

Client Privacy Policy

CFDC of Sun Country is committed to protecting your privacy and the confidentiality of your personal information. Our commitment to respecting and protecting the privacy and confidentiality of your personal information is addressed in this Client Privacy Policy. This policy and any applicable government privacy legislation are applied to protect the collection, use and disclosure of your personal information. We want you to know:

- Why we collect your personal information;
- How we use and disclose your personal information in establishing and maintaining your relationship with us;
- How we keep your personal information confidential; and
- How you can inquire about the personal information we hold about you. This Client Privacy Policy is designed to comply with B.C.'s Personal Information Protection Act. (PIPA)

What is Personal Information?

We collect personal information about you in order to provide you with the services and programs you request. Personal information is any information that identifies you as an individual. It includes information that you provide to us or that we collect from other sources with your permission.

For example, personal information includes your:

- name and address,
- age and gender,
- personal financial records,
- identification numbers including your Social Insurance Number,
- personal references, and
- employment records.

It does **not include** business contact information, which is information that enables us to contact you at your place of business.

What Personal Information do we Collect?

The better we know you, the better we are able to meet your needs. The personal information we collect about you depends on the nature of your relationship with us. Examples of the types of personal information we may collect include:

- your name,
- home contact information (such as your address and phone number),
- date of birth,
- social insurance number
- Information about your dependents
- Life insurance,
- Credit and financial history,
- Employment history, references, and
- Previous programs or services you have obtained from us or our affiliates.

We collect only the personal information we need in order to provide the program or service you have requested. When we request personal information, you may opt-out of providing us with information that is not essential to your relationship with us or our ability to provide the program or service to you.

Using and Disclosing Your Personal Information

We need certain personal information in order to conduct business with you and provide services to you. We may use your personal information for the following purposes:

- To process your request for a program or service offered by us;
- To determine the suitability of programs and services for you;
- To determine your eligibility for certain programs and services;
- To deliver, monitor, process and maintain the programs and services to you; and
- To comply with legal requirements.

If you are obtaining credit from us, we collect financial information including your credit and financial history and employment history in order to determine your credit worthiness. We also ask for references that we may use to verify the information you provide on your application form. We may obtain this information from your application, references you provide our records, credit reporting agencies, and other financial institutions. We may use your personal information for the following purposes:

- To process your application for a loan;
- To investigate your credit and financial history;
- To assess and update your credit worthiness; and
- To monitor, service, process, maintain and collect on your loan.

We will ensure you are aware of the purposes for which we collect your personal information and to whom we may disclose the personal information when you apply for a program or service. If a new purpose for using your personal information develops, we will ask for your consent prior to using your personal information except in the following situations where disclosure of personal information to a third party without consent is allowed:

- To a lawyer representing CFDC of Sun country;
- To collect a debt owed to CFDC of Sun Country by the individual or client;
- To comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction;
- To a law enforcement agency in the process of a civil or criminal investigation;
- To a government agency or department requesting the information; or as required by law.

Other Communications

Occasionally we may send you communications with information which may be of use to you, including information about future seminars and other services that may be of interest to you. If you do not wish to receive such communications, please inform us by contacting CFDC of Sun Country and we will ensure you do not receive such communications in the future.

Government Programs

Some of the programs and services we offer are in cooperation with the federal government, provincial government or municipalities. In such cases, our contract with that government body usually requires that we share with them the personal information we collect with respect to that particular program or service.

Personal information we collect with respect to programs and services we offer in cooperation with the BC Government and municipalities may be under the custody and control of the BC Government and would therefore be governed by the Freedom of Information and Protection of Privacy Act (FOIPPA). Our Privacy Officer will direct you to the appropriate government official to contact if you wish to access your personal information governed by FOIPPA.

Consent

Consent may be **express or implied**. Consent is considered to be express when all of the uses and disclosures that will occur with an individual's personal information have been explained and the individual has consented to such uses and disclosures. Implied consent happens when an individual provides information to an organization without knowing all of the uses and disclosures that may occur. In this case the organization may use and disclose the personal information for purposes that a

reasonable person would think the individual consented to in such circumstances.

Opting – Out

In general, you can choose not to provide us with some or all of your personal information. You can also withdraw your consent or our use of your personal information provided you give us at least thirty (30) days written notice, and the following does not apply:

- Your consent does not relate to credit we have granted to you, where we are required to collect and exchange your personal information on an ongoing basis with a credit reporting agency, credit insurers and other lenders, in order to maintain the integrity of the credit- granting system and the completeness of information held by the credit reporting agency;
- Withdrawing your consent does not result in our inability to fulfill our contract with us;
- There are no regulatory or legal requirements for the use of your personal information; and
- The personal information has not been used in the past year to make a decision about you.

