



## **Classmethod Canada**

### **Personal Information Protection Policy**

At Classmethod Canada Inc. ("Classmethod Canada"), we are committed to providing our customers with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our customers, protecting their personal information is one of our highest priorities.

While we have always respected our customers' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our customers of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting customers' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our customers' personal information and allowing our customers to request access to, and correction of, their personal information.

#### **Scope of this Policy**

This Personal Information Protection Policy applies to Classmethod Canada and to any service providers collecting, using or disclosing personal information on behalf of Classmethod Canada.

#### **Definitions**

***Personal Information*** –means information about an identifiable *individual including name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, education, employment information*. Personal information does not include contact information (described below).

**Contact information** – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

**Privacy Officer** – means the individual designated responsibility for ensuring that Classmethod Canada complies with this policy and PIPA.

## **Policy 1 – Collecting Personal Information**

- 1.1 Unless the purposes for collecting personal information are obvious and the customer voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect personal information that is necessary to fulfill the following purposes:
  - To verify the identity of customers of Classmethod Canada;
  - To open and manage an account on behalf of a customer;
  - To deliver requested products and services to the customer;
  - To respond to inquiries from customers of Classmethod Canada;
  - To perform appropriately and smoothly the services entrusted by other business entities when such services include the handling of whole or part of such personal information; and
  - To meet regulatory requirements; and

where the customer provides its information for such purposes voluntarily, Classmethod Canada shall not be required to make any communication to the customer regarding its reasons for collection of the customer's information.

## **Policy 2 – Consent**

- 2.1 We will obtain customer consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided electronically, through an authorized representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the customer voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a customer is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, and the customer does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), customers, can withhold or withdraw their consent for Classmethod Canada to use their personal information in certain ways. A customer's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the customer in making the decision.
- 2.5 We may collect, use or disclose personal information without the customer's knowledge or consent in the following limited circumstances:
  - When the collection, use or disclosure of personal information is permitted or required by law;

- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is available from a public source
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect ourselves from fraud; or
- To investigate an anticipated breach of an agreement or a contravention of law.

### **Policy 3 – Using and Disclosing Personal Information**

3.1 We will only use or disclose customer personal information where necessary to fulfill the purposes identified at the time of collection *or for a purpose reasonably related to those purposes such as:*

- To conduct client, customer, member surveys in order to enhance the provision of our services;
- To inform the customers of Classmethod Canada about its services and products, or to send promotions surveys and direct mails; and
- In order to facilitate communication or the provision of services, on the customer's behalf, between Classmethod Canada and a third-party.

3.2 We will not use or disclose customer personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell customer lists or personal information to other parties *unless we have consent to do so.*

### **Policy 4 – Retaining Personal Information**

4.1 If we use customer personal information to make a decision that directly affects the customer, we will retain that personal information for at least one year so that the customer has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain customer personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

### **Policy 5 – Ensuring Accuracy of Personal Information**

5.1 Customers may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought. *A request to correct personal information should be forwarded to the Privacy Officer or designated individual.*

5.2 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the customers' correction request in the file.

### **Policy 6 – Securing Personal Information**

6.1 We are committed to ensuring the security of customer personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

6.2 The following security measures will be followed to ensure that customer personal information is appropriately protected:

- the use of locked filing cabinets;
- physically securing offices where personal information is held;

- the use of user IDs, passwords, encryption, firewalls; and
  - restricting employee access to personal information as appropriate.
- 6.3 We will use appropriate security measures when destroying customer's personal information such as shredding documents and deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

## **Policy 7 – Providing Customers Access to Personal Information**

- 7.1 Customers have a right to access their personal information, except as provided in section 23 of PIPA.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 7.3 Upon request, we will also tell customers how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the customer of the cost and request further direction from the customer on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the customer in writing, providing the reasons for refusal and the recourse available to the customer.

## **Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual**

- 8.1 The Privacy Officer or designated individual is responsible for ensuring Classmethod Canada's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Customers should direct any complaints, concerns or questions regarding Classmethod Canada's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the customer may also write to the Information and Privacy Commissioner of British Columbia.