

# Hemispheres Security Investigation Corporation

## Privacy Code

### Table of Contents

Introduction

Scope and Application

Definitions

Hemispheres Security Investigation Corporation Privacy Code in Detail

1 - Accountability

2 - Identifying Purposes for Collection of Personal Information

3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

4 - Limiting Collection of Personal Information

5 - Limiting Use, Disclosure, and Retention of Personal Information

6 - Accuracy of Personal Information

7 - Security Safeguards

8 - Openness Concerning Policies and Procedures

9 - Employee Access to Personal Information

10 - Challenging Compliance

Web Log Files, Web Bugs, Cookies

Additional Information

### Introduction

At Hemispheres Security Investigation Corporation, respecting privacy is an important part of our commitment to our clients and employees. That is why we have developed this privacy code. The Hemispheres Security Investigation Corporation Privacy Code is a statement of principles and guidelines regarding the minimum requirements for the protection of personal information provided by Hemispheres Security Investigation Corporation to our clients and employees. The objective of the Privacy Code is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the *Personal Information Protection Act (BC)* and/or where applicable, the *Personal Information Protection and Electronic Documents Act (Canada)*.

Hemispheres Security Investigation Corporation has adopted the principles of the Canadian Standard Association Model Code Association Standard for the Protection of Personal Information and will take steps to ensure that our Privacy Policy is current with future amendments.

Hemispheres Security Investigation Corporation is a current member of The Private Investigators Association of British Columbia and has Investigative Body Status under the Personal Information Protection and Electronic Documents Act (Canada).

Respecting your personal privacy is important to Hemispheres Security Investigation Corporation and therefore, in general terms, we only collect your personal information for purposes of providing you with our services. In order to do this, we use and share your personal information to:

- establish and maintain communications with you
- price products and services
- provide and administer our services to you
- offer and provide products and services to meet your needs
- compile marketing and service statistics
- act as otherwise required or authorized by law.

By providing Hemispheres Security Investigation Corporation with these types of personal information, we consider that you do so with the knowledge and understanding that it is collected, used, and shared only for the purposes listed above.

We maintain safeguards to protect your information from unauthorized access. We restrict access to your personal information to those employees whom we have determined need to know your information to provide products or services to you. Our employees and contractors are bound by a Confidentiality Agreement when appropriate. Personal information is retained only as long as it is needed to fulfill an identified purpose or to meet any legal, regulatory or taxation requirements.

## **Scope and Application**

The ten principles that form the basis of the Hemispheres Security Investigation Corporation's Privacy Code are interrelated and Hemispheres Security Investigation Corporation adheres to these principles as a whole. Each principle must be read in conjunction with the accompanying commentary.

As permitted by the Personal Information Protection Act (BC) and/or where applicable in the Personal Information Protection and Electronic Documents Act (Canada), the commentary in Hemispheres Security Investigation Corporation's Privacy Code has been drafted to reflect personal information issues that are specific to Hemispheres Security Investigation Corporation

The scope and application of Hemispheres Security Investigation Corporation's Privacy Code is as follows:

- Hemispheres Security Investigation Corporation's Privacy Code applies to personal information collected, used, or disclosed by Hemispheres Security Investigation Corporation in the course of commercial activities.
- Hemispheres Security Investigation Corporation's Privacy Code applies to the management of personal information in any form, whether oral, electronic or written.
- Hemispheres Security Investigation Corporation's Privacy Code does not impose any limits on the collection, use or disclosure of the following information by Hemispheres Security Investigation Corporation:
  - (a) an employee's name, title or business address or telephone number;

- (b) information that Hemispheres Security Investigation Corporation collects, uses or discloses for journalistic, artistic or literary purposes and does not collect, use or disclose for any other purpose; or
- (c) other information about the individual that is publicly available and is specified by regulation pursuant to the Personal Information Protection Act (BC) and/or where applicable the Personal Information Protection and Electronic Documents Act (Canada), the regulations enacted there under, and any other applicable legislation or regulation.

## **Definitions**

**collection:** The act of gathering, acquiring, recording, or obtaining personal information from any

**source:** Including third parties, by any means.

**consent:** Voluntary agreement for the collection, use and disclosure of personal information for

**defined purposes:** Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of Hemispheres Security Investigation Corporation implied consent is consent that can reasonably be inferred from an individual's action or inaction.

