

Client Privacy Policy

Community Futures Development Corporation of Peace Liard is committed to protecting client privacy and the confidentiality of client personal information. Our commitment to respecting and protecting the privacy and confidentiality of personal information is addressed in this Client Privacy Policy. CFDC-PL's Client Privacy Policy and any applicable government privacy legislation is applied to protect the collection, use and disclosure of client personal information. We want our clients to know:

- (a) Why we collect client personal information;
- (b) How we use and disclose client personal information in establishing and maintaining the client relationship with us;
- (c) How we keep client personal information confidential; and
- (d) How our client can inquire about the personal information we hold about him/her. This Client Privacy Policy is designed to comply with B.C.'s *Personal Information Protection Act*.

What is Personal Information?

We collect personal information about our client in order to provide him/her with the services and programs he/she has requested. Personal information is any information that identifies someone as an individual. It includes information that our client provides to us or that we collect from other sources with the client's permission. For example, personal information includes our clients: name and address, age and gender, personal financial records, identification numbers including Social Insurance Numbers, personal references, and employment records. It does not include contact information, which is information that enables us to contact our client at his/her place of business.

What Personal Information Do We Collect?

The better we know our client, the better we are able to meet his/her needs. The personal information we collect about our client depends on the nature of the relationship with us. Examples of the types of personal information we may collect include your name, contact information (such as address and phone number), date of birth, social insurance number, information about clients' dependents, life insurance, credit and financial history, employment history, references, and previous programs or services the client has obtained from us or our affiliates.

Credit or Financial History

If our client is obtaining credit from us, we may collect financial information including client credit and financial history and employment history in order to determine credit worthiness. We also ask for references that we may use to verify the information provided on our client's application form. We may obtain this information from the client application, references the client has provided, our records, credit reporting agencies, and other financial institutions.

We collect only the personal information we need in order to provide the program or service our client has requested. When we request personal information, our client may opt-out of providing us with information that is not essential to his/her relationship with us or our ability to provide the program or service to our client.

Our Client's Social Insurance Number

If our client is applying for credit, we will ask for his/her Social Insurance Number ("SIN") to ensure an accurate match between client personal information and client credit information. The client is not legally obliged to provide us with his/her SIN for these purposes and doing so is optional. We can ask a credit

reporting agency to match our client's personal information with his/her credit information without a SIN, but the matching process is less accurate and we may not obtain the correct (or any) credit information for the client. In such a case, we may be unable to render a decision on your credit application and may ask again for the client's SIN so that we can respond to the application. In general, we will not refuse to consider a client application solely because he/she did not provide us with a SIN.

Using and Disclosing Client Personal Information

We need certain personal information in order to conduct business with and provide services to our client. We may use client personal information for the following purposes:

- To process our client's request for a program or service offered by us;
- To determine the suitability of programs and services for our client;
- To determine our client's eligibility for certain programs and services;
- To deliver the programs and services to our client; and
- To comply with legal requirements.

If our client is obtaining credit from us we may also use personal information for the following purposes:

- To process our client's application for a loan;
- To investigate our client's credit and financial history;
- To assess and update our client's credit worthiness; and
- To monitor, service, process, maintain and collect on our client's loan.

We will ensure our client is aware of the purposes for which we collect his/her personal information and to whom we may disclose the personal information when he/she applies for a program or service. Where we rely on implied consent, the purpose will be clear. However, if your client has any questions, please ask. If a new purpose for using our client's personal information develops, we will ask for his/her consent prior to using his/her personal information.

Government Programs

Some of the programs and services we offer are in cooperation with the federal government, provincial government or municipalities. In such cases, our contract with that government body usually requires that we share with them the personal information we collect with respect to that particular program or service.

Personal information we collect with respect to programs and services we offer in cooperation with the BC Government and municipalities may be under the custody and control of the BC Government and would therefore be governed by the *Freedom of Information and Protection of Privacy Act* ("FOIPPA"). Our Privacy Officer will direct our client to the appropriate government official to contact if he/she wish to access his/her personal information governed by FOIPPA.

