



**CREDIT RISK MANAGEMENT CANADA
GROUP OF COMPANIES**

ADMINISTRATION / OPERATIONS MANUAL

Issued By: C.O.O.
Category: Privacy Act

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Privacy Policy

Protecting Your Privacy

We keep your information in strict confidence

We do not sell your information

You have access to the information we have about you

You have control over how we obtain and use information about you

ACCOUNTABILITY:

Credit Risk Management is accountable for all personal information under our control. Responsibility for the protection of personal information rests with our Privacy Officer.

IDENTIFYING PURPOSE:

CRM will communicate the purpose for which information is being collected. CRM collects personal information for the following reasons only:

- to provide services to Clients and Debtors,
- to purchase debt portfolios, and
- to engage in an employee/employer relationship

CONSENT:

CRM will obtain Client and Employee consent for the collection, use and disclosure of personal information. Consent can be expressed or implied and may be given orally or electronically. Consent may be withdrawn upon provision of a written request. Withdrawal of consent may affect our ability to continue to provide services or maintain a working relationship.

LIMITING COLLECTION:

CRM will only collect personal information for our defined purposes by fair and lawful means.

LIMITING USE, DISCLOSURE and RETENTION:

CRM uses personal information collected from/or on behalf of another organization without the consent of the individual to whom the information relates, if the individual consented to the use of the personal information by the other organization, and the personal information is used by CRM solely for the purposes for which the information was previously collected, and to assist CRM to carry out work on behalf of the other organization.

CRM will retain Client, Employee and Debtor personal information only as long as necessary for the identified purposes or as required by legislation.

**ACCURACY:**

CRM will make every reasonable attempt to ensure personal information that is collected on behalf of the organization is accurate and up to date. Where CRM concurs that a correction to personal information is required, every effort will be made to correct our records.

SAFEGUARDS:

CRM maintains appropriate security safeguards to protect personal information from loss, theft unauthorized access, disclosure, duplication, use or modification. When personal information is no longer required to fulfill the purpose, and legislative retention periods have expired, CRM will dispose of the information in a safe and secure manner.

OPENNESS:

CRM will make the following information available:

- the name, title and address of the person who is accountable for compliance with the CRM Privacy Policy,
- the name title and address of the person who is the Privacy Officer delegate,
- the means of gaining access to personal information in our custody,
- a description of the type of personal information in our care and how it is used, and
- a copy of our Privacy Policy.

INDIVIDUAL ACCESS:

An individual desiring access to personal information must submit a written request to our Privacy Officer or Delegate. Existing contractual restrictions may affect the outcome of the request.

CRM will, upon confirmation of identity, provide access to the personal information within thirty business days, unless we notify the individual that we require a longer period to respond.

If a request is refused, CRM will notify the individual in writing, documenting the reasons for refusal and resources for available redress.

In certain situations CRM will not provide access to personal information if the disclosure could threaten the life or security of another individual; if the information was generated in a formal dispute resolution process; if the information contains references to other individuals or cannot be disclosed for legal, security or commercial proprietary reasons or if the information is subject to solicitor-client or litigation privilege.

CHALLENGING COMPLIANCE:

Individuals should direct any complaints, concerns or questions regarding this privacy code, in writing to the Privacy Officer. If the Privacy Officer is unable to address the individual's concerns, the issue can be referred to a Privacy Commissioner.

CONTACT INFORMATION:

Privacy Officer at CRM
61 Lorne Ave. E, PO Box 96
Stratford, Ontario N5A 6S8
privacyofficer@crmcanada.com

PRIVACY COMMISSIONER:

Office of the Privacy Commissioner of Canada
112 Kent Street
Ottawa, Ontario K1Z 1H3