

JOAN COTIE MEDIATION & CONSULTING LTD.
Privacy Policy

In compliance with the Personal Information Privacy Act (PIPA) of British Columbia JOAN COTIE MEDIATION & CONSULTING LTD. (Joan Cotie M & C Ltd..) has developed the following Privacy Policy.

Definitions

JOAN COTIE M & C LTD.: JOAN COTIE MEDIATION & CONSULTING LTD. and all subsidiaries and affiliates of JOAN COTIE MEDIATION & CONSULTING LTD.

Client: An individual who requests JOAN COTIE MEDIATION & CONSULTING LTD. to perform a service.

Collection: the act of gathering, acquiring or obtaining personal information from any source, including Third Parties.

Consent: Voluntary agreement with what is being done or proposed. Consent can be either express or implied. Express consent is given explicitly, in writing. Implied consent is where JOAN COTIE MEDIATION & CONSULTING LTD. can reasonably infer consent based on the action or inaction of the Client or Employee.

Contact Information: An individual's name, business title, business address, business telephone number and business email address.

Disclosure: The act of making personal information available to Third Parties.

Personal Information: Any information about an identifiable individual recorded in any form; excluding an individual's contact information.

Privacy Officer: The individual appointed from time to time by the organization who is accountable for JOAN COTIE MEDIATION & CONSULTING LTD's compliance with the policies outlined herein.

Staff or Employee: Any person(s) retained for employment by JOAN COTIE MEDIATION & CONSULTING LTD. All references to staff or employees is only valid if said staff are under hire by JOAN COTIE MEDIATION & CONSULTING LTD.

Third Party: Any individual or organization other than JOAN COTIE MEDIATION & CONSULTING LTD., the Client or the Employee.

Use: The treatment and handling of personal information by and within JOAN COTIE MEDIATION & CONSULTING LTD.

Principle One – Accountability

JOAN COTIE MEDIATION & CONSULTING LTD. is responsible for all Client and Personal Information under our control. Responsibility for compliance with this Privacy Policy rests with our appointed Privacy Officer, who has sufficient authority within our organization to ensure compliance.

JOAN COTIE MEDIATION & CONSULTING LTD. has developed policies and procedures to protect personal information, receive and respond to complaints and inquiries, train staff regarding the policies and procedures and communicate the policies and procedures to our Clients.

JOAN COTIE MEDIATION & CONSULTING LTD. reserves the right to change this Privacy Policy at any time by notifying Clients and Employees of the existence of a new Privacy Policy.

Principle Two – Identifying Purposes of Information

JOAN COTIE MEDIATION & CONSULTING LTD. will communicate the purposes for which personal information is collected either orally or in writing, at or before the time of collection.

The purposes for which JOAN COTIE MEDIATION & CONSULTING LTD. collects personal information are, as follows:

- to verify the identity of our client
- to meet legal and regulatory requirements
- for statistical evaluations
- to establish, manage or terminate an employment relationship within JOAN COTIE MEDIATION & CONSULTING LTD.

The purposes for which JOAN COTIE MEDIATION & CONSULTING LTD. collects company information are, as follows:

- to establish and manage a relationship with employers who participate in the wage subsidy programs
- to ensure that the company complies with the Employment Standards Act
- to ensure that the company is in good standing with the Worker's Compensation Board and the Canada Customs and Revenue Agency.

If any new purpose(s) arise when dealing with the personal information, we will obtain prior consent for the new use of the personal information.

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There may be situations where JOAN COTIE MEDIATION & CONSULTING LTD. is not required to explain purpose. These are described in Principle 3.

Principle Three – Consent

JOAN COTIE MEDIATION & CONSULTING LTD. will obtain consent to collect, use or disclose any personal information except where detailed in this code or where the law provides an exception. Clients will not be asked to sign a consent until the purposes for gathering the information are explained, and they are informed of the name of the Privacy Officer.

All consents to the gathering and release of information will be specific with regard to:

- identification of the information covered by the release,
- the purpose of the release,
- the recipients of information defined by the release, and
- the time frame during which the release is valid.

In addition to providing a written copy of the Release of Information to the Clients, staff of JOAN COTIE MEDIATION & CONSULTING LTD. will read and interpret the release for the Client prior to signing and will ensure that the release is clearly understood. This requirement is in compliance with the informed consent principle of the Code of Ethical Standards followed by JOAN COTIE MEDIATION & CONSULTING LTD. These include: the Code of Ethics of the B.C. Association of Social Workers; the Practice Standards for Professional Social Workers; the Practice, Certification and Training Standards of the ADRBC; the Code of Professional Conduct of the ADRBC; and, the Code of Professional Conduct of Family Mediation Canada.

Participants of any group programs will be asked to sign a release of information that outlines the limits of our responsibility for information that they freely share in the group. Confidentiality will be emphasized in the group. In some cases the group's success is dependent on networking with other group members and their contacts, therefore we will encourage participants to clearly identify information that may be disclosed and information that should remain confidential within the group setting.

The only exception to our policy regarding signed consent is in the case where the Client has disclosed to us that they are clearly an immediate danger to themselves or others. Information that is necessary to ensure the safety of those threatened by the Client may be shared with those threatened or with local intervention agencies. This information will not become a part of the Client

record maintained by JOAN COTIE MEDIATION & CONSULTING LTD. unless the person threatened is a JOAN COTIE MEDIATION & CONSULTING LTD. staff person and the Client is refused service as a result.

JOAN COTIE MEDIATION & CONSULTING LTD. may disclose personal information without consent for law enforcement and national security purposes, or to our corporate lawyer.

JOAN COTIE MEDIATION & CONSULTING LTD. may collect, use and disclose Employee personal information for reasonable purposes without consent, as long as the employee is notified.

