

# Personal Information Protection Policy

At Rd Marine Consulting Services, Inc. we are committed to providing our clients, customers, and members with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, customers, members, protecting their personal information is one of our highest priorities.

While we have always respected our clients, customers or members privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information.

We will inform our clients, customers or members 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', customers', members' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients', customers', members' personal information and allowing our clients, customers, members to request access to, and correction of, their personal information.

## Scope of this Policy:

This Personal Information Protection Policy applies to Rd Marine Consulting Services, Inc. This policy also applies to any service providers collecting, using or disclosing personal information on behalf of Rd Marine Consulting Services, Inc.

## **Definitions:**

Personal Information –means information about an identifiable individual like but not limited to; name, age, home address and phone number, social insurance number, marital status, religion, ,

www.rdmarine.ca



education, employment information. Personal information does not include contact information (described below).

Contact information:

Means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPEDA.

**Privacy Officer** – means the individual designated responsibility for ensuring that Rd Marine Consulting Services, Inc. complies with this policy.

## 1 – Collecting Personal Information

1.1 Unless the purposes for collecting personal information are obvious and the client, customer, member 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, customer, member information that is necessary to fulfill the following purposes:

To verify identity;

To identify [client, customer, member] preferences;

To understand the [financial, banking, insurance] needs of our [clients, customers, members];

To open and manage an account;

To deliver requested products and services

To guarantee a travel or hotel reservation;

To send out association membership information;

To ensure a high standard of service to our [clients, customers, members];

www.rdmarine.ca info@rdmarine.ca



To meet regulatory requirements;

1.3 Rd Marine Consulting Services, Inc. will store such personal information until you formally request its delation or revoke your consent to its storage, or otherwise deletes that personal information in accordance with its decisions or internal policies.

## 2 - Consent

2.1 We will obtain client, customer, member 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 [e.g., orally, 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, customer, member voluntarily provides personal information for that purpose.

2.3 Consent may also be implied where a client, customer, member 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, customer, member 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, customers, members can withhold or withdraw their consent for Rd Marine Consulting Services, Inc. to use their personal information in certain ways. A





client's, customer's, member'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, customer, member in making the decision.

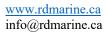
2.5 We may collect, use or disclose personal information without the client's, customer's, member's knowledge or consent in the following limited circumstances:

- 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

## 3 – Using and Disclosing Personal Information

3.1 The personal information you provide to us will be disclosed to authorize users of Rd Marine Consulting Services, Inc. as described in this Privacy Policy. Rd Marine Consulting Services, Inc. Will not sell, share or rent the information that you provide to third parties in any manner except as set out in this Privacy Policy.

Rd Marine Consulting Services, Inc. reserves the right to disclose your personal information to companies that we contract with and individuals that we employ to carry out functions on our behalf only to the extent required to carry out such functions. In addition, circumstances may arise in which Rd Marine Consulting Services, Inc. may have an obligation to disclose your personal information to comply with the law, prevent a crime or protect our own interests. Rd Marine





Consulting Services, Inc. may also disclose your personal information to third parties who acquire all or a significant part of our business, including by merger, amalgamation or sale of assets.

## 4 – Retaining Personal Information

4.1 If we use client, customer, member personal information to make a decision that directly affects the client, customer, member, we will retain that personal information for at least one year so that the client, customer, member has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain client, customer, member personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

#### 5 - Ensuring Accuracy of Personal Information

5.1 We will make reasonable efforts to ensure that client, customer, member personal information is accurate and complete where it may be used to make a decision about the client, customer, member or disclosed to another organization.

5.2 Clients, Customers, Members 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', customers', members' correction request in the file.

www.rdmarine.ca



## 6 – Securing Personal Information.

6.1 We are committed to ensuring the security of client, customer, member 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, customer, member personal information is appropriately protected:

the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate (i.e., only those that need to know will have access; contractually requiring any service providers to provide comparable security measures].

6.3 We will use appropriate security measures when destroying client's, customer's, member's personal information such as shredding documents, deleting electronically stored information.

6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

## 7 – Providing Clients, Customers, Members Access to Personal Information

7.1 Clients, Customers, Members have a right to access their personal information, subject to limited exceptions.

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, customers, members 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, customer, member of the cost and request further direction from the client, customer, member 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, customer, member in writing, providing the reasons for refusal and the recourse available to the client, customer, member.

## 8 - Advertising

We partner with third party ad networks, such as Google Adwords, Bing Ads and Yahoo Gemini, to manage our advertising on other sites. Our Ad network partners use cookies and Web beacons to collect non-personally identifiable information about your activities on this and other Web sites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by using the following links: Google's Opt-out, Bing's Opt-out, Yahoo's Opt-out, or the Network Advertising Initiative Opt-out page.

Please note that any opting-out will not opt you out of being served advertising. You will continue to receive generic ads.

#### 9 - Third Party Services



This site uses the Google Maps API and the terms of Google's Privacy Policy are incorporated by reference into our Privacy Policy.

## 10 – Questions and Complaints: The Role of the Privacy Officer or designated individual

10.1 The Privacy Officer or designated individual is responsible for ensuring Rd Marine Consulting Services, Inc. Compliance with this policy and the Personal Information Protection Act.

10.2 Clients, Customers, Members should direct any complaints, concerns or questions regarding Rd Marine Consulting Services, Inc. Compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client, customer, member may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Rd Marine Consulting Services, Inc. Privacy Officer or designated individual:

## **Rd Marine Consulting Services, Inc**

Moncton, New Brunswick Canada info@rdmarine.ca

www.rdmarine.ca