit the section below on "**Managing your preferences**" for more information on managing RIM's use of Cookies.
 - e) **Financial information:** If you purchase a product, service, software or customer support directly from RIM or our service providers, RIM may process credit card or other payment information and use it to facilitate billing and credit services and conduct credit checks, as applicable. Similarly, RIM may process payment or other financial information when you use Near Field Communications functionality on your RIM device.
 - f) **General usage data:** In some cases, information like technical properties and general usage information of software and hardware utilized in conjunction with a RIM Offering might be processed when you use such products, services or software (e.g. type of web browser, referring or exit web pages, operating system version, hardware model of your device or personal computer platform, IP address), or when you use a RIM troubleshooting tool (e.g. basic usage statistics or information about your device including event logs, application configurations, battery life, radio or Wi-Fi signal levels, device reset and memory or system performance information).
 - g) **Location information:** When you use RIM Offerings, enable data services, use the browser or location-based functionality on your device, location information associated to your device (e.g. Global Positioning System (GPS) or similar satellite triangulation information, carrier or tower ID,

the BSSID (Broadcast Service Set Identifier) and MAC address (Media Access Control address) of Wi-Fi access points, and signal strength of visible Wi-Fi hotspots or wireless towers) may be communicated to RIM or our service providers. If RIM collects and subsequently stores such information, it will be in a form that does not personally identify you (e.g. RIM does not maintain a system that would link specific individuals to a BSSID). RIM may process such information to provide you with or facilitate the provision of information and location-based services (e.g. mapping services, measuring traffic congestion, location-sensitive promotions or coupons). If you choose to use location-based services, you agree that such geographic location information may be processed to provide you with such services. You may manage through the settings on your device either the overall settings for your device's GPS or location functionality or individual settings for each application. If you choose to use location-based services or other applications to disclose your location to other persons or entities, you assume responsibility for the risks involved in doing so, and it is your responsibility to use them appropriately and according to applicable law. If you use Third Party Offerings which provide location-based services, please review the third party's terms and conditions and privacy policy regarding how your location and personal information will be processed, and how to opt-out of any location-based services and advertising provided by the third party.

- h) Quality assurance and customer service:** Your customer service telephone calls with RIM and RIM's service providers may be recorded or monitored for quality assurance and customer service purposes such as to assist in addressing your inquiries, troubleshooting, training and analytics to identify trends and make improvements to RIM Offerings.
- i) Third party information:** If necessary to fulfill RIM's identified purposes, RIM may combine the information you submit to RIM with information obtained from other sources or Third Party Offerings. For example, RIM may receive personal information about you from third parties involved in providing you with the products, services, software and websites you are utilizing, such as from your airtime service provider to facilitate the wireless services you are utilizing or in some cases from a Third Party Offering vendor regarding applications used on your device. RIM treats all such personal information in accordance with this Privacy Policy and the terms and conditions between RIM and such third parties, if any, may also apply. However, the third party's own use of your personal information in such cases will be determined by your agreement(s) with the third party, unless that third party is a RIM service provider.

Some of this information would not by itself identify you to RIM or be personally identifiable and is therefore considered non-personal information. If RIM combines any such non-personal information with other personal information available to RIM, the combined information will be treated as personal information in accordance with this Privacy Policy.

5. RIM's processing of your personal information

a) Retention

RIM retains personal information as long as necessary for the fulfillment of RIM's identified purposes or as otherwise necessary to comply with applicable laws. When personal information is no longer necessary or relevant for RIM's identified purposes, or required by applicable laws, RIM will take steps to have it deleted, destroyed, erased, aggregated or made anonymous. Consistent with good business practice, RIM continues to evolve our controls, schedules and practices for information and records retention and destruction which apply to your personal information.

b) International operations and onward transfers

RIM has an international presence, with offices and facilities in multiple jurisdictions. Except where a RIM subsidiary or affiliate has its own separate privacy policy, all of RIM's international operations and onward transfers are subject to this Privacy Policy.

