

Contact North/*Contact Nord* Privacy Policy

Contact North/ *Contact Nord* is committed to protecting and safeguarding the privacy and security of customer, partner and other personal information ("Personal Information"). This policy has been implemented to comply with the *Personal Information Protection and Electronic Documents Act* (the "Act") which came into effect on January 1, 2004. This Privacy Policy sets out the principles and guidelines Contact North/ *Contact Nord* has adopted for the management of Personal Information of its customers and partners, and is in accordance with the Act.

Personal Information is defined as information about an identifiable individual including customer information pertaining to the use of Contact North/ *Contact Nord* services, credit card information and purchase information whether provided in writing, orally or by other electronic means. Personal Information does not include information that is business contact information, is publicly available information such as customer names, addresses, telephone numbers, and electronic addresses when listed in a public directory or made available through another publicly available directory or other sources.

Contact North/ *Contact Nord* wants you to know how it keeps your Personal Information secure and uses it only as necessary and as is authorized. In recognition of this goal, Contact North/ *Contact Nord* makes the following commitments to its customers and partners.

1. Accountability

Contact North/ *Contact Nord* is accountable for the Personal Information under its control and has designated the Director, Human Resources as its Privacy Officer. There are other individuals within the organization who have responsibility for the day-to-day collection and management of Personal Information.

2. Identifying Purposes

- a. Contact North/ *Contact Nord* identifies the purposes for which Personal Information is being collected at or before the time of such collection.

- b. Generally, Contact North/*Contact Nord* collects Personal Information for the following reasons:
 - i. To establish and maintain a commercial relationship with its customers and provide ongoing services;
 - ii. To understand customer needs and obtain feedback on the services it provides;
 - iii. To develop, modify and market new services to its customers;
 - iv. To manage and operate Contact North/*Contact Nord's* commercial and other operations;
 - v. To meet legal and regulatory requirements; and
 - vi. To facilitate commercial transactions.
- c. In the event that Contact North/*Contact Nord* is required to use, disclose or collect Personal Information for a purpose not listed in b. above, the Personal Information will not be used or disclosed without first identifying the new purpose and obtaining the customer or partner's consent, unless otherwise exempted by the Act.

3. Obtaining Consent for Collection, Use or Disclosure

- a. Contact North/*Contact Nord* collects Personal Information by fair and lawful means and obtains the individual's consent for the collection, use or disclosure of said Personal Information, as required by the Act or other laws.
- b. The consent may be express, implied or given through an authorized representative.
- c. A customer or partner may withdraw consent to use his or her Personal Information at any time, subject to any legal or contractual restrictions and upon giving Contact North/*Contact Nord* reasonable notice. Contact North/*Contact Nord* will advise the individuals of the implications, if any, of withdrawing consent and how to do so.
- d. While Contact North/*Contact Nord* will seek consent from a customer or stakeholder to collect, use and disclose Personal Information in most circumstances, there are some exceptions to the requirement to obtain consent. These exceptions include, but are not limited to, where Contact North/*Contact Nord* is required to comply with a court order or investigation by law enforcement agencies.

4. Limiting Collection of Personal Information

Contact North/ *Contact Nord* limits the collection of Personal Information to that which is reasonably necessary for the identified purpose(s).

5. Limiting Use, Disclosure and Retention

- a. Contact North/ *Contact Nord* does not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the individual or stakeholder, or as permitted or required by law.
- b. Contact North/ *Contact Nord* retains Personal Information only as long as is necessary for the fulfillment of those purposes or as required by law.
- c. Contact North/ *Contact Nord* may disclose Personal Information to a person or organization involved directly or indirectly in supplying a product or service to Contact North/ *Contact Nord*'s customers or partners, including without limitation, its marketing department, its accounting department, and mailing suppliers. This disclosure is only made to the extent the Personal Information is required and is used only for the purposes such as the efficient supply of Contact North/ *Contact Nord* services. Such disclosure requires the receiving person or entity to keep the Personal Information confidential.
- d. Contact North/ *Contact Nord* will take reasonable steps to ensure that only employees who need to know or whose duties so require, are granted access to customer or stakeholder Personal Information.

6. Accuracy

Contact North/ *Contact Nord* takes reasonable steps to maintain Personal Information accurate, complete and up to date as is necessary for the identified purpose(s). Customers and partners are entitled to check on the accuracy of their Personal Information and, if necessary, submit a correction request. Contact North/ *Contact Nord* will rely exclusively on the information provided by the customer or partner in determining the completeness, accuracy and timeliness of his or her Personal Information and will have no further obligation to seek independent verification of the information supplied.

7. Security Safeguards

Contact North/ *Contact Nord* protects Personal Information from unauthorized access, use and disclosure by establishing and maintaining security safeguards.

8. Openness

Contact North/ *Contact Nord* makes information readily available about its practices and policies related to the collection and management of Personal Information of customers and partners.

Contact North/ *Contact Nord's* Privacy Policy is posted on its website.

9. Obtaining Access to Personal Information

- a. Upon request and in accordance with the Act, Contact North/ *Contact Nord* will provide its customers and partners with access to their Personal Information and details about its disclosure and use. The customer or stakeholder may challenge the accuracy of the Personal Information and to have it corrected.
- b. Contact North/ *Contact Nord*, in certain circumstances, may not be able to provide access to all Personal Information where it is unreasonable costly to provide, the information contains references to other individuals, the information cannot be disclosed for security, legal or commercial proprietary reasons or the information is subject to solicitor client or litigation privilege. Contact North/ *Contact Nord* will provide its reasons for denying access in writing.
- c. Contact North/ *Contact Nord* shall make all reasonable efforts to respond to requests for access to Personal Information within 30 days of receipt of the request at a minimal or no cost to the individual.

10. Challenging Compliance

Contact North/ *Contact Nord* provides customers and partners with information about challenging its compliance with the Act.

All complaints and/or questions should be directed to the Contact North/ *Contact Nord* Privacy Officer as follows:

Director, Human Resources / Privacy Officer
Contact North / *Contact Nord*
Northwest Regional Coordinating Centre
1139 Alloy Drive, Suite 104
Thunder Bay ON P7B 6M8