

# Alexandra J. Bignucolo Professional Corporation

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The office of Alexandra J. Bignucolo Professional Corporation knows how important your privacy is to you. Our relationship with you is founded on trust and I am committed to ensuring that we maintain that trust.

For these reasons, we have created the following privacy policy (the "Privacy Policy"). It confirms our dedication to protecting your privacy and maintaining the trust that you have placed in this office. This Privacy Policy is your guarantee that we will maintain the confidentiality and privacy of the personal information that you have entrusted to us.

## A. AN OVERVIEW

### 1. What this policy covers

This policy covers our treatment of the personal information we collect from you.

### 2. Purposes for collection of personal information

We collect personal information for the following limited purposes:

- (i) to establish and maintain client lists
- (ii) to represent you as our client
- (iii) to enforce any outstanding accounts

### 3. How personal information is used

By retaining our services you have confirmed your trust in us. We are honoured by this trust and take pride in serving you.

From time to time, our office may contact you requesting additional personal information to assist us in maintaining our contact or to assist us in representing you.

### 4. How personal information is maintained

This office does not sell, barter, trade, or give your personal information to third parties. This office stores and maintains your personal information in conformity with the requirements of the **Personal Information Protection and Electronic documents Act** (the "Act") and the **Model Code for the Protection of Personal Information** (the "Code") created and approved by the Canadian Standards Association ("CSA").

## B. APPLICATION OF THE CODE

Our firm applies the ten principles of the Code as follows:

### 1. ACCOUNTABILITY OF THE CODE

This office is responsible for the personal information collected and maintained by it and which is under its control. In order to fulfil this responsibility:

- (i) We have designated an official to be responsible for the day-to-day care and control of personal information;
- (ii) We have taken the following measures to ensure compliance with this Privacy Policy:
  - (a) developing procedures to protect personal information;
  - (b) developing procedures to receive and respond to complaints and inquiries; and
  - (c) ensuring that staff are aware of the policies and practices respecting personal information

## 2. IDENTIFYING PURPOSES

This office is committed to openness to you regarding its collection and use of personal information. As discussed above, we collect and use personal information for the following limited purposes:

- (i) to establish and maintain client lists
- (ii) to represent clients
- (iii) to enforce any outstanding accounts

Similarly, if any individuals wish to be advised of the personal information we have related to them, they can contact us at the address set out in Section C below.

## 3. CONSENT

This office is committed to ensuring that you are aware of how your personal information is used. We are dedicated to obtaining the consent of individuals who provide us with their personal information.

We rely on your actions as indications of your consent to our existing and future personal information practices including:

- a) your voluntary provision of information as requested by us
- b) your express consent or acknowledgment contained within a written process
- c) your consent for a specific purpose

As well, we may periodically request written confirmation from you to ensure that the personal information collected and maintained by us is up-to-date and accurate. We also may ensure that we have your continuing consent to use and retain your personal information.

This office will disclose your information without notice only if required to do so by law or in the good faith belief that such action is necessary to conform to obligations imposed by law, meet an emergency need, and/or as required pursuant to a criminal investigation and/or to enforce any outstanding accounts.

## 4. LIMITING COLLECTION

This office restricts the collection of personal information only to that information that is necessary for the limited purposes noted above. We are committed to collecting personal information in a fair, open and lawful manner.

For this reason, this office does not indiscriminately collect personal information. We collect personal information to fulfill the above-noted purposes only, and for no other purposes.

## 5. LIMITING USE, DISCLOSURE AND RETENTION

This office does not use personal information for purposes other than those for which it was originally collected, unless it has first obtained the consent of the person from whom such information was received. We retain personal information only for as long as it is needed and only for the fulfilment of the purposes for which it was originally collected.

## 6. ACCURACY

This office is committed to maintaining accurate, complete and up-to-date personal information. If you are aware of changes to the personal information you have given to us, simply inform us of the changes and we will update our records accordingly.

You may check and correct your personal information by contacting our firm and the official assigned to oversee the day-to-day care and control of personal information by writing or e-mailing your request to the address set out in Section C below.

## 7. SAFEGUARDS

This office has developed and implemented security safeguards appropriate to the sensitivity of the personal information kept by us. These security safeguards include:

- (i) physical security measures, such as restricted access to areas where personal information is stored; and
- (ii) internal employee security measures, including restricted computer access and limited access to where personal information is stored.

If we use the services of any third parties to process personal information, we will enter into legal agreements which require them to protect this personal information in a manner acceptable to us. In entering into these legal agreements, we do not transfer any interest in this personal information to them. Rather, the purpose of these legal agreements is to ensure that the personal information delivered to third parties is maintained at a level of security equal to that provided by the Privacy Policy.

We also ensure that any of our employees who deal with personal information are properly trained and are aware of the necessary and appropriate measures required to protect personal information.

Any personal information kept by us is disposed of or destroyed once it is no longer needed to meet the purposes for which it was collected.

## 8. INDIVIDUAL ACCESS

You can also request access to your personal information held by us. However, we reserve the right to confirm the identity of the person seeking access to personal information before complying with any access requests. Please forward your access request in writing or e-mail to the address set out in Section C below.

Upon request, we will inform you if we have any of your personal information in our care and control, as well as providing you with the details of such personal information. In responding to your request, this office may charge you a reasonable fee.

We are also committed to ensuring that the personal information that is collected and maintained by us is correct, accurate and complete.

As well, you can challenge the completeness of your personal information under our care and control. Where you can successfully demonstrate that an error in the accuracy or completeness of your personal information exists, we will amend your personal information appropriately. When a challenge is not resolved to your satisfaction, then we will destroy your personal information under our care and control.

If we are unable to provide you with access to all of the personal information we hold about you, then the reasons for the denial of access will be provided to you.

## 10. CHALLENGING COMPLIANCE

As noted above, our firm has designated an official who is responsible for the day-to-day care and control of the personal information. This official will receive and respond to all information requests regarding our privacy policies or about your personal information under our care and control.

### **C. HOW TO ADD, REMOVE OR AMEND YOUR PERSONAL INFORMATION**

If at any time, you wish to amend your personal information with us, please to:

ALEXANDRA J. BIGNUCOLO  
PROFESSIONAL CORPORATION  
108 DOWNIE STREET,  
STRATFORD ON N5A 1X1

519.814.1414  
519.814.8140

EMAIL: [alexandra@ajb-lawoffice.ca](mailto:alexandra@ajb-lawoffice.ca) WEBSITE: [www.ajb-lawoffice.ca](http://www.ajb-lawoffice.ca)