

TimeGhost Project Management Consulting LTD

Personal Information Protection Policy

At TimeGhost Project Management Consulting LTD, we are committed to providing our clients and employees with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients and employees, protecting their personal information is one of our highest priorities.

While we have always respected our client's and employee's privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of *The Personal Information Protection and Electronic Documents Act (PIPEDA)*. *PIPEDA*, which sets out the ground rules for how businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our clients and employees of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with *PIPEDA*, outlines the principles and practices we will follow in protecting clients and employee's personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our client's and employee's personal information and allowing our clients and employees to request access to, and correction of, their personal information.

Definitions

Personal Information – means information about an identifiable *individual*. Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or *PIPEDA*.

Privacy Officer – means the individual designated responsible for ensuring that TimeGhost Project Management Consulting LTD complies with this policy and *PIPEDA*.

Policy 1 – Collecting Personal Information

1.1 Unless the purposes for collecting personal information are obvious and the client or employee voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

1.2 We will only collect client or employee information that is necessary to fulfill the following purposes:

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- To verify identity;
- To verify creditworthiness;
- To identify [client or employee] preferences;
- To deliver requested products and services
- To ensure a high standard of service to our [clients and employees];
- To meet regulatory requirements;

Policy 2 – Consent

- 2.1 We will obtain client or employee consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided *orally, in writing, electronically* or it can be implied where the purpose for collecting, using, or disclosing the personal information would be considered obvious and the client or employee voluntarily provides personal information for that purpose.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), client's and employee's can withhold or withdraw their consent for TimeGhost Project Management Consulting LTD to use their personal information in certain ways. A client's or employee's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client or employee in making the decision.
- 2.5 We may collect, use or disclose personal information without the client's or employee's knowledge or consent in the following limited circumstances:
- When the collection, use or disclosure of personal information is permitted or required by law;
 - In an emergency that threatens an individual's life, health, or personal security;
 - When the personal information is available from a public source (e.g., a telephone directory);
 - When we require legal advice from a lawyer;
 - For the purposes of collecting a debt;
 - To protect ourselves from fraud;
 - To investigate an anticipated breach of an agreement or a contravention of law

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose client or employee personal information where necessary to fulfill the purposes identified at the time of collection.
- 3.2 We will not use or disclose client or employee personal information for any additional purpose [*unless we have consent to do so*].
- 3.3 We will not sell client or employee lists or personal information to other parties under any circumstances.

Policy 4 – Retaining Personal Information

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- 4.1 If we use client or employee personal information to make a decision that directly affects the client or employee, we will retain that personal information for at least one year so that the client or employee has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain client or employee personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that client or employee personal information is accurate and complete where it may be used to make a decision about the client or employee or disclosed to another organization.
- 5.2 Clients and employees may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

A request to correct personal information should be forwarded to the Privacy Officer.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of client or employee personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that client or employee personal information is appropriately protected:
 - *the use of locked filing cabinets;*
 - *physically securing offices where personal information is held;*
 - *the use of user IDs, passwords, encryption, firewalls;*
 - *restricting employee access to personal information as appropriate (i.e., only those that need to know will have access);*
 - *contractually requiring any service providers to provide comparable security measures.*
- 6.3 We will use appropriate security measures when destroying client's, customer's, member's personal information such as *shredding documents, and/or deleting electronically stored information.*
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Clients and Employees Access to Personal Information

- 7.1 Clients and employees have a right to access their personal information, subject to limited exceptions.

Some exception include: solicitor-client privilege, where disclosure would reveal personal information about another individual, health and safety concerns.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer

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- 7.3 Upon request, we will also tell clients and employees how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the client or employee of the cost and request further direction from the client or employee on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the client or employee in writing, providing the reasons for refusal and the recourse available to the client or employee.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

- 8.1 The Privacy Officer **or designated individual** is responsible for ensuring TimeGhost Project Management Consulting LTD's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Clients and employees should direct any complaints, concerns or questions regarding TimeGhost Project Management Consulting LTD's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client or employee may also write to the Information and Privacy Commissioner of Saskatchewan.

Contact information for TimeGhost Project Management Consulting LTD's Privacy Officer:

Privacy Officer

Privacy_officer@timeghost.com

PO Box 661 STN MAIN

White City, SK, S4L 5B1, Canada