CUSTOMER PRIVACY

Prince Albert & District Community Futures Development Corporation respects *client* privacy.

CFDC is committed to developing policies and procedures that address common privacy concerns.

CFDC protects their clients' privacy and their right to control the collection, use and disclosure of their personal information. CFDC have procedures in place which guide their employees, directors and officers in maintaining confidentiality. The protection of their clients personal information is their commitment to the client.

The Board of Directors for Prince Albert & District Community Futures Development Corporation have adopted the *Prince Albert & District Community Futures Development Corporation Code for the Protection of Personal Information*, established related Policies and Procedures, and appointed a Privacy Officer.

9.0 Your Personal Information

Principle 1 -- Accountability
CFDC is responsible for maintaining and protecting the personal information of the client. CFDC has a Privacy Officer, accountable to the CFDC, to ensure compliance with the ten privacy principles defined in the *Personal Information Protection and Electronic Documents Act* of Canada ("PIPEDA").

Principle 2 – Identifying Purposes
CFDC provides the client with information on the purposes for which personal information is collected before or at the time the information is actually gathered.

Principle 3 -- Consent
CFDC will obtain from the client, directly, his/her information and consent, in writing, when he/she becomes a loan client.

CFDC may possess personal information about the client that CFDC collected prior to implementation of PIPEDA. CFDC will continue to use that information for the purposes listed in its brochure unless the client ask CFDC to stop using the information.

Principle 4 – Limiting Collection
CFDC obtains only the necessary information it requires and limits the use of this information to the purposes CFDC has identified.

Principle 5 – Limiting Use, Disclosure and Retention

Client information may only be used or disclosed for the purposes for which it was collected unless the client has otherwise consented, or when it is required or permitted by law. Client information may only be retained for the period of time required to fulfill the purposes for which it was collected or as otherwise allowed by law.

Principle 6 -- Accuracy

Client information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

Principle 7 -- Safeguards

The security of clients' personal information is a priority for CFDC.

CFDC take steps to safeguard clients' personal information, regardless of the format in which it is held, including:

1. Physical security measures such as restricted access facilities and locked filing cabinets;
2. Electronic security measures for computerized personal information such as password protection, database encryption and personal identification numbers;
3. Organizational processes such as limiting access to clients' personal information to a selected group of individuals;
4. Contractual obligations with third parties who need access to clients' personal information requiring them to protect and secure your personal information.

Principle 8 -- Openness

CFDC is open about its privacy and security policy.

CFDC is committed to providing clients with understandable and easily available information about its policy and practices related to management of its clients' personal information.

This policy and related information is available at CFDC's website: **http://www.cfsask.ca** under privacy and security; or at CFDC Prince Albert and District's office:

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Prince Albert & District Community Futures Development Corporation
#5B – 598 15th Street East
Prince Albert, SK S6V 1G2
(306) 763-8125

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CFDC will endeavor to supply the requested information within a reasonable period of time from the date of the request. In some cases a fee may be charged; however, the requestee will be advised of any charges prior to fulfilling the request.

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Board Approved: January 26, 2010

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Principle 9 – Individual Access

When information is requested, CFDC will advise the client of what personal information it has in its possession or control about said client, what it is being used for, and to whom it has been disclosed.

When information is requested, CFDC will give the client access to personal information about themselves which is in our possession or control. In certain situations, however, CFDC may not be able to give access to all of the client's personal information.

Principle 10 – Challenging Compliance

The client is entitled to question CFDC's compliance with any of these principles by contacting its Privacy Officer. Any concerns clients may have about CFDCs handling of their personal information are to be directed to our Privacy Officer who will investigate the complaint and provide the client with the results of the investigation within a reasonable period of time.

9.1 Privacy Officer: Our Privacy Officer may be contacted at:

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Privacy Officer

#5B – 598 15th Street East

Prince Albert SK S6V 1G2

Ph: (306) 763-8125   Email: info@pacf.ca

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9.3 Fax Clause: This fax contains confidential information. Any copying, use, or distribution of this fax or the information contained therin by other than the intended recipient is strictly prohibited and unauthorized. If you have received this fax in error, please notify the sender (by return fax or otherwise) and then immediately destroy this fax.

9.4 Email Clause: This email contains confidential information. Any copying, use, or distribution of this email or the information contained therein by other than the intended recipient is strickly prohibited and unauthorized. If you have received this email in error, please notify the sender (by email reply or othersie) and then immediately and permanently delete this email.

9.5 Action Plan:

9.51 Organizational Requirements:

1. Appoint a Privacy Officer
2. Train Privacy Officer
3. Train all employees, directors and officers
4. Audit current practices and office set up
5. Implement policies and procedures ASAP

9.52 Documentation Requirements:

1. Create privacy documentation including:
2. Brochure setting out Privacy Policy
3. Standard Privacy Consent form and have all new clients complete
4. Complaint Resolution Process
5. Privacy Confirmation Letter for third parties
6. Confidentiality Agreement
7. Withdrawal of Consent Form

9.53 Create logs including:

1. Retention and Destruction Log
2. Disclosure Log
3. Individual Access Log
4. Requested Information Log

9.54 Revise documentation including:

1. Privacy Policy and Code
2. Loan Application
3. Facsimile cover sheets
4. New email messages
5. Web Page Information

9.55 Physical Requirements:

1. Mail out Privacy Policy brochure to existing clients
2. Audit closed files and stored information
3. Destroy all non-critical documents (privacy officer)
4. Shred closed files according to your new procedures
5. Audit safeguards and upgrade according to Code