



R.A. Malatest & Associates Ltd. Our Commitment to Privacy

R.A. Malatest and Associates Ltd. is committed to ensuring the protection of your privacy through responsible personal information management practices.

The personal information you provide (such as your name, address, date of birth, etc.) in response to our program evaluation and/or market research surveys, is subject to and collected under the *Personal Information and Electronic Documents Act* (PIPEDA) as well as other privacy legislation applicable to your provincial jurisdiction. Collection, use, disclosure, security and retention of our information must comply with these statutes.

Collected personal information will only be used by authorized staff to fulfill the purpose for which it was originally collected or for a use consistent with that purpose. We do not share your information with other third parties including public bodies, corporate entities or individuals except as authorized by law or as directed by you. We will not sell, share or disclose your information to any type of mailing list.

We are legally required to retain any personal information provided by you that has been used to make a decision about you, for a period of time that will allow you sufficient access to the information.

Our web based survey instruments automatically record website usage information. This information does not identify you personally, and we do not use this information to track or record information about individuals. We will disclose this information to third parties only in aggregate form or as may be required by law. For each survey instrument the following information is collected:

- Date and time of access;
- IP address from which our website was accessed;
- Type of browser and operating system used to access our site (if provided by the browser);
- URL address of the referring page (if provided by the browser); and
- Whether the site was accessed by a mobile device (if provided by the browser).

We are committed to ensuring the security of your personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks. Security measures in place to protect your personal information include the use of locked filing cabinets, physically secured office space, the use of user ID's, passwords, firewalls, and restricted employee access as appropriate.

You have the right to access your own personal information subject to limited exceptions. A request to access personal information must be made in writing and must provide sufficient detail to identify the personal information being sought. 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 your request. A minimal fee may be charged for providing



access to personal information. In such cases you will be notified of the fee in advance and provided the opportunity to either continue or discontinue with your information request.

For more information regarding this policy please contact our Privacy Officer, at privacy@malatest.com

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1. What is Personal Information?

Personal information is any information that permits an individual to be identified. This information may include, but is not limited to, your name, mailing address, telephone numbers, email address, personal educational, healthcare and financial history, personal identification numbers (e.g., social insurance number, health care number, etc.) and, in certain circumstances, your opinions and individual preferences. Personal information, however, does not include your employee contact information including your name, business title or business address and business telephone number and business fax number. However, if in your capacity as an employee of an organization you participate in one of our surveys, your responses will be treated as personal information.

2. How do we collect or receive your Personal Information?

We will always collect your personal information directly from you whenever possible, by fair and lawful means (for example, when you respond to one of our surveys). We collect your personal information where we have obtained your consent to do so or as otherwise permitted by law.

Sometime we may have been provided your personal information from the client who hired us. In such instances, they have only provided information that they are legally able to share in order for us to conduct our research.

3. How do we use your personal information?

We identify the purposes for which we use your personal information at the time we collect such information from you and obtain your consent, in any case, prior to such use. One of the primary purposes for which we collect your personal information is to conduct social research through conducting surveys. If you provide us with sensitive personal information such as health or financial information, we will obtain your express consent for the collection, use and disclosure of sensitive personal information.

4. To whom do we provide your personal information?

We identify to whom, and for what purposes, we disclose your personal information, at the time we collect such information from you and obtain your consent to such disclosure. For most studies, your specific personal information is never shared – a unique identifier code is attached to your survey results, and only that 'code' is forwarded on to link results to any one record – any personally identifiable information is 'stripped' from the collected data to ensure anonymous results. For some studies, however, personal information may be released with prior approval. For example, we may disclose your personal information:

- a. to a client of R.A. Malatest & Associates Ltd. for the client's purposes of conducting further research;
- b. to a client of R.A. Malatest & Associates Ltd. to identify specific survey results for an individual as part of the research process (such identification of results is detailed to respondents in the opening survey script);
- c. a third party engaged by R.A. Malatest & Associates Ltd. to perform functions on its behalf;
- d. such other disclosures of personal information to such persons for which you provide your consent; and
- e. as otherwise permitted by law.

5. When and how do we obtain your consent?

We obtain your consent prior to collecting, and in any case, prior to using or disclosing your personal information for any purpose. You may provide your consent to us either orally or in writing. For example, when you respond to a survey, you provide your implicit consent to allow us to use your personal information for the purposes of conducting social research and, in certain circumstances, to disclose your personal information to our clients. From time-to-time, we may collect, use or disclose your personal information based on your consent and as permitted by law. If you provide us with sensitive personal information such as health or financial information, we will obtain your express consent for the collection, use and disclosure of such sensitive personal information.

6. How do we ensure the privacy of your personal information when dealing with our employees and other third parties?

We ensure that all our employees and other third parties which are engaged to perform services on our behalf and are provided with, or have access to, personal information are required by contract to comply with our privacy policy and statutory privacy obligations.

7. How long will we use, disclose or retain your personal information?

We will use, disclose or retain your personal information for as long as necessary to fulfill the purposes for which it was collected and as permitted or required by law. We have established minimum and maximum retention periods and procedures for maintaining and destroying your personal information.

8. How can you review your personal information that we have collected, used or disclosed?

We will make available to you any specific personal information on you in our custody or control, that we have collected, used or disclosed, upon your written request, to the extent permitted by law. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes.

9. How do you know that the personal information we have on you is accurate?

We will ensure that your personal information is kept as accurate, complete and up-to-date as possible. When we collect personal information from you, we rely on you for its accuracy. When we collect personal information from other sources, we ask for a representation from such source as to the accuracy of such personal information.

10. What if the personal information we have for you is inaccurate?

You can at any time, demonstrate in writing the accuracy or completeness of the personal information we have on you. If you successfully demonstrate that the personal information we have on you is inaccurate or incomplete, we will amend the personal information as required. Where appropriate, we will transmit the amended information to third parties having access to your personal information.

11. How fast will we respond to your written requests?

We will attempt to respond to your written request within no later than thirty (30) days after receipt of the request. We will advise you in writing if we cannot meet your request within this time limit. As provided for by PIPEDA, you have the right to make a complaint to the federal Privacy Commissioner in respect of our compliance with this time limit. Please ensure that all written correspondence includes a method of contacting you (i.e., your mailing or email address) to enable us to provide you with the requested feedback.

12. Are there any costs to you for requesting information on your personal information or on our privacy policy or practices?

We will not assess any costs to you for access to your personal information or on our privacy policy or practices without first providing you with an estimate of the approximate costs, if any. You may withdraw your requests for access to information by notifying us within the thirty-day notice period disclosed on the estimate.

13. How do we know that it is really you requesting your personal information?

We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your personal information. Any such information shall be used only for this purpose.

14. What safeguards have we implemented to protect your personal information?

We have implemented physical, organizational, contractual and technological security measures to protect your personal information from loss or theft, unauthorized access, disclosure, copying, use or modification. The only employees who are granted access to your personal information are those with a business 'need-to-know' or whose duties reasonably require such information. All employees who have access to personal information have passed federal security clearances; have been trained in their privacy obligations, and hold positions of trust within the firm.

15. How do you contact us regarding access to your personal information or our privacy policy and practices?

All *comments, questions, concerns or complaints* regarding your personal information or our privacy policy and practices, should be forwarded to our privacy officer as follows.

In writing:

Attn: Privacy Officer
R.A. Malatest & Associates Ltd.
858 Pandora Avenue
Victoria BC V8W 1P4

privacy@malatest.com

Thank you for reviewing our privacy statement.