Other Communications

Occasionally we may send our client communications with information which may be of use to him/her, including information about future seminars and other services. If our client does not wish

to receive such communications, please inform us by contacting our Privacy Officer at CFDC-PL in writing, and we will ensure our client does not receive such communications in the future.

Limiting or Withdrawing Your Consent

In general, our client can choose not to provide us with some or all of his/her personal information. Our client can also withdraw his/her consent to our use of his/her personal information provided he/she give us at least thirty (30) days written notice, and the following does not apply:

1. Our client's consent does not relate to credit we have granted to him/her, where we are required to collect and exchange personal information on an ongoing basis with a credit reporting agency, credit insurers and other lenders, in order to maintain the integrity of the credit-granting system and the completeness of information held by the credit reporting agency;
2. Withdrawing our client's consent does not result in our inability to fulfill the contract with us;
3. There are no regulatory or legal requirements for the use of his/her personal information; and
4. The personal information has not been used in the past year to make a decision about our client.

Client Access to his/her Personal Information

If our client would like to verify his/her personal information or find out to whom we have disclosed it, please contact our Privacy Officer. Our Privacy Officer will forward an access request form that will provide us with the information we need in order to search for and provide our client with the personal information we hold about him/her. We may charge a minimal fee for the request, however, we will provide an estimate in advance. We do not charge for access to employee personal information.

There are a few instances where we will not be able to provide some of the personal information we hold. These includes, but is not limited to, situations where client personal information includes personal information of other persons, the information is subject to solicitor-client or litigation privilege, the information is no longer retained by us, or the information cannot be disclosed for legal reasons. If we are unable to provide our client with access to his/her personal information, we will explain the reason why.

Our client has the right to access and verify the personal information held about him/her by a credit reporting agency. We can give our client the name and location of any credit reporting agency that provided us with a credit report on him/her.

Keeping Client Personal Information Accurate

We are committed to maintaining the accuracy of client personal information for as long as it is being used for the purposes we have identified. To help keep client personal information up-to-date, we encourage our clients to notify us of any changes. Notification of changes to address and telephone numbers will help us provide the best possible service. If, upon review of personal information, our client discovers any inaccuracies, please contact us. We may ask that our client put his/her request for a correction in writing. Our Privacy Officer will provide you with the appropriate form. We will make the proper changes and provide our client with a copy of the correct information, upon request. We will also use our best efforts to inform third parties to whom we have disclosed the information in a prior year of any relevant corrections. If we do not agree to make the corrections that our client has requested, we will record that the request was made for the information to be corrected.

Protecting Client Personal Information

Our employees are responsible for maintaining the confidentiality of personal information to which they have access. As a condition of employment, our employees are required to sign an Oath of Confidentiality binding them to this responsibility which governs their actions, even after they are no longer employed by CFDC-PL. Our Board of Directors also sign an Oath of Confidentiality. Both our Directors and employees have access to client personal information only where necessary to fulfill their duties.

We keep our employees informed about our policies and procedures for protecting personal information and reinforce the importance of complying with them. Our employees are also required, as a condition of employment, to conform to these policies and procedures.

We endeavour to maintain adequate physical, procedural and electronic security with respect to our offices and information storage facilities so as to prevent unauthorized access, use, or disclosure of client personal information.

Security measures we employ include the use of secure locks on filing cabinets and doors, limited physical and electronic access to relevant information by authorized employees only, and the use of passwords. All personal information stored in our computer database is protected with a level of security appropriate to the sensitivity of the personal information and the need for the employee to have access.

Retention of Client Personal Information

We only keep client personal information for as long as we need it in order to meet the purposes for which it was collected. The length of time we retain client personal information varies, depending on the nature of the relationship with us, the type of program or service and any regulatory or legal requirements we may be required to meet. We have policies in place that govern the destruction of the personal information we hold. Client personal information that has been held for the use of making a decision will be kept for at least one year from the date of the decision.

Summary

We take our responsibility to respect and protect personal information seriously.

If you have any questions about this Privacy Policy or our privacy practices, or if you would like to review your personal information, please contact our Privacy Officer:

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