

| | |
|----------------------------------|-------------------------|
| Category: Human Resources | Number: HRT 1300 |
| Subject: Employee Privacy | Page: 1 of 5 |
| Approved: | Revised: |

STANDARD

- 1.1 Three Links Care Centre (“Three Links”) is committed to maintaining the security, confidentiality and privacy of your personal information. This Privacy Policy documents our on-going commitment to you and has been developed in compliance with relevant privacy legislation.
- 1.2 This Policy does not impose any limits on the collection, use or disclosure of the following information by Three Links:
 - your business contact information; or
 - publicly available information.
- 1.3 Three Links is accountable and responsible for personal information under its control. Three Links has designated a Privacy Officer to oversee Three Links’ compliance with this Policy.

PURPOSES

- 2.1 Three Links collects various personal information from you, such as your:
 - name, home contact information, marital status, date of birth, SIN (for tax purposes), and information about spouses and dependents (for benefits purposes),
 - contact information and medical information which might be required in emergencies,
 - information about medical conditions that require special equipment or other accommodations, where you request such equipment or accommodation,
 - hiring information, which may include your application for employment, resume, covering letter, letters of reference, interview notes, and reference checks,
 - salary, pay level, authorized deductions (e.g. RRSP contributions, charitable contributions), expense reports and other payroll information,
 - timesheets, hours worked, vacation time and sick time,
 - benefits information, including pension and benefits enrolment forms, insurance coverage and claims and pension plan beneficiary information,

- your employment status and history with Three Links, including positions held, evaluations, performance reviews, disciplinary records, promotions/demotions, and awards or commendations earned,
- information about training and courses completed or attended,
- identification and security information such as access card issuance and use, photographs, etc., and
- information relating to employee adherence to policies and to other security and internal control matters (e.g. computer monitoring).

2.2 Three Links uses this employee personal information to establish, manage or terminate your employment relationship with Three Links and for other purposes authorized or required by law. For example, Three Links may use your employee personal information in the following ways:

- to contact you or your family in an emergency,
- for hiring purposes such as verifying your references and background, employment history, education etc.,
- for general employment administration purposes such as administering your employment, salary and benefits, performance reviews, vacations, sick days, promotions etc., and
- for security purposes such as issuing access cards and providing you with proper identification for Three Links premises.

2.3 Three Links may disclose personal information to third parties in the process of establishing, managing or terminating your employee relationship with Three Links. For example, Three Links may disclose your personal information to the following types of third parties:

- benefits providers (e.g. pension and insurance providers),
- Canada Revenue Agency for income tax purposes,
- payroll and data processing suppliers and other service providers,
- workers' compensation agencies with respect to claims,
- medical services agencies,
- parties requesting an employment reference (only basic information provided unless you have authorized a full reference), and
- Three Links' advisors and consultants (including lawyers and accountants).

2.4 Three Links may disclose your personal information without your consent if authorized or required by law.

LIMITS ON COLLECTING PERSONAL INFORMATION

- 3.1 Three Links will not collect personal information indiscriminately and will limit its collection of your personal information to what is reasonably necessary to establish, maintain or terminate your employment relationship with us. Three Links may also collect information as authorized by law.

LIMITS FOR USING, DISCLOSING AND RETAINING PERSONAL INFORMATION

- 4.1 Your personal information will only be used or disclosed for the purposes set out above and as authorized by law.
- 4.2 Three Links will keep personal information used to make a decision affecting an individual for at least one year after using it to make the decision.
- 4.3 Three Links will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retaining the information and retention is no longer necessary for legal or business purposes.
- 4.4 Three Links will take due care when destroying personal information to prevent unauthorized access to such information.

ACCURACY

- 5.1 Three Links will make a reasonable effort to ensure that personal information it is using or disclosing is accurate and complete. In most cases, Three Links will rely on you to ensure that certain information, such as your street address, e-mail address or telephone number, is current, complete and accurate.
- 5.2 If you demonstrate the inaccuracy or incompleteness of personal information, Three Links will amend the information as required. If appropriate, Three Links will send the amended information to third parties to whom the information has been disclosed.
- 5.3 When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, Three Links will annotate the personal information under its control with a note that a correction was requested but not made.

SAFEGUARDING PERSONAL INFORMATION

- 6.1 Three Links protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.
- 6.2 Three Links will take reasonable steps, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by its suppliers and agents who assist in providing products and services to you.
- 6.3 Please note that confidentiality and security are not assured when information is transmitted through e-mail or other wireless communication.

PROVIDING ACCESS

- 7.1 You have a right to access your personal information held by Three Links.
- 7.2 Upon written request and authentication of identity, Three Links will provide you with your other personal information under its control, information about the ways in which that information is being used and a description of the individuals and organizations to whom such information has been disclosed.
- 7.3 Three Links will make personal information available within 30 days of a request from you or provide written notice where additional time is required to fulfil your information request.
- 7.4 In some situations, Three Links may not be able to provide access to certain personal information. This may be the case where, for example, disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purpose of an investigation or where disclosure of the information would reveal confidential commercial information that, if disclosed, could harm the competitive position of Three Links. Three Links may also be prevented by law from providing access to certain personal information.
- 7.5 Where an access request is refused in whole or in part, Three Links will notify you in writing, giving the reason for refusal and outlining further steps which are available to you.

COMPLAINTS

- 8.1 Three Links will, on request, provide information regarding its complaint response procedure.
- 8.2 Any inquiries, complaints or questions regarding this policy or our compliance with privacy legislation should be directed in writing to our Privacy Officer/Director of Human Resources.