**client:** An individual who purchases or otherwise acquires or uses any of Hemispheres Security Investigation Corporation's products or services or otherwise provides personal information to Hemispheres Security Investigation Corporation in the course of Hemispheres Security Investigation Corporation's commercial activities.

**disclosure:** Making personal information available to a third party.

**individual:** An identifiable person

**employee:** An employee of or independent contractor to Hemispheres Security Investigation Corporation.

**personal information:** Information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization.

**name of organization:** Hemispheres Security Investigation Corporation

**third party:** An individual or organization outside of Hemispheres Security Investigation Corporation.

**use:** The treatment, handling, and management of personal information by and within Hemispheres Security Investigation Corporation or by a third party with the knowledge and approval of Hemispheres Security Investigation Corporation or by a third party with the knowledge and approval of Hemispheres Security Investigation Corporation's commercial activities.

## **Hemispheres Security Investigation Corporation Privacy Code in Detail**

### **1. Accountability**

Hemispheres Security Investigation Corporation accepts responsibility for personal information under its control. A Privacy Officer has been appointed and is accountable for Hemispheres Security Investigation Corporation's compliance with the following principles.

Each Hemispheres Security Investigation Corporation employee is responsible for all personal information in their control. Hemispheres Security Investigation Corporation will assist all employees to ensure full compliance with the company's Privacy Policy.

1.1 Responsibility for compliance with the provisions of the Hemispheres Security Investigation Corporation Privacy Code rests with the Hemispheres Security Investigation Corporation's Privacy Officer. The Privacy Officer can be reached at 604-937-3355 or via email to [info@hemispheres.ca](mailto:info@hemispheres.ca) and marked for the attention of the Privacy Officer.

1.2 Hemispheres Security Investigation Corporation is responsible for personal information in its possession or control. Hemispheres Security Investigation Corporation shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.

1.3 Hemispheres Security Investigation Corporation shall implement policies and procedures to give effect to Hemispheres Security Investigation Corporation Privacy Code, including:

- (a) implementing procedures to protect personal information and to oversee Hemispheres Security Investigation Corporation's compliance with its's Privacy Code;
- (b) implementing procedures to receive and respond to complaints or inquiries;
- (c) training and communicating to staff about Hemispheres Security Investigation Corporation's policies and procedures; and
- (d) developing information materials to explain Hemispheres Security Investigation Corporation's policies and procedures.

### **2. Identifying Purposes**

The purposes for which personal information is collected shall, where possible, be identified by Hemispheres Security Investigation Corporation before the information is

collected. When the foregoing is not possible, then the purpose can be identified to the Client or Employee at the time of collection.

2.1 Hemispheres Security Investigation Corporation will collect personal information to facilitate the investigation of contravention or suspected contravention of the law. Personal information collected may include information pertaining to individuals involved in criminal activity, individuals suspected of involvement in criminal activity, individuals with knowledge of criminal activity, and individuals who may advance an investigation by providing information relating to the identity of those involved in, or suspected of criminal activity.

2.2 Hemispheres Security Investigation Corporation will collect personal information to facilitate the investigation of breaches or suspected breaches of agreements. Personal information collected may include information pertaining to individuals who are party to an agreement, individuals who have knowledge of the terms and conditions of an agreement, individuals who have knowledge of the breach of an agreement, or individuals who may advance an investigation by providing information relating to a breach of an agreement.

2.3 Hemispheres Security Investigation Corporation will collect personal information for the purposes of establishing, managing or terminating an employment relationship between Hemispheres Security Investigation Corporation and individual employees. Personal information collected may include employment related information for payment, tax related, and other purposes relating to personnel management.

### **3. Obtaining Consent for Collection, Use or Disclosure of Personal Information**

The knowledge and consent of an individual or employee are required for the collection, use, or disclosure of personal information, except where inappropriate. In certain circumstances personal information can be collected, used, or disclosed without the knowledge and consent of the individual.

3.1 In obtaining consent, Hemispheres Security Investigation Corporation will use reasonable efforts to ensure that an individual or employee is advised of the purposes for which personal information will be used or disclosed. The identified purposes shall be stated in a manner that can be reasonably understood by the individual or employee.

