

What is PIPEDA?

Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) creates an enforceable right to privacy with respect to the collection, use and disclosure of personal information by private sector organizations. All Companies must comply with this Act regardless of size.

All of our clients must comply with this Act as it pertains to their customers and employees.

The Act is a safeguard of Canadian consumers, and will protect them and their personal information from being traded and misused between entities such as market researchers and credit agencies and/or for the purposes of identity theft. The key requirements of PIPEDA are to:

- Satisfy clients, employees and other individuals that their information is protected; and
- Explain to them why the information is being collected.

What we will NOT do with your information

Your information will not be traded, disclosed, or sold to outside non-related entities such as market researchers or advertising and telemarketing agencies.

Your personal information will not be released to any unrelated third party unless specific consent is obtained by you and documented in our files, or in such situations where we are legally obligated to supply the information to government or regulatory agencies as applicable.

We strive to protect your personal information.

Your information will be retained on file and used only for the purpose of Second Foundation providing to you and your organization support and proactive information concerning new and updated software and business practices. Information is securely filed centrally, or at the desks of our employees when in use.

Our employees are fully aware of the need to protect personal information from misuse. Any personal information of yours is safeguarded from unauthorized access, disclosure, copying and modification via our computer system and client and visitor meeting rooms segregated from employee work and file storage areas.

We have had formal training within our office regarding our Privacy Policy and staff members are fully aware of how personal information must be handled.

Your Privacy Choices and more information

If at any time you wish to withdraw consent or have any concerns you have the right to do so. Please contact David Popowich at our office providing reasonable notice. You have a right to your personal information. Should you wish to review the personal information on file, please do not hesitate to contact us.

If you require any further information regarding our policy and practice, please contact us at (519) 885-2040, or by writing, Second Foundation Consulting at 5 Hill Street, PO Box 65, Kitchener, Ontario N2G 3X4.

A copy of the Act may be obtained at: <http://laws.justice.gc.ca/en/P-8.6/91355.html>.

Further questions pertaining to this Act and how this pertains to you may be addressed by contacting the Ontario Privacy Commissioner at www.ipc.on.ca.

Second Foundation Privacy Policy

Approach

Second Foundation Consulting is committed to ensuring that your privacy is protected. Our Privacy Policy identifies the ways we ensure that your privacy and the confidentiality of your personal information are protected within our business, whether provided at our office, your company site(s), paper correspondence, electronic communication over the internet or on the telephone.

At Second Foundation our staff have received training with respect to PIPEDA. All personal information collected will be protected by way of securely storing the information, using the information only for the purpose of which consent was obtained, and preventing information from entering the hands of third parties where it will be misused.

The prime individual responsible for client and internal communications compliance is David Popowich. He will ensure that our Privacy Policy is being fully adhered to.

Individual's Rights

Individuals are provided through the Act, the right to know why an organization collects, uses or discloses personal information about them. Individuals have the right to expect an organization to reasonably protect the information and use it only for the purpose for which it was provided. Individuals can obtain access to their personal information, ask for clarification, and to complain to the Privacy Commissioner of Canada about how an organization handles their personal information.

Collected Information

Employees

Employees are asked to provide their personal information, including name, age, income, marital status, address, social insurance number, birthday, employment information and other personal information required to ensure complete information is contained in our employment files. For our employees, personal information remains with our Office and Human Resources Manager, and is used to complete personnel files, preparation of payroll, preparation of health and benefit forms, preparation of T4 summaries and supplementaries, and preparation of forms for government compliance such as Canada Customs and Revenue agency. Selected staff are also requested to provide passport and other personal information for purposes of US immigration document preparation.

Payroll and benefits processing for Second Foundation is currently performed by external agencies. These organizations are only provided with the required information to perform these services under authorization by our staff.

None of the information above is released to any other third parties without staff's direct involvement and consent, except in such cases as we may be legally obligated to supply the information to government or regulatory agencies as applicable. Personal information for employees is securely stored in personnel and payroll files.

Clients

Our clients are normally not required to provide any extensive private personal information. Information held concerning client personnel typically includes the organization they work for, corporate address, full name, contact phone number(s), email information, accounting system and software supported and any preferences they may have specifically requested of Second Foundation concerning communications with them. This information is provided for the purposes

of Second Foundation providing support services and communicating information pertinent to the support of the accounting systems and other software at the organization. Second Foundation periodically provides to our clients information concerning other business and software opportunities for the betterment of their organization.

Personal information pertaining to our clients remains in our client files or computer systems securely out of reach of third parties and/or visitors to our office. As new engagements are contracted with clients, new engagement letters providing continued consent to use this existing and any additional information are obtained.

This information will not be released to any third party without direct consent from our client, except in such cases as we may be legally obligated to supply the information to government or regulatory agencies as applicable. Third parties that we may deal with include Canada Customs and Revenue Agency, the client's lawyer, and the Ministry of Revenue. This information will not be released to third parties such as marketing firms. Personal information pertaining to clients will be reviewed for accuracy annually.

Privacy Principles

Canada's Personal Information Protection and Electronics Document Act is in place to assure individuals that their personal information is safeguarded by private sector companies with whom they conduct business. All organizations must comply with principles of the Act that specify limits and constraints for businesses and the rights of individuals.

Our response to these principles, contained in our policy, is as follows:

Accountability:	Our President, the highest position in our company, is responsible to ensure that the Company complies with the Act.
Identify the Purpose:	Second Foundation Consulting has, in our privacy policy and in each Engagement Letter disclosed the reason why personal information is collected, how it will be used, and when it will be disseminated to third parties.
Consent:	In addition to the time of collecting personal information, personal consent will be obtained prior to your personal information being used in a new manner than was previously identified.
Limited Collection:	Second Foundation Consulting will limit the collection of personal information to only that required for the identified purpose.
Limit Use, Disclosure, and Retention:	We will only use the information obtained with consent for support services and communicating information pertinent to the accounting and business operations at the organization. We will only retain information for as long as required.
Be Accurate:	Personal information will be maintained in an accurate, complete and up to date manner.
Safeguarding:	Personal information is protected against unauthorized access, disclosure, copying use or modification.
Openness:	Second Foundation Consulting has created and made available understandable practices relating to the management of personal information.
Access:	On request, we will inform you of existence, use and disclosure of your personal information only. You have the right to challenge the accuracy and completeness of the information pertaining to yourself.
Recourse:	If you have any questions or concerns as to how your information is being handled, please contact us.

Changes to Our Privacy Policy

Second Foundation Consulting reserves the right to make changes to this policy at any time. Changes will be updated and posted on our website and in our staff handbook to inform you of the changes that might affect you. However, regardless of changes or updates to our Privacy Policy, we will never use the information you submit under the present policy in a new way without providing you an opportunity to give us your consent.

Complaints

Second Foundation is committed to ensuring our Privacy Policy is properly implemented and enforced. It is our intent that all people that may have any complaint have a suitable process for resolution. Second Foundation is committed to resolving issues promptly, justly objectively and confidentially.

A written description of the issue should be forwarded directly to Second Foundation's Privacy Officer who will in turn investigate, and evaluate all of the relevant details. A formal written response will be completed and forwarded to the complainant within 20 business days.

Individuals may also contact the office of the Privacy Commissioner of the federal government if they are dissatisfied with the implementation of the policy by Second Foundation Consulting.