

Schedule B

Personal Information Protection and Electronic Documents Act (PIPEDA)

PRIVACY PRINCIPLES

1. **Accountability:** Develop and implement Privacy Policies and Procedures. Each Broker is required to appoint a Privacy officer as well as develop a Privacy Policy.
2. **Identifying purposes:** Inform clients why you are collecting Personal Information.
3. **Consent:** Obtain your clients consent to collect and use the Personal information they are providing. Consent should be expressed in the form of a signature.
4. **Limiting collection:** Collect only the information needed, do not collect information indiscriminately. Information must be collected in a fair and legal manner.
5. **Limiting use, disclosure and retention:** Keep Personal information only for as long as is needed or as required under law.
6. **Accuracy:** Keep Personal information updated as needed.
7. **Safeguards:** Ensure files are kept in locking cabinets only accessible to the parties who require access. Ensure all documents are shredded prior to disposal. Client information stored electronically should be password protected. Remove and destroy any documents no longer required. Ensure all employees are trained on an annual basis.
8. **Openness:** Inform clients the process and safeguards you have in place with respect to Personal information. Your company Privacy statement should be available on your company website, keep a written document of your Privacy statement available for distribution to clients.
9. **Individual access:** When requested advise individuals in writing of the nature of the Personal information you have in your possession. Requests from clients regarding Personal information should be addressed within 30 days of receiving the request.
10. **Challenging compliance:** Ensure staff are aware how compliance complaints should be handled and by whom. Inform clients of their right and recourse under PIPEDA. Advise clients if you are unable to rectify the complaint how to reach the office of the Privacy Commissioner of Canada.

What is considered Personal Information?

Age, name, ID numbers, income, ethnic origin, or blood type, opinions, evaluations, comments, social status, or disciplinary actions; and employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs)

Personal information does not include the name, title or business address or telephone number of an employee of an organization.