

## Personal Information Protection Policy

# TalentFIT Staffing Services Limited

## Personal Information Protection Policy

At TalentFIT, we are committed to providing our consultants with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our consultants, protecting their personal information is one of our highest priorities.

British Columbia's *Personal Information Protection Act* (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 consultants 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 consultant's personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our consultant's personal information and allowing our consultants to request access to, and correction of, their personal information.

### Scope of this Policy

This Personal Information Protection Policy applies to TalentFIT as well as any of our approved subcontractors and partners who collect, use, or disclosing personal information on behalf of TalentFIT.

### Definitions

**Personal Information** – means information about an identifiable *individual* [including name, home address and phone number, 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 TalentFIT complies with this policy and PIPA.

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

- 1.1 Unless the purposes for collecting personal information are obvious and the consultant 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 consultant information that is necessary to fulfill the following purposes:
  - To open and manage a candidate profile and match this profile with our clients' requirements;
  - To contact you regarding suitable permanent or contract opportunities
  - To validate information you have in your resume such as certificates, degrees, and licences;
  - To obtain further information about you by contacting references supplied by you;
  - To submit your information to clients for a suitable position in the form of a resume, references, Counterpart Match (personality) report, or other similar documents;
  - To carry out contests, surveys, questionnaires, or inform you of events we think you would be interested in;
  - To send you information about TalentFIT or our partners from time to time but only if we feel you would be interested or benefit from the information;
  - To improve the services we offer;
  - To meet regulatory requirements;
  - To complete the placement process when you are placed with one of our clients (for example: banking information for direct deposit)
  - For other similar or related purposes that are reasonably necessary for the proper management of TalentFIT's business.

## **Policy 2 – Consent**

- 2.1 We will obtain consultant 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, electronically, through an authorized representative, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the consultant voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a consultant is given notice and a reasonable opportunity to opt-out of his or her personal information being used for TalentFIT's legitimate and disclosed business purposes and the consultant 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), consultants can withhold or withdraw their consent for TalentFIT to use their personal information in certain ways. A consultant'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 consultant in making the decision.
- 2.5 We may collect, use or disclose personal information without the consultant'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);
- Other limited circumstances as specified in PIPA (Personal Information Protection Act in BC) sections 12, 15, and 18.

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

- 3.1 We will only use or disclose consultant personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:
- To obtain further information about you by contacting references supplied by you
  - To submit your information to clients for a suitable position in the form of a resume, references, Counterpart Match (personality) report, or other similar documents
  - To allow our disclosed business partners to assist us in completing your candidate career profile
- 3.2 We will not use or disclose consultant personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will never sell consultant lists or personal information to other parties

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

- 4.1 If we use consultant personal information to make a decision that directly affects the consultant, we will retain that personal information for at least one year so that the consultant has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain consultant 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 consultant personal information is accurate and complete where it may be used to make a decision about the consultant or disclosed to another organization.
- 5.2 Consultants 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 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. If the correction is not made, we will note the consultants' correction request in the file.

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

- 6.1 We are committed to ensuring the security of consultant 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 consultant personal information is appropriately protected:
- All consultant personal information in paper format is stored in a locked office which is further secured with a monitored alarm system and on-site security 7 days a week.
  - All consultant personal information in electronic format is stored in a database which is housed locally and accessible by password only. The hardware used to run the database is stored in a locked office environment when not in use.

- Talentfit's computer systems are powered off when not in use and protected with a firewall when in use.
  - Filing cabinets are kept locked when not in use and only accessible to TalentFIT staff who require access to the information to conduct company business.
  - TalentFIT partners and approved subcontractors are required to maintain their own privacy policies which meet applicable laws.
- 6.3 We will use appropriate security measures when destroying Consultant's personal information such as shredding paper documents and deleting electronically stored information.
- 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 Consultants Access to Personal Information**

- 7.1 Consultants have a right to access their personal information, subject to limited exceptions (as noted in section 23 of PIPA).
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer.
- 7.3 Upon request, we will also tell consultants 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 administrative fee will be charged for providing access to personal information. We will inform the consultant of the cost and request further direction from the consultant 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 consultant in writing, providing the reasons for refusal and the recourse available to the consultant.

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

- 8.1 The Privacy Officer is responsible for ensuring TalentFIT's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Consultants should direct any complaints, concerns or questions regarding TalentFIT's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the consultant may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for TalentFIT's Privacy Officer or designated individual:

**Vivek Belgaumkar**

**(250)590-7139**

**vivek@talentfit.ca**

This policy may be updated at any time – for the latest revision please go to [www.talentfit.ca](http://www.talentfit.ca)