You agree that, to be able to better serve you and facilitate the use or functioning of RIM Offerings, your personal information may be collected, used, processed, transferred or stored by or on behalf of RIM in multiple jurisdictions including Canada, the United States, the European Economic Area, Singapore and any other country where RIM or our service providers have offices or facilities, including countries which may be outside the region in which you are situated and may have different privacy or data protection legislation, and may therefore be subject to the laws of these countries. If you are a resident of the European Economic Area or a country which restricts data transfers outside of that jurisdiction or region without your consent, you consent to your personal information being transferred outside of the European Economic Area or your country for processing or storage by or on behalf of RIM.

Given the international nature of our business, RIM may also be required to disclose or otherwise provide access to your communications data, including the contents of your communications, and other information under the laws of countries where RIM, our service providers, affiliates and data are located. By using RIM Offerings, you consent to our compliance with applicable laws including any legal process that RIM believes requires that we produce or provide access to your communications data and other information.

c) Marketing communications from RIM

RIM may communicate with you by a variety of means, such as using the email address(es) that you associate to your RIM device or your unique device identifier (e.g. PIN). RIM may communicate information, surveys, marketing materials, advertisements or customized content which has been personalized to try to make it more relevant to you as part of your existing business relationship with RIM. For example, we may do so where you have not unsubscribed from receiving such communications and it is permitted by law, where you have explicitly agreed to receive such communications, where you use free services which rely upon advertising (including targeted advertising based on profile information), or through utilizing aggregated data or data that has been made anonymous. RIM may ask you from time to time if you would like to receive from RIM or authorized third parties selected by RIM additional announcements, news, offers or event invitations regarding RIM and RIM Offerings. You may also choose to provide RIM with information in response to various RIM promotions. If you agree to participate in contests, surveys, giveaways, reviews, or other promotions that RIM sponsors or co-sponsors, please ensure that you read the Notice that may be associated with these initiatives in order to obtain further details about how your personal information will be managed. Typically, an unsubscribe mechanism is included with every RIM marketing or commercial communication. Please visit the section below on **"Managing your preferences"** for more information on managing marketing or commercial communications from RIM.

d) Service-related communications from RIM

RIM may also send you certain service-related communications. For example, RIM may send a welcome email or message when you first register your device to inform you about the service and its terms, to notify you of important changes, to tell you how to manage your credentials or account, to provide service infrastructure notifications or information about upgrades or updates, to provide warranty information, product recall information, safety or security information, or for surveys of current or former users. Because such service-related communications are important to your use of RIM Offerings, you may not opt-out of receiving these communications.

e) Information sharing

In accordance with this Privacy Policy, RIM may share your personal information within RIM or with our service providers. RIM may also share information with our financial, insurance, legal, accounting or other advisors that provide professional services to RIM. RIM may also share information in a manner consistent with this Privacy Policy with third parties involved in providing RIM Offerings to you including airtime service providers, authorized resellers, distributors, merchants of record or payment processors, subcontractors or entities participating in RIM's supply or repair chains.

In certain situations where you purchase or use a Third Party Offering (e.g. paid content subscription service, downloaded application), RIM may share certain information with the third party for purposes of providing you with the product, service or software and your information will then be subject to the third party's privacy policy. We encourage all our users to learn about the privacy practices of such third parties before agreeing to purchase or obtain their products, services or software.

RIM uses contractual or other means to provide a comparable level of protection while the information is being processed by our service providers. It is RIM's policy to enter into confidentiality obligations with any third party that obtains confidential information including personal information from RIM. For example, except where RIM is required or permitted by law to disclose personal information, our service providers to whom we provide your personal information typically agree to hold the information in confidence and only use the information for the purposes for which it was provided or to comply with applicable laws.

In the event of the sale of all or a portion of RIM's assets, RIM may provide personal information to the third party purchaser.

