

PRIVACY POLICY

Privacy of personal information is an important principle to us at VGM Group Services Ltd. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide. We also try to be open and transparent as to how we handle personal information. This document describes our privacy policies.

WHAT IS PERSONAL INFORMATION?

Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them) or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information is to be contrasted with business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

WHO WE ARE

Our organization, VGM Group Services Ltd., operates from our offices at 231 Oak Park Blvd., Suite 214, Oakville, Ontario. Our general manager is assisted by five support staff. In the course of providing goods and services to our members, we use a number of consultants and agencies that may, in the course of their duties, have limited access to the personal information we hold. These include computer consultants, office security and maintenance, bookkeepers and accountants, temporary workers to cover holidays, credit card companies, website managers, cleaners, our landlord and lawyers. We restrict their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

WE COLLECT PERSONAL INFORMATION:

PRIMARY PURPOSES

About Members

We collect, use and disclose personal information in order to serve our members. For our members, the primary purpose for collecting personal information is to provide our services as a group buying agent. Where a member is an individual or where a member discloses to us personal information about one of their clients, we collect such information so that we can assist the member, and by extension the member's client, in acquiring the best services and products available at the best prices.

A second primary purpose for collecting personal information might be to collect personal information from third parties about an individual's needs. A third primary purpose is to obtain home contact information so that we can contact the member or its designated personal representative in an emergency or if there is an urgent matter requiring the member's involvement.

It would be rare for us to collect any personal information without the member's express consent, but this might occur in a case of urgency (e.g. the member is unavailable) or where we believe the member, or the member's personal representative, would consent if asked and it is impractical to obtain consent.

About the General Public

When we collect information about members of the general public, our primary purpose is to provide notice of special events put on by our members or to promote an activity of our members of benefit to the general public. Thus, the personal information is usually incidental to our providing services to our own members. Often this collection, use and disclosure is done without the individual's express consent because we have received the personal information from our member. While we try to collect work contact information where possible, we might collect home addresses, fax numbers and email addresses. Upon your request, we will immediately remove any such personal information concerning you from our distribution list.

On our website, we only collect, with the exception of cookies, the personal information you provide and only use that information for the purpose you gave it to us (e.g., to respond to your email message, to register for a course, to subscribe to our newsletters). Cookies are only used to help you navigate our website and are not used to monitor you.

About Contract Staff and Students

For people who are contracted to do work for us (e.g., temporary workers), our primary purpose for collecting personal information is to ensure we can contact them in the future (e.g., for new assignments) and for necessary work-related communications (e.g. sending out pay cheques, year-end tax receipts, tax filings). Examples of the type of personal information we collect for those purposes include home addresses and telephone numbers. It is rare for us to collect such information without prior consent, but it might happen in the case of a health emergency or to investigate a possible breach of law. If contract staff or students wish a letter of reference or an evaluation, we will collect information about their work related performance and provide a report as authorized by them.

WE COLLECT PERSONAL INFORMATION: RELATED AND SECONDARY PURPOSES

Like most organizations, we also collect, use and disclose information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

- To invoice members for goods or services that are not paid for at the time, to process credit card payments or to collect unpaid accounts.
- To advise members and others of our newsletters and the seminars we provide or any special buying opportunities or promotions that we have available.
- At VGM, we review our members files and other files for the purpose of

ensuring that we provide high quality services, including assessing the performance of our staff. In addition, external consultants (e.g., auditors, lawyers, information technology) may on our behalf do audits and continuing quality improvement reviews of our firm, including reviewing members' files and interviewing our staff.

- Like all organizations, various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. In these circumstances, we may consult with professionals (e.g., lawyers, accountants) who will investigate the matter and report back to us.
- The cost of some services and products provided by us is paid for by third parties (e.g., insurance policies). These third party payers often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate your entitlements to and responsible use of this funding.
- Members or other individuals we deal with may have questions about our services after they have been received. We also provide ongoing services for many of our members over a period of months or years for which previous records are helpful. We retain our client information for a period of approximately seven years after the last contact to enable us to respond to those questions and provide these services.
- If VGM Group Services Ltd. Or its assets were to be sold, the purchaser would want to conduct a "due diligence" review of our records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the organization's business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

You can choose not to be part of some of these related or secondary purposes (e.g., by declining special offers or promotions, by paying for your services in advance). We do not, however, have much choice about some of these related or secondary purposes (e.g., external regulation).

PROTECTING PERSONAL INFORMATION

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or

restricted area at all times.

In addition, passwords are used on computers. All of our cell phones are digital, which signals are more difficult to intercept.

- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted, when it is transmitted at all, either through a direct line or is encrypted or is altered to make the information anonymous.
- Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- External consultants and agencies with access to personal information must enter into privacy agreements with us.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services or products we provided and for our own accountability to external regulatory bodies. However, in order to protect your privacy, we do not want to keep personal information too long.

We keep our files for about seven years. Our member and contact directories are much more difficult to systematically destroy, so we remove such information when we can if it appears that we will not be contacting you again. However, if you ask, we will remove such contact information right away. We keep any personal information relating to our general correspondence (i.e., with people who are not our members), newsletters, seminars and marketing activities for about six months after the newsletter ceases publication or a seminar or marketing activity is over.

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed. Alternatively, we may send some or all of the client file to the member.

YOU CAN LOOK AT YOUR INFORMATION

With some exceptions (one of which is quiet broad), you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what record we might have about you. We will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity, if we do not know you, before providing you with this access. We reserve the right to charge a nominal fee for such requests.

If there is a problem, we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

If you believe there is a mistake in the information, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions we or our advisors may have formed. We may ask you to provide documentation showing that our files are wrong. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

DO YOU HAVE A QUESTION?

Our Information Officer, Dave Davies can be reached at:

VGM Group Services Ltd.
231 Oak Park Blvd., Suite 214
Oakville, Ontario L6H 7S8

Tel: (905) 450-5734
Fax: (905) 450-1695

Mr. Davies will attempt to answer any questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. Mr. Davies will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

This policy is made under the *Personal Information Protection and Electronic Documents Act*. It is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above which Mr. Davies will explain to you if you should encounter one of these exceptions as you work with our company.

For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commissioner can be reached at:

112 Kent Street
Ottawa, Ontario K1A 1H3
Tel: (613) 995-8210, Toll Free 1-800-282-1376
Fax: (613) 947-6850
TTY: (613) 992-9190
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