

COLLINS INVESTIGATION SERVICES INC.

PRIVACY POLICY

INTRODUCTION

On January 1, 2004, the *Personal Information Protection and Electronics Documents Act (PIPEDA)* came into force, and with it, a responsibility for businesses to protect all personal information within their control and allow access by those concerned to the information.

Collins Investigation Services Inc. is licenced by the Province of Ontario under the Ontario *Private Investigators and Security Guards Act* to provide private investigation services in Ontario.

We will only collect personal information where there is a potential contravention of the law, breaches of agreement or other circumstances that permit us to legally collect such information.

CONSENT

Unless otherwise provided for by law, all personal information will be collected and disseminated with the consent of the individual concerned. That consent may be expressed or implied.

- **Express consent**

Express consent is obtained when the individual supplying the information gives specific consent for it to be shared.

- **Implied consent**

Implied consent is assumed when the circumstances dictate that the person supplying the information is aware that the data is going to a third party.

In cases where witnesses let the solicitor for the plaintiff or defendant know they have information they wish to impart, it is implied that information gathered from the witnesses will be relayed back to the solicitor concerned.

LIMITING COLLECTION

Personal information collected will be limited to that which is necessary for the identified purpose.

RETENTION OF FILES

All original documents are transferred to the client, and in the case of Collins Investigation Services Inc., usually solicitors. The *Private Investigators and Security Guards Act* dictates that private investigation agencies must keep files; however, those will only be retained for a) two years plus the current year or b) until the case has been disposed of by the courts, whichever is the longest period of time.

DISPOSAL OF FILES

When we are disposing of files, we undertake to do the following to prevent unauthorized access:

- shred all paperwork before recycling and
- delete all electronically stored data.

ACCURACY

Our goal is to make sure any personal information collected by us is accurate and up to date.

The process for ensuring accuracy will involve:

- verification by the person supplying the information at the time it is gathered and
- confirmation by third parties where required and/or appropriate.

SECURITY

All personal information and files in our care will be kept under lock and key and only accessed by Collins Investigation Services personnel.

Personnel will be instructed in the requirements of PIPEDA and Collins Investigation Services policy pertaining to the security of personal information.

INDIVIDUAL ACCESS

PIPEDA is access-based legislation, which provides for affected parties to obtain access to personal information held by Ontario businesses, including Collins Investigation Services Inc.

Upon written request to our privacy officer, and with suitable identification, an individual will be informed of the existence, use and disclosure of his or her personal information, under our control, and may be given access to and permitted to challenge the accuracy and completeness of that information.

There are lawful exceptions that will prevent us from providing access, which include, but are not limited to:

1. Personal information about another person might be revealed.
2. Confidential information might be revealed.
3. The life or personal security of another person may be jeopardized.
4. The information was collected without consent during an investigation into a breach of the law or an agreement, or some other lawful exception.
5. The information was obtained during a formal dispute resolution process.
6. The information is protected by solicitor/client privilege.
7. When restricted under S. 25(1) of the *Private Investigators and Security Guards Act*, R.S.O. 1990. Ch. P.21.

PRIVACY OFFICER

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