RIM may utilize third parties (e.g. advertising networks) to target advertisements at non-personally identifiable attributes or aggregated data that is derived from profile data processed by RIM, and provide such third parties with general statistics relating to the advertisements delivered. Please visit the section below on "**Managing your preferences**" for more information on managing marketing or commercial communications from RIM.

f) Third Party Offerings

RIM does not own or operate all the applications or services that you download and use on your device or through other RIM Offerings. When you download or utilize Third Party Offerings, personal information from your device or other RIM Offerings may be accessed by such third parties. For example, a Third Party Offering might access on-device data such as contacts, calendar entries, email, location-based information, or it may access or share files or data stored on the device (including with additional Third Party Offerings). You should review the privacy policies and any agreements with such third parties to understand how your personal information will be treated by those entities, as RIM is not responsible for your dealings with third parties or their applications, products, services or software. RIM does not directly control how such third parties process any personal information they collect in connection with the Third Party Offerings you use.

In some cases, you may adjust the permissions granted to Third Party Offerings. You should periodically review these permissions including default permissions, as well as the Options or Settings menu on your device, in order to learn more about its security and available controls.

6. Accuracy of your personal information

RIM takes reasonable steps to ensure that personal information is sufficiently accurate, complete and up-to-date. RIM also depends on you to update or correct your personal information whenever necessary.

7. Safeguarding your personal information

RIM continues to evolve our physical, organizational and technological measures used to protect your personal information against loss or theft, unauthorized access, alteration or disclosure appropriate to its level of sensitivity. For example, if a RIM website requests your name and password, it will have a variety of security measures in place that are designed to protect against the loss, misuse and unauthorized alteration of the personal information submitted to RIM. Through RIM's *Code of Business Standards and Principles*, RIM employees are made aware of the importance of appropriately and securely handling personal information, to keep it in secure locations and systems, and to limit access to personal information to those with a need to know it for business reasons.

In addition, certain RIM systems and processes are externally certified on a regular basis (e.g. certification to *ISO/IEC 27001:2005 Information Security Management System* standard).

a) Your obligations to safeguard your personal information

You also have an obligation to safeguard your personal information. You can reduce risk of unauthorized access to your personal information by using common sense security practices. For example, you are responsible for utilizing appropriate security measures to control access to your device and computer system, such as creating a strong password that cannot be easily guessed by others (e.g. by including punctuation marks, numbers, capital and lowercase letters, and choosing a password of an appropriate length and which does not include your name or account name), using different passwords for different services and using up-to-date antivirus software.

As noted above, in some cases, you may adjust the permissions granted to Third Party Offerings. You should periodically review these permissions including default permissions, as well as the Options or Settings menu on your device, in order to learn more about its security and available controls.

If you return, sell, discard, or transfer your device or other RIM product to another person or entity (such as providing your device to RIM or another entity for repair, refurbishment or replacement), you should ensure that the device and any associated accessories and peripherals are removed or securely wiped of any personal information or other sensitive data they might contain (e.g. SIM cards, microSD cards). You should also disassociate your device from all email accounts and other data services so that email and data are no longer directed to the device (e.g. push services, emails delivered through the BlackBerry Internet Service, remote backup). Otherwise, your personal information may be available to a subsequent user of the device, and you may incur subscription and network data charges. You may learn more about how to take steps to protect yourself through the Options or Settings menu on your device, searching support articles online at www.blackberry.com, or by contacting your airtime service provider.

8. RIM's ongoing efforts to be transparent

RIM continues to make available information to help our users better understand RIM's processing of personal information and how to exercise choices regarding the use of your personal information through various channels including this Privacy Policy, applicable Notices and additional information that may be made available from time to time on various RIM websites or on your device.

9. You can access your personal information

Upon written request, RIM will inform you whether or not it holds personal information about you and provide you with access to your information within a reasonable timeframe and at minimal or no cost in accordance with applicable laws. If you identify an inaccuracy or incompleteness in your personal information, RIM will amend your information and notify any third parties as required by applicable laws.

