

Personal Information Protection
Private Sector Privacy Legislation
Personal Information Protection Policy

Richmond Property Group Ltd
Personal Information Protection Policy

At Richmond Property Group Ltd (RPG), we are committed to providing our clients, and customers, with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, and customers, , protecting their personal information is one of our highest priorities.

While we have always respected our clients, and customers, privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). 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 clients, and customers, 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 clients, and customers, personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients, and customers, personal information and allowing our clients, and customers, to request access to, and correction of, their personal information.

This Personal Information Protection Policy applies to Name of organization and its subsidiaries, Names of subsidiaries.

This policy also applies to any service providers collecting, using or disclosing personal information on behalf of Name of organization.

Definitions

Personal Information – means information about an identifiable *individual* [E.g., including name, age, home address and phone number, banking details, credit history, 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 RPG complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the clients, and customers, 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 clients, and customers, information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To verify creditworthiness;
 - To deliver requested products and services
 - To meet regulatory requirements;
 - To assess suitability for tenancy;
 - To collect and process rent payments;

Policy 2 – Consent

- 2.1 We will obtain clients, and customers, 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 clients, and customers, voluntarily provides personal information for that purpose.
- 2.3 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), clients, and customers, can withhold or withdraw their consent for RPG to use their personal information in certain ways. A clients, and customers, 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 clients, and customers, in making the decision.
- 2.3 We may collect, use or disclose personal information without the clients, and customers, knowledge or consent in the following limited circumstances:

As set out in sections 12, 15, and 18 of PIPA. For example:

- 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);
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose clients, and customers, 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 conduct client, customer, surveys in order to enhance the provision of our services;
- 3.2 We will not use or disclose clients, and customers, personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell clients, and customers, lists or personal information to other parties

Policy 4 – Retaining Personal Information

- 4.1 If we use clients, and customers, personal information to make a decision that directly affects the clients, and customers, we will retain that personal information for at least one year so that the clients, and customers, has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain clients, and customers, 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 clients, and customers, personal information is accurate and complete where it may be used to make a decision about the clients, and customers, or disclosed to another organization.
- 5.2 clients, and customers, 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 clients, and customers, correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of clients, and customers, 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 clients, and customers, personal information is appropriately protected:

: the use of locked filing cabinets;; the use of user IDs, passwords, encryption, firewalls; (i.e., only those that need to know will have access;

- 6.3 We will use appropriate security measures when destroying clients, and customers, personal information such as *documents, 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 clients, and customers, Access to Personal Information

- 7.1 clients, and customers, have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought
- 7.3 Upon request, we will also tell clients, and customers, 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 fee may be charged for providing access to personal information. Where a fee may apply, we will inform the clients, and customers, of the cost and request further direction from the clients, and customers, 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 clients, and customers, in writing, providing the reasons for refusal and the recourse available to the clients, and customers,

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

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

Contact information for RPG's Privacy Officer

Jean McKay 250-388-9920 jmckay@richmondproperty.ca