

## **PRIVACY POLICY**

Purpose: Each employee is entitled to know how we handle personal information.

Policy: Personal information is any information that is identifiable to an individual, or by which, through deduction, would be identifiable to an individual. It does not include the name, business address, title and contact information of an employee of an organization (“personal information”).

### 1. **Our Obligations in Handling Personal Information**

In handling personal information, we must, at a minimum:

- not disclose personal information to anyone outside the office;
- not access personal information within the office unless such access is required in the course of discharging an employee’s employment duties;
- use personal information only for the purpose for which it was collected;
- take appropriate security precautions with respect to personal information as dictated by the sensitivity of the information in order to prevent improper or unauthorized disclosure, modification or loss;
- ensure the accuracy of personal information held by us.

### 2. **Principles for Handling of Personal Information**

In each instance that personal information is collected, used, communicated, stored or disposed of, it is important to consider whether those activities are being conducted in accordance with the principles set out in this document. A failure to do so could have serious implications with respect to our reputation and our business. It could result in a privacy or professional conduct complaint, negative publicity, loss of public confidence, and financial loss to or legal action against Celco.

### 3. **Principles For Collection and Use**

When collecting personal information we shall comply with the *Personal Information Protection and Electronic Documents Act (the “Act”)*.

Access to all personal information shall be limited to circumstances where staff need to know the information in order to discharge their employment duties. We shall have appropriate access control procedures to limit access to physical and electronic files.

Personal information shall be used only as required for legitimate purposes, in the course of an employee’s employment duties and for no other purpose. A failure to comply with this requirement may lead to disciplinary action including dismissal from employment for just cause.

We shall not create unnecessary copies of any personal information.

#### 4. **Principles for Communicating and Transmitting Personal Information**

Personal information sent externally from Celco in hard copy format should be sent via courier or first class mail only in a properly sealed envelope marked “Confidential” or “Personal” or “Strictly Confidential” as appropriate and where appropriate “To be opened by addressee only” shall be added in bold face type to the front of the envelope. It is the responsibility of each person sending mail to ensure that all mail (other than bulk mail), whether or not containing personal information, is properly sealed before mailing.

Caution must be applied to avoid transmission of personal information to the wrong email address. The email address should be verified before attempted transmission. The name of the individual to whom the information relates or other personal information shall not be recorded in the “re” line.

Fax transmission shall not be used for personal information unless the person to whom the information relates has specifically consented to the method of transmission and then only with a fax cover sheet including an appropriate message regarding unauthorized receipt. Caution shall be taken to avoid transmission to the wrong party. The fax number shall be verified before attempted transmission.

#### 5. **Principles for Storage of Personal Information**

Personal information shall be labelled as “confidential”.

Physical files containing sensitive personal information should be locked up or in control of the custodian when not in use.

Lockable storage shall be used after business hours for all sensitive personal information.

Employees shall not disclose their password or identifier except to an authorized system administrator.

#### 6. **Principles for Disposal of Personal Information**

Hardcopy of personal information must be destroyed by shredding or by a professional disposal service.

#### 7. **What to do in the Event of a Breach of Confidentiality**

If there is a breach of confidentiality of which you become aware, you must **immediately** contact the General Manager, or in her absence the President. Examples of such a breach include but are not limited to:

- theft of a lap top containing Personal Information
- unauthorized access to our premises or systems

- loss of a file or documents containing Personal Information
- misdirection of material outside the firm containing Personal information
- loss of personal financial or health information

8. **Summary**

If there is any doubt about how to handle Personal Information or whether the information is confidential, employees shall treat the information as confidential. All questions should be referred to the General Manager or the President.

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