



# Privacy Policy

<b>Policy Owner</b>	President
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<b>Related Documents</b>	<i>Confidentiality Policy, External Communication and Disclosure Management Procedural Policy</i>
<b>Storage Location</b>	S:/Company Policies & Procedures/Administration
<b>Version ID</b>	2
<b>Effective Date</b>	Mar. 19, 2021
<b>Next Review Date</b>	Mar. 2022
<b>Distribution</b>	SUITABLE FOR EXTERNAL DISTRIBUTION

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## Important Notice

Privacy laws across Canada are evolving, and therefore this policy is subject to change.

## Purpose

This policy describes the principles on which Northern Communication Services Inc. and its subsidiaries, shall protect the privacy of personal information. The policy is based on the Canadian Standards Association Model Code for the Protection of Personal Information.

This Policy is part of Northern Communication Services' commitment to ensure that all personal information of individuals in its possession is protected and used in accordance with the law.

## Scope

This Policy applies to all Staff, Business Associates, and any other parties who may have access to Confidential, Private, or otherwise sensitive information owned and/or controlled by Northern Communication Services.

**The duty to preserve the confidentiality of Company information extends beyond, and continues after the individual's termination of employment, engagement, or contract with the Company.**

## Definition – Personal Information

**Personal Information** is any information about an identifiable person, other than business contact information including an employee's name, title, business address and business telephone number or email. It includes such things as a person's home address, date of birth, social insurance number, medical records, employment and financial information.

With respect to customers, such information is collected primarily in connection with services and products provided by Northern Communication Services. Employees may be asked to provide such information to Northern Communication Services in connection with matters relating to their employment. In all cases, Northern Communication Services is committed to protecting the privacy of individuals and the integrity of their personal information.

## Roles and Responsibilities

**Senior Management** are responsible for overseeing development and implementation of this Policy, and for authorizing any exceptions before they are granted.

**Managers** are responsible for creating, maintaining, and promoting a culture of confidentiality, information security, and privacy protection within the Company, and for implementing the items of this Policy as applicable to their Department.

**All Staff** who may have access to Personal Information are responsible for the security and integrity of this data while it is in their use/control, in compliance with relevant *Policy* and *Procedure*.



## Governing Laws & Regulations

Guidance	Section
PIPEDA (Canada)	4.1 – 1.7 (inclusive)
HIPAA (USA)	Title II

## Mission Statement

The privacy of individuals connected with our business, including our customers, contractors, employees, and website visitors has always been of great importance to Northern Communication Services Inc. Keeping personal information in strict confidence is a cornerstone of our business.

Regardless of how the range of products and services we offer our customers expands, and the technology we use changes, we shall always strive to protect the privacy of personal information, subject to any consent an individual has provided for its use.

## Policy Statements

### Accountability

1. Northern Communication Services is responsible for personal information under its control, including any personal information disclosed to third parties for handling or administrative purposes. Northern Communication Services has designated a Privacy Officer who is accountable for Northern Communication Services’ compliance with this Policy and with privacy legislation.
  - 1.1. While ultimate accountability for Northern Communication Services’ compliance with the Policy rests with the Privacy Officer and Senior Management of Northern Communication Services, day-to-day compliance with the Policy is delegated to individuals throughout Northern Communication Services’ business.
  - 1.2. With respect to personal information that has been transferred to a third party for processing, Northern Communication Services shall use contractual or other means, which may include the examination of such third party’s practices with respect to personal information, to safeguard personal information while it is being handled by a third party.
  - 1.3. Northern Communication Services has implemented internal guidelines and practices to give effect to this Policy, including:
    - A. Establishing procedures to protect personal information;
    - B. Establishing procedures to receive and respond to complaints and inquiries;
    - C. Developing information to explain Northern Communication Services’ policies and procedures; and



- D. Training staff and communicating to staff information about Northern Communication Services' policies and procedures.
- 1.4. Northern Communication Services has implemented practices to effectively monitor compliance with this policy across its business, including the appointment of a Privacy Officer.

### **Identifying the Purposes for which Personal Information is Collected**

- 2. The purposes for which personal information is collected shall be identified by Northern Communication Services at or before the time the information is collected, unless such purposes are immediately obvious.
  - 2.1. Northern Communication Services shall ensure that the purposes for which personal information is collected and the way in which the information may be used are clear to the individual. In some cases, the purpose shall be clear from the context of the interaction, in other circumstances, a written or verbal explanation may be required.
  - 2.2. When a customer orders or comes in to pick up a product, some basic personal information may be collected, such as name, address, and contact information. This is necessary to effectively serve the customer.
    - 2.2.1. Some of our services require that we obtain the names and contact numbers of multiple people in order to most effectively provide the required service.
  - 2.3. More detailed information may be collected for credit applications, for example: A birth date, Social Insurance Number, banking information and/or employment information shall enable us to confirm a client's credit worthiness as well as to reach the customer should they default on payment.
  - 2.4. Employees are required to give certain personal information that is essential to the employer-employee relationship, such as SIN and banking information for payroll deposits.

