



Personal Information Protection Policy

At Hunter West Legal Recruitment Ltd. ("HWLR"), we are committed to providing our clients and candidates with exceptional service. As providing this service involves the collection, use, and disclosure of some personal information, protecting this personal information is one of our highest priorities.

Our policies and procedures have been established in accordance with the *Personal Information Protection Act*, BC ("PIPA") *Personal Information Protection Act*, Alberta and the *Personal Information Protection and Electronic Documents Act*, Canada.

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

Definitions

Personal Information – means information about an identifiable individual e.g., including name, home address, phone number, income information, education, transcripts, employment information, client/transaction lists. 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, and/or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that HWLR complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and clients and candidates voluntarily provide their 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 candidates' information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To identify client and candidate preferences;
 - To understand the recruitment needs of our clients and candidates;
 - To deliver requested services we provide to you or receive from you;
 - To ensure candidate and client relationship information such as client requests and feedback are adhered to;
 - To ensure a high standard of service to our clients and candidates including business relationship information;
 - To be able to inform you of our services other than those you have specifically requested;
 - To meet regulatory requirements;
 - For any other reasonable purpose to which you consent.

Policy 2 – Consent

- 2.1 We will obtain client and candidate 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, on our website www.hunterwest.ca or it can be implied where the purpose for collecting, using, or disclosing the personal information would be considered obvious (such as finding a candidate a new position or filling an open position for a client) and the client or candidate voluntarily provides personal information for that purpose.

- 2.3 Consent may also be implied where a client or candidate is given notice and a reasonable opportunity to opt-out of their personal information being used for mail-outs, the marketing of new services or products, or fundraising, and the client or candidate 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 and candidates can withhold or withdraw their consent for HWLR to use their personal information in certain ways. A client's or candidate's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide recruitment services. If so, we will explain the situation to assist the client or candidate in making the decision.
- 2.5 We may collect, use or disclose personal information without the client's or candidate's knowledge or consent in the following limited circumstances:
 - When the collection, use or disclosure of personal information is permitted or required by law;
 - When the personal information is available from a public source (e.g., a telephone directory);
 - 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 and candidate personal information where necessary to: (i) fulfill the purposes of this Personal Information Protection Policy; (ii) for the purposes identified at the time of collection; or (iii) for a purpose reasonably related to those purposes such as:
 - To conduct client or candidate surveys in order to enhance the provision of our services;
 - To contact our clients or candidates directly about new recruitment services that may be of interest.
- 3.2 We will not use or disclose a client or candidate's personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We **never** provide a candidate's personal information to a potential employer without the candidate's prior consent.

Policy 4 – Retaining Personal Information

- 4.1 If we use clients' or candidates' personal information to make a decision that directly affects them, we will retain that personal information for at least one year so that they have a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain client or candidate 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 and candidate personal information is accurate and complete where it may be used to make a decision about the client or candidate or disclosed to another organization.
- 5.2 Clients and candidates 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 or emailed to privacy@hunterwest.ca 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 client's or candidate's correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of client and candidate 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 and candidate personal information is appropriately protected: the use of locked filing cabinets; physically securing offices where personal information is held if there is a paper copy; the use of user IDs, passwords, encryption, firewalls; using a secure cloud server.
- 6.3 We will use appropriate security measures when destroying a client or candidate'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 and Candidates Access to Personal Information

- 7.1 Clients and candidates have a right to access their personal information, subject to limited exceptions such as: solicitor-client privilege, disclosure would reveal personal information about another individual, health and safety concerns.

- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought:

Privacy Officer, Hunter West Legal Recruitment
300 – 1055 W. Hastings Street
Vancouver, BC
V6E 2E9
privacy@hunterwest.ca
604-609-6188

- 7.3 Upon request, we will also tell clients and candidates 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 60 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 client or candidate of the cost and request further direction from the client or candidate 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 client or candidate in writing, providing the reasons for refusal and the recourse available to them.

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

- 8.1 The Privacy Officer is responsible for ensuring HWLR's compliance with this policy and PIPA. Any concerns or questions regarding HWLR's compliance in writing to the Privacy Officer.
- 8.2 HWLR may from time to time make changes to this Personal Information Protection Policy. Any revised versions of this Personal Information Protection Policy will be posted on our website at www.hunterwest.ca. Any changes to this Personal Information Protection Policy will be effective from the date they are posted. This Personal Information Protection Policy has a limited scope and application and the rights and obligations contained in this Personal Information Protection Policy may not be available to all individuals or in all jurisdictions. This Personal Information Protection Policy does not create or confer upon any individual any rights, or impose upon HWLR any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Personal Information Protection Policy and Canada's federal and provincial privacy laws, as applicable, this Personal Information Protection Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

Policy 9 – Our Website

- 9.1 You can visit our website (www.hunterwest.ca) without informing us who you are or revealing any information about yourself, including your e-mail address. Our server may collect information related to your visit to our website, including the IP address and domain used to access our site, the type and version of your browser, the website you came from to access our site, the page you entered and exited at, any website page that is viewed by that IP address and what country you are from. We use this information to monitor our website's performance (such as number of visits, average time spent, page views) and for our business purposes such as working to continually upgrade our website.
- 9.2 When you apply for a position on our website, we imply that you have consented to the collection, use, and disclosure of your personal information for the purposes and in the manner set out in this Personal Information Protection Policy.