

At Reliable Controls we are committed to providing you with exceptional service. This service involves the collection, use, and disclosure of some personal information. Protecting your personal information is one of our highest priorities.

While we have always respected your privacy and safeguarded your personal information, we have strengthened our commitment to protecting personal information because 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 BC businesses and not-for-profit organizations may collect, use, and disclose personal information.

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

This Personal Information Policy outlines the principles and practices we follow in protecting your personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of your personal information and allowing you to request access to, and correction of, your personal information.

## **Purpose of this policy**

This policy outlines the principles governing the collection, use and management of personal information and business-related information by Reliable Controls. The purpose of this policy is to ensure that all personal information is collected in a lawful, transparent, and secure manner.

## **Scope of this policy**

This policy applies to all employees, contractors, partners, and third-party service providers who collect, access, or use business information on behalf of Reliable Controls. It covers all forms of data, including physical, electronic, and verbal information.

## **Definitions**

**Personal information:** Information about an identifiable individual.

**Contact information:** 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.

**Privacy officer:** Individual designated responsible for ensuring Reliable Controls complies with this policy and PIPA.

## **Policy 1: Collecting personal information**

1.1 Unless the purposes for collecting personal information and business contact information are obvious and you voluntarily provide your 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 collect only information that is necessary to fulfill the following purposes:

- To verify identity
- To complete business to business transaction
- To open and manage an account.
- To deliver requested products and services
- To meet regulatory requirements
- To respond to questions, concerns, or customer service inquiries
- To send information about our current and future products, including marketing communications
- To fulfill customer orders and deliver services.
- To improve customer service and product offerings
- To manage supplier relationships and procurement processes
- For internal business operations, including financial management and reporting.
- For recruitment/employment purposes
- To provide medical insurance coverage

## **Policy 2: Consent**

2.1 We will obtain your 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 verbally, in writing, electronically, or 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 you voluntarily provide personal information for that purpose.

2.3 Consent may also be implied where you are given notice and a reasonable opportunity to opt out of your personal information being used for marketing of new services or products and you do not opt out.

2.4 Subject to certain exceptions (e.g., where personal information is necessary to provide a service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), you withhold or withdraw your consent for Reliable Controls to use your personal information in certain ways. Your decision to withhold or withdraw your 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 you in making the decision.

2.5 We may collect, use, or disclose personal information without your knowledge or consent in the following limited circumstances:

- It is clearly in your interests, and consent cannot be obtained in a timely way.
- When the collection, use, or disclosure of personal information is permitted or required by the law.
- In an emergency that threatens an individual's life, health, or personal security
- When the personal information is available from the public source.
- When we require legal advice from a lawyer
- To protect ourselves from fraud

### **Policy 3: Using and disclosing personal information**

3.1 We will use or disclose your personal information only where necessary to fulfill the purposes identified at the time of collection or for a purpose related to those purposes, such as

- To conduct individual surveys to enhance the provision of our services.
- To contact you directly about products and services that may be of interest.

3.2 We will not use or disclose your personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell your personal information to other parties.

3.4 We will not practice any secondary use processing of personal data, unless it is for the purposes of archiving data in the public interest, statistical, scientific, or historical research purposes.

### **Policy 4: Retaining personal information**

4.1 If we decide to use your personal information for identified purposes or a legal or business purpose, we will retain that personal information for at least 1 year after using it, so you have a reasonable opportunity to request access to it.

4.2 Subject to Policy 4.1, we will retain your personal information only if 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 your personal information is accurate and complete where it may be used to decide about you or disclosed to another organization.

5.2 You may request correction to your personal information 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.

A request to correct personal information should be forwarded to the privacy officer at [privacy@reliablecontrols.com](mailto:privacy@reliablecontrols.com).

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 your correction request in the file.

## **Policy 6: Securing personal information**

6.1 We are committed to ensuring the security of your personal information to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal, or similar risks.

6.2 The following security measures will be followed to ensure your personal information is appropriately protected:

- Physically secured offices where personal information is held.
- Secure access code to enter the building with timestamp.
- Access to guests scheduled or approved through locked entrances.
- PC protection with two-step authentication of user IDs and passwords and encryption of data
- Encrypted network access to Wi-Fi and network
- Server firewalls that restrict employee access to personal information as appropriate (i.e., only those who need to know will have access)
- Antispam software to protect against unwanted emails that can create risks and distractions for employees.
- Locked filing cabinets
- Use of cloud-based technology to back up data and storage.
- Training and awareness to employees and new hires on privacy and information practices

6.3 We will use appropriate security measures when destroying your personal information, such as:

- Shredding documents
- Destruction of offsite records

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 access to personal information

- 7.1 You have a right to access your personal information, subject to limited exceptions:
- When personal information is protected by solicitor–client privilege.
  - When disclosure of the personal information would reveal confidential commercial information that could, in a reasonable person’s opinion, harm the competitive position of organization.
  - When disclosure would reveal personal information about another individual or 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.
- A request to correct personal information should be directed to the privacy officer at [privacy@reliablecontrols.com](mailto:privacy@reliablecontrols.com).
- 7.3 On request, we will tell you how we use your 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 If a request is refused in full or in part, we will notify you in writing, providing the reasons for refusal and the recourse available to you.

## Policy 8: Questions and complaints—The role of the privacy officer

- 8.1 The privacy officer is responsible for ensuring Reliable Controls compliance with this policy and PIPA.
- 8.2 Direct any complaints, concerns, or questions regarding Reliable Controls compliance in writing to the privacy officer. If the privacy officer is unable to resolve the concern, you may also write to the information and privacy commissioner of BC.

Contact information for Reliable Controls privacy officer: [privacy@reliablecontrols.com](mailto:privacy@reliablecontrols.com)

*People and technology  
you can rely on™*



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