### **Consent**

- 3. Northern Communication Services shall not collect, use or disclose the personal information of a person without the individual's knowledge and consent, except in certain limited circumstances permitted by law, such as where immediate health of a person is at risk, or in connection with the breach of an agreement or a law. Customer's personal information may be provided to a third party if the provision of such information is necessary to provide the services required by the customer.
  - 3.1. Northern Communication Services shall obtain consent, either express or implied, for the use or disclosure of personal information at the time of the collection of the information. In certain circumstances, consent with respect to use or disclosure shall be sought after the information has been collected but before use, particularly if



Northern Communication Services wants to use the information for a purpose not previously identified to the individual.

- 3.2. Northern Communication Services is committed to obtaining meaningful consent to the collection, use and disclosure of personal information. To achieve this aim, the purposes for which the information shall be used, if not obvious, shall be explained in such a manner that the individual can reasonably understand how the information shall be used or disclosed.
- 3.3. Northern Communication Services shall not, as a condition of the supply of a product or service, unreasonably require an individual to consent to the collection, use, or disclosure of information beyond what is required in the circumstances.
- 3.4. The way in which Northern Communication Services seeks consent may vary, depending on the circumstances and the type of information collected.
  - 3.4.1. In determining the type of consent that may be required, Northern Communication Services shall consider the nature of the information, the use to which the information shall be put, applicable laws and the type of interaction in which the information is provided.
- 3.5. Consent may be express or implied, given orally, electronically or in writing and provided by an action or inaction. Consent may be given through a legally appointed representative or a legal guardian. Implied consent shall be provided in circumstances where it is clear that the collection and use of the information is required for a specific purpose.
- 3.6. An individual, subject to legal or contractual limitations, may withdraw his or her consent at any time on sufficient notice to Northern Communication Services. Withdrawal of consent may result in Northern Communication Services becoming unable to provide or continue to provide the person with certain services, products or benefits, and the individual shall be given notice of the implications of the withdrawal of his or her consent.

**For example:**

When using a Northern Communication Services website, “cookies” (small data files containing information to specify preferences and provide personalized content) may be used. If a website user does not want cookies used, they may be turned off on the individual web browser. However, if a user refuses cookies, this may result in some limitations on use of the website.

**Limits on the Collection of Personal Information by Northern Communication Services**

4. The collection of personal information by Northern Communication Services shall be limited to that which is necessary for the purposes identified by Northern Communication Services. At all times, Northern Communication Services shall collect personal information by fair and lawful means.



- 4.1. It is possible that Northern Communication Services may, with the consent of an individual, collect and use information about that individual from a third party. For instance, credit references may be checked if a customer is applying for a credit product.

### **Limits on the Use, Disclosure and Retention of Personal Information by Northern Communication Services**

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

### **Accuracy of Personal Information held by Northern Communication Services**

6. Northern Communication Services shall make reasonable efforts to ensure that personal information of individuals is as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
  - 6.1. Personal information shall not be updated without the consent of the individual and it shall only be updated if it is necessary for the continued use of the personal information.
  - 6.2. Northern Communication Services shall make reasonable efforts to obtain information from individuals in order to update information on hand if required to fulfill the purposes for which the information was collected.
    - 6.2.1. If informed by a person that personal information held by Northern Communication Services about them is inaccurate, Northern Communication Services shall update the information as soon as possible.
  - 6.3. Ultimately it is the responsibility of the customer to update information required by Northern Communication Services for the provision of the services required by the customer.

#### **For example:**

If Northern911 monitors an alarm for the customer, it is their responsibility to provide the names and numbers of people to contact in case of an alarm. It is also their responsibility to contact us to advise us to remove contact names and numbers of people that should no longer be contacted in regard to alarms. Likewise, if we provide answering services for the client, it is their responsibility to update the method of message delivery should they require a change in the current method.



## **Safeguarding Personal Information**

7. Northern Communication Services shall protect personal information by the use of security safeguards appropriate to the sensitivity of the information.
  - 7.1. Northern Communication Services shall employ security safeguards that shall protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification, regardless of the format in which the information is held.
  - 7.2. The nature of the safeguards used by Northern Communication Services shall vary depending on the sensitivity of the information that has been collected, the amount, distribution, and format of the information, and the method of storage of the information. More sensitive information shall be safeguarded by a higher level of protection.
  - 7.3. The methods of protection used by Northern Communication Services shall include:
    - A. Physical measures, for example, locked filing cabinets and restricted access to offices;
    - B. Organizational measures, for example, security clearances and limiting access on a “need-to-know” basis; and
    - C. Technological measures, for example, the use of passwords and encryption.
    - D. Some less sensitive information shall be kept in unlocked filing cabinets in various areas but normally, no person shall be allowed into these filing cabinets unless their job requires that they have access to the information contained in them.
  - 7.4. Northern Communication Services shall ensure that its employees who are in contact with personal information are trained in the appropriate protection of personal information and that they are aware of the importance of maintaining the confidentiality of personal information. Employees are required to abide by this Policy.
  - 7.5. All employees sign a confidentiality agreement upon being hired. All employees are subjected to a criminal background check before being hired. Northern Communication Services does not employ anyone who has a criminal record therefore ensuring that your personal information does not fall into the hands of known criminals.
  - 7.6. If personal information is disclosed to third parties for the purpose of processing, providing the required service or another administrative purpose, Northern Communication Services shall make reasonable efforts to ensure that the third party uses safeguards to protect personal information which are comparable to those used by Northern Communication Services.



