

# Thomson-Gordon Privacy Policy

At Thomson-Gordon, the privacy of your personal information has always been an important aspect of how we operate. On January 1, 2004, the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA) began to apply to provincially regulated organizations that collect, use and disclose personal information in the course of commercial activity. As such, Thomson-Gordon has developed the following Privacy Policy in order to ensure compliance with PIPEDA, as well as to inform individuals of our continuing commitment to the protection of their personal information.

## **What is personal information?**

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form such as a personal e-mail address, home addresses and so on. It does not include information normally found on a business card, such as name, title, company, business address, business name, business e-mail address, business telephone or fax number.

## **Objective**

Thomson-Gordon collects and stores information on its employees and customers. The policy and procedures below outline how this information is managed and used in order to protect the privacy of our employees and customers and to respect the *Personal Information and Electronic Documents Act*. The purpose of the act is to establish rules to govern the collection, use and disclosure of personal information.

## **Who is responsible for protecting the personal information collected, used and disclosed by Thomson-Gordon?**

The Human Resource Manager of Thomson-Gordon Group is the Chief Privacy Officer for the organization. The Chief Privacy Officer is responsible for ensuring compliance with PIPEDA and with this Privacy Policy. At times Thomson-Gordon Group staff may be delegated to act on behalf of the Chief Privacy Officer or to take responsibility for occasional collection, use and disclosure of personal information.

## **Why does the Thomson-Gordon Group collect, use or disclose personal information?**

- Personal information is typically collected and used in the hiring process for payroll and benefit administration purposes.
- To monitor customer accounts
- To identify customers' orders

## **Limiting Collection**

Thomson-Gordon restricts the collection of personal information only to that information that is necessary for the limited purposes noted above. We are committed to collecting personal information in a fair, open and lawful manner.

## **Limiting Use, Disclosure and Retention**

Thomson-Gordon does not use personal information for purposes other than those for which it was originally collected, unless it has first obtained the consent of the person from whom such information was received.

Further, Thomson-Gordon will only disclose your personal information under the following circumstances.

- When we are required or authorized by law to do so
- When you have consented to the disclosure
- When it is necessary to collect debts
- If the information is already publicly known

## **How is Personal Information Maintained?**

Thomson-Gordon does not sell, barter, trade or give away your personal information to third parties. Thomson-Gordon stores and maintains personal information conformity with the requirements of the *Personal Information Protection and Electronic Documents Act*.

## **Safeguards**

Thomson-Gordon takes all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. We also ensure that any of our employees who deal with personal information are properly trained and are aware of the necessary and appropriate measures required to protect personal information.

## **How can individuals access their personal information held by Thomson-Gordon Group?**

Individuals have a right to access their own personal information in the possession and control of Thomson-Gordon Group. However, we reserve the right to confirm the identity of the person seeking access to personal information before complying with any requests.

## **Changes to This Privacy Policy**

Since Thomson-Gordon regularly reviews all of its policies and procedures, we may change our privacy policy from time to time.