3.2 Generally, Hemispheres Security Investigation Corporation shall seek consent to use and disclose personal information at the same time it collects the information. However, in many instances, obtaining the knowledge and consent of individuals would defeat the purpose of an investigation. Personal information will only be collected, used and disclosed by Hemispheres Security Investigation Corporation without consent in accordance with Section 7 of the Personal Information Protection and Electronics Documents Act, S. C. 2000, c 5 (PIPEDA) and Section 12 of the Personal Information Protection Act (PIPA). In certain cases Hemispheres Security Investigation Corporation

may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.

3.3 Hemispheres Security Investigation Corporation may require clients to consent to the collection, use and/or disclosure of personal information as a condition of providing a service only if such collection, use and/or disclosure is required to fulfill the explicitly specified, and legitimate identified purposes.

3.4 In determining the appropriate form of consent, Hemispheres Security Investigation Corporation shall take into account the sensitivity of the personal information and the reasonable expectations of its clients and employees.

3.5 The purchase or use of services by a client, or the acceptance of employment by an employee, may constitute implied consent for Hemispheres Security Investigation Corporation to collect, use and disclose personal information for the identified purposes.

3.6 A client or employee may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Clients and employees may contact Hemispheres Security Investigation Corporation for more information regarding the implications of withdrawing consent.

3.7 Hemispheres Security Investigation Corporation may collect or use personal information without knowledge or consent if it is clearly in the interests of the individual and consent cannot be obtained within reasonable time constraints.

3.8 Hemispheres Security Investigation Corporation may collect, use or disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting, using or disclosing the information, such as in the investigation of a breach of an agreement or a contravention of a law or where it is reasonable to expect the consent may compromise the investigation.

3.9 Hemispheres Security Investigation Corporation may collect, use or disclose personal information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.

3.10 Hemispheres Security Investigation Corporation may use or disclose personal information without knowledge or consent to a lawyer representing Hemispheres Security Investigation Corporation, to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required or authorized by law.

#### **4. Limiting Collection of Personal Information**

Hemispheres Security Investigation Corporation shall limit the collection of personal information to that which is necessary for the purposes identified by Hemispheres Security Investigation Corporation and the information will be collected by lawful means.

4.1 Hemispheres Security Investigation Corporation collects personal information from its clients and employees. Personal information may also be collected by lawful means during investigations.

4.2 Hemispheres Security Investigation Corporation may collect personal information from other sources including credit bureaus, employers or personal references, or other third parties who represent that they have the right to disclose the information.

## **5. Limiting Use, Disclosure, and Retention of Personal Information**

Hemispheres Security Investigation Corporation shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Hemispheres Security Investigation Corporation shall retain personal information only as long as necessary for the fulfillment of those purposes.

5.1 Hemispheres Security Investigation Corporation may disclose a Client's personal information to:

- it's employees/sub-contractors for purposes of providing services to the client
- other parties when consent for release of the information is authorized by the client
- other authorities as required by law

5.2 Hemispheres Security Investigation Corporation may disclose personal information about its employees to authorities as required by law or statute

5.3 Only Hemispheres Security Investigation Corporation employees whose duties reasonably require the information are granted access to personal information about clients and employees.

5.4 Hemispheres Security Investigation Corporation shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a client or employee, Hemispheres Security Investigation Corporation shall retain either the actual information or the rationale for making the decision for a period of time that is reasonably sufficient to allow for access by the client or employee,.

5.5 Hemispheres Security Investigation Corporation shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

## **6. Accuracy of Personal Information**

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

6.1 Personal information used by Hemispheres Security Investigation Corporation shall be sufficiently accurate, complete and current to minimize the possibility of inappropriate information being used that affects a client, employee or a subject of an investigation.

6.2 Hemispheres Security Investigation Corporation shall update personal information about clients and employees as necessary to fulfill the identified purposes or upon notification by the individual.

## **7. Security Safeguards**

Hemispheres Security Investigation Corporation shall protect personal information by security safeguards appropriate to the sensitivity of the information.

7.1 Hemispheres Security Investigation Corporation shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held.

7.2 Hemispheres Security Investigation Corporation shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

7.3 All of Hemispheres Security Investigation Corporation employees with access to personal information shall be required to respect the confidentiality of that information.

## **8. Openness Concerning Policies and Procedures**

Hemispheres Security Investigation Corporation shall make readily available to clients and employee specific information about its policies and procedures relating to the management of personal information.

