

## Our Commitment to Privacy

Protecting the privacy and confidentiality of personal information is an important aspect of the way Denbow conducts its business. Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to Denbow's daily operations.

Denbow strives to protect and respect personal information of its customers, employees, business partners, and so on in accordance with all applicable regional and federal laws. Each staff member of Denbow must abide by this organization's procedures and practices when handling personal information.

## Applicability

This Privacy Policy informs everyone of Denbow's commitment to privacy and establishes the methods by which privacy is ensured. This Privacy Policy applies to all personal information within Denbow's possession and control.

Personal information is defined as any identifying information about an individual or group of individuals, including name, date of birth, address, phone number, e-mail address, social insurance/security number, nationality, gender, health history, financial data, credit card numbers, bank account numbers, assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views.

Business information is defined as business name, business address, business telephone number, name(s) of owner(s), executive officer(s), and director(s), job titles, business registration numbers, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

Consent occurs and is obtained when an individual signs an application or other form containing personal information, thereby authorizing Denbow to collect, use, and disclose the individual's personal information for the purposes stated on the form or in the Appropriate Use section of this policy.

- Implied consent is granted by the individual when he/she signs the application or form. This allows Denbow to obtain or verify information from third parties (such as banks, credit bureaus, lenders, or insurance companies) in the process of assessing the eligibility of an individual, customer, client, job applicant, or business partner.

## Appropriate Use

Denbow collects and uses personal information solely for the purpose of conducting business and developing an understanding of its customers. Denbow hereby asserts that personal information will only be used for the following purposes:

1. Application for Credit, Collection of Accounts Receivable and other common practices as a result of a client relationship.
2. Application for Employment, sharing information with Revenue Canada, WorkSafe BC, and our current Extended Health Benefits provider.

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## Policy Statements

1. Denbow assumes full accountability for the personal information within its possession and control. This organization has appointed Willetta Les, Office Manager, as custodian of all privacy matters and legal compliance with privacy laws.
2. Denbow obtains personal information directly from the individual to which the information belongs. Individuals are entitled to know how Denbow uses personal information and this organization will limit the use of any personal information collected only to what is needed for those stated purposes. Denbow will obtain individual consent if personal information is to be used for any other purpose. Denbow will not use that information without the consent of the individual.
3. Under no circumstances will Denbow sell, distribute, or otherwise disclose personal information or contact lists to third parties. However, limited disclosure may be required as part of Denbow fulfilling its stated business duties and day-to-day operations. This may include consultants, suppliers, or business partners of Denbow, but only with the understanding that these parties obey and abide by this Privacy Policy, to the extent necessary of fulfilling their own business duties and day-to-day operations.
4. Denbow will retain personal information only for the duration it is needed for conducting business. Once personal information is no longer required, it will be destroyed in a safe and secure manner. However, certain laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this policy.
5. Denbow vows to protect personal information with the appropriate security measures, physical safeguards, and electronic precautions. Denbow maintains personal information through a combination of paper and electronic files. Where required by law or disaster recovery/business continuity policies, older records may be stored in a secure, offsite location.
  - o Access to personal information will be authorized only for the employees and other agents of Denbow who require the information to perform their job duties, and to those otherwise authorized by law.
  - o Denbow's computer and network systems are secured by complex passwords. Only authorized individuals may access secure systems and databases.
  - o Active files are kept in locked filing cabinets.
  - o Routers and servers connected to the Internet are protected by a firewall, and are further protected by virus attacks or "snooping" by sufficient software solutions.
  - o Personal information is not transferred to volunteers, summer students, interns, or other non-paid staff by e-mail or any other electronic format.
6. Denbow's website also discloses its personal information practices. Individuals inputting data into the Web site will be notified of:
  - o Personally identifiable information about the individual that is collected from the Web site or through affiliate sites.
  - o Information about the organization collecting the data.

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- How the data will be used.
  - With whom the data may or may not be disclosed.
  - What options are available to the individual regarding the collection, use, and disclosure of personal information.
  - The information technology security procedures in place that protect against the destruction, loss, theft, alteration, or misuse of personal information under Denbow's possession and control.
  - How the individual may access and correct any inaccuracies in their personal information.
  - Denbow does not collect personally identifiable information from any individual known to be under the age of 13.
  - Denbow may share compiled demographic information with its business partners and/or advertisers, but no personal information that can identify any individual person shall be disclosed.
  - This Web site may contain links to other sites, but Denbow is not responsible for the privacy practices of other organizations' sites.
  - Any registration or order form asking site visitors to enter personal or financial information will be protected by SSL encryption.
  - Site visitors are given the choice to opt out of having their personal information used at the point where the information is gathered.
7. In most instances, Denbow will grant individuals access to their personal information upon presentation of a written request and satisfactory identification. If an individual finds errors of fact with his/her personal information, please notify Denbow as soon as possible to make the appropriate corrections. Should Denbow deny an individual's request for access to his/her personal information, Denbow will advise in writing of the reason for such a refusal. The individual may then challenge the decision.
8. Denbow may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:
- Denbow is under obligation by law to disclose personal information in order to adhere to the requirements of an investigation of the contravention of a regional or federal, under the purview of the appropriate authorities.
  - An emergency exists that threatens an individual's life, health, or personal security.
  - The personal information is for in-house statistical study or research.
  - The personal information is already publicly available.
  - Disclosure is required to investigate a breach of contract.

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## **Conclusion**

Any questions or concerns regarding this Privacy Policy can be addressed by contacting us at 1-888-933-6269. Denbow will investigate and respond to concerns about any aspect of the handling of personal information. This organization will address concerns to the best of its abilities.