



## Privacy Protection Policy

At **Direct Source Solutions**, we are committed to providing our candidates with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our candidates, protecting their personal information is one of our highest priorities.

While we have always respected our candidate's privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of the Personal Information Protection and Electronic Documents Act (PIPEDA), which sets out the ground rules for how Canadian businesses and not-for-profit organizations may collect, use and disclose personal information.

Our commitment is to inform our Candidates of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

The following Personal Information Protection Policy, in compliance with PIPEDA, outlines the principles and practices we will follow in protecting candidate's personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our candidate's personal information and allowing our candidates to request access to, and correction of, their personal information.

### Definitions

Personal Information -means information about an identifiable individual. At **Direct Source Solutions**, this information is usually provided from you in the form of a resume and includes name, address, phone number, email address and work/education history. Personal information does not include contact information (described below).

Contact information -means 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 this policy or PIPEDA.

Privacy Officer -means the individual who has responsibility for ensuring that **Direct Source Solutions** complies with this policy and PIPEDA.

## Policy 1 - Collecting Personal Information

### 1.1

Unless the purposes for collecting personal information are obvious and the candidate voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

1.2 We will only collect the information necessary to fulfill the following purposes:

- To verify past employment; we may collect reference information and past work history information.
- To verify education; we may collect educational information and contact the institutions, if required.
- To identify candidate preferences; we may collect information regarding your interests.
- To understand financial needs of our candidates; we may collect past salary information as well as salary expectations.
- To send e-mail notifications to candidates that wish to receive job offers.

## Policy 2 - Consent

### 2.1

We will obtain candidate consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

## 2.2

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

## 2.3

Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), candidates can withhold or withdraw their consent for **Direct Source Solutions** to use their personal information in certain ways. A candidate's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the candidate in making the decision.

## 2.4

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

The use is clearly in the interests of the individual and consent cannot be obtained in a timely way.

## **Policy 3 - Using and Disclosing Personal Information**

### 3.1

We will only use or disclose candidate personal information where necessary to fulfill the purposes identified at the time of collection.

### 3.2

We will not use or disclose candidate personal information for any additional purpose unless we obtain consent to do so.

### 3.3

We will not sell candidate lists or personal information to other parties.

### 3.4

Once personal information is disclosed to a potential employer or other organizations, it is no longer in our direct control. **Direct Source Solutions** cannot guarantee that such organizations have the same policy of confidentiality and privacy, although we will make reasonable efforts to request that they treat the information appropriately.

## **Policy 4 - Retaining Personal Information**

### 4.1

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

### 4.2

Subject to policy 4.1, we will retain candidate personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

## **Policy 5 - Ensuring Accuracy of Personal Information**

### 5.1

We will make reasonable efforts to ensure that candidate personal information is accurate and complete where it may be used to make a decision about the candidate or disclosed to another organization.

### 5.2

Candidates may request correction to 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 the correction being sought.

### 5.3

If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the candidate's correction request in the file.

## **Policy 6 - Securing Personal Information**

### 6.1

We are committed to ensuring the security of candidate personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

### 6.2

The following security measures will be followed to ensure that candidate personal information is appropriately protected:

- Use of locked filing cabinets
- Physically securing the office
- Restricting employee access to personal information as appropriate
- Passwords restricting access to the Information on every computer

### 6.3

We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

## **Policy 7 - Providing Candidates Access to Personal Information**

### 7.1

Candidates have a right to access their personal information, subject to limited exceptions.

### 7.2

A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.

### 7.3

Upon request, we will also tell candidates how we use their personal information and to whom it has been disclosed if applicable.

### 7.4

We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

### 7.5

A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the candidate of the cost and request further direction from the candidate on whether or not we should proceed with the request.

### 7.6

If a request is refused in full or in part, we will notify the candidate in writing, providing the reasons for refusal and the recourse available to the candidate.

## **Policy 8 - Questions and Complaints: The Role of the Privacy Officer or designated individual**

The Privacy Officer, Stacy Agnos, is responsible for ensuring *Direct Source Solutions* compliance with this policy and the Personal Information Protection and Electronic Documents Act and PIPEDA.

Contact information for Direct Source Solutions Privacy Officer:

stacy@directsourcesolutions.ca