8.1 Hemispheres Security Investigation Corporation shall make information about its policies and procedures easy to understand, including:

- (a) the title and address of the person or persons accountable for Hemispheres Security Investigation Corporation's compliance with Hemispheres Security Investigation Corporation's Privacy Code and how inquiries and/or complaints can be forwarded;
- (b) the means of gaining access to personal information held by Hemispheres Security Investigation Corporation;
- (c) a description of the type of personal information held by Hemispheres Security Investigation Corporation, including a general account of its use; and
- (d) a description of what personal information is made available to related organizations (e.g., subsidiaries).



8.2 Hemispheres Security Investigation Corporation shall make available information to help employees exercise control of the collection, use and/or disclosure of personal information and, where applicable, privacy-enhancing services available.

## **9. Individual Access to Personal Information**

Upon request, Hemispheres Security Investigation Corporation shall inform a client or employee of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. A client or employee shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

9.1 Upon request, Hemispheres Security Investigation Corporation shall afford clients and employees a reasonable opportunity to review the personal information in the individual's file. Personal information shall be provided in understandable form within a reasonable time, and at minimal or no cost to the individual.

9.2 In certain situations, Hemispheres Security Investigation Corporation may not be able to provide access to all the personal information that it holds about a client or employee. For example, Hemispheres Security Investigation Corporation may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Hemispheres Security Investigation Corporation may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor/client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to an investigation and it is reasonable to expect the access would compromise an investigation or in relation to an investigation of a breach of an agreement or a contravention of the laws of Canada or a province.

9.3 Upon request, Hemispheres Security Investigation Corporation shall provide an account of the use and disclosure of personal information and, where reasonably possible, shall state the source of the information. In providing an account of disclosure, Hemispheres Security Investigation Corporation shall provide a list of third parties to which it may have disclosed personal information about the individual when it is not possible to provide an actual list.

9.4 In order to safeguard personal information, a client or employee may be required to provide sufficient identification information to permit Hemispheres Security Investigation Corporation to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.

9.5 Hemispheres Security Investigation Corporation shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where

appropriate, Hemispheres Security Investigation Corporation shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

9.6 Clients and employees can obtain information or seek access to their individual files by contacting the Hemispheres Security Investigation Corporation Privacy Officer at 604-937-3355 or via email to [info@hemispheres.ca](mailto:info@hemispheres.ca) and marked for the attention of the Privacy Officer.

## **10. Challenging Compliance**

A client or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Hemispheres Security Investigation Corporation compliance with Hemispheres Security Investigation Corporation's Privacy Code.

10.1 Hemispheres Security Investigation Corporation shall maintain procedures for addressing and responding to all inquiries or complaints from its clients and employees regarding Hemispheres Security Investigation Corporation handling of personal information.

10.2 Hemispheres Security Investigation Corporation shall inform its clients and employees about the existence of these procedures as well as the availability of complaint procedures.

10.3 The person or persons accountable for compliance with Hemispheres Security Investigation Corporation's Privacy Code may seek external advice where appropriate before providing a final response to individual complaints.

10.4 Hemispheres Security Investigation Corporation shall investigate all complaints concerning compliance with Hemispheres Security Investigation Corporation's Privacy Code. If a complaint is found to be justified, Hemispheres Security Investigation Corporation shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A client or employee shall be informed of the outcome of the investigation regarding his or her complaint.

## **Web Log Files, Web Bugs, Cookies**

### **Web Log Files**

We may collect and use our visitors' IP addresses to diagnose any problems and assess the performance of our servers, to administrate our Web site, to improve our marketing efforts. Any future changes to this practice will be reflected in this Privacy Policy.

## **Web Bugs**

We do not use 'web bugs' in any of our HTML code or in our email updates. Any future changes to this practice will be reflected in this Privacy Policy.

## **Cookies**

Our site makes no use of persistent cookies or other types of persistent identifiers. Any future changes to this practice will be reflected in this Privacy Policy.

## **Additional Information**

For more information regarding The Hemispheres Security Investigation Corporation Privacy Code, please contact The Hemispheres Security Investigation Corporation Privacy Officer at 604-937-3355 or via email to [info@hemispheres.ca](mailto:info@hemispheres.ca) and marked for the attention of the Privacy Officer.