

## Policies

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### **Protection of Personal Information at High Def Consult**

High Def Consult Privacy Coordinator is accountable for High Def Consult's policies and practices, with respect to the management of personal information, and is the individual to whom complaints and inquiries can be forwarded.

#### **High Def Consult Inc.**

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### **Privacy on the Internet**

This privacy statement is applicable to all High Def Consult web-sites.

High Def Consult respects the privacy of its Internet users and will protect that privacy as vigorously as possible.

High Def Consult does not collect information that personally identifies individuals except when individuals provide such specific information on a voluntary basis. There may be occasions where specific personal information is requested before an individual can enter certain sections of a High Def Consult site. For example, registration is needed to subscribe or participate in future online forums.

In all such cases, High Def Consult will collect only information that is voluntarily provided by the user and undertakes that such information will be kept strictly confidential. Individual information provided to High Def Consult to gain access to any High Def Consult site will not be sold or made available to a third party.

High Def Consult does reserve the right, however, to perform statistical analyses of user behaviour and characteristics, in order to measure interest in and use of the various sections of its sites so as to improve design and navigation and to gather marketing information. Only aggregated data from these analyses, not individual data, will be used for this purpose.

As well, users should be aware that certain non-personal information and data may be automatically collected by High Def Consult through the operation of what are called "cookies." "Cookies" are small text files that identify an individual computer's browser entering a web site. They allow the site to track that browser's movement through the site over several sessions. Through cookies, a web site can recognize repeat users, facilitate the user's access to and use of the site and allow a site to track usage behaviour that will allow content improvements. High Def Consult uses cookies only for the above-mentioned purposes and will not use them to identify users or to track non-High Def Consult usage.

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If you do not want a cookie placed on your computer by High Def Consult, you may disable cookies altogether by modifying the Preferences section of your Netscape or Internet Explorer browser (under Edit/Preferences/Advanced). Note that it is possible that some aspects of High Def Consult sites may be unavailable to you if you choose this option.

If you have no problem accepting cookies, but wish to be informed of their appearance, you may turn on a warning prompt by modifying the cookie warning section in Edit/Preferences/Advanced.

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## Definitions

The Personal Information Protection and Electronic Documents Act is described as:

An Act to support and promote electronic commerce by protecting personal information that is collected, used or disclosed in certain circumstances, by providing for the use of electronic means to communicate or record information or transactions and by amending the Canada Evidence Act, the Statutory Instruments Act and the Statute Revision Act.

The term record includes any correspondence, memorandum, book, plan, map, drawing, diagram, pictorial or graphic work, photograph, film, microform, sound recording, videotape, machine readable record, and any other documentary material, regardless of physical form or characteristics, and any copy thereof.

The term personal information is defined as information about an identifiable individual but does not include the name, title or business address or telephone number of an employee of an organization.

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## 1. Statement of Policy

It is the policy of High Def Consult to control the collection, use, and disclosure of personal information in accordance with all requirements set out in the Personal Information Protection and Electronic Documents Act. In certain circumstances personal information may be collected, used, or disclosed without the knowledge and consent of the individual. Exemptions include, but are not limited to personal information gathered for:

Legal, medical, or security reasons.

Detection and prevention of fraud or for law enforcement.

Journalistic, artistic or literary purposes if its use is confined to those purposes.

### 1.1 Requirements

The following requirements shall be met by High Def Consult unless exempted by the Personal Information Protection and Electronic Documents Act.

#### 1. Accountability

High Def Consult is responsible for personal information under its control and shall designate a Privacy Coordinator to be accountable for High Def Consult's compliance with the Act.

## 2. Identifying Purposes

The purposes for which personal information is collected shall be identified by High Def Consult at or before the time the information is collected.

## 3. Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information.

## 4. Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by High Def Consult.

## 5. Limiting Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

## 6. Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

## 7. Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

## 8. Openness

High Def Consult shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

## 9. Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

## 10. Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for High Def Consult's compliance.

## 1.2 Responsibility

All High Def Consult employees, who collect, maintain and/or use personal information, are responsible for insuring that the collection, use and disclosure of this information is carried out in accordance with this policy and relevant procedures.

The Corporate Secretariat is the department responsible for supervising compliance with the legislation and for initiating procedures, guidelines and schedules that will be developed to effect this policy.

The Privacy Coordinator is accountable for High Def Consult's policies and practices, with respect to the management of personal information, and is the individual to whom complaints and inquiries can be forwarded.

## Privacy Standards

High Def Consult's privacy provisions are based on the CSA International's Model Code for the Protection of Personal Information, recognized as a national standard in 1996. The standard addresses the ways in which organizations collect, use and disclose personal information. It also addresses the rights of individuals to have access to their personal information and to have it corrected if necessary.

## The code's 10 principles are:

### Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with these principles.

### Identifying Purposes

The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.

### Consent

The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate.

### Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

### Limiting Use, Disclosure, and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfilment of these purposes.

### Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

### Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

### Openness

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

### Individual Access

Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

### Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.