



## PRIVACY POLICY

### **OUR COMMITMENT TO PRIVACY**

Concord Security is committed to maintaining the security, confidentiality and privacy of your personal information. Concord Security has always respected the importance of privacy and has strived to be an open and accessible organization. This Privacy Policy documents our on-going commitment to you and has been developed in compliance with the British Columbia *Personal Information Protection Act* (“*PIPA*”).

### **SCOPE OF POLICY**

In accordance with *PIPA*, this Policy addresses personal information about individuals and does not apply to information collected, used or disclosed with respect to corporate or commercial entities. However, corporate and commercial information is protected by other Concord Security policies and practices and through contractual arrangements.

This Policy does not impose any limits on the collection, use or disclosure of the following information by Concord Security:

- your business contact information; or
- publicly available information recognized under *PIPA*.

### **DEFINITIONS**

#### **In this Policy:**

“**Concord Security**” means Concord Security Corporation and Concord Security System Corp., both British Columbia companies.

“**collection**” means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.

“**consent**” means voluntary agreement to the collection, use and disclosure of personal information for specified purposes. Consent may be express or implied. Express consent may be given orally or in writing, if it is unequivocal and does not require any inference on the part of Concord Security. Implied consent exists when Concord Security can reasonably infer consent based upon your action or inaction.

“**disclosure**” means making personal information available to a third party.

“**personal information**” means information about an identifiable individual but does not include his or her business contact information. Personal information does not include information concerning corporate or commercial entities. It also does not include information that cannot be associated with a specific individual.

“**PIPA**” means the British Columbia *Personal Information Protection Act*, S.B.C. 2003, c.63.

“**third party**” means an individual or organization other than Concord Security and you.

“**Privacy Officer**” means an individual designated by Concord Security who is accountable for compliance with this policy by Concord Security and whose contact particulars are provided at the end of this Policy.

“**use**” means the treatment and handling of personal information by and within Concord Security.

## 1. ACCOUNTABILITY

Concord Security is accountable and responsible for personal information under its control. Concord Security has designated a Privacy Officer who is accountable for Concord Security's compliance with this Policy.

Other individuals within Concord Security may be accountable for the day-to-day collection and processing of personal information or to act on behalf of the Privacy Officer.

Concord Security will adopt procedures to protect personal information, receive and respond to complaints and inquiries, train staff regarding privacy policies and procedures and communicate policies and procedures to you.

## 2. PURPOSES

When collecting information, Concord Security will state the purpose of collection and will provide, on request, contact information for the Privacy Officer who can answer questions about the collection.

Concord Security collects your personal information for the following purposes:

- to determine suitability for employment with Concord Security
- to provide for employee payroll
- to provide for employee workers compensation claims, third party garnishee, and the like reporting requirements
- to provide for employee security licensing, background checks, and licensing renewals/reviews through the Ministry of Public Safety and Solicitor General
- to contact employees for the purposes of scheduling
- to contact employees, or other provided contacts, in case of emergency
- to contact clients, in case of emergency
- to evaluate employee performance and determine employee suitability for wage increases/decreases, workplace transfers, promotions, and the like
- to determine which products and services, particularly in the areas of employee benefits, may meet your potential needs, and to obtain quotations for and ordering of these products or services;
- to provide and administer products and services requested and to use and disclose the information for any purpose related to operation of accounts and provision of requested products and services;
- to protect Concord Security, yourself and others from fraud and error and to safeguard the financial interests of Concord Security;
- to authenticate your identity;
- to collect debts owed to Concord Security;
- to manage or transfer assets or liabilities of Concord Security, for example in the case of an acquisition or merger, the provision of security for a credit facility;
- and
- to comply with legal and regulatory requirements.

Concord Security is required by law to obtain employee social insurance numbers to report employee wages, statutory deductions, Record of Employment data, and other information to Canada Revenue Agency.

The above collections, uses and disclosures are a reasonably necessary part of your relationship with Concord Security.

When your personal information is to be used for a purpose not previously identified, the new purpose will be disclosed to you prior to such use, and your consent will be sought unless the use is authorized or required by *PIPA* or other law.

### **3. CONSENT**

Concord Security will obtain your consent to collect, use or disclose personal information except where Concord Security is authorized or required by *PIPA* or other law to do so without consent. For example, Concord Security may collect, use or disclose personal information without your knowledge or consent where:

- ❑ Concord Security is collecting or paying a debt;
- ❑ Concord Security is obtaining legal advice; or
- ❑ Concord Security reasonably expects that obtaining consent would compromise an investigation or proceeding.

We therefore request employees sign a consent authorization as part of their orientation package which we will keep on file. Your written consent may also be given through an authorized representative such as a lawyer, agent, or broker.