Principle Four – Limited Collection of Personal Information

We collect personal information for our defined purposes by fair and lawful means and do not deceive individuals about the purpose for which the information is collected. Information that is not clearly related to employment issues and/or is clearly not factual will not be recorded or stored.

No suppositions, interpretations or assumptions on the part of JOAN COTIE MEDIATION & CONSULTING LTD. staff will form any part of the Client file. The exception to this is noted in Principle Three.

Principle Five – Limited Use, Disclosure and Retention of Personal Information

JOAN COTIE MEDIATION & CONSULTING LTD. will only use the information gathered for the purposes outlined in the release of information.

Prior to the disclosure of information for statistical purposes individual identifiers will be removed and the information will be rendered anonymous.

The retention period for Client personal information for JOAN COTIE MEDIATION & CONSULTING LTD. is either:
Twelve months from the final date of business conducted as specified on the final invoice or from the client's most recent access to their own electronic files. The retention period for Employee personal information is as required by law or by the Canada Customs and Revenue Agency, whichever is greater.

Only JOAN COTIE MEDIATION & CONSULTING LTD. staff directly involved with the Client's contract will have access to the Client's personal information.

Disclosure of personal information will be for the purposes detailed in the Release of Information form and only during the specified time period.

Where there is a requirement to disclose personal information to JOAN

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COTIE MEDIATION & CONSULTING LTD. staff not directly involved with the Client contract that disclosure will be noted in the Client file.

In the case of the sale, or amalgamation of JOAN COTIE MEDIATION & CONSULTING LTD., personal information may be disclosed subject to the receipt of third party explicit consent indicating that the information will be used or disclosed for the same purposes for which it was collected, used or disclosed originally.

Information may be provided for research purposes only after individual identifiers are removed. Client lists or personal information will not be used or provided to others for the purpose of market research.

Personal information will not be transmitted to other agencies by fax or email.

After the designated period of retention, hard copy information will be destroyed (shredded or burned) and disposed of and electronic information will be deleted in such a way that reconstruction of the data is not possible.

Principle Six – Accuracy

JOAN COTIE MEDIATION & CONSULTING LTD. will make all reasonable efforts to ensure that the personal information collected by and on behalf of the organization is accurate and complete.

JOAN COTIE MEDIATION & CONSULTING LTD. will verify information with Clients at the time of collection and encourage individuals to update their supplied information on a regular basis or as appropriate.

When making decisions based on collected information, JOAN COTIE MEDIATION & CONSULTING LTD. will provide a reasonable opportunity to verify or correct the information and review any decisions based on the corrected information.

JOAN COTIE MEDIATION & CONSULTING LTD. will not routinely update personal information, unless such a process is necessary to fulfill the purposes for which the information was collected.

Principle Seven – Safeguards

In order to safeguard the privacy of personal information all JOAN COTIE MEDIATION & CONSULTING LTD. staff members will sign Confidentiality Agreements. Staff will be trained on the subject of personal information safeguards.

All individuals and companies who sub-contract to JOAN COTIE MEDIATION & CONSULTING LTD. must provide us with a copy of their Privacy Policy upon request. They must also agree to comply with the terms of our Privacy Policy.

All personal information in hard copy will be stored in locked filing cabinets that are not accessible to the public. All electronic information will be stored on a secure server. All offices will be protected by an alarm system or patrolled by a security company.

We will ensure that the disposal or destruction of personal information does not permit unauthorized parties to gain access to the personal information.

Principle Eight – Openness

JOAN COTIE MEDIATION & CONSULTING LTD. will make the following information available:

A description of the type of personal information held by JOAN COTIE MEDIATION & CONSULTING LTD. including a general account of its use. A copy of any brochures or other information that explains the JOAN COTIE MEDIATION & CONSULTING LTD. Privacy Policy.

The Privacy Officer of JOAN COTIE MEDIATION & CONSULTING LTD. is:

Name: Joan Cotie

Title: Principal

Address: P.O. Box 435, 3864 Leaside Road
Cobble Hill, B.C. V0R 1L0

Telephone: 250-213-1812

Email: jamcotie@telus.net

This information is included in any brochure and posted on our website at www.joancotie.com to facilitate requests for our policies concerning the handling and storage of personal information.

Principle Nine – Individual Access

In order for an individual to obtain access to his or her personal information or to request a correction of his or her personal information the individual must make a written request. The request must provide sufficient detail to enable JOAN COTIE MEDIATION & CONSULTING LTD. to identify the individual and the personal information or correction being sought. JOAN COTIE MEDIATION & CONSULTING LTD. will make every effort to assist each applicant with preparation of the request, if required.

JOAN COTIE MEDIATION & CONSULTING LTD. will provide access to personal information within 30 business days. In addition, JOAN COTIE MEDIATION & CONSULTING LTD. will provide:

- information about the ways in which the personal information has been and is being used by the organization, and
- the names of the individuals and organizations to whom the personal information has been disclosed.

Note: JOAN COTIE MEDIATION & CONSULTING LTD. will *not* disclose personal information if the privacy officer determines that:

- the disclosure could reasonably be expected to threaten the safety of physical or mental health of individuals other than the individual who made the request, or
- the disclosure can reasonably be expected to cause immediate or grave harm to the safety or to the physical or mental health of the individual who makes the request, or
- the disclosure would reveal personal information about another individual, or
- the disclosure would reveal the identity of an individual who has provided personal information about another individual where the individual providing the personal information does not consent to disclosure of his or her identity.

If JOAN COTIE MEDIATION & CONSULTING LTD. is able to remove the information referred to in this **Note** from a document that contains personal information about the individual who requested it, we will provide the individual with access to the personal information.