

Privacy Code

As you may be aware, in an effort to privacy concerns of Canadians, the federal government enacted the Personal Information and Electronic Documents Act (PIPEDA). The purpose of PIPEDA, in general terms, is to regulate private sector collection, use and disclosure of personal information.

As of January 01, 2004, PIPEDA will apply to our company operations and therefore AFI International Group will be required to be compliant with PIPEDA principles regarding the collection, use and disclosure of personal information.

For additional information or should you have concerns, you can contact our Chief Privacy Officer (CPO) directly by email at info@afi-international.com

The AFI International Group - Privacy Code

Protecting the confidentiality of our client's personal information has always been an important part of the way we do business. To ensure that we protect your privacy, AFI has adopted a Privacy Code. This Code sets out how and why we collect and use personal information about our clients and of those subjects whom we investigate. It also explains limited circumstances, which we may need or be required to disclose it.

“Personal Information” means information that identifies you as a specific individual. It does not include the sort of general information that could be found in a business directory or a telephone book.

Effective January 1, 2004, the Government of Canada is scheduled to implement the last phase of the Personal Information Protection and Electronic Documents Act (PIPEDA). This federal statute will then apply to much of the industry sector. This legislation establishes rules and principles for the use and disclosure of personal information based on the ten privacy principles developed by the Canadian Standards Association (CSA). These principles recognize that we live in an era where commercial information is exchanged and circulated by electronic means. It balances the individual's right to privacy in their personal information with the reasonable need of organizations to collect, use or disclose personal information.

Under the new legislation, an organization may collect, use or disclose personal information only for a purpose that a reasonable person would consider to be appropriate in the circumstances.

PIPEDA requires us to provide the same safeguards for privacy and confidentiality that we have always provided on both a voluntary and a mandated basis as has been required under the Private Investigators and Security Guard Act. Our Privacy Code sets out these principles in simple terms. It explains how we ensure that your privacy and the confidentiality of the personal information you provide are protected.

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As a client of AFI International Group you have a right to expect that all of the information you provide, request of us, and the investigations conducted by AFI on your behalf is accountable by AFI for the personal information it collects and uses as your designated investigative body. “Client” means a current and former user of our investigative services, an authorized agent of the company, organization or representative to which it represents. A “subject” of investigation means a party to whom the client is legally charged with their well-being in their employment environment, meaningfully bound and or who provides service to, designated with their supervision, and to whom the client serves to provide and ensure an essence of safety and security.

We are responsible for maintaining and protecting all personal information provided while it is under our control. This includes any personal information that may need to be disclosed to third parties for inquiries, processing or other administrative functions.

To help ensure the confidentiality of your personal information, we have established policies and procedures to ensure that we comply with PIPEDA. We have designated a privacy officer who is responsible for our company’s compliance with the ten privacy principles dictated by the Canadian Standard’s Association (CSA). If you have any questions or inquiries about how your personal information is stored, or when it may need to be disclosed to others, our privacy officer is there to assist and explain our policies to you.

Identifying our purpose for the collection, use or disclosure of Personal Information

Before or when we collect information, we will explain how we intend to use it. AFI collects personal information only for the following purposes:

- **To provide ongoing service to our clients.**
- **To conduct inquiries, research, surveillance and gather evidence which may be required by law pursuant to the terms of the Private Investigator’s and Security Guard Act - Ontario.**
- **To develop, enhance, market or provide security and or investigative training products, and professional services.**
- **To provide us with the information that we need to conduct an investigation in a fair, legal and expeditious manner.**
- **To meet our legal and regulatory requirements under the Private Investigator’s and Security Guard Act and other statutes.**

Unless required by law, AFI will not use or disclose any personal information that has been collected without obtaining the client’s consent. The information provided to AFI by the

client is considered privileged and may not be divulged to anyone other than the client without implied or express permission granted by the client in writing. Only information acquired relevant to an investigation may be conveyed to the authorized client representative by AFI in written, oral and or electronic format.

Where it is required that a third party be provided privileged information falling under the auspices of PIPEDA to effect service under the Private Investigation and Security Guard Act - Ontario, only required information will be provided to an authorized third party in order to ensure verification and or accuracy of the information acquired. Where any information is received by AFI, it will be retained and secured and provided only to the authorized client or where required by law.

Obtaining Your Consent for the Collection, Use or Disclosure of Personal Information

AFI will make a reasonable effort to make sure that our clients understand and consent to how information will be used by our agency and college. We will obtain your consent if we need to use information for any other purpose and before collecting information from third parties such as other investigative and regulated information bodies.

In all but exceptional circumstances, however, personal information may need to be collected, used or disclosed without the knowledge and consent of the subject of investigation. For example, legal, medical, or security reasons may make it impossible or impractical to seek consent. PIPEDA recognizes that when information is being collected for the detection and prevention of fraud or for matters including but not limited where statutes governed under federal, provincial, municipal jurisdiction, for example but not limited to Occupational Health and Safety Act, Worker's Safety and Insurance Board, Insurance Act etc. or for the purpose of law enforcement, seeking the consent of any individual may defeat the purpose of collecting the information. Seeking consent may also be impossible or inappropriate when the individual is a minor, seriously ill or mentally incapacitated.

