



*We believe in You.*

## **Community Business Development Corporations**

### **Privacy, Consent, and Release Policy For Client / Individual**

The CBDC recognizes the importance of privacy and the sensitivity of personal information. We have an obligation to keep confidential all information by which you can be identified. We are committed to protecting any personal information we hold. This Privacy Policy outlines how we manage your personal information and safeguard your privacy.

#### *Your Privacy Rights*

From January 1, 2004, all businesses engaged in commercial activities must comply with the Personal Information Protection and Electronic Documents Act, and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. The Act gives you rights concerning the privacy of your personal information. The CBDC is responsible for the personal information we collect and hold. To ensure this accountability, we have developed this policy, and trained our directors and staff about our policies and practices.

#### *Why Does the CBDC Need Personal Information?*

The CBDC provides services and products to a wide range of clients. In doing so, it may from time to time distribute materials concerning its services and developments that may be relevant to your business.

#### *What personal information do we collect?*

Personal information is any information that identifies you, or by which your identity could be deduced. We need this information in order to provide lending services to our clients.

#### *How do we collect your personal information?*

We collect information only by lawful and fair means and not in an unreasonably intrusive way. Wherever possible we collect your personal information directly from you, beginning with the application for and loan and continuing throughout the life of the loan if it is approved.

Sometimes we may obtain information about you from other sources, which may include:

- your bank or credit union;
- your insurance company;
- your real estate agent in a property transaction;
- government agencies or registries;
- your employer;
- your lawyer;
- your accountant.

### *Consent.*

In most cases, we will ask you to specifically consent, if we collect, use, or disclose your personal information. By signing an application for a loan, you are consenting to our collecting, using and disclosing the information referred to in the Application. Normally, we ask for your consent in writing, but in some circumstances, we may accept your oral consent. Sometimes, your consent may be implied through your conduct with us.

### *Use of Your Information*

We use your personal information to provide advice and services to you, and to include you in any direct marketing activities. If you no longer have a loan with us, and tell us that you no longer wish to receive information about our services or otherwise, we will remove you from our mailing list.

### *Disclosure of your Personal Information*

The CBDC does not disclose your personal information to any third party to enable them to market their products and services. We are required, however, to disclose information to certain government organizations including Atlantic Canada Opportunities Agency (ACOA) and Human Resources Development Canada (HRDC). In addition, the CBDC will disclose your personal information when:

- required or authorized by law to do so;
- you have consented to the disclosure;
- necessary in order to establish or collect sums owing to us;
- *we engage a third party to provide administrative services to us (like computer back-up services or archival file storage);*
- the information is already publicly known.

In addition, we will disclose your personal information to third parties in order to facilitate the granting of a loan. Examples of those third parties include lawyers acting in connection with the loan and the security being taken to support it. In those instances, your consent will be implied, and we will release the information unless you tell us otherwise.

### *Retention of your Personal information*

The CBDC receives funding from the Atlantic Canada Opportunities Agency (ACOA), Human Resources Development Canada (HRDC), and certain other government organizations. The terms of our agreements with those organizations require that we maintain the information that we collect for a period of not less than **seven** years from the date that an application is rejected or the loan, if granted, is repaid.

### *Correcting Errors*

If the CBDC holds information about you and you can establish that it is not accurate, complete and up-to-date, the CBDC will take reasonable steps to correct it.

### *Updating Your Information*

Since we use your personal information to provide services to you, it is important that the information be accurate and up-to-date. If during the course of our dealings, any of your information changes, please inform us so that we can make any necessary changes.

### *Is My Personal Information Secure?*

The CBDC takes all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- premises security;
- restricted access to personal information;
- deploying technological safeguards like security software and firewalls to prevent hacking or unauthorized computer access;
- internal password and security policies.

### *Access to Your Personal Information*

You may ask for access to any personal information we hold about you. Summary information is available on request. We may ask to be reimbursed for copying charges if you require copies of the information held in our files.

### *Can I be Denied Access to My Personal Information?*

Your right to access your personal information is not absolute. We may deny access when:

- denial of access is required or authorized by law;
- granting access would have an unreasonable impact on other people's privacy;
- to protect the CBDC's rights and property;
- where the request is frivolous or vexatious.

If we deny your request for access to, or refuse a request to correct information, we shall explain why.

### *Credit Bureaus*

To help us make credit decisions about clients, prevent fraud, and check the identity of new clients, we may, on occasion, request information about you from the files of consumer reporting agencies.

### *Communicating with Us*

You should be aware that e-mail is not a 100% secure medium, and you must be aware of this when contacting us to send personal or confidential information.

### *Changes to this Privacy Policy*

Since The CBDC regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time.

### *Requests for Access*

If you have any questions, or wish to access your personal information, please write to:

John Cooke  
Executive Director  
CBDC Blue Water  
P.O. Box 39  
Musquodoboit Harbour  
B0J 2L0

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

112 Kent Street,  
Ottawa Ontario, K1A 1H3  
1.800.282.1376

### *Employment Inquiries*

If you apply to the CBDC for a job, we must consider your personal information as part of our review process. We normally retain information from candidates after a decision has been made, unless you ask us not to retain the information. If we offer you a job, which you accept, the information will be retained in accordance with our privacy procedures for employee records.