

Alan Davis & Associates Inc.



Privacy Statement

The purpose of this Privacy Statement is to help you understand our practices with respect to the collection, storage, use, disclosure, protection and accuracy of Personal Information that we collect and control. This Privacy Statement applies to any information we collect or receive about you, from any source.

We are demonstrating our commitment to your privacy, by complying with the laws and regulations under applicable privacy laws in Canada.

What is Personal Information?

"Personal Information" means any information about an identifiable individual with the exception of the name, title or business address or telephone number of an employee of an organization.

How do we collect your Personal Information?

We will always collect your Personal Information by fair and lawful means, with your consent to do so or as otherwise permitted by law.

When and how do we obtain your consent?

We obtain your consent prior to collecting and, in any case, prior to using or disclosing your Personal Information for any purpose. We identify to whom, and for what purposes, we disclose your Personal Information, at the time we obtain your consent to such disclosure, either orally or in writing.

How do we use your Personal Information?

One of the primary purposes for which we collect your Personal Information is to conduct talent searches on behalf of our Clients. We may disclose your Personal Information:

- a. to a third party who have engaged Alan Davis & Associates to perform talent searches on their behalf;
- b. to conduct reference checks necessary to assist employers in assessing candidates' fit for the position/client company;
- c. to agents, contractors, or individuals employed by or under contract with us to perform reasonable business functions on our behalf, such as but not limited to contract management and administration;
- d. to a government institution or part of a government institution, if we have reasonable grounds to believe that there is imminent danger to life or a contravention of the law involving property which is being or is about to be committed;
- e. in connection with a corporate merger, consolidation, sale of substantially all assets, or other fundamental corporate change;
- f. such other disclosures of Personal Information to such persons for which you provide your consent; and
- g. as otherwise permitted by law.

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How do we ensure the privacy of your Personal Information when dealing with third parties?

We ensure that all third parties to whom we disclose Personal Information are required by contract to observe the intent of this Privacy Statement.

How long will we use, disclose or retain your Personal Information?

We will use, disclose or retain your Personal Information for as long as necessary to fulfill the Identified Purposes and/or as required by law. If your Personal Information has been used to make a decision about you, it will be retained for a reasonable period of time after the decision has been made to allow you access to the information. If you have filed a request regarding Personal Information, we will retain it for as long as is necessary to allow you to exhaust any recourse you may have under the law.

How can you review your Personal Information that we have collected, used or disclosed?

We will make available to you any specific Personal Information on you in our custody or control upon written request, to the extent permitted by law. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes.

How do you know that the Personal Information we have on you is accurate?

We will ensure that your Personal Information is kept as accurate, complete and up-to-date as is necessary for the identified purposes so as to minimize the risk of using incorrect information about you.

- a. We update your Personal Information as it is made available to us by you, and only if the information is necessary to fulfill the Identified Purposes.
- b. You are responsible for informing us about changes to Personal Information that are necessary to fulfill the Identified Purposes, such as but not limited to: changes to name or address, telephone number, employer, etc.

What if the Personal Information we have on you is inaccurate?

If you successfully demonstrate, in writing, that the Personal Information we have on you is inaccurate or incomplete, we will amend the Personal Information as required. Where appropriate, we will transmit the amended information to third parties having access to your Personal Information.

How fast will we respond to your written requests?

We will attempt to respond to written requests within thirty (30) days after receipt. We will advise you in writing if we cannot meet this target.

How do we know that it is really you requesting your Personal Information?

We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your Personal Information. Any such information shall be used only for this purpose.



Are there any costs to you for requesting information on your Personal Information or on our privacy practices?

We will not assess any costs to you for access to your Personal Information or on our privacy practices without first providing you with an estimate of the approximate costs, if any. You may withdraw your requests for access to information by notifying us within the thirty-day notice period disclosed on the estimate.

What safeguards have we implemented to protect your Personal Information?

We have implemented physical, organizational, contractual and technological security measures to protect your Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification.

We ensure our employees are aware of the importance of maintaining the security and confidentiality of Personal Information and restrict their access to information they need to know in connection with their duties and in order to fulfill the Identified Purposes.

We dispose of and destroy Personal Information with care, in order to prevent unauthorized parties from gaining access to the information.

How do you contact us regarding access to your Personal Information or our Privacy Policy and practices?

All *comments, questions, concerns or complaints* regarding your Personal Information or our privacy practices, should be forwarded to our Privacy Officer in writing to:

Privacy Officer
Alan Davis & Associates
538 Main Road
Hudson Heights, PQ
J0P 1J0

We will inform you when you make an inquiry or lodge challenges or complaints of the relevant procedures.

