

**Private Sector Privacy Legislation**  
**Personal Information Protection Policy**

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**Gibraltar Holdings Ltd.**  
**Personal Information Protection Policy**

At Gibraltar Holdings Ltd., we are committed to providing our clients with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients protecting their personal information is one of our highest priorities.

While we have always respected our clients privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our clients of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting clients' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients' personal information and allowing our clients to request access to, and correction of, their personal information.

**Policy 1 – Collecting Personal Information**

- 1.1 Unless the purposes for collecting personal information are obvious and the client voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect client information that is necessary to fulfill the following purposes:
  - To verify identity;
  - To verify creditworthiness;
  - To deliver requested products and services
  - To ensure a high standard of service to our clients;

## Policy 2 – Consent

- 2.1 We will obtain client consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally *or* in writing, electronically, through an authorized representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a client is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising and the client does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients can withhold or withdraw their consent for Gibraltar Holdings Ltd. to use their personal information in certain ways. A client's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client in making the decision.
- 2.5 We may collect, use or disclose personal information without the client's knowledge or consent in the following limited circumstances:
  - When the collection, use or disclosure of personal information is permitted or required by law;
  - In an emergency that threatens an individual's life, health, or personal security;
  - When the personal information is available from a public source (e.g., a telephone directory);
  - When we require legal advice from a lawyer;
  - For the purposes of collecting a debt;
  - To protect ourselves from fraud;
  - To investigate an anticipated breach of an agreement or a contravention of law

## Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose client personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:
  - To conduct client, customer, member surveys in order to enhance the provision of our services;
  - To contact our clients directly about products and services that may be of interest;
- 3.2 We will not use or disclose client personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell client lists or personal information to other parties unless we have consent to do so.

## Policy 4 – Retaining Personal Information

- 4.1 If we use client personal information to make a decision that directly affects the client we will retain that personal information for at least one year so that the client has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain client personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

## **Policy 5 – Ensuring Accuracy of Personal Information**

- 5.1 We will make reasonable efforts to ensure that client personal information is accurate and complete where it may be used to make a decision about the client or disclosed to another organization.
- 5.2 Clients may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the clients' correction request in the file.

## **Policy 6 – Securing Personal Information**

- 6.1 We are committed to ensuring the security of client personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that client personal information is appropriately protected:
  - Offices with personal information will be secured.
- 6.3 We will use appropriate security measures when destroying client's personal information such as shredding documents and deleting electronic files.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

## **Policy 7 – Providing Clients Access to Personal Information**

- 7.1 Clients have a right to access their personal information, subject to limited exceptions.  
[A full listing of the exceptions to access can be found in section 23 of PIPA. Some examples include: solicitor-client privilege, disclosure would reveal personal information about another individual, health and safety concerns]
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 7.3 Upon request, we will also tell clients how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the client of the cost and request further direction from the client on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the client in writing, providing the reasons for refusal and the recourse available to the client.

## **Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual**

- 8.1 The Privacy Officer is responsible for ensuring Gibraltar Holdings Ltd. compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Clients should direct any complaints, concerns or questions regarding Gibraltar Holdings Ltd. compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Gibraltar Holdings Ltd. Privacy Officer should be directed to [info@gibraltar.ca](mailto:info@gibraltar.ca) and in the Subject line “Attention Privacy Officer” or the address below.