

# THE CLI-INVESTIGATION'S CODE OF PRIVACY

## INTRODUCTION

CLI-Investigation inc., hereafter named CLI, is in the business of conducting investigations and gathering information. We are a provincially based company with three offices situated throughout Quebec, Canada that handles enquiries locally, nationally and internationally. We collect personal information on individuals daily. We understand the societal value in protecting personal information and ensuring its safekeeping. We at CLI embrace the new federal Personal Information Protection and Electronics Documents Act (PIPEDA) and acknowledge the importance of national standards to protect the personal information that we collect. Please note that our firm is properly licensed and tightly regulated by the Ministry of Public Security of Quebec, Ontario, Canada. We will only collect personal information on individuals where there is a potential contravention of the law or breaches of agreements or other circumstances that permit us to legally collect this information under the laws of Quebec and Canada. The CLI's Code of Privacy follows and complies to the Privacy laws of Quebec since 1994 and the CSA Model Code of Personal Information Privacy and is as follows:

## 1. ACCOUNTABILITY

CLI will be responsible for all personal information under our control. We have designated our Privacy Officer, to ensure our organization's compliance with the policies and procedures indicated in our Code of Conduct.

The Privacy Officer of CLI is Joanne Strati, Manager, Business Development. Mrs. Strati can be reached at:

Mrs. Joanne Strati  
Manager, Business Development  
Privacy Officer  
CLI-INVESTIGATION INC.  
2, Place Laval  
Suite 350  
Laval, Québec  
H7N 5N6  
Telephone : (450) 668-5353  
facsimile : (450) 668-3616  
Toll free : ((800) 363-7960  
E-mail. : [jstrati@chartrand-laframboise.com](mailto:jstrati@chartrand-laframboise.com)

Upon receiving an enquiry, Mrs. Strati will respond to you within 30 days.

It is CLI's commitment to:

- Protect personal information
- Allow individuals to request information; seek amendments to their personal information; and file complaints against CLI with our Privacy Officer:
- Train and educate our staff:
- Develop information which explains these procedures to the public and our clients.

Although we rarely, if at all, use third parties to process personal information, we use reasonable means to ensure that all third party transferring of personal information is afforded a comparable level of protection to that which CLI maintains.

## **2. IDENTIFY PURPOSES**

CLI identifies the purpose for which we collect personal information on affected individuals at or before the time of collection. All assignments received from our corporate, government, and other clients are vetted to ensure their requests for information are compliant with Quebec's Privacy laws and PIPEDA. We may choose to orally explain to affected individuals the purposes for which personal information is being collected and then place a notation in the applicable file indicating that this has been done. Alternatively, an application form may be used.

CLI identifies any new purposes that arise during the course of dealings with personal information and obtain prior consent required for this new use, even if we have already identified certain initial purposes. However, we only do this when the intended new use purpose truly constitutes a "new" use, i.e., when the new purpose being proposed is sufficiently different from the purpose initially identified.

## **3. CONSENT**

We obtain the appropriate consent from individuals for collection, use or disclosure of personal information, except where the law provides an exception. We may obtain express consent for the collection, user disclosure of personal information, or when we determine that consent has been applied by the circumstances.

Express consent is specific authorization given by the individual to CLI, either orally or in writing. Implied consent is when CLI has not received a specific consent but the circumstances allow us to collect, use, or disclose personal information.

In most incidences, obtaining the knowledge and consent of individuals would defeat the purpose of an investigation, in particular with respect to a breach of an agreement or contravention of a law. Personal information will only be collected, used and disclosed by CLI employees without consent in accordance with Section 7 of the Personal Information Protection and Electronics Documents Act, S.C. 2000, c.5 (PIPEDA) or the Quebec Privacy Laws or under other lawful means.