In obtaining the client's consent, we will always use reasonable efforts to ensure that you are advised of the identified purposes for which any personal information collected will be used or disclosed.

Limiting our Collection of Personal Information

We will always limit the collection of personal information to that which is necessary for the identified purposes. Typically, this is information that is required to enable us to conduct accurate and responsible inquiries and or conduct investigation into specific matters. We may need to collect personal information from other sources including persons or institutions providing information relative to our inquiries.

Under certain circumstances we need to collect information to assist us in investigating unsubstantiated claims or to prove or disprove allegations concerning a subject of investigation. This may involve the use of licensed and regulated independent investigators, contractors, and forensic experts, engineers whose skills lend to evidence gathering. We will always collect personal information by fair and lawful means.

Limiting the Use, Disclosure and Retention of Personal Information

Personal information will not be used or disclosed for purposes other than for which it was collected, except with your consent or as permitted or required by law. Personal information provided will be retained only as long as it is necessary to fulfill those purposes. AFI may disclose personal information to the following organizations:

- A corporation or persons as part of conducting business. This may include a person or company or administrative personnel subject to agreeing to manage personal information in accordance with these privacy principles.
- Persons or corporations involved in supplying us with support services. This may include licensed independent investigators, fire or forensic expert, engineers and or contractors whose skills lend to the gathering of evidence.
- A company or individuals employed by AFI to perform data processing, accounting, actuarial or statistical functions on our behalf.
- A company or individuals involved in the development, enhancement, marketing or provision of our investigative products and services. This may include a professional marketing agent or sales representative.
- An agent or agency to evaluate creditworthiness or to collect outstanding accounts. This may include credit grantors and reporting agencies.
- A public authority or agent of a public authority, if the information is required to verify compliance or verify whether there exists a breach of federal, provincial, municipal or corporate statute or governing regulations.
- A law enforcement agency, where our client consents to such disclosure or disclosure is required by law or emergency.

AFI does not provide or sell its customer lists to any outside company for use in marketing or solicitation. Only employees with a business “need to know”, or those, whose duties require it, are granted access to personal information about our client and subject’s of investigation. We keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Personal information that is no longer necessary or relevant for the identified purposes or required to be retained by law is destroyed, erased or made anonymous.

Keeping Personal Information Accurate

AFI makes every effort to ensure that personal information about its clients is as accurate, complete, and up to date as is necessary for the purposes for which it was collected.

This may require contact from time to time to confirm or update personal information for contact purposes. If you have any questions about the accuracy and completeness of the personal information that we have collected or retained, please do not hesitate to contact our privacy officer. If you need to update some aspect of your personal information, please contact our administrative personnel or your personal representative contact.

Safeguarding Your Personal Information

AFI takes steps to protect personal information with security safeguards appropriate to the sensitivity of the information. Specifically, we have stringent security measures in place to

protect personal information against such risks as loss or theft, computer hackers, unauthorized access, disclosure, copying, use, modification or destruction.

AFI protects your personal information regardless of the format in which it is held. We also protect personal information we disclose to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used. Our employees with access to personal information are required as a condition of their employment to respect the confidentiality of personal information.

Openness Concerning our Privacy Practices

AFI pursues a policy of openness about the procedures it uses to manage personal information. We will make specific information about our policies and practices relating to the management of personal information available to clients upon request. We ensure openness by providing you with the following information:

- The title and address for the privacy officer accountable for our compliance with the policy.
- The name of the individual to whom inquiries or complaints can be forwarded.
- The means of gaining access to personal information held by our agency.
- A description of the type of personal information held by AFI including a general account of its use.

AFI makes information available to help our clients exercise informed choices regarding the use of their personal information.

Client Access to Personal Information

AFI informs its clients of the existence, use, and disclosure of the personal information provided upon request and provides access to that information. Our clients are able to challenge or correct the accuracy and completeness of their personal information and have it amended when appropriate.

When a request is made in writing, we will inform you in a timely fashion, of the existence, use, and disclosure of your personal information and you will be given access to that information. In certain situations, we may not be able to provide you with access to all of the personal information we hold.

Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, information that is subject to solicitor-client or litigation privilege, or, in certain circumstances, information of a medical nature and or in the case where a confidential source of information has provided required information. If this is the case, AFI will provide the reason for denying access upon request.

Clients can obtain information or seek access to their individual file by contacting our designated chief privacy officer at our Milton corporate facility.

Challenging Compliance

A client has the right to challenge AFI compliance with the above principles by contacting the privacy officer accountable for our compliance with the policy.

AFI maintains strict procedures for addressing and responding to all inquiries or complaints from its clients about its handling of personal information. We inform our clients about our privacy practices as well as availability of complaint procedures, if necessary. Our privacy officer will investigate all complaints concerning compliance with the privacy policy. If a complaint is found to be justified, we will take appropriate measures to resolve the complaint including the amendment of our policies and procedures.

Circumstances may warrant the privacy officer accountable for compliance with our privacy policy to seek external legal advice where appropriate before providing a final response to individual complaints.

For further Information please contact our chief privacy officer at

info@afi-international.com