

**TYERMAN & DAUGHTERS INC.,  
EMPLOYMENT & COMMUNITY SERVICES**



**TYERMAN & DAUGHTERS INC.**  
Employment & Community Services



# PRIVACY CODE

## INTRODUCTION – OUR COMMITMENT TO PRIVACY

TYERMAN & DAUGHTERS INC., EMPLOYMENT & COMMUNITY SERVICES is committed to protecting the privacy of our clients.

As part of our commitment, we have put rules in place across our Company, to make sure our actions as they relate to the collection, use and disclosure of the Personal Information of our clients is kept secure, confidential and accurate.

Personal information means any information that would identify a client; for example, name and address and phone number, age, education or employment history and social insurance number.

What is generally *not* considered Personal Information is information that has been anonymized or combined with other details in such a way that is it impossible to identify any individual.

Further details about how we protect our clients' privacy can be found below. We have developed our privacy policy based upon the values set by the Freedom of Information and Protection of Privacy Act and the Personal Information Protection and Electronic Documents Act, and the 10 Principles as devised by the Canadian Standards Association.

If you have any questions about how we protect personal information, or questions or comments about how your own personal information was collected, used or shared, please contact Tyerman & Daughters Inc., Employment and Community Services Privacy Officer(s).

Tyerman & Daughters Inc.,  
Employment and Community Services  
240 Bridge Street, Box 431  
Eganville, ON K0J 1T0  
613-628-1700  
Privacy1@tyerman.com

OR

Tyerman & Daughters Inc.,  
Employment and Community Services  
19538 Opeongo Line  
Barry's Bay, ON K0J 1B0  
613-756-8079  
Privacy2@tyerman.com

## Key Principles

### 1. Accountability

*An organization is responsible for Personal Information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.*

Each employee and director of Tyerman & Daughters Inc., Employment & Community Services is responsible for the Personal Information under his or her possession or custody, including information that has been transferred to a third party for processing. In addition to establishing this Code, we have appointed 2 Privacy Officers who are responsible for our compliance with this Code and the principles outlined herein.

### 2. Identifying Purposes

*The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.*

Either before or when we collect Personal Information about you, we will explain to you how we intend to use it. We will limit the information we collect to what we need for those purposes, and we will use it only for those purposes. We will obtain your consent if we need to use your information for any other purpose and before collecting information from third parties. If information that has been collected is to be used for any other purpose we did not previously explain to you, we will inform you of that new purpose before we use the information.

Tyerman & Daughters Inc., Employment & Community Services collects Personal Information only for the following purposes:

- The Employment Ontario services it tailors and provides to you
- Support you receive and incentives available to your employer to hire you
- Your employment progress and outcomes
- Your satisfaction with the services received
- Collect information about you from third parties
- Share information about you with third parties

### 3. Consent

*The knowledge and consent of the individual are required for the collection, use, or disclosure of Personal Information, except where appropriate.*

We will not collect, use or disclose to a third party your Personal Information without your consent, except where:

(a) we are required to do so by law; or such information could aid in an emergency where the life, health or safety of an individual may be threatened.

We will use reasonable efforts to ensure that you are advised of the purpose for which the information will be used in a way that you can reasonably understand.

Consent may be expressed in writing or implied, depending on all the circumstances, including the purposes for which it is being collected and the sensitivity of the information.

Individuals can give consent in many ways:

(a) An application form may be used to seek consent, collect information and inform the individual of the use that will be made of the information. By completing and signing the form, the individual is giving consent to the Ministry's collection, use and disclosure of their personal information and the specified uses

(b) A checkoff box may be used to allow individuals to request that their names and addresses not be given to other organizations. Individuals who do not check the box are assumed to consent to the transfer of this information to third parties

(c) Consent may be given orally when information is collected over the telephone

(d) Consent may be given at the time that the individuals use a product or service

An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice and we will explain the implications of such withdrawal.