#### **4. LIMITING COLLECTION**

The personal information that we collect is limited to that which is necessary for purposes we have identified. We only collect personal information for specific, legitimate purposes. We do not collect personal information indiscreetly. We only collect information by fair and lawful means and not by misleading or deceiving individuals about the purpose for which the information is being collected. Our policies and procedures relating to the limitations on collection of personal information are regularly communicated to our investigators who deal with collection, use and disclosure of personal information.

#### **5. LIMITING USE, DISCLOSURE, AND RETENTION**

Personal information is not used or disclosed for purposes other than those for which it is collected, except with the consent of the individual or as permitted by law. We only retain personal information as long as necessary for the fulfillment of those purposes. Personal information that is no longer required to fulfill identified purposes is destroyed, erased, or made anonymous in accordance to the laws regulating our industry.

Please note that there may be situations where CLI uses, discloses or retains personal information for legitimate purposes not identified to the individual to which the information pertains including those situations referred to in Section 3.

#### **6. ACCURACY**

The personal information we collect is accurate, complete and up-to-date as necessary for its intended purposes. Our goal is to minimize the possibility that inappropriate information may be used to make a decision about any individual whose personal information we process.

The process for ensuring accuracy and compliance involves:

- initial collection from client
- client are asked to verify accuracy and completeness
- regular reviews; and
- verifying accuracy by contacting third parties (e.g. public records available, etc.)

If a significant error or omission is identified, we correct or amend the information as appropriate. Where necessary, we send such corrected or amended information to third parties who have had access to the information in question.

#### **7. SAFEGUARDS**

CLI safeguards all personal information under our control in a manner that is appropriate to the sensitivity of the information. We take all the physical security measures necessary including alarming and properly locking our facilities and/or locking all personal information in secure filing cabinets. All CLI's staff, including investigators and administration staff have been properly vetted, then trained in the policies of that pertain to these safeguards. All CLI's personnel have signed confidentiality and code of

conduct agreements. Members of the public are not allowed access to our facilities unless identified, logged in, and escorted by properly trained staff. No sensitive personal information, pertaining to subjects of investigations will be electronically transferred to our clients unless security measures according to the sensitivity of the information to be sent have been applied. Distribution of personal information will be on a need-to-know basis.

We will take precautions in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to information. These measures include:

- Ensuring that no one retrieves personal information after disposal
- Shredding all documents
- Deleting electronically stored information

## **8. OPENNESS**

We make readily available to individuals requesting specific information about our policies and procedures relating to the management of personal information that is under our control.

Investigators and staff of CLI do make available to the public easily understandable information about our company, it's privacy policies, the Code of Privacy, both in hard copy or by requesting a copy of same by calling toll free 1-800-363-7960 or by accessing our website at [www.cli-investigation.com](http://www.cli-investigation.com) [www.king-reed.com](http://www.king-reed.com).

## **9. INDIVIDUAL ACCESS**

Upon request, an individual will be informed of the existence, use and disclosure of his/her personal information which is under our control, and may be given access to and be permitted to challenge the accuracy and the completeness of that information.

There are lawful exceptions that will prevent us from providing access, which include, but are not limited to the following:

1. Personal information about another person might be revealed.
2. Commercially confidential information might be revealed.
3. Someone's life or security might be compromised.
4. The information was collected without consent for the purposes related to an investigation of a breach or an agreement or contravention of a law or other lawful exemption.
5. The information was generated during the course of a formal dispute resolution process.
6. The information is protected by the Solicitor/Client privilege.
7. When restricted from providing this disclosure under Section 9 of the Personal Information Protection and Electronics Documents Act (PIPEDA) (L.R.C. c. P-8.6), Section 9 Of the *Loi sur les agences d'investigation et de sécurité* (L.R.Q., c. A-8) and Section 4, part 2 of the *Loi sur la protection des renseignements*

*personnels dans le secteur privé (L.R.Q., c. P-39.1)* , and any other law or regulation applicable.

## **10. CHALLENGING COMPLIANCE**

An individual may address a challenge concerning compliance with the aforementioned policies and procedures to our Privacy Officer whose details are listed in Section 1.