

SureFire IT Solutions Inc. Personal Information Protection Policy

SureFire IT Solutions Inc. (SureFire IT) is committed to safeguarding the personal information entrusted to us by our clients. We manage your personal information in accordance with Alberta's Personal Information Protection Act and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to SureFire IT and applies to any person providing services on our behalf.

A copy of this policy is provided on our website at www.SureFireIT.com/privacy.

What is personal information?

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, business related information, security codes, passwords, etc.

What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our clients, including personal information needed to:

- deliver requested products and services
- enroll a client in a program
- send newsletters
- provide warranties for products and services
- contact clients about appointments
- follow up with clients to determine satisfaction with products and services
- notify clients of upcoming events of interest
- meet regulatory requirements
- gain access to client facilities during non-work hours to complete upgrades & repairs
- provide technical or training services to clients
- enable us to contact existing and potential clients
- establish and maintain communications with existing and potential clients
- update our contact information database
- accommodate and process the payment of fees, invoice clients for services and to collect unpaid accounts
- advise existing and potential clients of additional services that we offer
- obtain access to clients computer hardware as required by the client

We normally collect client information directly from our clients. We may collect your information from other persons with your consent or as authorized by law.

We inform our clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we do not provide this notification is when a client volunteers information for an obvious purpose (for example, producing a cheque for services, when the information will be used only to process the payment).

Consent

We ask for consent to collect, use or disclose client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask clients to provide their consent orally (in person, by telephone), in writing (by signing a consent form, by checking a box on a form, or electronically (by clicking a button).

A client may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfill our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose client personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is reasonable for an investigation or legal proceeding, to collect a debt owed to our organization, in an emergency that threatens life, health or safety, or when the personal information is from a public directory.

How do we use and disclose personal information?

We use and disclose client personal information only for the purposes for which the information was collected, except as authorized by law. For example, we may use client contact information to deliver goods and services. The law also allows us to use that contact information for the purpose of collecting a debt owed to our organization, should that be necessary.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent.

How do we safeguard personal information?

We make every reasonable effort to ensure that client information is accurate and complete. We rely on our clients to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about yourself or your organization, please let us know and we will correct it on request wherever possible.

In some cases we may ask for a written request for correction.

We protect client personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying client personal information, including shredding paper records and permanently deleting electronic records. Personal information is kept under supervision or stored in a locked filing cabinet that is not accessible to the public. Staff members have limited access to files depending on what information is needed to complete a service ticket or project. Passwords are used on all

computers and periodically changed. When sending personal or sensitive information over email, we make every attempt to secure that information.

We retain client personal information only as long as is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes.

Visitors may remain anonymous when visiting a SureFire IT website. SureFire IT will not collect any personal information about individuals unless that information is required to provide a particular service such as when visitors complete a request for articles or service information.

SureFire IT will not intentionally collect personally identifiable information about visitors to its website. Like most websites, when accessing SureFire IT's website, log files can and will be generated by the web servers that show the IP address of the visitor, date, time, and pages visited.

SureFire IT may review the information in the website logs from time to time and logs may be periodically deleted. Information in web logs will be used in the aggregate to generate statistics about access to SureFire IT's website.

Cookies will not be used for general tracking purposes but may be used where functionality requires it. No attempt will be made to observe the use of the site by individuals except in the course of investigating any abuse.

Access to records containing personal information

Clients of SureFire IT have a right of access to their own personal information in a record that is in our custody or under our control, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual. Organizations are authorized under the Act to refuse access to personal information if disclosure would reveal confidential business information. Access may also be refused if the information is privileged or contained in mediation records.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to the Business Administrator. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization.

You may also request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted.

Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information by SureFire IT Solutions Inc., or about a request for access to your own personal information, please contact the Business Administrator at:

SureFire IT Solutions Inc.
200, 8727 – 53 Ave
Edmonton, AB T6E 5E9
Phone: 780-490-6705
Fax: 780-490-6170
Email: Privacy@SureFireIT.com

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 - 6 Avenue, SW
Calgary, Alberta T2P 3W2
Phone: (403) 297-2728 Toll Free: 1-888-878-4044
E-mail: generalinfo@oipc.ab.ca Web site: www.oipc.ab.ca