



K.C.D. CONSULTING INCORPORATED PRIVACY POLICY

A. Introduction

The purpose of this Privacy Policy (the “**Policy**”) is to outline K.C.D. Consulting Incorporated’s (“**KCD**”) obligations with respect to the proper collection, use and disclosure of Personal Information (as defined below) of clients and third parties in compliance with British Columbia’s Personal Information Protection Act (“**PIPA**”). KCD recognizes and respects the importance of privacy and the sensitivity of its clients’ Personal Information.

KCD will continue to review this Policy to make sure that it is relevant and remains current with changing standards in the consulting profession and the law.

B. Definitions

“**Business Contact Information**” means information that enables an individual to be contacted at work, including his/her name, title, business address, business telephone number, fax number and e-mail address;

“**Personal Information**” means personally identifiable information about clients and third parties, but does not include Business Contact Information or Work Product Information;

“**Personal Information Officer**” means that officer whose contact information is set out in paragraph L of this Policy;

“**Work Product Information**” means information prepared or collected by an individual or group of individuals as part of their employment or business responsibilities or activities related to their employment or business.

C. Scope and Application of this Policy

This Policy applies to all Personal Information of clients, employees, suppliers, agents, contractors, partners and affiliated entities and other third parties that is collected, used or disclosed by KCD.

This Policy does not, however, impose any limits on the collection, use and disclosure of:

- (a) information that is not personally identifiable;
- (b) Business Contact Information; and

- (c) information that is publicly available or is required or authorized by law to be collected, used or disclosed.

D. Purpose for Collection

KCD collects Personal Information for the following purposes:

- (a) to provide consulting services to its clients;
- (b) to develop, enhance and market consulting services and products to its clients and third parties;
- (c) to better understand the needs and preferences of its clients and third parties;
- (d) to establish and maintain relations with its clients, employees and third parties;
- (e) to meet legal and regulatory requirements; and
- (f) such additional purposes that are identified.

E. Consent

KCD requires the informed consent of individuals to collect, use or disclose any Personal Information, subject to certain exceptions discussed below. Consent can be express, implied or given through an authorized representative and may be given orally, in writing or electronically depending on such factors as the sensitivity of the Personal Information, applicable time limitations and the reasonable expectations of the client or third party.

By retaining KCD to provide consulting services, an individual consents to the collection, use and disclosure of Personal Information by KCD in order to properly advise the individual.

If possible, KCD will seek consent to use and disclose the Personal Information at the same time as it collects the Personal Information.

After the Personal Information has been collected, KCD may want to use the Personal Information for a new purpose. In such circumstances, KCD will not use or disclose Personal Information for the new purpose without obtaining the consent of the individual concerned, unless permitted or authorized by law.

Subject to contractual or legal arrangements, an individual may withdraw or refuse consent. In such circumstances, KCD will stop collecting, using and disclosing the Personal Information of such individual. KCD will inform such individual of the likely consequences of withdrawing his or her consent, if any.

KCD can collect, use or disclose Personal Information without an individual's knowledge or consent in the following circumstances:

- (a) when such collection, use or disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- (b) when such collection, use or disclosure is for the medical treatment of the individual and the individual is unable or does not have the legal capacity to give consent;

- (c) when the information is publicly available;
- (d) when such collection or use is on behalf of another organization and the individual has consented to the collection of Personal Information by that other organization, as long as the Personal Information is collected and used by KCD for the purposes for which it was previously collected and the Personal Information assists KCD in carrying out work on behalf of the other organization; and
- (e) when such collection, use or disclosure is required or authorized by law.

F. Limiting Collection of Personal Information

KCD will only collect Personal Information that is necessary for purposes disclosed above or disclosed at or before the time of collection or as permitted by law. KCD will collect Personal Information only by fair and lawful means.

Where practical, KCD will collect Personal Information directly from the individual to whom the information relates. When necessary or as otherwise permitted by PIPA, KCD may collect Personal Information from other sources.

G. Limiting Use, Disclosure and Retention of Personal Information

KCD will only use or disclose Personal Information for the purpose for which it was collected, subject to the consent of the individual or as permitted or required by law. Under some circumstances, KCD may have a legal obligation or right to disclose Personal Information without an individual's consent.

