

PRIVACY POLICY

The Southern Ontario Credit Bureau Inc. o/a The Credit Bureau of Southern Ontario and Canadian Business Information Services recognizes the importance of privacy and the sensitivity of personal information for all of our clients. For these reasons we have created the following privacy policy (the “policy”). The privacy policy outlines how we manage personal information, the uses to which personal information is put and how we safeguard privacy.

Your Privacy Rights

From January 1, 2004 all businesses engaged in commercial activity must comply with the “Personal Information Protection and Electronic Documents Act”, and the “Canadian Standards Association Model Code for the Protection of Personal Information”, which it incorporates. These obligations extend to our company and the act gives you, our clients, certain rights concerning the privacy of your personal information.

The Southern Ontario Credit Bureau Inc. is responsible for the personal information we collect and hold. To ensure this accountability, we have developed this policy and trained our staff about our policies and practices.

An Overview

1. What this Policy Covers

This policy covers our treatment of the personal information we collect from you.

2. Purposes for Collection of Personal Information

Our company collects personal information for the following limited purposes:

- a) to evaluate potential membership
- b) to ensure the accurate performance of various client services

3. How Do We Collect Your Personal Information?

We collect information only by lawful and fair means that are not reasonably intrusive. Wherever possible we collect your personal information from you, our client, directly at the start of your membership. We also collect the personal information of your clients through the performance of various services on your behalf.

4. How is Personal Information Maintained?

Our company does not sell, barter, trade or give away your personal information to third parties. For example, we do not provide our member mailing list to other companies. Our company stores and maintains personal information in conformity with the requirements of the “Personal Information Protection and Electronic Document Act” and the “Model Code for the Protection of Personal Information” created and approved by the Canadian Standards Association.

Application of the Code

The Southern Ontario Credit Bureau Inc. applies the ten principles of the code as follows:

1. Accountability

Our company is responsible for the personal information collected and maintained by us and which is under our control. In order to fulfill this responsibility:

- a) we have designated officials to be responsible for the day to day care and control of personal information
- b) our staff oversee compliance with the terms of this policy
- c) our company has taken the following measures to ensure compliance with this policy:
 - 1. developing procedures to protect personal information
 - 2. developing procedures to receive and respond to complaints and inquiries
 - 3. training our staff about the policies and practices respecting personal information
 - 4. developing and distributing information to our staff explaining our policies and procedures respecting personal information and having this information available to our clients upon request

2. Identifying Purposes

Our company is committed to openness regarding the collection and use of personal information. As discussed above we collect and use personal information for the following limited purposes:

- a) to evaluate potential membership
- b) to ensure the accurate performance of various client services

To demonstrate this openness we require the consent of our clients prior to using their personal information for any purpose other than that for which it was originally collected.

If any individuals wish to be advised of the personal information we have in relation to them, they are advised to follow the procedure listed at the end of this document.

3. Consent

In most cases, we shall ask you to specifically consent, if we collect , use or disclose your personal information. Normally we ask you for your consent in writing but in some circumstances, we may accept your oral consent. Sometimes your consent may be implied throughout your conduct with us. The company will only further disclose your personal information, without notice, only in the situations described in Section 5 below.

4. Limiting Collection

Our company restricts the collection of personal information only to that information that is necessary for the limited purposes noted above. We are committed to collecting personal information in a fair, open and lawful manner.

For this reason, our company does not indiscriminately collect personal information. We collect personal information to fulfill the above noted purposes only, and for no other purpose.

5. Limiting Use, Disclosure and Retention

Our company does not use personal information for purposes other than those for which it was originally collected, unless it has first obtained the consent of the person from whom such information was received.

Further, The Southern Ontario Credit Bureau Inc. will only disclose your personal information or your client's personal information that we acquire through the performance of various services on your behalf, under the following circumstances:

- a) when we are required or authorized by law to do so, for example if a court issues a subpoena
- b) when you have consented to the disclosure
- c) where it is necessary to establish or collect fees
- d) if the information is already publicly known

We retain personal information only for as long as it is needed and only for the fulfillment of the purposes for which it was originally collected.

6. Accuracy

Since we use personal information to evaluate potential clients and may use it to maintain current clients, it is important that the information be accurate and up-to-date. If during the course of your membership any of your information changes, please inform us of such changes and we will update our records accordingly. If during the course of performing any of our services on your behalf, personal information is found to be inaccurate, we will contact you for any corrections deemed necessary.

You may confirm the accuracy of your personal information by contacting us in writing at the address set out at the end of this document.

7. Safeguards

Our company takes all reasonable precautions to ensure that personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect this information are:

- a) premise security
- b) restricted file access to personal information
- c) secured databases
- d) hard copies of membership information kept in a secure area with restricted access
- e) confidential shredding

We also ensure that any of our employees who deal with personal information are properly trained and are aware of the necessary and appropriate measures required to protect personal information.

8. Openness

Our company makes information about its policies and practices respecting the collection and maintenance of personal information available to all interested parties.

We are pleased to answer any questions that you may have regarding the collection and maintenance of personal information. Please forward any questions in writing to the address set out at the end of this document.

9. Individual Access

You may ask for access to any personal information which we hold about you, however, we reserve the right to confirm the identity of the persons seeking access to personal information before complying with any requests.

Your rights to access of your personal information are not absolute. We may deny access when:

- a) denial of access is required or authorized by law
- b) information relates to existing or anticipated legal proceedings against you
- c) when granting you access would have an unreasonable impact on other people's privacy
- d) when to do so would prejudice negotiation with you
- e) to protect our company's rights and property
- f) when the request is frivolous or vexatious

If we deny your request to access information we shall provide you with a written explanation for such denial.

10. Challenging Compliance

Our company has designated officials who are responsible for the day to day care and control of personal information. These officials will receive and respond to all information requests concerning our privacy policies or about your personal information under our care and control.

We investigate all complaints received by us and will respond in a timely manner. If any complaint is found to be justified, then we will take the appropriate measures to respond to the matter to the satisfaction of the complainant.

How to Access or Amend Your Personal Information

If you have any questions, or wish to access your personal information, please write to our privacy officer at:

Box 3128, Hamilton, Ontario, L8H 7K6

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

112 Kent Street, Ottawa, Ontario, K1A 1H3 1-800-282-1376