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## **Total Green Commercial Cleaning and Maintenance Ltd.**

### **Personal Information Protection Policy**

At Total Green, we are committed to providing our clients with exceptional service. As providing this service may involve the collection, use and disclosure of some personal information about our clients or customers, protecting their personal information is one of our highest priorities, along with protecting our own employees' personal information.

While we have always respected our clients, customers and employees privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our clients, customers and employees of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting clients' and employees' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients' and employees' personal information and allowing our clients and employees to request access to, and correction of, their personal information.

#### **Scope of this Policy**

This Personal Information Protection Policy applies to Total Green and its subsidiaries. This policy also applies to any service providers collecting, using or disclosing personal information on behalf of Total Green.

#### **Definitions**

**Personal Information** –means information about an identifiable *individual which may include name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, education, employment information*. Personal information does not include contact information (described below).

**Contact information** – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

**Privacy Officer** – means the individual designated responsibility for ensuring that Total Green complies with this policy and PIPA.

## **Policy 1 – Collecting Personal Information**

- 1.1 Unless the purposes for collecting personal information are obvious and the client, customer and/or employee voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect client, customer and/or employee information that is necessary to fulfill the following purposes:
  - To verify identity
  - To verify creditworthiness
  - To identify client preferences
  - To understand the needs of our clients
  - To open and manage an account
  - To deliver requested products and services
  - To ensure a high standard of service to our clients
  - To meet regulatory requirements
  - To process Gaming Policy Enforcement Branch (GPEB) government issued ID, where applicable.

## **Policy 2 – Consent**

- 2.1 We will obtain client, customer and/or employee consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally, in writing or electronically or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the client, customer and/or employee voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a client or customer is given notice and a reasonable opportunity to opt-out of his or her personal information being used for marketing of new services or products and the client or customer does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients and customers can withhold or withdraw their consent for Total Green to use their personal information in certain ways. A client's or customer's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client and customer in making the decision.
- 2.5 We may collect, use or disclose personal information without the client's, customer's or employee's knowledge or consent in the following limited circumstances:
  - When the collection, use or disclosure of personal information is permitted or required by law
  - In an emergency that threatens an individual's life, health, or personal security

- When the personal information is available from a public source (e.g., a telephone directory)
- When we require legal advice from a lawyer
- To protect ourselves from fraud
- To investigate an anticipated breach of an agreement or a contravention of law.

### **Policy 3 – Using and Disclosing Personal Information**

- 3.1 We will only use or disclose client, customer and/or employee personal information where necessary to fulfill the purposes identified at the time of collection of for a purpose reasonably related to those purposes such as:
- To conduct client or customer surveys in order to enhance the provision of our services
  - To contact our clients or customers directly about products and services that may be of interest.
- 3.2 We will not use or disclose client, customer and/or employee personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell client, customer or employee lists or personal information to other parties unless we have consent to do so.

### **Policy 4 – Retaining Personal Information**

- 4.1 If we use client or customer personal information to make a decision that directly affects the client or customer we will retain that personal information for at least one year so that the client or customer has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain client or customer personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

### **Policy 5 – Ensuring Accuracy of Personal Information**

- 5.1 We will make reasonable efforts to ensure that client and customer personal information is accurate and complete where it may be used to make a decision about the client or customer.
- 5.2 Clients and customers may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing to the Total Green Privacy Officer and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year.

### **Policy 6 – Securing Personal Information**

- 6.1 We are committed to ensuring the security of client, customer, and employee personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that client, customer and employee personal information is appropriately protected:
- Personal information on paper/hard copy is stored in locked filing cabinets at the Total Green office
  - Computers and software are user ID/password protected and further protected by firewalls
  - Only those in need of client, customer or employee information will have access to it.

- 6.3 We will use appropriate security measures when destroying client's, customer's and employee's personal information by shredding hard copies/paper and permanently deleting electronically stored information when it is no longer needed.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

### **Policy 7 – Providing Clients, Customers and Employee Access to Personal Information**

- 7.1 Clients, customers and employees have a right to access their personal information, except where disclosure would reveal personal information about another individual, health and safety concerns.
- 7.2 A request to access personal information must be made in writing to the Total Green Privacy Officer and provide sufficient detail to identify the personal information being sought
- 7.3 Upon request, we will also tell clients, customers and employees how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the client or customer of the cost and request further direction from the client or customer on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the client, customer or employee in writing, providing the reasons for refusal and the recourse available to the client, customer or employee.

### **Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual**

- 8.1 The Privacy Officer is responsible for ensuring Total Green's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Clients, customers and/or employees should direct any complaints, concerns or questions regarding Total Green's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client, customer and/or employee may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Total Green's Privacy Officer:

Shannon Stahr – Co-Owner and Controller

Total Green Commercial Cleaning and Maintenance Ltd.

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