



PERSONAL INFORMATION PROTECTION PRIVACY POLICY

PURPOSE

The Personal Information Protection and Electronic Documents Act, 2004 (PIPEDA) was passed by the Canadian legislature with the purpose of creating standards to respect the privacy rights of individuals while conducting commercial activities. The Act includes ten (10) principals that form ground rules for the collection, use, and disclosure of personal information.

James Fryett Architect Inc., hereinafter known as James Fryett (115 Metcalfe St., Elora, Ontario, Canada NOB 1S0) has adopted this Personal Information Protection Privacy Policy as it is committed to protecting and respecting the privacy rights of both its employees and clients. All employees of **James Fryett** shall abide by the aforementioned procedures and practices when handling personal information as per PIPEDA.

SCOPE

This Policy applies to **James Fryett** employers, managers and employees who may have access to personal information.

DEFINITIONS

Personal Information	Any factual or subjective information, recorded or not, about an identifiable individual. The includes information in any form, such as: <ol style="list-style-type: none"> 1. Age, name, ID numbers, income, ethnic origin, or blood type; 2. Opinions, evaluations, comments, social status, or disciplinary actions; and 3. Employee files, credit records, loan records, medical records, existence of a dispute between a customer and a merchant, intentions (for example, to acquire goods or services, or change jobs). <p>Note: Personal information does not include the name, title or business address or telephone number of an employee of an organization.</p>
Consent	Voluntary agreement with what is being done or proposed. Consent can either be express or implied. Express consent is given explicitly, either orally or in writing. Express consent is unequivocal and does not require any inference on the part of

	the organization seeking consent. Implied consent arises where consent may reasonably be inferred from the action or inaction of the individual.
Use	Refers to the treatment and handling of personal information within an organization.
Disclosure	Making personal information available to others outside the organization.

POLICY STATEMENT

James Fryett is committed to ensuring that fair information practices are in place for both employees and clients. The following are the ten (10) principals outlined by PIPEDA that **James Fryett** will abide by:

1. Accountability
2. Identifying Purposes
3. Consent
4. Limiting Collection
5. Limiting Use, Disclosure and Retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual Access
10. Challenging Compliance

PROCEDURES

ACCOUNTABILITY

James Fryett designates Jim Fryett as their Chief Privacy Officer (CPO). The CPO is responsible for the organization's compliance with the following principals in regards to employee and client records and contact information. The CPO may intervene in privacy issues relating to any of **James Fryett's** operations should they see fit.

James Fryett will train employees on the ten (10) principals outlined by PIPEDA and communicate to employees any information about the privacy policy and procedures in place.

IDENTIFYING PURPOSES

James Fryett's purpose for collecting personal information for employees is for payroll administration and for T4 tax purposes. Client personal information is collected for the sole purpose of invoicing and client contact. Both employees and clients will be informed as to why this information is being collected and how the information will be used or disclosed before or at the time of collection.

James Fryett shall document the purposes for which personal information is collected as per the above statement. If a new purpose for the personal information arises, consent from the individual will be acquired unless the new purpose is required by law.

CONSENT

James Fryett will obtain consent from individuals whose personal information is collected, used, or disclosed except in circumstances where disclosure without consent is required by law. Consent can be obtained in person, by phone, via e-mail, by signature or by other lawful means.

To make consent meaningful, the purposes for personal information collection will be stated by the organization in such a way that the individual could reasonably understand how the information will be used or disclosed. Consent shall never be obtained by deceptive means.

James Fryett's identified purposes such as payroll, taxes, billing, and contact information will be recorded as well as obtained consent for easy reference.

James Fryett will not make consent a condition of supplying a product or service, unless the information requested is required to fulfil any explicitly specified and legitimate purpose such as billing or client contact.

Should an individual wish to withdraw their consent, the implications of doing so shall be explained to them.

Any **James Fryett** employees involved in collecting personal information will be knowledgeable in areas regarding the purposes of the collection and will be able to answer an individual's questions should they arise.

LIMITING COLLECTION

James Fryett will limit the amount and type of information gathered to what is necessary for the identified purposes. The organization will use or disclose personal information only for the purpose it was collected, unless the individual consents, or the organization is required to do so by law. Collection shall not be done through deception.

LIMITING USE, DISCLOSURE AND RETENTION

James Fryett's general practice is to keep personal information (both in hard copy and electronic copy) indefinitely for company records. However, should information become irrelevant as it is no longer necessary for the identified purposes or required by law, hard copy records shall be shredded and electronic records erased.

ACCURACY

James Fryett will keep personal information as accurate, complete, and up to date as necessary to fulfil the purposes for which it is to be used. They will update personal information only when required by the identified purposes.

SAFE GAURDS

Personal information that has been collected by **James Fryett** is protected by security safeguards such as an alarm system, lockable filing cabinets, and a password protected server. Security measures shall prevent unauthorized access, disclosure, copying, use or modification of personal information. **James Fryett** employees are aware of the importance of maintaining the security and confidentiality of personal information when handling payroll, tax, billing, and payment information.

OPENNESS

If requested, **James Fryett** shall be open and provide information to individuals about its policy and procedures on managing personal information. This information shall be made available on the organization's website and onsite at their business location. The CPO, if requested, will give a description of the personal information of an individual that is in **James Fryett's** control and a general account of its use.

INDIVIDUAL ACCESS

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information at **James Fryett** and shall be given access to that information. Corrections or amendments to any personal information shall be made by the CPO if its accuracy and completeness is challenged and found to be deficient. Access requests shall be responded to as quickly as possible by the designated individual mentioned above.

CHALLENGE COMPLIANCE

Individuals who feel compliance with the principals has not been met may address a challenge to the CPO. **James Fryett** exercises an open door policy with the process for receiving and responding to complaints and inquiries being to contact Jim Fryett (519-846-2201), who will respond to the complaint or inquiry within five (5) business days.

James Fryett shall record the date a complaint is received and the nature of the complaint. They will contact the individual to clarify the complaint if necessary. All complaints received shall be investigated. If the complaint is found to be valid, **James Fryett** shall take the appropriate measures including amending its policies and procedures if necessary.

REFERENCES

- Personal Information Protection and Electronic Documents Act, 2004 (PIPEDA)
- PIPEDA [A Guide for Businesses and Organizations – Your Privacy Responsibilities (Canada's Personal Information Protection and Electronic Documents Act)]