

Schedule "A"
Privacy Policy

TRUE NORTH DISABILITY SERVICES LTD.

PRIVACY POLICY

Effective: Dec 27, 2018

1. Purpose

True North Disability Services Inc. ("True North") is committed to protecting the privacy of its clients ("Clients").

The purpose of this Privacy Policy ("Policy") is to inform our Clients how True North gathers and uses the personal information of its Clients. True North reserves the right to change, add, or remove portions from this Policy at any time. However, if any change involves a plan to use personal information in a way that differs from this privacy policy, True North will first obtain the Client's prior consent, except where such new uses are permitted or required by law.

2. Scope

(a) This Policy applies to True North's collection, use, and disclosure of personal information in connection with the Website and its related services, but does not limit its collection, use or disclosure of:

- (i) Business contact information; and
- (ii) Certain publicly available information.

(b) This Policy is intended to comply with the applicable federal and provincial privacy legislation in all the jurisdictions that True North operates.

3. Collection, Use and Disclosure of Personal Information

(a) Personal Information

- (i) "Business Contact information" is information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual.
- (ii) "Personal information" is information about an identifiable individual but does not include business contact information. Examples of information that could be personal information include your name, home address, gender, date of birth, language preference, personal email address, personal telephone number, credit card information, personal opinions, or health or medical information.

(b) Collection and Use of Personal Information

- (i) Except where otherwise required or permitted by law, True North will inform Clients of the purposes for the collection, use or disclosure of the Client's personal information, prior to collecting, using or disclosing that personal information.
- (ii) True North collects and uses personal information for the purposes of providing the Client with the services agreed upon in the Client Services Agreement and for reasonable business purposes which include, but are not limited to:
 - A. completing applications, forms, and other documents on the Client's behalf;
 - B. completing transactions, billing, and other payment obligations;
 - C. regulatory reporting requirements;
 - D. to protect True North and its Clients from fraud, theft and similar risks;
 - E. to defend True North and to address, where necessary, any claims, complaints, or legal proceedings;
 - F. to ensure quality service to Clients

(c) Disclosure of Personal Information

- (i) True North will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the Client or as required or permitted by law.
- (ii) True North may disclose certain personal information to third party service providers and to affiliated entities in order to carry out the purposes outlined above (e.g., credit card processing, storage and retention of personal information and medical evaluations). This may include the storage of personal information on servers that may be located outside of Canada such as in the United States, (which means that such information will be available to law enforcement and/or regulatory authorities according to the applicable laws of such foreign jurisdictions). Prior to sharing personal information with a service provider, True North will use diligence to ensure that such recipients safeguard the personal information and use the information only for authorized purposes.

4. Consent

- (a) Requirements for consent to collection, use, or disclosure of personal information vary depending on circumstances and on the type of personal information that is intended to be collected, used or disclosed. In determining whether consent is required and, if so, which form of consent is appropriate, True North will take into account both the sensitivity of the personal information at issue and the purposes for which True North will use the information. Consent may be express, implied (including through use of "opt-out" consent where appropriate), or deemed.
- (b) By submitting personal information to True North or its service providers and agents, the Client agrees that True North may collect, use and disclose such personal information in accordance with this Policy and as permitted or required by law.
- (c) Subject to legal and contractual requirements, the Client may refuse or withdraw his or her consent to certain of the identified purposes at any time by contacting the privacy officer identified in Section 10 of

this Privacy Policy. If the Client refuses to consent (or withdraws his/her consent), True North may be unable to, among other things, provide or continue to provide the Client with certain services.

5. Accuracy

- (a) True North will make reasonable efforts to ensure that the personal information collected, used, or disclosed is accurate and complete.
- (b) It is the responsibility of the Client to provide True North with any changes in personal information, where necessary.
- (c) Clients may request in writing that True North correct an error or omission in personal information. If True North is satisfied that a correction should be made, it will amend the information as requested and, where appropriate, will send the corrected information to the third parties to which it has disclosed that information.
- (d) Requests to correct an error or omission should be made, in writing, to the Privacy Officer, identified in Section 10 of this Privacy Policy. The written request must also provide sufficient detail so that the Privacy Officer can properly and efficiently respond to the request.
- (e) True North will respond to such written requests within 30 days, or alternatively, the timeframe prescribed by the relevant legislation.

6. Access

- (a) Clients may request in writing access to their personal information and information regarding the collection, use and disclosure of that personal information. True North will provide appropriate access to personal information requested. A written explanation will be provided if the requested access is not granted. Access requests should be made, in writing, to the Privacy Officer, as identified in Section 10 of this Privacy Policy.
- (b) True North will respond to the written requests within 30 days, or alternatively, the timeframe prescribed by the relevant legislation.

7. Personal Information Retention

True North retains personal information in accordance with its legal or business practices. Once the personal information is no longer required to fulfill the purpose for which it was collected and no longer required or permitted to be retained for legal or business purposes, it will be securely destroyed or made anonymous.

8. Protection of Personal Information

True North takes appropriate steps to protect personal information whether in paper or electronic form from unauthorized access disclosure, use or modification. These steps include but are not limited to:

- (a) protecting the confidentiality of Clients' personal information when doing business internally or externally with other organizations;
- (b) protecting Clients' personal information with appropriate and effective security safeguards, including physical, administrative, and technology safeguards, against such risks as loss or theft, unauthorized access, disclosure, copying, use or destruction, regardless of the format in which it is held; and
- (c) retaining Clients' personal information only as long as necessary for the fulfilment of the identified purposes, or as required by law, and maintaining reasonable and systematic controls, schedules and practices for the retention and destruction of such information.

9. Concerns of Non-Compliance

- (a) Clients may direct a complaint concerning compliance with the Policy to the True North Privacy Officer.

Steven Black
Privacy Officer
Tel & Fax 1-800-317-0627
[Email: privacy@tnds.ca](mailto:privacy@tnds.ca)

- (b) Any complaint must be provided in writing. Within a reasonable time following receipt of the complaint, the Privacy Officer will conduct an investigation into the complaint. The format of this investigation will vary depending on the circumstances and may or may not involve an interview with the complainant and/or True North employees conducted by the Privacy Officer.
- (c) After the investigation into the complaint, True North will take appropriate measures where necessary to address the cause of the complaint ..
- (d) Within a reasonable time following the conclusion of the investigation, the Privacy Officer will inform the complainant, either verbally or in writing, of:
- (i) the result of the investigation; and
 - (ii) any measures True North will take to address the cause of the complaint .

10. Privacy Officer

Any concern, inquiry or request regarding personal information should be directed in writing to the privacy officer:

Steven Black
Privacy Officer
Tel & Fax 1-800-317-0627
[Email: privacy@tnds.ca](mailto:privacy@tnds.ca)

11. Changes to the Policy

True North may from time to time make changes to this Policy to reflect changes in its legal or regulatory obligations or in the manner in which True North deal with the personal information of Clients.

True North will communicate any revised version of this Policy by providing reasonable notice of the revised Policy on its Website.

TRUE NORTH DISABILITY SERVICES LTD.
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