



Personal Information Protection and Electronic Documents (PIPEDA) Policy

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Policy on Privacy of Personal Information

Lowe-Martin is committed to protecting the privacy and security of all personal information regardless of how it is obtained, whether by reason of customer relationship with Lowe-Martin or directly from its employees or prospective employees.

This policy explains the types of personal information we collect or receive, how it is used, and the steps we take to ensure all personal information is handled appropriately.

Our policies and practices have been designed to comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and corresponding provincial privacy acts.

What is personal information?

Personal information is information that refers to an individual specifically and is recorded in any form. Personal information includes such things as age, income, date of birth, ethnic origin, medical records and credit records.

Information about individuals contained in the following documents is not considered personal information:

- public telephone directories, where the subscriber can refuse to be listed
- professional and business directories available to the public
- certain public registries and court records
- certain other publicly available printed and electronic publications.
- business card information such as title or business address or telephone number

Lowe-Martin does not obtain personal information directly from individuals other than its own employees.

Due to the nature of the services Lowe-Martin provides, we do however obtain personal information from clients in the form of lists of individuals and the information needed to mail out documents to their homes or compile statistical or analytical reports on behalf of that same client. Lowe-Martin does not collect personal information via its website.

Our privacy commitment, as a third-party service provider and as an employer, is governed by the following privacy principles:

1. We are accountable to our clients

Lowe-Martin is responsible for all personal information under its control, including any personal information that is transferred to third parties for processing, storage or other purposes. We have appointed the Director, Human Resources as the Privacy Officer within in our Company. The Privacy Officer reports to the COO and is accountable for compliance with these privacy and security principles for all areas within the Lowe-Martin.

2. We let our clients and employees know why we collect personal information

Lowe-Martin identifies the purpose for which personal information is collected. We do this before or at the time the information is actually being collected.

3. We obtain consent to collect, use or disclose the personal information they provide

Lowe-Martin obtains the client's or employee's consent to collect, use or disclose personal information. The method of obtaining consent is appropriate to the type of personal information being collected, used or disclosed:

- Lowe-Martin will obtain our clients' express consent (verbal, written or electronic agreement) to collect, use or disclose sensitive personal information such as medical data or personal financial information.
- Lowe-Martin will use implied consent to collect, use or disclose the personal information provided where one or more of the following apply
 - a customer relationship already exists
 - an employer/employee relationship exists
 - where the purpose of using the personal information is reasonably apparent to the client/employee.

The client can change their consent preferences at any time by contacting a Lowe-Martin Customer Relations representative who can help direct the call to the appropriate department within Lowe-Martin. To change consent preferences, refer to the "How to Contact Us" section below. Employees may contact the Human Resources department.

4. We limit collection of personal information

Lowe-Martin collects only the information required to provide products and services on behalf of the client or to administer HR services, pay and benefits for employees. If the personal information we require is collected for a reason other than to provide products and services, the client's or employee's consent will be obtained before or at the time the information is collected. Lowe-Martin will collect personal information only by clear, fair and lawful means.

Examples of why we collect personal information include:

- Communicating with individuals on behalf of the client that provided the information.
- Processing and keeping track of transactions and reporting back to the client.
- Providing product and services requested by the client.
- Employee services, emergency contacts, work-related information

5. We maintain records of personal information/data collected, received and handled within customer work processes

6. We limit the use, disclosure and retention of all personal information

Lowe-Martin uses and discloses personal information only for the purposes it was collected.

Lowe-Martin does not sell or rent personal information to any organization or person for any reason.

We do not share the personal information provided by our clients with third party organizations except to provide the service as contracted.

If the personal information provided is to be shared with third parties, these third parties are bound by appropriate agreements with Lowe-Martin to secure and protect the confidentiality of the personal information.

Lowe-Martin retains the personal information only as long as it is required for our business relationship or as required by federal and provincial laws.

Destruction, disposal or return of personal information files will be performed as requested by each client.

Employee information is retained as required under provincial employment legislation. When files are no longer required, employee personal information will be shredded.

7. We keep personal information up-to-date and accurate

Lowe-Martin considers the personal information provided by the client to be up-to-date, accurate and relevant for its intended use.

The client may request access to the personal information we have on record in order to review and amend the information, as appropriate. To access the personal information Lowe-Martin holds on the client's behalf, the client may refer to the "How to Contact Us" section below.

Employees are required to advise the Human Resources department of any changes to the personal information given to Lowe-Martin.

8. The security of personal information is a priority for Lowe-Martin

We take steps to safeguard all personal information, regardless of the format in which it is held, including:

- Physical security measures such as restricted access facilities and locked filing cabinets
- Electronic security measures for computerized personal information such as password protection, database encryption and personal identification numbers
- Organizational processes such as limiting access to personal information to a selected group of individuals on a need to know basis only
- Contractual obligations with third parties who need access to personal information requiring them to protect and secure the personal information provided by our clients
- Live personal data is never used as marketing collateral or for demonstration purposes

9. We are open about our privacy and security policy

We are committed to providing our clients and employees with understandable and easily available information about our policy and practices related to management of the personal information they provide to Lowe-Martin. This policy and any related information is available to our management personnel at all times on our company intranet site. This policy is also posted on Lowe-Martin's public website.

10. We provide our clients or employees with access to their personal information.

Our clients can request access to the personal information stored by Lowe-Martin on their behalf. To contact us, refer to the “How to Contact Us” section below. Upon receiving such a request, Lowe-Martin will:

- Inform the client about what type of personal information we have on record or in our control, how it is used and to whom it may have been disclosed
- Provide the client with access to their information so they can review and verify the accuracy and completeness and request changes to the information
- Make any necessary updates to the personal information we store

Our employees can request to see their employment files where employee personal information is kept.

11. We respond promptly to questions, concerns and complaints about privacy

Lowe-Martin responds in a timely manner to all questions, concerns and complaints about the privacy of personal information and our privacy policies and procedures.

12. We follow PIPEDA

Lowe-Martin follows the rules laid out for the use of personal data as a third-party provider of services.

In an effort to protect personal data provided by clients, we have enacted the following policies regarding data transfer and handling of electronic files:

1. Provision of a public key to customer with which the customer can use PGP encryption before submitting data to us; access to our private key is limited to the staff that works with the data.
2. Provision of a Virtual Private Network for the transmittal of data, with access limited to the customer and to the staff who work with the data.
3. Creation of a data summary report to allow the customer to verify that the correct records have been received.
4. Backup and archiving routines can be customized to the customer's data requirements, including scheduled destruction of backup files.

All data will be monitored, held in strict confidence and not be provided to any third-party vendors without expressed consent from clients.

How to contact us:

Lowe-Martin
400 Hunt Club Road
Ottawa, ON K1V 1C1
Attention: Chief Privacy Officer
chiefprivacyofficer@LMGroup.com