

Privacy Policy

At Evolve we embrace the federal Personal Information Protection and Electronic Documents Act (PIPEDA) and acknowledge the importance of national standards that are designed to protect the personal information that we collect.

The Privacy Policy for Evolve follows and complies with the CSA Model Code of Personal Information and Privacy.

Evolve will be responsible for all personal information under our control. Our management team forms a Privacy Committee headed up by our Chief Privacy Officer, whose responsibility it is to ensure our organization remains privacy compliant.

Evolve has made a commitment to:

- Protect personal information under our control
- allow individuals to request information; seek amendments to their personal information; and file complaints against Evolve with our Chief Privacy Officer;
- provide continuous training on information management to our staff.

We will use reasonable means to ensure that all third party transferring of personal information is afforded a comparable level of protection to that which is employed by Evolve.

Evolve will limit its collection of personal information to that which is necessary for purposes we have identified. We will only collect personal information for specific, legitimate purposes and will not collect personal information indiscriminately. Evolve will only collect information by fair and lawful means, 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 will be regularly communicated to our investigators who deal with collection, use and disclosure of personal information.

Evolve will limit the use, disclosure of personal information to those purposes for which it is initially collected, except with the consent of the individual or as otherwise permitted by law. Evolve will only retain personal information for as long as necessary to fulfill those purposes. Personal information that is no longer required to fulfill identified purposes will be destroyed, erased, or made anonymous.

Evolve will make every effort to ensure that the personal information collected for an intended purposes is accurate, complete and up-to-date. Our goal is to minimize the possibility that inappropriate or inaccurate information may be used to make a decision about any individual whose personal information we process.

Evolve will safeguard all personal information under our control in a manner that is appropriate to the sensitivity of the information. We will take all the physical security measures necessary including alarming and properly locking our facilities and/or locking all personal information in secure filing cabinets.

Evolve has a strict policy respecting the management and distribution of personal information, whether by electronic means or otherwise, and we ensure that all staff are trained in these procedures. The 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 personal information. These measures include:

- Ensuring that no one may retrieve personal information after disposal,
- Shredding documents before recycling the chaff,
- Deleting electronically stored information,
- Destroying hard drives, memory sticks, disks, etc. when they are no longer of use and are decommissioned.

Upon request, an individual will be informed of the existence, use and disclosure of his / her personal information that is under our control. They 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 such access, which include, but are not limited to the following:

- Personal information about another person might be revealed,
- Commercially confidential information might be revealed,
- Someone's life or security might be compromised,
- The information was collected without consent for the purposes related to an investigation of a contravention of a law or a breach of an agreement or other lawful exemption,
- The information was generated during the course of a formal dispute resolution process,
- The information is protected by the Solicitor / Client privilege,
- When restricted from providing this disclosure under other Federal or Provincial legislation.

**For further information, please contact our
Chief Privacy Officer at
1-519-432-7211**