## Openness

8. Northern Communication Services shall make available to individuals information about its policies and practices relating to the management of personal information. Northern Communication Services is open about the Policy it has in place to ensure the protection of personal information.
  - 8.1. Northern Communication Services shall make this information readily available to individuals. The information shall be made available in a form that is generally understandable.
  - 8.2. Northern Communication Services may make information on its policies and practices available in a variety of ways, depending on the nature of the service or product being provided and the nature of the personal information.

## Individual Access to Personal Information

9. Upon the receipt by Northern Communication Services of a written request, an individual shall be informed, within a reasonable time following such request, of the existence, use, and disclosure of his or her personal information and shall be given access to that information.

**NOTE:** In certain limited circumstances, as permitted by law, certain information, such as that collected and held in the context of an investigation of the breach of a law or a contract, shall not be disclosed to the individual. Northern Communication Services has established procedures for an individual to follow in order to access their personal information.

  - 9.1. Subject to applicable laws, upon receipt of a written request from an individual (and proof of identification), Northern Communication Services shall inform him or her whether or not Northern Communication Services holds personal information about the individual and make reasonable efforts to indicate the source of the information. In addition, Northern Communication Services shall, upon written request, provide a summary of the use that has been made or is being made of this information.
  - 9.2. An individual may be required to provide sufficient information to permit Northern Communication Services to provide an account of the existence, use, and disclosure of personal information. The information provided shall only be used for this purpose.
  - 9.3. Upon receipt of a written request, Northern Communication Services shall provide an individual the identities of third parties to which it may have disclosed personal information about the individual and the purpose for which the information may have been disclosed to the third party.
  - 9.4. Northern Communication Services may charge a reasonable fee to cover its cost of providing the information, provided that Northern Communication Services shall inform the individual of the approximate cost of providing the information prior to doing so and shall afford the individual the opportunity to withdraw his or her request.



- 9.5. If an individual successfully demonstrates the inaccuracy or incompleteness of personal information held by Northern Communication Services, Northern Communication Services shall amend the information as required. Where appropriate, the amended information shall be transmitted to third parties having access to the information in question.
- 9.6. Northern Communication Services may decline to provide an individual access to his or her information in accordance with applicable laws.
  - 9.6.1. If such a refusal is made, Northern Communication Services shall inform the individual of the reasons why such access has been denied, except when Northern Communication Services is prohibited from doing so by law.

### **Complaints and Questions**

10. A person about whom personal information is kept may challenge Northern Communication Services concerning its compliance with this Policy.
  - 10.1. Complaints and questions regarding Northern Communication Services' compliance with this Policy may be made in writing to the Northern Communication Services Privacy Officer at 230 Alder St., Sudbury, Ontario, P3C 4J2, by phone at 1-800-461-3317 or by e-mail at [info@northerncom.com](mailto:info@northerncom.com). Complaints and inquiries with respect to the subsidiaries of Northern Communication Services can be made in the same manner.
  - 10.2. Northern Communication Services has procedures in place to receive and respond to inquiries or complaints about this Policy and its practices relating to the handling of personal information. These procedures shall be provided upon request and are easily accessible on Northern Communication Services' web site.
  - 10.3. If an individual is not satisfied with a response by Northern Communication Services to a complaint or is otherwise not satisfied with Northern Communication Services' policies and practices with respect to its handling of personal information, a complaint may be made to the provincial privacy commissioner of the province where the personal information of the individual is kept, or to the Federal Privacy Commissioner at 112 Kent Street, Ottawa, Ontario, K1A 1H3, 1-800-282-1376. More information can be obtained at the federal privacy commissioner's website, <https://www.priv.gc.ca/>.



## Exceptions

Anyone seeking an exception to this policy must contact, and obtain written permission from, the Policy Owner.

## Noncompliance

Violations of this policy shall be treated like other allegations of wrongdoing at Northern Communication Services. Allegations of misconduct shall be adjudicated according to established procedures. Sanctions for noncompliance may include, but are not limited to, one or more of the following:

1. Disciplinary action according to applicable Northern Communication Services policies.
2. Termination of employment.
3. Legal action according to applicable laws and contractual agreements.

## Approval and Review

The Privacy Policy shall be reviewed and approved annually.

Version ID	Approval Date	Name	Title	Next Review Date
2	Mar. 19, 2021	Mike Shantz	President	Mar. 2022

## Authorization

Signature (physical or electronic) below indicates approval of and responsibility for the content of this document.

Mike Shantz, President

March 19, 2021

Reviewer Signature

Name and Title (please print)

Date

## Revision History

Version ID	Date of Change	Author	Rationale
2	Mar. 19, 2021	Mike Shantz Chris Binstock (Technical Writer)	Reformatted to current standard.