

# **Case Receivable Management Inc. Code of Privacy**

## **Introduction**

Case Receivable Management Inc.(CRMI) is a locally owned, Alberta based corporation. Our company and our employees are licensed and regulated by Alberta Government Services Consumer and Corporate Services Division.

We understand the societal value in protecting personal information and ensuring its safekeeping. We at CRMI embrace the new federal Personal Information Protection and Electronics Documents Act (PIPEDA) and acknowledge the importance of national standards to protect the personal information that we collect.

The Code of Privacy for CRMI follows and complies to the CSA Model Code of Personal Information Privacy and is as follows:

## **1.Accountability**

CRMI will be responsible for all personal information under our control. We have designated one individual to be our Chief Privacy Officer, to ensure our organization's compliance with the policies and procedures indicated.

**The Chief Privacy Officer of CRMI is Chris J. Dugan.**

**Case Receivable Management Inc.  
Lower Concourse, Box 34  
2016 Sherwood Drive  
Sherwood Park, AB. T8A 3X3  
Phone: (780)-416-4819  
Facsimile: 1-(866)-717-1902  
E-mail: [info@invoice911.ca](mailto:info@invoice911.ca)**

Upon receiving an enquiry, Mr. Dugan will respond to you within 30 days.

It is CRMI's commitment to:

- Protect personal information
- Allow individuals to request information; seek amendments to their personal information; and file complaints against CRMI with our Privacy Officer:
- Train and educate our staff:
- Develop information which explains these procedures to the public and our clients.

Although we rarely, if at all, use third parties to process personal information, we will use reasonable means to ensure that all third party transferring of personal

information is afforded a comparable level of protection to that which CRMI maintains.

## **2. Identify Purposes**

CRMI will identify the purpose for which we collect personal information on affected individuals at or before the time of collection. All assignments received from our corporate, government, and other clients will be vetted to ensure their requests for information are compliant with PIPEDA. We may choose to orally explain to affected individuals the purposes for which personal information is being collected and then place a notation in the applicable file indicating that this has been done.

CRMI may identify any new purposes that arise during the course of dealings with personal information and obtain prior consent required for this new use, even if we have already identified certain initial purposes. However, we will only do this when the intended new use purpose truly constitutes a "new" use, i.e., when the new purpose being proposed is sufficiently different from the purpose initially identified.

## **3. Consent**

We will obtain the appropriate consent from individuals for collection, use or disclosure of personal information, except where the law provides an exception. We may obtain express consent for the collection, user disclosure of personal information, or when we determine that consent has been applied by the circumstances.

Express consent is specific authorization given by the individual to CRMI, either orally or in writing. Implied consent is when CRMI has not received a specific consent but the circumstances allow us to collect, use, or disclose personal information.

In most incidences, obtaining the knowledge and consent of individuals would defeat the purpose of an investigation, in particular with respect to a breach of an agreement or contravention of a law. Personal information will only be collected, used and disclosed by CRMI employees without consent in accordance with Section 7 of the Personal Information Protection and Electronics Documents Act, S.C. 2000, c.5 (PIPEDA) or under other lawful means.

## **4. Limiting Collection**

The personal information that we collect will be limited to that which is necessary for purposes we have identified. We will only collect personal information for specific, legitimate purposes. We will not collect personal information indiscriminately. We will only collect information by fair and lawful means. Our policies and procedures relating to the limitations on collection of personal information will be regularly communicated to our staff who deal with collection, use and disclosure of personal information.

## **5. Limiting Use, Disclosure, and Retention**

Personal information will not be used or disclosed for purposes other than those for which it is collected, except with the consent of the individual or as permitted by law. We will only retain personal information as long as necessary for the fulfillment of those purposes. Personal information that is no longer required to fulfill identified purposes will be destroyed.

Please note that there may be situations where CRMI uses, discloses or retains personal information for legitimate purposes not identified to the individual to which the information pertains including these situations referred to in Section 3.

## **6. Accuracy**

The personal information we collect will be accurate, complete and up-to-date as necessary for its intended purposes. Our goal is to minimize the possibility that inappropriate information may be used to make a decision about any individual whose personal information we process.

## **7. Safeguards**

CRMI will safeguard all personal information under our control in a manner that is appropriate to the sensitivity of the information. We will take all the physical security measures necessary including alarming and properly locking our facilities and/or locking all personal information in secure filing cabinets. All of CRMI's staff have been properly trained in the policies of that pertain to these safeguards.

Personal information under the control of CRMI is electronically stored and maintained on our own on-site servers and protected through the application of the latest technological measures. Distribution of personal information will be on a need-to-know basis.

We will take precautions in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to information. These measures include:

1. ensuring that no one may retrieve personal information after disposal
2. shredding documents before recycling
3. deleting electronically stored information
4. destroying decommissioned computer hardware appliances

## **8. Openness**

We will make readily available to individuals requesting specific information about our policies and procedures relating to the management of personal information that is under our control.

CRMI will make available to the public easily understandable information about our company via our website at [www.invoice911.com](http://www.invoice911.com).

## **9. Individual Access**

Upon request, an individual will be informed of the existence, use and disclosure of his/her personal information which is under our control, and may be given access to

and be permitted to challenge the accuracy and the completeness of that information.

There are lawful exceptions that will prevent us from providing access, which include, but are not limited to the following:

1. Personal information about another person might be revealed.
2. Commercially confidential information may be revealed.
3. Someone's life or security might be compromised.
4. The information was collected without consent for the purposes related to an investigation of a breach or an agreement or contravention of a law or other lawful exemption.
5. The information was generated during the course of a formal dispute resolution process.
6. The information is protected by the Solicitor/Client privilege.
7. When restricted from providing this disclosure under other Federal or Provincial legislation.

## **10. Challenging Compliance**

An individual may address a challenge concerning compliance with the aforementioned policies and procedures to our Privacy Officer whose details are listed in Section 1.