

We take your privacy seriously:

Wilson Banwell Human Solutions, a national services company carrying out business in various provinces across Canada, is regulated by federal legislation, the Personal Information Protection and Electronic Documents Act (PIPEDA), which applies to every organization across Canada when collecting, using or disclosing personal information while carrying out a commercial activity within any province in Canada. The purpose of this Act is to govern the collection, use and disclosure of personal information by organizations in a manner that recognizes both the right of individuals to protect their personal information and the need of organizations to collect, use or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances. This Act is considered “substantially similar” to other provincial acts also in place.

Wilson Banwell is legally responsible for all personal information in our custody and under our control. This includes information about our customers, clients and employees. We will protect that information, collect only that which is necessary and will not disclose information without your consent.

What is Personal Information?

Information is personal if it can be attributable to a specific individual, either directly or indirectly, by reference to an identification number or one or more factors specific to his or her physical, psychological, economic, cultural or social identity. Includes:

- medical or financial records
- credit and loan records
- employee files, evaluations and disciplinary records
- documented disputes between consumer and merchant
- intentions to acquire goods or services

We will use fair and lawful means to collect your personal information. We will only collect information that is pertinent and consistent with the purposes of the

collection. Whenever practical, we will collect the required information directly from you, or from your authorized representative(s), in completed forms, through other means of correspondence, such as the telephone, mail or the internet, and through your direct dealings with us.

What We Collect, Primary Purposes

In our clinical practice, we collect, use and disclose personal information in order to serve our clients. For our clients, the primary purpose for collecting personal information is to provide psychological health and wellness and organizational health products and services to companies and their employees. For example, we collect information about a client's health history, including their family history, physical condition and function and social situation in order to help us assess what their health needs are, to advise them of their options and then to provide the health care they choose to have. If at all possible, we will avoid asking for a client's social insurance number, except when it is required by a third party which may be responsible for paying for that service.

A second primary purpose is to obtain a baseline of health and social information so that in providing ongoing health services we can identify changes that occur over time. It would be rare for us to collect such information without the client's express consent, but this might occur in an emergency or where we believe the client would consent if asked and it is impractical to obtain consent. An individual is deemed to consent to collection, use or disclosure of personal information if the individual voluntarily provides it for a purpose that would, at the time, be considered obvious to a reasonable person.

Employees are those employed by our organization or someone who performs a service for the organization. We will collect, use and disclose employee personal information for the purposes of starting, managing or ending an employment relationship. We may undergo these activities for reasonable purposes related to managing or recruiting personnel, having given notice to employees. Employee personal information does not include business contact information or work product information.

For members of the general public, the only collection of personal information may take place on our website. On our website we only collect, with the exception of "cookies", the personal information you provide and only use that information for the purpose you gave it to us (e.g., to respond to your email

message or receipt of your resume). “Cookies” are only used to help you navigate our website and are not used to monitor you.

Secondary Purposes

Like most organizations, we also collect, use and disclose information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

- To invoice clients for goods or services that were not paid for at the time, to process credit card payments or to collect unpaid accounts.
- Our organization may review client and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff. In addition, external consultants (e.g., auditors, lawyers, consultants) may do audits when client consent has been obtained for such purposes.
- Psychologists are regulated by the respective Colleges of Psychology in each province who may request to inspect our records and interview our staff as a part of their regulatory activities in the public interest. Also, like all organizations, various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. In these circumstances, we may consult with professionals (e.g., lawyers, accountants) who will investigate the matter and make appropriate recommendations.
- The cost of goods/services provided by the organization to clients is often paid for by third parties (e.g., Employee and Family Assistance Plans, WCB). These third-party payers will often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.

Consent

It is our responsibility to inform individuals in a meaningful way of the purposes for the collection, use or disclosure of personal data. We will always obtain consent from the individual whose personal information is collected, used or disclosed and record that it has been obtained. We will communicate this in a manner that is clear and understandable and is as specific as possible. We will limit the amount and type of the information gathered to what is necessary for the identified purposes and identify the kind of personal information we collect in our information-handling policies and practices.

Protecting Personal Information

We understand the importance of protecting personal information. For that reason, we take the following steps:

- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers. All of our cell phones are digital as these signals are more difficult to intercept.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through a direct line or has identifiers removed or is encrypted.
- Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- External consultants and agencies with access to personal information must enter into privacy agreements with us.

Retention and Destruction of Personal Information

We will use or disclose personal information only for the purpose for which it was collected. We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory bodies. However, we do not want to keep personal information too long in order to protect your privacy.

We keep our client files for ten years. We keep any personal information relating to our general correspondence, seminars and marketing activities for six months following the associated activity. We take all possible steps to remove aged information from our records and keep only accurate, up to date information. However, if you ask, we will remove such contact information right away.

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed. Alternatively, we may send some or the entire client file to our client.

You Can Look at Your Information

With only a few exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc). We will need to confirm your identity, if we do not know you, before providing you with this access. We reserve the right to charge a nominal fee for such requests.

If there is a problem we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

If you believe there is a mistake in the information, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions we may have formed. We may ask you to provide documentation that our files are wrong. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we have sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

Do you have a question?

Our Privacy Information Officer, Greg Banwell can be reached:

By mail:

Wilson Banwell Human Solutions™
Privacy Information Officer
355 Burrard Street, Suite 1600
Vancouver, B.C. V6C 2G8
1-888-689-8604

By fax:

1-800-903-5891

By email:

privacyofficer@wilsonbanwell.com

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Privacy Information Officer. We will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal written decision with reasons.

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This policy is made under the Personal Information Protection and Electronic Documents Act. That is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above.