Guide for Disclosure Requests from Law Enforcement or Others

2026-09 revision

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1. Purpose and Scope

1.1. Purpose

The purpose of this guide is to clarify our practices with respect to personal information disclosure requests by law enforcement or other third parties. We believe that transparent practices benefit our customers, benefit the public, and benefit entities who make such requests.

This purpose is animated by two responsibilities: stewarding our users' privacy rights and assisting law enforcement when a valid legal basis justifies disclosing or preserving personal information. We care, and we want the best for our customers and our communities: as such, we take our role in the community seriously.

The policies and practices described in this guide are subject to change without notice.

1.2. Legal Entities

The terms "we" and "our" in this guide refer to the following entity or entities, collectively, and this guide applies to disclosure requests made to any of the following entities:

Entity	Address
Beanfield Technologies Inc. Beanfield Fibre 1 L.P. Beanfield Fibre 2 L.P. Walnut TV Inc.	418-67 Mowat Avenue, Toronto, ON, M6K 3E3

1.3. Contact information

Write to privacy@beanfield.ca regarding any issue connected to this guide, including to submit a disclosure request.

The associated letter mail address is as follows:

Director, Information Security and Privacy
Beanfield Technologies Inc.
418-67 Mowat Avenue,
Toronto, Ontario
M6K 3E3

For urgent requests, please also phone 1-855-532-1555 and select the option to receive general support, if the request meets the conditions described below in section 5

2. Informal requests

We do not accept informal requests. We do not provide informal confirmation, for example, that we possess subscriber information related to any given IP address.

The *Criminal Code* expressly sets out the appropriate methods for obtaining preservation orders and demands and production orders where law enforcement is concerned, including predetermined preservation timelines established by

Parliament.[1] We understand ourselves to be bound by the methods prescribed by law. We thus invite you to consult the following sections in this guide which provide information and guidance on the requests that we accept.

We do not accept police or other requests that are sometimes styled as **"jurisdiction requests"** and which relate to the geographical location of a customer. If we conducted such searches, then the searches would themselves constitute personal information about the customer concerned that we would then be required to disclose to that customer.

Please note that in our experience the results of an ARIN whois lookup demonstrating that a given IP address is correlated with our network (https://whois.arin.net/ui/) is sufficient to demonstrate that the relevant data is in our possession for the purpose of obtaining a production order.

3. Production orders

ARIN search. Before applying to obtain a production order in connection with a given IP address, please verify whether the publicly available data in response to an ARIN whois lookup (https://whois.arin.net/ui/) already provides the information you seek, for example, the identity of a sub-lessee of an IP block that contains the IP of interest to you.

Non-disclosure. Please note that we may disclose production orders to those whose information they concern. If a valid consideration requires that this disclosure be delayed, please apply for a Non-Disclosure Order as described below and provide a copy with the production order.

Form. We most commonly receive production orders formatted according to Form 5.005 of the *Criminal Code,* and occasionally in analogous formats in connection with other statutes. When filling out forms such as these:

- In the "name of person" field, indicate the appropriate corporate name (a list is provided above in section 2), **not the name of an individual** such as an employee. In the event that a Justice of the Peace or Judge requires the name of an individual, please contact us and we will provide an appropriate individual to name.

- Draft the order so as to require us to “prepare and produce a document containing” the information that you seek rather than requiring us to “produce a document that is a copy of” that information. If you absolutely need a copy, you must justify that request in your information to obtain (ITO) a production order (Form 5.004).

- When you describe the data that we must disclose in the Form 5.005, ensure that this description is framed so as to be no more intrusive than is reasonably necessary to achieve the investigative objective. An overbroad order is a privacy violation and risks having all evidence obtained through the order excluded in court. Do not request “all data held” about a given customer, which will likely encompass significant amounts of irrelevant data. Instead specify what you are seeking, e.g. “basic subscriber information” or customer names, addresses and phone numbers. Be especially careful, for orders that will encompass the data of more than one customer

[1] In the case of other authorities, other statutes set out analogous rules such as, in the case of *Revenu Québec*, Quebec's *Tax Administration Act*.

or individual, to restrict the scope as much as possible.

