

**Personal Information Protection  
Private Sector Privacy Legislation  
Personal Information Protection Policy**

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**Anotek Anodizing Inc  
Personal Information Protection Policy**

At Anotek Anodizing Inc, we are committed to providing our clients, customers, vendors and partners with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, customers, vendors and partners, protecting their personal information is one of our highest priorities.

British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our clients, customers, vendors and partners 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 with PIPA, outlines the principles and practices we will follow in protecting clients', customers', members' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients', customers', members' personal information and allowing our clients, customers, vendors and partners to request access to, and correction of, their personal information.

**Scope of this Policy**

This Personal Information Protection Policy applies to Anotek Anodizing and any service providers collecting, using or disclosing personal information on behalf of Anotek Anodizing.

**Definitions**

**Personal Information** –means information about an identifiable *individual*. 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 PIPA.

**Privacy Officer** – means the individual designated responsibility for ensuring that Anotek Anodizing complies with this policy and PIPA.

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

- 1.1 Unless the purposes for collecting personal information are obvious and the client, customer, vendor and partner 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 client, customer, vendor and partner information that is necessary to fulfill the following purposes:
  - To verify identity;
  - To verify creditworthiness;
  - To identify client, customer, vendor and partner preferences;
  - To understand the needs of our clients, customers, vendors and partners ;
  - To open and manage an account;
  - To deliver requested products and services
  - To ensure a high standard of service to our clients, customers, vendors and partners ;
  - To meet regulatory requirements;

## **Policy 2 – Consent**

- 2.1 We will obtain client, customer, vendor and partner 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 or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client, customer, vendor and partner voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a client, customer, vendor and partner 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, fundraising and the client, customer, vendor and partner does not opt-out.
- 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), clients, customers, vendors and partners can withhold or withdraw their consent for Anotek Anodizing 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 client, customer, vendor and partner 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 client, customer, vendor and partner 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 client, customer, vendor and partner surveys in order to enhance the provision of our services;
  - To contact our clients, customers, vendors and partners directly about products and services that may be of interest;]
- 3.2 We will not use or disclose client, customer, vendor and partner personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell client, customer, vendor and partner lists or personal information to other parties.

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

- 4.1 If we use client, customer, vendor and partner personal information to make a decision that directly affects the client, customer, vendor and partner, we will retain that personal information for at least one year so that the client, customer, vendor and partner has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain client, customer, vendor and partner 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 client, customer, vendor and partner personal information is accurate and complete where it may be used to make a decision about the client, customer, vendor and partner or disclosed to another organization.
- 5.2 Clients, customers, vendors and partners 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 clients', customers', members' correction request in the file.

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

- 6.1 We are committed to ensuring the security of client, customer, vendor and partner 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 client, customer, vendor and partner personal information is appropriately protected:  
  
Personal information will not be held physically on premises. It will be held only in the company's ERP system, or on the servers of contractors who can guarantee a sufficient level of security.
- 6.3 We will use appropriate security measures when destroying client's, customer's, member's personal information such as *shredding documents and deleting electronically stored information*.
- 6.4 We will regularly review and update our security policies and controls as technology changes to ensure ongoing personal information security.

## **Policy 7 – Providing Clients, Customers, Vendors and Partners Access to Personal Information**

- 7.1 Clients, customers, vendors and partners 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
- 7.3 Upon request, we will also tell clients, customers, vendors and partners 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 client, customer, vendor and partner of the cost and request further direction from the client, customer, vendor and partner 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 client, customer, vendor and partner in writing, providing the reasons for refusal and the recourse available to the client, customer, vendor and partner .

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

- 8.1 The Privacy Officer is responsible for ensuring Anotek Anodizing's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Clients, customers, vendors and partners should direct any complaints, concerns or questions regarding Anotek Anodizing's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client, customer, vendor and partner may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Anotek Anodizing's Privacy Officer:

Andrew Huige

President

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