

# Privacy Policy and Practices

**Encore Solutions has made consumer privacy a high priority.** We have a long-standing policy of protecting our customers' privacy in all of our business operations. Encore Solutions has the responsibility to protect the confidentiality of any information and to safeguard the use of information customers may reasonably expect us to keep private.

Encore Solutions will maintain the confidentiality of personal information you provide to Encore Solutions and use it only to support your customer relationship with Encore Solutions.

## **In protecting your privacy rights, Encore Solutions:**

- Safeguards customers' information from unauthorized access.
- Honors consumers' requests to remove their names from our telephone, e-mail, or mail solicitation lists.
- Strives to keep customer records current and accurate.
- Collects, maintains and uses customer information that is necessary to provide the most helpful and personalized products and services to meet consumers' needs.
- Maintains the confidentiality of customer information when undertaking projects with other companies.
- Honors requests from customers for account information the company has about them.

**In support of our commitment to privacy, Encore Solutions has developed a Privacy Code that adopts the follows the Canadian Standards Association Model Code for Protection of Personal Information –approved customer information principles to guide business decisions and to earn our customers' trust. These principles seek to balance the application of information age technologies with the privacy concerns of consumers:**

## **Accountability**

- Encore Solutions is responsible for personal information under its control and for designating individual(s) accountable for compliance with the following principles. Identifying purposes; The purposes for collecting personal information shall be identified at or before the time the information is collected.

## **Consent**

- The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate. Limiting collection; The collection of personal information shall be limited to that which is necessary for the purposes identified by Encore Solutions. Information shall be collected by fair and lawful means. 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 fulfillment of those purposes.

## **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.

## **Safeguards**

- Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

## **Openness**

- Encore Solutions will make readily available to individuals specific information about its policies and practices relating to the management of personal information. Individual access; Upon request, an individual will be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual can challenge the accuracy and completeness of the information and have it amended as appropriate.

## **Challenging compliance**

- An individual shall be able to address a challenge concerning compliance with the above principles to the designated compliance officer accountable for compliance.