



## Pension Valuers of Canada Privacy Policy

Pension Valuers, collect, use and disclose personal information and we are dedicated to doing so responsibly, and only to the extent necessary for the services we provide. The following document explains our privacy policies. We have the right to revise our Privacy Policy when necessary. This policy is accessible on our website or copies can be requested from our office at no charge.

**1. Accountability:** The Office of the Privacy Commissioner of Canada has developed the *Personal Information Protection and Electronic Documents Act (PIPEDA)* concerning the collection, use, storage, and disclosure of Personal Information.

**2. Identify the purpose of data collection:** Collecting, using, storing and disclosing personal information is essential to serving our clients accurately.

For our clients, the primary purpose for collecting personal information is to provide pension valuation services. Third party sources are also used to obtain personal information concerning our client so that we can provide a pension valuation report.

**3. Obtain consent:** Clients sign a consent form allowing us to collect, use, store, and disclose their personal information in order to provide them, their lawyer or their mediator with a pension valuation report for marriage breakdown purposes.

Clients sign an authorization letter allowing pension plan administrators or the employer to disclose to Pension Valuers of Canada certain personal information in order to produce a pension valuation report for marriage breakdown purposes.

**4. Limit collection:** We engage a number of pension plan administrators or employers that have access to personal information we hold. Access to personal information is limited to a reasonable amount. We also seek assurances from any third party that they follow appropriate privacy principles. Although office cleaners have access to our premises, access to personal information is restricted.

Now and again we may gather information about the general public to provide them with our ezine or monthly newsletter. Permission to use personal information is always our goal, but in cases where permission is not obtained, we will promptly remove any personal information upon request.



Our website provides us with personal information given by you, and is only used for the reason you gave it to us. For example, to respond to an e-mail inquiry, or to subscribe to our ezine. We collect statistics, which reveal the traffic source, time of day and duration of visit, which pages better serve the visitors. None of these statistics reveal any identifiable personal information.

**5. Limit use, disclosure and retention:** Pension Valuers may also collect, use and disclose information for purposes associated with our services. For example, to invoice a client, to finalize a credit card payment, or to collect monies on outstanding accounts. We also may do so to inform clients of our ezines.

Informing us of your desire to not receive our ezines will remove you from our mailing list.

**6. Be accurate:** We endeavor to minimize the possibility of using incorrect information. This is why we confirm all pension information with the pension plan administrators whenever possible. Clients or their lawyers fill in our information sheet. If there are conflicts with the dates given on our information sheet and those given by the pension plan administrators we ensure that we ascertain which of the dates are correct, and use the correct information.

**7. Use appropriate safeguards:** Pension Valuers understands how important it is to have your personal information protected. The following steps are taken to ensure your privacy:

- Our paper and computer files are under supervision as well as having passwords on all computers to restrict access.
- Our staff uses your personal information only to complete the necessary duties our service requires in compliance with our privacy policy.
- Reputable companies transmit paper information through sealed, addressed envelopes.
- Electronic information is transmitted by fax through a direct line.
- Third party sources with access to personal information must provide us with their privacy policy or confidentiality agreement.
- Our paper-based files are kept for seven years and then shredded and disposed of by an accredited company.
- We have an up-to-date security system in our offices.
- Protected server where the information is stored.
- Files shredded and disposed of by an accredited company.



**8. Be open:** We ensure that our front-line staff are familiar with the procedures for responding to individual inquiries. We will give you a description of what personal information we have made available to pension plan administrators and why this information was disclosed.

**9. Give individuals access:** With some exceptions, you have the right to see what personal information we have in our records about you. We will gladly assist you with any confusion about information such as technical terms. Any information you request will be given to you upon confirmation of your identity for your own personal protection. We reserve the right to charge a fee for these requests.

If you would like to review your information, please put your request in writing. If for any reason we cannot grant you access, we will let you know along with a reason why within 30 days. If we collect personal information about you for a client and/or lawyer, in most cases this information is protected and access will be denied without our clients permission.

If you think there are any errors regarding your personal information, you may ask for it to be corrected. This is only relevant to information based on fact, not on any professional views that have been formed. Documentation may be required to prove our files hold inaccurate information. The correction will be made and we will advise anyone whom we may have forwarded your information to.

**10. Provide recourse:** Our privacy compliance officer is G. Edmond Burrows, and he can be reached at:

Pension Valuers of Canada  
785 the Kingsway  
Peterborough, ON K9J 6W7  
Phone: (705) 749-0947  
Fax: (705) 749-6762  
Email: [eburrows@pension.ca](mailto:eburrows@pension.ca)

Mr. Burrows will make every effort to answer any inquiries you may have.

If you would like to make a formal complaint about the above privacy practices, please make it in writing to our Privacy Compliance Officer Mr. Ed Burrows. Upon receipt of your complaint, he will send you an acknowledgement of your letter and make certain the issue is examined carefully and quickly. He will also be sure a formal decision including reasons is sent to you in writing.

This policy complies with the Personal Information Protection and Electronic Documents Act.



The administration of the privacy legislation is overseen by the Information and Privacy Commissioner of Canada.

For general inquiries, the information and Privacy Commissioner can be reached at:

112 Kent Street  
Ottawa, ON K1A 1H3  
Phone: (613) 995-8210  
Toll-free: 1-800-282-1376  
Fax: (613) 947-6850  
TTY: (613) 992-9190  
[www.privcom.gc.ca](http://www.privcom.gc.ca)

### **Definitions (from PIPEDA Guide)**

#### **Personal information:**

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- Age, name, ID numbers, income, ethnic origin, or blood type;
- Opinions, evaluations, comments, social status, or disciplinary actions; and
- Employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs)

Personal information does not include the name, title or business address or telephone number of an employee of an organization.

#### **Consent:**

Voluntary agreement with what is being done or proposed. Consent can be either express or implied. Express consent is given explicitly, either orally or in writing. Express consent is unequivocal and does not require any inference on the part of the organization seeking consent. Implied consent arises where consent may reasonably be inferred from the action or inaction of the individual.

#### **Disclosure:**

Making personal information available to others outside the organization.

#### **Use:**

Refers to the treatment and handling of personal information within an organization.