



Uniscan Consulting Inc.

Personal Information Protection Policy

Uniscan Consulting Inc. is committed to safeguarding the personal information entrusted to us by our clients. We manage your personal information in accordance with Alberta's *Personal Information Protection Act* (PIPA), Canada's *Personal Information Protection and Electronic Documents Act* (PIPEDA) and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to Uniscan Consulting Inc. and any person, organization or business providing services on our behalf.

A copy of this policy is provided to any client on request.

Uniscan Consulting Inc.'s Privacy Policy is guided by the following 10 principles:

1. Accountability

Uniscan Consulting Inc. is responsible for personal information under its control and has designated an individual or individuals who are accountable for our compliance with the following principles.

2. Identifying Purposes

The purposes for which personal information is collected shall be identified at or before the time the information is collected.

3. Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where required or permitted by law.

4. Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified. Information shall be collected by fair and lawful means.

5. Limiting Use, Disclosure, and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

6. Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

7. Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

8. Openness

Uniscan Consulting Inc. shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

9. Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that

information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

10. Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for Uniscan Consulting Inc.'s compliance.

What is personal information?

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, etc.

What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our clients, including personal information needed to:

- open and manage an account
- provide coaching services
- deliver requested products and services
- enroll a client in a program
- process a subscription to an email list, newsletter or similar
- contact clients about appointments
- follow up with clients to determine satisfaction with products and services
- notify clients of upcoming events of interest
- administer our loyalty program
- grant credit
- meet regulatory requirements

We normally collect client information directly from our clients. We may collect your information from other persons with your consent or as authorized by law.

We inform our clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when a client volunteers information for an obvious purpose (for example, producing a credit card for a purchase when the information will be used only to process the payment).

Consent

We ask for consent to collect, use or disclose client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

In cases where we collected personal information before January 1, 2004, we assume your consent to our use and, where applicable, disclosure for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask clients to provide their consent orally (in person, by telephone), in writing (by signing a consent form), by checking a box on a form, or electronically (by clicking a button).

We will never sell, rent, or give away personal information to any other business, organization or person without your expressed consent.

A client may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfill our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose client personal information without the client's knowledge or consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is reasonable such as:

- for an investigation or legal proceeding,
- to collect a debt owed to our business,
- in an emergency that threatens life, health or safety,
- to protect ourselves from fraud,
- to investigate an anticipated breach of an agreement or contravention of law, or
- when the personal information is from a public telephone directory.

How do we use and disclose personal information?

Except as authorized by law, we use and disclose client personal information only for the purposes for which the information was collected or for a purpose reasonably related to those purposes such as:

- we may use client contact information to deliver products and services,
- collecting a debt owed to our business, should that be necessary,
- conducting client surveys in order to enhance our products and services,
- contacting our clients directly about products and services that may be of interest.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent.

How do we safeguard personal information?

We make every reasonable effort to ensure that client information is accurate and complete. We rely on our clients to notify us if there is a change to their personal information that may affect their relationship with our business. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible.

In some cases we may ask for a written request for correction.

We protect client personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying client personal information, including shredding paper records and permanently deleting electronic records.

We retain client personal information only as long as is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes.

Access to records containing personal information

Clients of Uniscan Consulting Inc. have a right of access to their own personal information in a record that is in our custody or under our control, subject to some exceptions. For example, we are required under the Personal Information Protection Act to refuse to provide access to information that would reveal personal information about another individual. We are authorized under the Act to refuse access to personal information if disclosure would reveal confidential business information. Access may also be refused if the information is privileged or contained in mediation records.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to

Privacy Officer
Uniscan Consulting Inc.
507 Hawkside Mews NW
Calgary AB T3G 3G9
Canada

You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. For personal information collected before January 2004, if we do not have a record of disclosures, we will provide information about any disclosure of your information that is likely to have occurred.

You may also request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.

Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information by Uniscan Consulting Inc., or about a request for access to your own personal information, please contact:

Privacy Officer
Uniscan Consulting Inc.
507 Hawkside Mews NW
Calgary AB T3G 3G9
Canada
Phone (1) 403-475-0073
Email: [info\(at\)uniscan.ca](mailto:info(at)uniscan.ca)

If you are not satisfied with the response you receive, you should contact one of the following:

In Alberta:

Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 - 6 Avenue, SW
Calgary, Alberta T2P 3W2
Canada
Phone: (403) 297-2728 Toll Free: 1-888-878-4044
E-mail: generalinfo@oipc.ab.ca Web site: www.oipc.ab.ca

In Canada:

Office of the Privacy Commissioner of Canada
112 Kent Street
Ottawa ON K1A 1H3
Canada
Phone (1) 613-995-8210 Toll Free: 1-800-282-1376
Web site: www.priv.gc.ca