

8760 Personal Information Protection Policy

At 8760, we are dedicated to providing you with superior service while protecting your privacy and safeguarding the personal information entrusted to us by you. “You” may be an existing or potential client, person associated with an existing or potential client, employee or otherwise a member of 8760. We manage your personal information in accordance with Alberta’s *Personal Information Protection Act* and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

What is personal information?

Personal information means information about an identifiable individual. This includes an individual’s name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, etc. It does not usually include business contact information when used to contact a person in respect of their business role or function.

What personal information do we collect?

The personal information that we may collect from you includes information we receive from you, such as your name, address, phone number, e-mail address, birthdate, identification, and general payment information.

Why do we collect and use your personal information?

We collect your personal information to be able to provide the products and services that best meets your needs. Personal information may be used for the following purposes:

- To process applications for products and services and to provide information and services;
- To understand and assess ongoing needs of clients and potential clients and offer products and services to meet those needs;
- For communication, service, marketing, billing and administration;
- To inform you of 8760’s programs and services;
- For fraud detection and prevention;
- For analytics purposes by aggregating or otherwise de-identifying personal information. De-identifying personal information means using information for our business purposes that does not identify you, for example, aggregating your personal information with others to prepare statistics;
- To develop proprietary tools and databases;
- To meet legal and regulatory requirements; and
- Other purposes disclosed in our Privacy Policy or our terms of business or disclosed to you at the time of collection, use or disclosure.

We normally collect your personal information directly from you. We may collect your information from other persons with your consent or as authorized by law.

We will inform you, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we do not provide this notification is when someone volunteers

information for an obvious purpose (for example, producing a credit card to pay a fee when the information will be used only to process the payment).

Consent

We ask for consent to collect, use or disclose your personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may determine that consent is implied by the circumstances.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask you to provide your consent orally (in person, or by telephone), or in writing (by signing a consent form or agreeing to an online statement).

You may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfill our legal obligations. We will respect your decision, but in certain circumstances, we may not be able to provide you with reliable service if we do not have the necessary personal information. Additionally, in certain circumstances, we will not need to obtain your consent or explain the purposes for the collection, use or disclosure of personal information. For example, this exception would apply in situations of fraud detection or prevention or if we must comply with a court order.

How do we use and disclose personal information?

We use and disclose your personal information only for the purposes for which the information was collected, except as authorized by law. For example, we may use your personal information to assess your ongoing needs and provide you information on our programs and services.

8760 only discloses personal information as required and described in this Policy or as otherwise required by law. In providing our services, we may need to disclose the personal information we collect to affiliates and other service providers or agents who perform various functions for us.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent. We may not seek consent if the law allows this (e.g. the law allows organizations to use personal information without consent for the purpose of collecting a debt).

Keeping your information accurate

It is important to us that your personal information is accurate and complete. You have the right to determine, verify and amend the information we have about you. If you identify any personal information that is out-of-date, incorrect or incomplete, let us know and we will make the required corrections. In some cases we may ask for a written request for the correction.

How do we safeguard personal information?

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

Our employees, service providers and agents are bound to maintain the confidentiality of your personal information and will not use the information for any unauthorized purpose. All information is stored on our database which is kept secure by our third-party network provider.

We use appropriate security measures when destroying personal information, including shredding of paper records and permanent deletion of electronic files from our network database.

We retain personal information only as long as is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes.

Access to records containing personal information

Individuals have a right to access their own personal information in a record that is in the custody or under the control of 8760, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by contacting the Privacy Officer at 8760, contact information provided in the following section. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We do not charge fees when the request is for personal employee information. We will advise you of any fees that may apply before beginning to process your request.

Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information by 8760, or about a request for access to your own personal information, please contact us at the following address:

8760
Suite 1201 Sun Life Place
10123 99th Street
Edmonton, Alberta T5J 3S4
Attn: Privacy Commissioner

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta

Suite 2460, 801 - 6 Avenue, SW

Calgary, Alberta T2P 3W2

Phone: 403-297-2728

Toll Free: 1-888-878-4044

Email: generalinfo@oipc.ab.ca

Website: www.oipc.ab.ca