

PIPEDA Privacy Statement and Policy

Objective/Purpose:

To protect private matters regarding client, customer, and other 3rd party information. At The Collection Consultants inc, the basis of each customer relationship, many of which span many years, is trust. You have chosen to do business with The Collection Consultants inc, and we are obligated to honor that relationship with great care, beginning with the information you have chosen to share with us. As financial services professionals entrusted with sensitive information, we respect the privacy of our clients, and the privacy of their customers, and are committed to treating customer's information responsibly. Our Privacy Policy serves as a standard for all The Collection Consultants inc employees for the collection, use, retention, and security of private information.

Responsibilities

Customer Expectation of Privacy

We believe that the confidentiality and protection of customer information is one of our fundamental responsibilities. While information is critical to providing quality services, we recognize that one of our most important assets is our client's trust, and our integrity in doing business. We will maintain high standards to ensure that information is kept private and secure at all times.

Limitations on Employee Access to Information

Employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer's information and in this Privacy Policy. Due to the importance of these issues, all The Collection Consultants inc employees are responsible for maintaining the confidentiality of customer information, and employees who violate this Privacy Policy are subject to disciplinary measures.

Restrictions on the Disclosure of Account Information

We do not reveal information about accounts or other personally identifiable data to third parties and companies for their independent use unless: 1) you request or authorize it; 2) the information is provided to help complete a transaction initiated by you; 3) the disclosure otherwise is lawfully permitted or required. We observe the same policy in dealing with your customers.

Maintaining Privacy in Business Relationships with Third Parties

When our firm conducts business with third parties such as brokers, lending institutions, suppliers, technicians, and the like, we require these vendors and suppliers to maintain similar standards of conduct regarding the privacy of personally identifiable customer information provided to, or accessible by them.

Providing Privacy Information to Clients and Responding to Inquiries

The Collection Consultants inc recognizes and respects the privacy expectations of all individuals. We want our clients to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed a Privacy Policy, which is made readily available to our clients. Clients who have questions about this Privacy Policy or have a question about the confidentiality of their clients' information should contact:

Alexandre Landry alandry@tcclcr.com

P: 1-800-401-6953

Procedure:

The privacy policy is made available and easily accessible to all employees. The policy is included in employee handbooks. We include the privacy policy in all applicable employment contracts. In this way the employee must acknowledge in writing that he/she is aware of the privacy policy and of the obligation to adhere to it. When the policy is updated a new copy is circulated via email as well as on paper, and prepared for insertion into our handbooks. We have each new update signed by employees.

Enforcing the Privacy Policy

There are a number of ways in which we enforce the company privacy policy:

Provide training

We regularly train staff in applying the privacy policy. Through role-playing seminars we test our employees to ensure that they are fully aware of what information is private, and what can be disclosed. This training is ongoing and random checks are done frequently throughout the company, with "test calls" being made by our Quality Assurance Department.

Take prompt action

If an employee commits a breach of our privacy policy, it is dealt with fairly and quickly. Internal procedures are in place in order to allow investigation into complaints of privacy policy breaches. Employees are also encouraged to come forward if they are witness to any such breaches by other staff members.

Monitor Telephone Interactions

The monitoring of telephone interactions is the most advantageous way to ensure that no privacy policy rules are being breached. Our Quality Assurance Department ensures that all staff, regardless of their primary responsibilities, are aware, and are in compliance with our privacy policy, in all situations where there is a possibility of breach.

The Collection Consultants inc Confidentiality & Integrity of Personal Information Privacy Policy

The Collection Consultants inc restricts access of information to those employees who need to know that information for the purpose of accomplishing all of their responsibilities within their role in our firm. Employees are provided with general privacy guidelines, and further guidelines specific to their roles within our organization. We maintain physical, electronic, and procedural safeguards that comply with federal regulations, and our firm's mandate, to guard private information.

Legal Liability

In most cases the employee is held responsible for all the information transmitted by them whether by email, sms, telephone, fax or other communications device.

GENERAL PROVINCIAL LAWS GOVERNING COLLECTION AGENCIES

Each Province has its own set of laws which govern the activities of both Collectors and Collection Agencies. Although there are differences between provinces many of the requirements are basically the same across the country. The following principles are the same for all provinces. These rules apply to Ontario as well as all provincial and territorial land in Canada.

- No details of the debt can be discussed with any third party without the express written consent of the debtor.
- Collections Agencies and Collectors must conduct business activities using their legal name.
- The Collection Agency or agent of is not permitted to relay any false or misleading information related to the collection of the debt.
- No spouses (other than those named as debtors) are permitted to be named on any documents related to the collection of the debt.
- Collection Agencies are not permitted to use the name(s) of any individuals who are not working for the agency in any written or verbal communication.
- Collection Agencies are only permitted to collect moneys that they believe in good faith to be owed to the creditor.

- Collectors are not permitted to communicate to a debtor's friends, family, or co-workers in a manner that is likely to result in embarrassment, humiliation or jeopardize their employment or status within a community in any way.
- Collection Agencies shall not misrepresent their rights, powers or authorities in any manner.

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- **Security**

- We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. Our paper files are locked with access granted only to those employees who need to use the information. Our computer systems require administrator-granted passwords and are backed up on a regular basis to prevent loss of data. Firewall software is installed and regularly updated on all our computers to prevent electronic theft of information or data. Protecting and serving the best interests of our clients is our first priority.
- If we decide to change our privacy policy, we will post those changes on this page.
- If at any time you wish to access your personal information to check it for accuracy, or should you have any questions about these policies and procedures, please call our office at 1-800-401-6953