Walker's/Capital Group of Companies Limited is governed by the <u>Personal Information Protection and Electronic Documents Act (PIPEDA)</u> respecting the use and disclosure of personal information and is committed to maintaining the accuracy, confidentiality, and security of personal information regarding customers and employees. As part of this commitment, we follow the *Ten Fair Information Principles* set out in the Act as they relate to our collection and use of customer and employee personal information.

- 1. Accountability Walker's/Capital Group is responsible for all employee and customer personal information under its control and will ensure its accountability to the 10 Fair Information Principles. A privacy commissioner has been designated within the organization to address all inquiries of a private nature and is responsible for compliance with privacy legislation. Employees of Walker's/Capital Group are required in all matters while carrying out their duties to comply with PIPEDA and company policy & procedures respecting privacy and confidentiality.
- 2. **Identifying purposes** Walker's/Capital Group will always identify to employees/customers why their personal information is being collected and do so before/at time of collection.
- Consent An individual's specific consent is required for the collection, use, or disclosure of their information, as appropriate. No third party disclosure may be made without the informed and express consent of the individual.
- 4. Limiting collection Walker's/Capital Group will only collect the personal employee/customer information that is required for the purposes identified by the organization. Information must be collected by fair and lawful means
- Limiting use, disclosure, and retention Unless required by law, all private employee/customer
 information collected by Walker's/Capital Group will only be used for the purposes for which it was
 collected. Private employee and customer information will only be retained as necessary to serve the
 purposes for which it was collected.
- 6. **Accuracy** Personal information must be as accurate, complete, and up-to-date as possible to properly satisfy the purposes for which it is to be used.
- 7. **Safeguards** Personal information must be protected by appropriate security relative to the sensitivity of the information.
- 8. **Openness** Walker's/Capital Group makes detailed information about its policies and practices relating to the management of personal information publicly and readily available.
- 9. Individual access Upon request, an individual (employee/customer) must be informed of the existence, use, and disclosure of their personal information and be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.
- 10. Challenging compliance Walker's/Capital Group will endeavour to meet or exceed the compliance regulations under PIPEDA and the principles established by the Act. Should an employee bring forward a way that the Company could improve the safety of personal employee information, they may bring it forward to the Privacy Officer.

You may at any time ask that personally identifiable information not be used for the foregoing purposes. In addition, you may at any time inquire to determine what information we do have, and to request correction of any errors in it. Questions may be directed to privacy@walkerscapitalgroup.ca or 613-546-3621 ext. 231.

Website Contact Forms - Terms of Use: By completing and submitting any of the contact forms on this site, you consent to receipt of your information by members of our marketing/sales/customer service team for the purpose of providing you with the requested pricing and service information. Your submitted information will be stored securely in the website database, may be transmitted by secure email to the team member responding to your inquiry, and for the purpose of creating a service profile to respond to your inquiries, entered into our cloud-based pricing and CRM system. All the foregoing platforms are password protected and some are

supported by MFA when accessed. Your information will only be used to respond to your inquiry and should you choose to book a service with WCG, confirmed and used to create a workorder on your behalf. Following service provision, you may be contacted for a satisfaction survey. Your initial inquiry data will be anonymized for use in marketing reports. At no time will your information be sold to a third party.