

Life's Emergency Training

Personal Information Protection Policy

Life's Emergency Training is committed to providing our clients, customers, members with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, employees, members/independent trainers; protecting their personal information is of highest priority.

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

Scope of this Policy

This Personal Information Protection Policy applies to Life's Emergency Training and its clients, customers, and members. This policy also applies to any service providers inclusive our roster of independent trainers collecting, using or disclosing personal information on behalf of Life's Emergency Training.

In addition, any third party or client that has shared client and/or employee personal information with Life's Emergency Training, in the normal course of business, under release and consent executed and retained by Third Party, will be held and treated within the standards of this Policy.

Definitions

Personal Information – means information about an identifiable individual [*including name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, health information, education, employment information*]. 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 or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that Life's Emergency Training (hereinafter LET) complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the client, customer, member voluntarily provides his or her 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. Definitions:

CLIENT: Independent party that has utilized and engaged LET; invoice payer.

CUSTOMER: students and employees in attendance of training

MEMBER (Independent Trainer): Certified VIP and Masters hired to do training under the LET umbrella. Members/Independent trainers are responsible for adhering to this policy, while acting on behalf of and providing training for LET. All Members are addressed within this policy, as it pertains to their personal information.

- 1.2 LET will only collect client, customer, member information that is necessary to fulfill the following purposes:

- To verify identity;
- To enrol the client and respective customers in a program;
- To identify client preferences and service needs;
- To deliver requested products and services;
- To manage certification renewal of all customers, clients and members;
- To guarantee a travel or hotel reservation for members;
- To process a newsletter subscription;
- To send out association membership and regulatory information;
- To contact our clients, customers, members for continuous training, services and products;
- To ensure a high standard of service to our clients, customers, members;

- To meet regulatory requirements;
- To assess suitability for member and client;
- To collect and process r payments;

Policy 2 – Consent

- 2.1 We will obtain client, customer, member 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, and through an authorized representative* such as Client and/or Member; or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client, customer, member voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a client, customer, member is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising and the client, customer, member 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, customers, members can withhold or withdraw their consent for Life’s Emergency Training to use their personal information in certain ways. A client’s, customer’s, member’s decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client, customer, member in making the decision.
- 2.5 We may collect, use or disclose personal information without the client’s, customer’s, member’s knowledge or consent in the following limited circumstances:
- When the collection, use or disclosure of personal information is permitted or required by law;
 - In an emergency that threatens an individual's life, health, or personal security;

- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To investigate an anticipated breach of an agreement or a contravention of law.

2.5 We may collect and use personal information without the client's, customer's, member's knowledge or consent in the following limited circumstances:

- In the normal course of business, whereby customer personal information has been shared by Client, to LET or member, in order to facilitate training and maintain certificate renewal database. Under no circumstance will Customer's personal information be shared with anyone other than originating source (Client). In such circumstances, LET will rely upon the Client to maintain any and all necessary release and consents.

Policy 3 – Using and Disclosing Personal Information

3.1 We will only use or disclose client, customer, member personal information where necessary to fulfill the purposes identified at the time of collection

- To conduct client, customer, member surveys in order to enhance the provision of our services;
- To contact our clients, customers, members directly about products and services that may be of interest;

3.2 We will not use or disclose client, customer, member personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell client, customer, member lists or personal information to other parties.



Policy 4 – Retaining Personal Information

- 4.1 If we use client, customer, member personal information to make a decision that directly affects the client, customer, member, we will retain that personal information for at least one year so that the client, customer, member has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain client, customer, member 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, customer, member personal information is accurate and complete where it may be used to make a decision about the client, customer, member or disclosed to another organization.
- 5.2 Clients, Customers, Members 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 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 clients', customers', members' correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of client, customer, member 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, customer, member personal information is appropriately protected:

- All electronic data files are maintained with restricted access (password protected);
- All hard copy files will be held under lock, with restricted access to President only.

6.3 We will use appropriate security measures when destroying client's, customer's, member's personal 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, Customers, Members Access to Personal Information

7.1 Clients, Customers, Members have a right to access their personal information, subject to limited exceptions.

- Clients that have engaged LET for training and certification, that request all training outcomes be directed to Client, as opposed to customer.

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

7.3 Upon request, we will also tell clients, customers, members 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 30 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, customer, member of the cost and request further direction from the client, customer, member 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, customer, member in writing, providing the reasons for refusal and the recourse available to the client, customer, member.



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

- 8.1 The **President**, acting as Privacy Officer is responsible for ensuring Life’s Emergency Training’s compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Clients, Customers, Members should direct any complaints, concerns or questions regarding Life’s Emergency Training’s compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client, customer, member may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Life’s Emergency Training’s Privacy Officer or designated individual:

Kathryn Davies
President
kathryn@lfiesemerg.com
www.lifeseemerg.com
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I acknowledge I have read and understood this document.

Print Name

Signature

Date