



PROTECTION OF PERSONAL INFORMATION

**CAUS Canadian Administration Services Inc.
Working Enterprises Insurance Services Ltd.
CAUS Financial & Insurance Services Inc.**

We are committed to protecting our clients' privacy. Protecting personal information has always been our priority.

In 2004 the British Columbia created the Personal Information Protection Act (PIPA). This act sets the rules for how Businesses and non-profit organizations collect, use and disclose personal information.

Our commitment includes ensuring the accuracy, security and confidentiality of our client's personal information as well allowing clients to request access to, and correction of, personal information.

Personal Information – includes name, age, address, phone number, social insurance number, marital status, religion, income, credit history, medical information, education, employment information.

Contact information – may not include 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. Contact information is “not” covered by the PIPA

Privacy Officer – means an individual designated responsibility for ensuring that our Companies comply with PIPA

Collecting Information – We will only collect client information that is necessary to fulfill the following purposes:

- **To verify identity;**
- **To understand the needs of our clients;**
- **To open and/or manage case management;**
- **To help service our client's needs**
- **To provide client's or prospective clients with counseling services;**
- **To ensure high standards of service to our clients;**
- **To meet regulatory requirements;**

Consent

Consent can be provided orally, in writing, electronically, or it can be implied where the purpose of collecting using or disclosing the personal information would be considered obvious and the client, voluntarily provides personal information for that purpose.

Consent may also be implied where a client, customer is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products.

Clients can withhold or withdraw their consent of their personal information in certain ways. In withholding or withdrawing consent may restrict our ability to provide a particular service to the client. If so we will explain the situation to assist the client making the decision.

We may collect, use or disclose - personal information without the client's customer's knowledge or consent in the following limited circumstances:

- **When the collection, use or disclosure of personal information is permitted or required by law;**
- **When we require legal advice from a lawyer;**
- **In an emergency that threatens an individual's life, health, or personal security;**
- **When the personal information is available from a public source;**
- **For the purpose of collecting a debt;**
- **To protect ourselves from fraud;**
- **To investigate an anticipated breach of an agreement or a contravention of law;**

Using & Disclosing Personal Information

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

- To conduct client, member surveys in order to enhance the provision of our services;
- To contact our clients directly about products and services that we may offer or they may be interested in;

Retaining Personal Information

If we use client information to make a decision that directly affects the client we will retain that information for at least one year so the client has a reasonable opportunity to request access to it.

Subject to the above we will retain client information only as long as necessary to fulfill the purposes or a legal or business purpose.

Ensuring Accuracy or Personal Information

We will make reasonable efforts to ensure client's personal information is accurate and complete. Clients may request correction of their personal information in order 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 correction being sought. If the correction is not made, we will note the client's correction request in the file.

Securing Personal Information

We are committed to ensuring the security of client information to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal. Our security measures include physically securing our offices where personal information is held, the use of user IDs, passwords, encryption, firewalls; restricting employee access and contractually requiring any service providers to provide comparable security measures.

Providing Clients Access to Personal Information

Clients have a right to access their personal information, subject to exceptions. Such as, but not limited to: Solicitor-client privilege, disclosure which would reveal personal information about another individual, and/or health and safety concerns. Any request must be made in writing and provide sufficient detail to identify the information being sought. If requested we will provide the client with information on how we use their personal information and to whom it has been disclosed. The information will be made available within 30 business days, or we will provide written notice of an extension where additional time is needed to fulfill the request. A minimal fee may be charged for providing the client's personal information. If a request is refused, we will notify the client in writing, providing the reasons for refusal and any recourse available to the client.

The Role of the Privacy Officer

Clients should direct and Questions and/or Complaints: to our company Privacy Officer or designated individual. Our Privacy Officer is David J.A. Porteous EPC President. He is responsible for ensuring compliance with the Personal Information Protection act.

Clients and members should direct any concerns or questions in writing to:

David J.A. Porteous EPC President
WE Consulting & Benefits Services Ltd.
#105 – 251 Lawrence Ave. Kelowna, BC. V1Y 6L2
Toll Free: 1-855-894-8111 Phone: 250-861-5200 Ext. 104 or 604 – 941-7430 Ext. 104
Email: dave@weconsultants.ca

If the Privacy Officer is unable to resolve a client's concerns, the client may also write to the Information and Privacy Commissioner of BC.