In certain situations and depending on applicable laws, RIM may not be able to provide access to all of the personal information that it holds about you. For example, RIM may not provide access to information if doing so:

- would likely reveal personal information about a third party;
- could reasonably be expected to threaten the life or security of another individual;
- would reveal RIM or third party confidential information;
- includes information that is protected by solicitor or attorney client privilege; or
- includes information that was processed in relation to the investigation of a breach of an agreement or a contravention of a law.

In order to safeguard your personal information from unauthorized access, RIM may ask that you provide sufficient information to identify yourself prior to providing access to your personal information.

Depending on the circumstances and applicable laws, RIM may refuse to process certain access requests (e.g. access requests that are unreasonably repetitive or systematic, would be extremely impractical or require disproportionate technical effort).

10. Questions or concerns? How to contact us

RIM welcomes your questions or comments regarding this Privacy Policy and the way we process your personal information. If you have any questions, concerns or wish to request access to your personal information pursuant to applicable privacy or data protection laws, please contact RIM either by email or in writing and we will use commercially reasonable efforts to respond:

- by email: privacyoffice@rim.com, or
- write to one of the following RIM offices closest to you:
 - ***RIM Privacy Office c/o Research In Motion (attention Legal Department), 295 Phillip Street, Waterloo, Ontario, Canada N2L 3W8***
 - ***RIM Privacy Office c/o Research In Motion (attention Legal Department), 200 Bath Road, Slough, Berkshire, United Kingdom SL1 3XE***
 - ***RIM Privacy Office c/o Research In Motion (attention Legal Department), 1 International Business Park, The Synergy Building, 2nd Floor, Singapore 609917***

a) **Managing your preferences**

Generally, you may withdraw at any time your consent for RIM to process your personal information in accordance with this Privacy Policy, subject to legal or contractual restrictions and reasonable notice. For example, although you can use RIM Offerings for some purposes without providing us with any personal information, RIM may need to process personal information for some services, including those that require payment or involve an ongoing relationship such as registration or subscription services. As such, RIM may

continue to use your personal information as may be required to provide you with requested services, and to the extent that RIM is contractually obligated to do so or as necessary to enforce any contractual obligations you may have with RIM. If you refuse to provide RIM with the information it requires or later contact us in writing at one of the addresses above to withdraw your consent to use and disclose this information, RIM may no longer be able to provide you with your RIM Offerings.

Marketing or commercial communications: You may unsubscribe from receiving marketing or commercial communications about RIM or BlackBerry® products, services and software by:

- clicking the unsubscribe link at the end of any marketing or commercial communication from RIM;
- by indicating your preference at www.blackberry.com/unsubscribe; or
- by writing to ***RIM Privacy Office c/o Research In Motion (attention Legal Department), 295 Phillip Street, Waterloo, Ontario, Canada, N2L 3W8*** and advising what particular types of marketing or commercial communications you no longer wish to receive.

Cookies: As noted above, you may also opt-out of RIM’s use of Cookies through one of the following methods:

- Change your browser settings to refuse Cookies or to indicate when a Cookie is being sent.
- Remove or block browser Cookies using the settings in your browser, but that may impact your ability to use certain RIM Offerings as they may not work well or at all with Cookies disabled.
- Opt-out directly from certain ***performance*** Cookies at <http://metrics.blackberry.com/optout.html>.

b) Changes to this Privacy Policy

RIM will occasionally update this Privacy Policy so that it remains relevant and current with changing technologies, applicable laws, our evolving business practices and the needs of our users. RIM encourages you to periodically review this Privacy Policy to stay informed of how RIM manages your personal information. If any changes are made to this Privacy Policy, RIM will revise the “Last Updated” date that is indicated on the Privacy Policy.

If material changes are made that impact you, we will notify users by placing a prominent notice at www.blackberry.com/legal. Depending on the circumstances, we may also decide to send users a notice electronically. If you continue to use your RIM Offerings after notice of the change has been given, you will be deemed to have accepted such changes.

Last Updated 2012-08