Consent may also be provided orally, in writing, electronically, through inaction (such as when you fail to notify Concord Security that you do not wish your personal information collected / used / disclosed for optional purposes following reasonable notice to you) or otherwise. For example, oral consent could be expressed over the telephone when information is being collected; electronically when submitting an agreement, application or other information; or in writing when signing an agreement or application form.

You may withdraw your consent at any time, subject to legal or contractual restrictions, provided reasonable written notice of withdrawal of consent is given by you to Concord Security. Upon receipt of your written notice, Concord Security will inform you of the likely consequences of the withdrawal, which may include the inability of Concord Security to provide certain products or services for which the delivery of that information is a prerequisite.

### **4. LIMITS ON COLLECTION OF PERSONAL INFORMATION**

Concord Security will not collect personal information indiscriminately and will limit its collection of your personal information to what is reasonably necessary to provide a product or service and which is reasonably necessary for the purposes consented to by you. Concord Security may also collect information as authorized by *PIPA* or other law.

### **5. LIMITS FOR USING, DISCLOSING AND RETAINING PERSONAL INFORMATION**

Your personal information will only be used or disclosed for the purposes set out above and as authorized by *PIPA* and other law.

Concord Security will keep personal information used to make a decision affecting an individual for at least one year after using it to make the decision.

Concord Security will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes.

Concord Security will take due care when destroying personal information so as to prevent unauthorized access to such information.

## **6. ACCURACY**

Concord Security will make a reasonable effort to ensure that personal information it is using or disclosing is accurate and complete. In most cases, Concord Security will rely on you to ensure that certain information, such as your street address, e-mail address or telephone number, is current, complete and accurate.

If you demonstrate the inaccuracy or incompleteness of personal information, Concord Security will amend the information as required. If appropriate, Concord Security will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, Concord Security will annotate the personal information under its control with a note that a correction was requested but not made.

## **7. SAFEGUARDING PERSONAL INFORMATION**

Concord Security protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

Concord Security will take reasonable steps, through contractual or other reasonable means, to ensure that its suppliers and agents who assist in providing products and services to you implement a comparable level of personal information protection. Some specific safeguards include:

- ❑ physical measures such as fire-resistant filing cabinets and relevant office shelving which are locked during non-business hours;
- ❑ organizational measures such as restricting employee access to files and databases as appropriate;
- ❑ electronic measures such as passwords and firewalls;
- ❑ investigative measures where Concord Security has reasonable grounds to believe that personal information is being inappropriately collected, used or disclosed.
- ❑ confidentiality and security are not assured when information is transmitted through e-mail or other wireless communication.
- ❑ Concord Security will not be responsible for any loss or damage suffered as a result of a breach of security or confidentiality when you transmit information to Concord Security by e-mail or other wireless communication or when Concord Security transmits such information by such means.

## **8. OPENNESS**

Concord Security is open about the policies and procedures it uses to protect your personal information. Disclosure of our policies and procedures will be made available in writing and electronically. However, to ensure the integrity of our security procedures and business methods, Concord Security will not disclose sensitive information about its policies and procedures.

Concord Security will make available a description of the type of personal information held by Concord Security, and a general description of its use and disclosure.

## **9. PROVIDING ACCESS**

You have a right to access your personal information held by Concord Security. Your personal information, which is or will be contained in files, statements, transaction slips and account agreements will be provided upon request and authentication of identity.

Upon written request and authentication of identity, Concord Security will provide you with your other personal information under its control, information about the ways in which that information is being used and a description of the individuals and organizations to whom such information has been disclosed.

Concord Security may charge a reasonable fee for providing personal information in response to a *PIPA* access request and will provide an estimate of any such fee upon receiving a written access to personal information request. Concord Security may require a deposit for all or part of the fee.

Concord Security will make personal information available within 30 days or provide written notice where additional time is required to fulfill the request.

In some situations, Concord Security may not be able to provide access to certain personal information. This may be the case where, for example, disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purpose of an investigation or where disclosure of the information would reveal confidential commercial information that, if disclosed, could harm the competitive position of Concord Security. Concord Security may also be prevented by law from providing access to certain personal information.

Where an access request is refused in whole or in part, Concord Security will notify you in writing, giving the reason for refusal and outlining further steps which are available to you.

#### **10. CHALLENGING COMPLIANCE**

Concord Security will, on request, provide information regarding its complaint response procedure. Any inquiry, challenge, complaint or question regarding this Privacy Policy must be directed in writing to the Concord Security Privacy Officer.

##### Contact Information:

Privacy Officer  
Concord Security Corporation  
4<sup>th</sup> Floor, 570 Granville Street  
Vancouver, BC, V6C 3P1

Phone: 604-689-4005

Facsimile: 604-689-3244

E-mail: [mforward@consec.com](mailto:mforward@consec.com)