



April 23, 2022

Personal Information Protection Policy

McEnhill & Company Consulting Ltd. (McEnhill & Co.) is committed to safeguarding the personal information entrusted to us by our clients and potential clients. We manage personal information in accordance with Alberta's *Personal Information Protection Act* and other applicable laws.

This policy outlines the principles and practices we follow in protecting your personal information. This policy applies to McEnhill & Co. and to any person providing services on our behalf. A copy of this policy is provided to any client upon request and is posted on our website.

What is personal information?

Personal information means information about an identifiable individual. This includes an individual's name, home address, phone number, age, sex, marital or family status, an identifying number, financial information, educational history, etc.

What personal information do we collect?

We only collect the personal information that we need for the purposes of providing services to our clients, including personal information needed to:

- deliver requested services
- register a client in a program (Certificate of Recognition)
- contact clients about appointments
- follow up with clients to determine satisfaction with products and services
- notify clients of upcoming events of interest
- meet regulatory requirements
- respond to client requests
- communicate information related to our consulting services

We normally collect personal information directly from our clients. We may collect information from other persons with consent or as authorized by law.

We inform our clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when a client volunteers information for an obvious purpose (e.g., providing Workers' Compensation Board information for audit registration).

Consent

We ask for consent to collect, use, or disclose a client's personal information, except in specific circumstances where collection, use, or disclosure without consent is authorized or required by law. We may assume consent in cases where a client volunteers information for an obvious purpose.

We assume consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain client services if you are unwilling to provide consent to the collection, use, or disclosure of certain personal information. Where express consent is needed, we will normally ask clients to provide their consent orally (in person, by telephone), in writing (by signing a consent form, by checking a box on a form, or electronically (by clicking a button)).

A client may withdraw consent to the use and disclosure of personal information at any time unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain consulting services if we do not have the necessary personal information.

We may collect, use, or disclose client personal information without consent only as authorized by law. For example, we may not request consent when the collection, use, or disclosure is to determine suitability for an honour or award, or in an emergency that threatens life, health or safety or when the personal information is readily available to the public.

How do we use and disclose personal information?

We use and disclose client personal information only for the purpose for which the information was collected, (e.g., we will use information gathered during audit document review, interviews, and observation tours to complete Certificate of Recognition audit reports) except as authorized by law. The law also allows us to use that contact information for the purpose of collecting a debt owed to our organization, should that be necessary.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent.

How do we safeguard personal information?

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases, we may ask for a written request for correction.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure, or modification of personal information, as well as any unauthorized access to personal information.

We will notify the Office of the Information and Privacy Commissioner of Alberta, without delay, of a security breach affecting personal information if it creates a real risk of significant harm to individuals.

We retain client personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

We render client personal information non-identifying or destroy records containing personal information once the information is no longer needed.

We use appropriate security measures when destroying personal information, including shredding paper records, and permanently deleting electronic records.

Access to records containing personal information

Clients of McEnhill & Co., have a right to access their own personal information in a record that is in the custody or under the control of McEnhill & Co., subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual. Organizations are authorized under the Act to refuse access to personal information if disclosure would reveal confidential business information. Access may also be refused if the information is privileged or contained in mediation records.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to info@mcenhillandcompany.ca with Attn: Director re: PIPA compliance in the subject line. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within forty-five (45) calendar days unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.

Questions and complaints

If you have a question or concern about any collection, use, or disclosure of personal information by McEnhill & Co., or about a request for access to your own personal information, please contact the Director of McEnhill & Co. at the first instance:

- info@mcehillandcompany.ca with Attn: Director re: PIPA compliance in the subject line.

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 - 6 Avenue, SW
Calgary, Alberta T2P 3W2
Phone: 1.403-297-2728
Toll Free: 1-888-878-4044
Email: generalinfo@oipc.ab.ca
Website: www.oipc.ab.ca