

**Procedure Number**

GI-ALL-0008-v5

**Procedure Date**

7/29/2014

**Department**

All Departments

**Amendment**

Yes

## POLICY

### Guiding Principle - Privacy Policy

Our Privacy Policy seeks to protect your personal information in accordance with the federal legislation, Personal Information Protection and Electronics Documents Act (PIPEDA). PIPEDA regulates the collection, use and disclosure of “personal information”. As part of this Act we are required to receive the consent of our Consultants and Clients before we can collect, use, or disclose their personal information. Following are our commitments in fulfillment of the PIPEDA regulations that you will need to give your informed consent to TEEMA to lawfully represent you in our Services.

### 1. TEEMA PRIVACY POLICY

TEEMA respects the privacy of individuals in all aspects of our business operations. Your personal information is only collected, used, and disclosed by TEEMA in accordance with this Privacy Policy. TEEMA is committed to safeguarding the personal information entrusted to us by our Clients, Consultants, and Members. We manage your personal information in accordance with all applicable laws. This policy outlines the principles and practices we follow in protecting your personal information. This policy applies to TEEMA and any subsidiaries, future or existing. The policy also applies to any person providing services on our behalf. A copy of this policy is available free of charge from our website, <http://www.teemagroup.com/>.

### 2. WHAT PERSONAL INFORMATION DO WE COLLECT?

#### 2.1 CONSULTANTS

Personal information is information that is enough to identify an individual. This includes an individual’s name, home address, and phone number, etc. In order to maintain a current profile, we must access information required of typical job applications including your contact details, experience, and education to the extent of a typical résumé, and a description of the type of work for which you are looking. We also store and access the following information pertaining to you, as a Consultant: our interview notes, information obtained from references provided by you and with your express permission granted for us to collect information from, reference letters, and upon successfully obtaining a Contract: information required to provide payroll services, including business name, Social Insurance Number (as applicable), banking details, tax deductions and vacation allowances.

#### 2.2 CLIENTS

Personal information is information that is enough to identify an individual. This includes a contact’s name, address, and phone number, etc. In order to maintain a current profile, we must access information required of a typical job posting, such as your company contact details, business description, job description, and a description of the type of consultant for which you are looking. We also store and access the following information pertaining to you, as a Client: any interview notes, and upon successfully filling a job, information required by our Accounting department to provide invoices.

### 3. WHY DO WE COLLECT PERSONAL INFORMATION?

### **3.1 CONSULTANTS**

As a consultant using TEEMA's services, you are asked to provide certain pieces of information in order for us to provide you with the best possible service. We use your information to: understand your qualifications, needs and preferences, find the best job opportunities for you that will give you the job satisfaction you want, fulfill our clients' requests for information about job candidates, assess and develop our business and operations to better service our consultants and our clients, and provide payroll and other administrative functions. TEEMA never collects more personal information than is needed to fulfill these purposes, unless requested by the client and consented to by the consultant.

### **3.2 CLIENTS**

As a client using TEEMA's services, you are asked to provide certain pieces of information in order for us to provide you with the best possible service. We use your information to: understand your needs and preferences, find the best candidates to fill your opportunities, fulfill our consultants' requests for information about job opportunities, assess and develop our business and operations to better service our candidates and our clients, and provide payroll and other administrative functions. TEEMA never collects more personal information than is needed to fulfill these purposes, unless requested, and consented to, by you, the Client.

## **4. WHEN DO WE DISCLOSE PERSONAL INFORMATION AND TO WHOM?**

Your personal information is never traded, sold or leased by us to any external companies. Your information is only disclosed for TEEMA's legitimate and disclosed business purposes or as required to meet legal and regulatory requirements, for example, to comply with a court order. In the normal course of business, we disclose personal information of our Consultants to our Clients when we feel there is a potential for a suitable job. We only provide Candidate information to Clients if there is a job that is well-suited, and we only provide information required and requested to make an informed decision regarding a job candidate. Such information includes, but is not limited to, Consultant résumé and summaries of references checks, and a business description of the Client. We may share information with our affiliates, partners, or other companies (collectively "representatives") that we use to provide full staffing services. However, we only disclose limited information as required for the function that will be performed by the representative on our behalf. We also ensure that every contract we enter into with a representative clearly outlines the representative's obligation to protect your personal information and live up to the principles of privacy. Such release of your personal information shall not compromise any Federal or Provincial Legislation. An example of companies we share your limited personal information would be organizations that perform background checks including criminal, educational, and credit checks as required by the Client and consented to by the Consultant.

## **5. HAVE YOU CONSENTED?**

Having read this, our Privacy Policy, and by using our services and providing us with your personal information, we imply your consent to the collection, use, and disclosure of your personal information as specified herein. Wherever possible and when necessary, we obtain your express consent for particular uses and disclosures. We imply your consent if we feel we are using your personal information for purposes that are obvious to you. For example, if a Consultant lists the names and phone numbers of his or her previous employers on his or her résumé for reference checking purposes, we will not seek his or her express consent before checking these references. In cases where we collected personal information before January 1, 2004, we assume your consent to our use and, where applicable, disclosure for the purposes for which the information was collected.

## **6. HOW LONG IS YOUR INFORMATION RETAINED?**

We retain your information as long as you are using our placement services, or longer if required by law. For consultants, that means we retain all your information as long as you remain on our payroll, and for seven years thereafter. For permanent placements, we retain your information for one year after you accept a permanent employment position.

## **7. HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?**

We have staff procedures and policies in place to ensure that your personal information, in both paper and electronic format, are secure. For example, we require the following: TEEMA employees may carry security cards to enter the premises, filing cabinets remain locked at all times, access to electronic and paper files is limited on a need-to-know basis depending on job function, systems' password selection criteria and expiry make unauthorized access more difficult, staff training on the importance of privacy and security is undertaken regularly. Through our website, you can ask questions about our services, and provide information about yourself, such as your résumé. To secure the transfer of such personal information, TEEMA has put in mechanisms whereby personal information entered through our site is collected within a secure page, such that it is encrypted while being transferred to a password protected TEEMA server equipped with an enterprise firewall. If you provide personal information to us via unencrypted e-mail you should be aware of the inherent risks of interception over which we have no control.

#### **8. HOW CAN YOU ACCESS YOUR PERSONAL INFORMATION AND CHECK ITS ACCURACY?**

TEEMA relies on the information provided by you. You may at any time make a written request for access to your personal information. TEEMA strives to maintain accurate records of your personal information; however, this cannot be achieved without your help. In this ongoing effort, we ask you to provide us with your most up to date information. Please login to our website and provide us with any personal information you have given us in the past that is incomplete, inaccurate, or no longer relevant.

#### **9. CONTACT US WITH ANY QUESTIONS OR CONCERNS**

TEEMA takes the security of your personal information and privacy seriously. If you have any concerns about this policy, or feel that TEEMA is not abiding by it, please write to [support@teemagroup.com](mailto:support@teemagroup.com).