

Capturing Legacies Inc.

Personal Information Protection Policy

At Capturing Legacies Inc., we are committed to providing our clients, customers, and members with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, customers, and members, protecting their personal information is one of our highest priorities.

While we have always respected our clients, customers, and members privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of Alberta's *Personal Information Protection Act* (PIPA). PIPA, current as of December 17, 2014, sets out the ground rules for how Alberta businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our clients, customers, and members 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', customers', and members' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients', customers', and members' personal information and allowing our clients, customers, and members to request access to, and correction of, their personal information.

Scope of this Policy

This Personal Information Protection Policy applies to Capturing Legacies Inc. and its subsidiary application, AStoryNotForgotten.com

This policy also applies to any service providers collecting, using or disclosing personal information on behalf of Capturing Legacies Inc..

Definitions

Personal Information – means information about an identifiable *individual*; *E.g., name, age, home address and phone number, marital status, religion, income, medical information, education, and 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 Capturing Legacies Inc. complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the client, customer, member 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 client, customer, member information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To verify creditworthiness;
 - To identify [client, customer, member] preferences;
 - To open and manage an account;
 - To deliver requested products and services
 - To process your application subscription;
 - To enrol the client in a program;
 - To ensure a high standard of service to our [clients, customers, and members];
 - To meet regulatory requirements;
 - To collect and process payments;

Policy 2 – Consent

- 2.1 We will obtain client, customer, member 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, or 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 client, customer, member voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a client, customer, member is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising and the client, customer, member 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), clients, customers, and members can withhold or withdraw their consent for Capturing Legacies Inc. to use their personal information in certain ways. A client's, customer's, member'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 client, customer, member in making the decision.
- 2.5 We may collect, use or disclose personal information without the client's, customer's, member's knowledge or consent in the following limited circumstances:
 - When the collection, use or disclosure of personal information is required by law;
 - In an emergency that threatens an individual's life, health, or personal security;
 - 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 client, customer, member 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, member surveys in order to enhance the provision of our services;
 - To contact our [clients, customers, and members] directly about products and services that may be of interest;]
- 3.2 We will not use or disclose client, customer, member personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell client, customer, member lists or personal information to other parties

Policy 4 – Retaining Personal Information

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

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of client, customer, member 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 client, customer, member personal information is appropriately protected:
 - *The use of user IDs, passwords, encryption, firewalls;*
 - *Restricting employee access to personal information as appropriate (i.e., only those that need to know will have access; contractually requiring any service providers to provide comparable security measures).*
- 6.3 We will use appropriate security measures when destroying client's, customer's, member's personal information such as *shredding 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 Clients, Customers, Members Access to Personal Information

- 7.1 Clients, Customers, Members have a right to access their personal information, subject to limited exceptions. A full listing of the exceptions to access can be found 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.

- 7.3 Upon request, we will also tell clients, customers, and members 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 If a request is refused in full or in part, we will notify the client, customer, member in writing, providing the reasons for refusal and the recourse available to the client, customer, member.

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

- 8.1 The Privacy Officer **or designated individual** is responsible for ensuring Capturing Legacies Inc.'s compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Clients, Customers, Members should direct any complaints, concerns or questions regarding Capturing Legacies Inc.'s compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client, customer, member may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Capturing Legacies Inc.'s Privacy Officer or designated individual:

info@capturinglegacies.com