Accessing Your Personal Information

If you want to review or verify your personal information or find out to whom we have disclosed it, please contact our Privacy Officer. Our Privacy Officer will forward you an access request form that will provide us with the information we need in order to search for and provide you with the personal information we hold about you. We may charge you a minimal fee for your request; however, we will provide you with an estimate in advance.

There are a few instances where we will not be able to provide some of the personal information we hold about you. These include, but are not limited to, situations where your personal information includes personal information of other person, the information is subject to solicitor- client or litigation privilege, the information is no longer retained by us, or the information cannot be disclosed for legal reasons. If we are unable to provide you with access to your personal information, we will explain the reason why.

You have the right to access and verify the personal information held about you by a credit reporting agency. We can give you the name and location of any credit reporting agency that provided us with a credit report on you.

Accuracy

CFDC of Sun Country endeavors to ensure that any personal information provided by the individual in his or her active file(s) is accurate, current and complete as is necessary to fulfill the purposes for which the information has been collected, used,

retained and disclosed. It is the responsibility of individuals to notify CFDC of Sun Country of any change or inaccuracy in personal or business information. Inactive files will not be updated.

Protecting your Personal Information

Our employees are responsible for maintaining the confidentiality of personal information to which they have access. Our employees and volunteers are required to sign the Sun Country Confidentiality Agreement binding them to this responsibility which governs their actions, even after they are no longer associated with CFDC Sun Country. All volunteers and employees have access to your personal information only where necessary to fulfill their duties.

CFDC of Sun Country endeavors to maintain adequate physical, procedural and electronic security with respect to our offices and information storage facilities so as to prevent unauthorized access, use, or disclosure of your personal information. Security measures we employ include an electronic alarm system, the use of secure locks on filing cabinets and doors, limited electronic and physical access to relevant information by authorized employees only, and the use of passwords. All personal information stored in our computer database is protected with a level of security appropriate to the sensitivity of the personal information and the need for the employee to have access.

Openness

CFDC of Sun Country will endeavor to make its privacy policies and procedures known to the individual via this Privacy Policy as well as the CFDC of Sun Country Privacy Statement. This document will also be available on CFDC of Sun Country's website: www.cfsun.ca

Retention of Your Personal Information

We only keep your personal information for as long as we need it in order to meet the purposes for which it was collected. The lengths of time we retain your personal information varies, depending on the nature of your relationship with us, the type of program or service any regulatory or legal requirements we may be required to meet as per the Records Retention and Destruction Policy.

Complaints/Recourse

If an individual has a concern about CFDC of Sun Country's personal information handling practices, please contact CFDC of Sun Country to obtain a complaint form which must be filled out and returned to CFDC of Sun Country.

CFDC of Sun Country's Chief Privacy Officer will act promptly to investigate the complaint, consult with the Board of Directors and provide a written report of the investigation's findings to the individual.

Where CFDC of Sun Country's Chief Privacy Officer makes a determination that the individual's complaint is well founded, the Chief Privacy Officer will take the necessary steps to correct the offending information handling practice and/or revise CFDC of Sun Country's privacy policies and procedures.

Where CFDC of Sun Country's Chief Privacy Officer determines that the individual's complaint is *not* well founded, the individual will be notified in writing.

If the individual is dissatisfied with the finding and corresponding action taken by CFDC of Sun Country's Chief Privacy Officer, the individual may bring a complaint to the Information and Privacy Commissioner at the address below:

The Information and Privacy Commissioner www.oipc.org.
Toll free 1-800-663-7867

Summary

CFDC of Sun Country is committed to protecting your privacy and the confidentiality of your personal information.

If you have any questions about this Privacy Policy or our privacy practices, or if you would like to review your personal information, please contact our Privacy Officer at: vision@cfsun.ca
1-800-567-9911

Amendment to CFDC of Sun Country Privacy Policies

This CFDC of Sun Country's Privacy Policy is in effect [date privacy policy approved by Board of Directors] and is retroactive to January 1, 2004. This policy is subject to amendment in response to developments in the privacy legislation. The Chief Privacy Officer will review and revise the Privacy Policy from time to time as required by changes in privacy law. Notification of any changes in the Privacy Policy will be posted on CFDC of Sun Country's website, as well as in CFDC of Sun Country's Privacy Statement. Any changes in the Privacy Policy will apply to Personal information collected from the date of the posting of the revised Privacy Policy on CFDC of Sun Country's website: www.cfsun.ca