#### 4. Limiting Collection

*The collection of Personal Information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.*

The type of information we usually collect and maintain in your customer file may include your:

- Name
- Mailing and alternate address
- Primary and Alternate Telephone Number

- Date of Birth
- Email address
- Social Insurance Number (SIN#)
- Status in Canada – citizen, permanent citizen
- Marital Status
- Self-identification as a member of a designated group

Personal Information is information that refers to you specifically. With your consent, we will collect Personal Information from you in person at one of our offices. The choice to provide us with your Personal Information is always yours.

## 5. Limiting Use, Disclosure and Retention

*Personal Information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal Information shall be retained only as long as necessary for the fulfilment of those purposes.*

We will not disclose any Personal Information to anyone without your written consent except where such disclosure is required. This might include:

- For law enforcement purposes, or
- To comply with a legal requirement

Under certain circumstances, we may have a legal duty or right to collect, use or disclose your Personal Information without your knowledge or consent.

We will keep your Personal Information only as long as we need it for the reasons we gave you when we collected it in the first place and to meet legal and contractual obligations.

We will protect your Personal Information while we have it. We will apply our records retention policies and schedules to your personal information. Once we no longer need to keep your information we will destroy it in a secure manner so it cannot be reassembled and used by anyone else.

## 6. Accuracy

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

We will ensure that Personal Information shall be as accurate, complete and up to date as is necessary for the purposes for which it was obtained. While we will do our best, we rely on individuals to disclose all material information and to inform us of any relevant changes to the Personal Information.

We encourage you to review and confirm the accuracy of information provided. If you find any errors in your information, we urge you to immediately contact us and we will make the appropriate corrections immediately, upon receipt of appropriate evidence.

## 7. Safeguards

***Personal Information shall be protected by security safeguards appropriate to the sensitivity of the information***

The nature of the safeguards will vary depending on the sensitivity of the information that has been collected, the amount, distribution, and format of the information and the method of storage.

We will protect all Personal Information regardless of the format in which it is held. The methods of protection include:

- Physical measures, such as locked filing cabinets and restricted access to filing cabinets and offices
- Organizational measures, for example security clearances and limiting access on a “need to know” basis
- Technological measures, for example, the use of passwords and encryption

We make our employees aware of the importance of maintaining the confidentiality of Personal Information.

We also ensure that care is used in the disposal or destruction of Personal Information to prevent unauthorized parties from gaining access to the information.

## 8. Openness

***An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information***

We have prepared this plain-language Privacy Code to make you aware of our policies and procedures relating to the management of Personal Information. It is available to the public online at: <https://www.tyerman.com>

## 9. Individual Access

***Upon request, an individual shall be informed of the existence, use, and disclosure of his or her Personal Information and shall 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***

We will give you access to the Personal Information we retain about you within a reasonable time, with a written request and satisfactory identification. You also have the right to know of the existence, use, and disclosure of your Personal Information. We may charge a nominal fee for responding to any request and if so, we will give you notice in advance of costs for processing your request.

## 10. Challenging Compliance

*An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance*

You may address a challenge concerning compliance with the above principles as outlined in the Section below entitled `Questions or Concerns`

### CUSTOMER CHOICE

In most cases, you are free to refuse or withdraw your consent to the collection, use or release of your Personal Information at any time by contacting us as specific in the Questions or Concerns section below. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent and we will record and respect your choices.

### QUESTIONS AND CONCERNS

If you have any questions, concerns, or problems about privacy, your Personal Information, or how a request for information was handled, please contact us using the information below:

Email: [privacy1@tyerman.com](mailto:privacy1@tyerman.com)  
Tyerman & Daughters Inc.,  
Employment and Community Services  
240 Bridge Street, Box 431  
Eganville, ON K0J 1T0  
Attention: Privacy Officer

OR

Email: [privacy2@tyerman.com](mailto:privacy2@tyerman.com)  
Tyerman & Daughters Inc.,  
Employment and Community Services  
19538 Opeongo Line  
Barry's Bay, ON K0J 1B0  
Attention: Privacy Officer