- **Do not add non-disclosure requirements directly to the conditions** of the order. If non-disclosure is necessary, instead apply for a Non-Disclosure Order in Form 5.0091 to the *Criminal Code* (or as the case may be, when available) and send us the non-disclosure order with your production order. We reserve the right to apply to have a production order revoked or varied if it directly includes a non-disclosure condition, instead of attaching the appropriate separate non-disclosure order.

Submission. Submit the production order to privacy@beanfield.ca and note the following:

- If you are not providing an associated non-disclosure order, confirm in the body of the email that the absence of an accompanying non-disclosure order is intentional.
- Provide the name of the Justice of the Peace or Judge who authorized each of the orders you are submitting.
- Submit the order as soon as possible after it is judicially authorized. We reserve the right to apply to revoke an order if we receive it after a significant amount of the time to comply has elapsed.
- Submit the order in a form in which none of the text has been cut off and the document is legible.

4. Preservation of data

We comply with legally binding instruments that require us to preserve data for a specified time. It is currently our approach to retain IP address correlation information for periods that exceed 60 days.

The preservation instruments that we most commonly receive are preservation orders (formatted using Form 5.003 of the *Criminal Code*) and preservation demands (formatted using Form 5.001 of the *Criminal Code*).

Before you prepare a preservation instrument for submission to us, please review all of the considerations explained in the previous section on production orders, because the same considerations also apply to your preparation and submission of preservation orders or demands (with the necessary adjustments made).

For preservation demands, in the field where the Form 5.001 asks you to insert the date of the end of the preservation requirement, **you must enter the exact date that is 21 days[2] after the date of the preservation demand is made**: the *Criminal Code* does not allow any other date or delay.[3] Please also ensure the Form 5.001 includes the officer's name and signature and that all other all necessary fields have been appropriately completed. Please also provide the name of the officer's force and their title.

[2]Or 90 days in the event the offence listed in the Form 5.001 is one enacted under a law of a foreign state.

[3]See s. 487.012(4)(*a*).

For preservation orders, in the field where the Form 5.003 asks you to insert the date of the end of the preservation requirement, **you must enter the exact date that is 90 days after the date that the order is made by the judge or justice of the peace**.

5. Urgent requests

We disclose personal information without prior judicial authorization only in response to urgent requests, as described in this section.

5.1. Definition

An urgent request is a request that meets **both** of the following conditions:

1. You have reasonable grounds to believe that exigent circumstances render it impracticable to obtain timely judicial authorization.
2. You have reasonable grounds to believe that the requested information is necessary to prevent an imminent risk of either:
    - serious bodily harm or death to any person;
    - a threat to police or public safety; or
    - the loss or destruction of evidence.

5.2. Submission

To submit an urgent request please submit a completed copy of the Emergency Information Request form (which is appended to this guide and is also available at https://static.beanfield.com/handoff/emergency-information-request.pdf to privacy@beanfield.ca.

As you prepare to submit such a request, please also immediately phone our 24/7 emergency contact for such requests at 1-855-532-1555 and select the option to receive general support.

To avoid delays in processing your urgent request, please ensure that you appropriately complete all of the fields in the Emergency Information Request form, including information about officers in charge and information that demonstrates that the situation meets the definition in section **5**.

6. International requests

We do not accept requests received directly from foreign law enforcement. Foreign law enforcement should obtain an order from a Canadian court, if available to them, or contact the Department of Justice International Assistance Group (IAG) to request legal assistance with their request.

The request should be submitted through the IAG even if it meets the conditions to be considered an urgent request described in section **5**Authorities in states that participate in the 24/7 network[4] can contact Canada's designated contact points for the 24/7 network, which are the Royal Canadian Mounted Police's (RCMP's) National Cybercrime Coordination Centre (NC3) and its National Operations Centre (NOC).

Appendices

- Emergency Information Request Form
- Form 5.005 (production order)
- Form 5.0091 (non-diclosure order)
- Form 5.003 (preservation order)
- Form 5.001 (preservation demand).

[4]https://www.coe.int/en/web/cybercrime/24/7-network-new