

**PRIVACY AND THE PERSONAL INFORMATION PROTECTION AND ELECTRONIC
DOCUMENTS ACT**

02-006

Status:	Approved	Date
Effective:		August 1, 2019
Initiated by:	Guillaume Clairet Managing Partner	June 23, 2019
Reviewed by:	Dave Stratton Managing Partner	July 8, 2019
Approved by:	Guillaume Clairet Managing Partner	July 17, 2019

Objective

Protecting the privacy and confidentiality of personal information is an important aspect of the way Daniel et Daniel Catering Inc. conducts its business. Collecting, using, and disclosing personal information appropriately, responsibly, and ethically is fundamental to the company's daily operations.

The company strives to protect and respect personal information of its customers, employees, business partners, and so on in accordance with all applicable statutory requirements. All employees must abide by the procedures and practices set out below while handling personal information.

Scope

Definitions

Policy

This policy outlines the company's commitment to privacy and establishes the methods by which privacy is ensured. This policy applies to all employee personal information in the company's care, custody, and control.

Personal information is any factual or subjective identifying information about an individual or group of individuals. This can include name, date of birth, address, income, e-mail address, social insurance number, gender, evaluations, credit records, and so forth.

Business information is confidential information related to a specific business that is not readily available to the public, such as names of executive officers, business registration numbers, proprietary information, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

Consent occurs and is considered obtained by Daniel et Daniel Catering Inc. when an individual provides express consent orally, in writing, or through an applicable online action. Before being asked to provide

consent, individuals will be provided with the reasons their personal information is being collected, how it will be used and stored, and any disclosure or possible disclosure of the information.

Implied consent is granted by the individual where consent may reasonably be inferred from the action or inaction of the individual. Where possible, this should always be followed up by a Daniel et Daniel Catering Inc. representative to obtain express consent.

Appropriate Use

Daniel et Daniel Catering Inc. collects and uses personal information solely for the purpose of conducting business and developing an understanding of its customers. The company hereby asserts that personal information may only be used for the following purposes:

- Accounts Receivable & Payable i.e. billing, invoicing & bill payments
- Communications
- Deliveries
- Human Resources & Payroll
- Emergency contacts

Policy Statements

Daniel et Daniel Catering Inc. assumes full accountability for the personal information within its possession and control. The company has appointed Ken Marshall as custodian of all privacy matters and legal compliance with privacy laws.

In the course of conducting its business, the company may have to obtain personal information directly from the individual to whom the information belongs. Individuals whose personal information is being collected are at all times entitled to know how the company uses their personal information and that the use of any personal information collected is limited to only what is needed for those stated purposes. If necessary, Daniel et Daniel Catering Inc. will obtain individual consent if personal information is to be used for any other purpose.

The company will not use that information without the consent of the individual.

Under no circumstances will the company sell, distribute, or otherwise disclose personal information, including personal contact information or employee lists, to third parties, unless required to do so by law. This may include consultants, suppliers, or business partners of the company, but only with the understanding that these parties obey and abide by this policy, to the extent necessary of fulfilling their own business duties and day-to-day operations.

The company will retain personal information only for the duration it is needed for conducting its business and ensuring statutory compliance. Once personal information is no longer required, it will be destroyed promptly, safely, and securely. However, certain laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this policy.

The company will take every reasonable precaution to protect personal information with appropriate security measures, physical safeguards, and electronic precautions. The company maintains personal information through a combination of paper and electronic files. Where required by legislation or disaster recovery or business continuity policies, older records may be stored in a secure, offsite location.

Daniel et Daniel Catering Inc. will ensure:

- Access to personal information is authorized only for the employees and other agents of the company who require the information to perform their job duties, and to those otherwise authorized by law;
- The company's computer network systems and databases are secured by complex passwords and firewalls to which only authorized individuals may access;
- Active physical files are kept in locked filing cabinets;
- Routers and servers connected to the Internet are protected by a firewall, and are further protected against virus attacks or "snooping" by sufficient software solutions;
- Personal information is not transferred to employees, volunteers, summer students, or any other person in the company unless authorized.

The Daniel et Daniel Catering Inc. website will include our privacy policy and disclose our personal information practices. Individuals adding data into the web site will be notified about:

- Personally identifiable information about the individual that is collected from the website or through affiliate sites;
- Information about the organization collecting the data;
- How the data will be used;
- To whom the data may or may not be disclosed;
- What options are available to the individual regarding the collection, use, and disclosure of personal information;
- The information technology security procedures in place that protect against the destruction, loss, theft, alteration, or misuse of personal information under the company's possession and control; and
- How the individual may access and correct any inaccuracies in their personal information.

In addition, Daniel et Daniel Catering Inc. will explain that the company may share compiled demographic information with its business partners or advertisers, but no personal information that can identify any individual person will be disclosed. While IP addresses will be logged in order to administer the site, track visitor movement, and gather demographic information, but these IP addresses will not be linked to any personally identifiable information. Any registration or order form asking site visitors to enter personal or financial information will be protected by SSL encryption. Site visitors may opt out of having their personal information used at the point where the information is gathered.

In most instances, Daniel et Daniel Catering Inc. will grant individuals access to personal information in the care, custody, and control of the company upon presentation of a written request and satisfactory identification. If an individual finds errors of fact with their personal information, they should notify the company as soon as possible to make the appropriate corrections.

If the company denies an individual's request for access to their personal information, the company will advise in writing of the reason for such a refusal. The individual may then challenge the decision.

Daniel et Daniel Catering Inc. may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:

- The collection is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- The personal information was produced by the individual in the course of their employment, business, or profession, and the collection is consistent with the purposes for which the information was provided;
- The collection is made for the purpose of making a disclosure required by law; or
- Any other reason as defined in applicable legislation

Any questions or concerns regarding this policy can be addressed by contacting Daniel et Daniel Catering Inc. at 416 968 9275 ext 40 and by email kmarshall@danieletdaniel.ca. The company will investigate and respond to concerns about any aspect of the handling of personal information. This organization will address concerns to the best of its abilities.

The Personal Information Protection and Electronic Documents Act

(How it pertains to Daniel et Daniel.)

The Personal Information Protection and Electronic Documents Act (PIPEDA) is a law that protects personal information in the hands of private sector organizations and provides guidelines for the collection, use and disclosure of that information in the course of commercial activity. The Act is based on ten privacy principles developed by the Canadian Standards Association, and is overseen by the Privacy Commissioner of Canada and the Federal Court.

This Act applies to all business and organizations in Canada. It sets the ground rules for the collection, use and disclosure of personal information in the course of commercial activities.

In terms of the retention and safeguarding of personal information PIPEDA states:

“Personal information that is no longer required to fulfill the identified purposes should be destroyed, erased or made anonymous. Organizations shall develop guidelines and implement procedures to govern the destruction of personal information.” Principle 4.5.3 “Care shall be used in the disposal of destruction of personal information, to prevent unauthorized parties from gaining access to the information...”

Principle 4.7.5 Information including home and business addresses, phone numbers and credit card numbers are taken by employees of Daniel et Daniel on a daily basis, henceforth it will be company policy and procedure to:

Any employee who records, for business purposes, any information which could be deemed sensitive, including but not limited to; home or business addresses, phone numbers and credit card information will keep said information in a place which is considered safe and secure.

All departments, Sales, Accounting, and Shipping/Receiving, will shred and properly dispose of all limited to: home or business addresses, telephone numbers and credit card numbers.

Any documents that leave the building through normal business operations

i.e.: shipping order copies; are to be returned to Daniel et Daniel premises for proper disposal.