



# Privacy Policy

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## Personal Information Protection Policy

At Electrical Wholesale Supply, we are committed to providing our customers with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our customers and staff, protecting their personal information is one of our highest priorities.

While we have always respected our Customers and Staff privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of federal government's Personal Information Protection and Electronic Documents Act

We will inform our Customers and Staff of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance the federal government's Personal Information Protection and Electronic Documents Act, outlines the principles and practices we will follow in protecting customers and staffs' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our Customers and Staff personal information and allowing our Customers and Staff to request access to, and correction of, their personal information.

## Definitions

Personal Information –means information about an identifiable individual., including name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, education, employment information]. Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or FEDERAL GOVERNMENT’S PERSONAL INFORMATION PROTECTION AND ELECTRONIC DOCUMENTS ACT.

Privacy Officer – means the individual designated responsibility for ensuring that Electrical Wholesale Supply complies with this policy and the federal government’s Personal Information Protection and Electronic Documents act.

## **Policy 1 – Collecting Personal Information**

1.1 Unless the purposes for collecting personal information are obvious and the customer or staff voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

1.2 We will only collect customer & staff information that is necessary to fulfill the following purposes:

- To verify identity;
- To verify creditworthiness;
- To identify [ customer or staff] preferences;
- To open and manage an account;
- To offer employment;
- To comply with government regulations;
- To deliver requested products and services
- To enroll the client in a program;
- To ensure a high standard of service
- To meet regulatory requirements;
- To collect and process payments;

To verify identity, we may collect name, home address, home telephone number and birth date;

## Policy 2 – Consent

- 2.1 We will obtain customer & staff consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided, orally, in writing, electronically, through an authorized representative] or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the customer & staff voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a customer & staff is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), Customers and Staff can withhold or withdraw their consent for Electrical Wholesale Supply to use their personal information in certain ways. A client's, customer's, member's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the customer & staff in making the decision.
- 2.5 We may collect, use or disclose personal information without the client's, customer's, member's knowledge or consent in the following limited circumstances:
  - When the collection, use or disclosure of personal information is permitted or required by law;
  - In an emergency that threatens an individual's life, health, or personal security;
  - When the personal information is available from a public source (e.g., a telephone directory);
  - When we require legal advice from a lawyer;
  - For the purposes of collecting a debt;
  - To protect ourselves from fraud;
  - To investigate an anticipated breach of an agreement or a contravention of law

## **Policy 3 – Using and Disclosing Personal Information**

- 3.1 We will only use or disclose customer & staff personal information where necessary to fulfill the purposes identified at the time of collection [or for a purpose reasonably related to those purposes such as:
- To conduct customer & staff surveys in order to enhance the provision of our services;
  - To contact our customers or staff members directly about products and services that may be of interest;
- 3.2 We will not use or disclose customer & staff personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell customer & staff lists or personal information to other parties [unless we have consent to do so].

## **Policy 4 – Retaining Personal Information**

- 4.1 If we use customer & staff personal information to make a decision that directly affects the customer & staff we will retain that personal information for at least one year so that the customer & staff has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain customer & staff personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

## **Policy 5 – Ensuring Accuracy of Personal Information**

- 5.1 We will make reasonable efforts to ensure that customer & staff personal information is accurate and complete where it may be used to make a decision about the customer & staff or disclosed to another organization.
- 5.2 Customers and Staff may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing

and provide sufficient detail to identify the personal information and the correction being sought.

- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the Customers and Staff correction request in the file.

## **Policy 6 – Securing Personal Information**

- 6.1 We are committed to ensuring the security of customer & staff personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that customer & staff personal information is appropriately protected:

*Measures may include: the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate (i.e., only those that need to know will have access; contractually requiring any service providers to provide comparable security measures.*

- 6.3 We will use appropriate security measures when destroying customers and staffs personal information such as [Fill in destruction methods your organization employs. Examples may include: shredding documents, deleting electronically stored information].
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

## **Policy 7 – Providing Customers and Staff Access to Personal Information**

- 7.1 Customers and Staff have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer

- 7.3 Upon request, we will also tell Customers and Staff how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the customer & staff of the cost and request further direction from the customer & staff on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the customer & staff in writing, providing the reasons for refusal and the recourse available to the client, customer, member.

## **Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual**

- 8.1 The Privacy Officer or designated individual is responsible for ensuring Electrical Wholesale Supply 's compliance with this policy and the Personal Information Protection Act.
- 8.2 Customers and Staff should direct any complaints, concerns or questions regarding Electrical Wholesale Supply 's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the customer & staff may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Electrical Wholesale Supply's Privacy Officer or designated individual:

Contact Information

Mr Dave Austin

President