KCD may disclose an individual's Personal Information:

- (a) to a third party who in the reasonable judgment of KCD is seeking the information as an agent of the individual;
- (b) to a third party engaged by KCD to perform functions on its behalf, including research or data processing;
- (c) to collect fees or other amounts owed to KCD;
- (d) to a public authority or agent of a public authority if, in the reasonable judgement of KCD, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information;
- (e) where the client or third party consents to such disclosure; or
- (f) as required or authorized by law.

KCD will retain Personal Information for only as long as is necessary for the purposes for which it was collected, for legal or business purposes or as required by law. Subsequently, such information will be destroyed, erased or made anonymous in accordance with established procedures.

H. Accuracy of Personal Information

KCD will make reasonable efforts to ensure that Personal Information in its control is as accurate, complete and current as required for the purposes for which it was collected and will minimize the possibility that incorrect Personal Information may be used to make a decision about a client or third party or may be disclosed to a third party. However, KCD will not routinely update other Personal Information unless it is necessary to fulfill the purposes for which it was collected.

I. Safeguarding Personal Information

KCD will protect Personal Information in its control against risks of loss, theft, unauthorized access, disclosure, copying, use, modification or destruction by security safeguards that are appropriate to the sensitivity of the information.

KCD will use appropriate security measures when destroying or disposing of Personal Information to prevent unauthorized access, use and disclosure of such information.

J. Access and Correction

Clients and third parties have a right to make a written request for access to their Personal Information in the control of KCD.

KCD will, within 30 days, or such other time period if KCD has obtained an extension under PIPA, inform the individual of the Personal Information about that individual in its possession, what it is being used for, and where reasonably possible, to whom it has been disclosed.

If KCD is granted an extension under PIPA to respond to a request to view Personal Information, it will notify the individual of the reason for the extension, the time when a response can be expected and the right of the individual to complain about the extension to British Columbia's Information and Privacy Commissioner.

The reasons for not providing access to Personal Information may include that the Personal Information:

- (a) contains references to other individuals;
- (b) cannot be disclosed for legal, security or commercial reasons;
- (c) would threaten the life or security of another individual;
- (d) is necessary to protect KCD's rights and property;
- (e) relates to existing or anticipated legal proceedings against that individual; or
- (f) was collected as part of an investigation (as defined in PIPA).

If an individual's request for access to Personal Information is rejected by KCD, KCD will:

- (a) inform the individual of the reasons for the rejection and the applicable provision of PIPA on which the rejection is based;

- (b) provide the name, title and contact information of the Personal Information Officer who can address the refusal; and
- (c) inform the individual that she or he is entitled to request a review of the decision.

KCD reserves the right to charge a reasonable fee for access to Personal Information that will vary with the type and amount of information requested. Where a cost will be incurred by the requesting individual, KCD will inform the individual of the cost and request further direction from the individual on whether or not KCD should proceed with the request. In some circumstances, KCD will require a deposit for all or part of the fee.

Individuals may request corrections to their Personal Information in the control of KCD. If an individual's request for correction is rejected by KCD, KCD will make a notation of such request and rejection on the individual's file or Personal Information.

K. Questions and Complaints

Questions and complaints relating to this Policy and KCD's handling of an individual's Personal Information should be directed in writing to KCD's Personal Information Officer or any other person designated for this purpose by KCD. KCD will investigate the complaint and notify the complainant of the results of the investigation.

If KCD does not address the individual's concerns to the satisfaction of the individual, the individual may ask for a review of KCD's decision or make a complaint to the British Columbia Information and Privacy Commissioner.

L. Personal Information Officer

KCD's Personal Information Officer may be contacted at:

Office of the Personal Information Officer
K.C.D. Consulting Incorporated
#510 – 580 Raven Woods Drive
North Vancouver, BC V7G 2T3
Tel: 778-338-3422
Email: keithalfredhenry@gmail.com

M. Address of British Columbia's Information and Privacy Commissioner

British Columbia's Information and Privacy Commissioner may be contacted at:

Office of the Information and Privacy Commissioner for British Columbia
P.O. Box 9038, Stn. Prov. Govt.
Victoria, BC V8W 9A4
Tel: in Vancouver: 604-660-2421
in Victoria: 250-387-5629
rest of BC: 1-800-663-7867
Fax: 250-387-1696