



Women's Enterprise Centre Privacy Policy

Updated July 6, 2012

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The Women's Enterprise Centre Privacy Policy informs you of our commitment to privacy. It tells you the ways we ensure that your privacy and the confidentiality of your information are protected.

The objective of the Women's Enterprise Centre Privacy Policy is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the Personal Information *Protection Act* (BC) and other applicable privacy legislation.

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1. COMPLIANCE WITH LEGAL AND INDUSTRY STANDARDS

We will make every reasonable effort to comply with industry standards and applicable federal and provincial laws in Canada, including the Personal Information Protection Act.

2. WHO THIS PRIVACY POLICY APPLIES TO

The Women's Enterprise Centre Privacy Code only applies to identifiable individuals whose personal information Women's Enterprise Centre collects, uses, retains and discloses in the course of commercial activities. When we use the words "personal information" or "information" in this Privacy Policy, we mean information about an identifiable individual, with the exception of the name, title or business address or telephone number of an employee of an organization, which is public information. Further, these terms do not include information that does not identify particular individuals, like aggregate statistics or anonymous data, or information which is publicly available, as specified in applicable laws.

3. PURPOSES FOR THE COLLECTION, USE, RETENTION AND DISCLOSURE OF INFORMATION

The following are our purposes for collecting, using, retaining and disclosing personal information:

- To establish and maintain a relationship with you as a client and to provide services to you
- To provide you with information about products, programs, services, training resources and upcoming events that we believe may interest you

- To administer our services, to assess the quality and quantity of our services, conferences, to maintain adequate accounting and tax records, and to have information in such form as we may reasonably require for our business needs
- To meet legal, regulatory and governmental requirements (including, for example, the requirements of Western Economic Diversification Canada ("WD") as our primary funder
- To detect and prevent fraud and to protect the interests of you, Women's Enterprise Centre and WD
- To achieve any other purpose to which you have given your consent

For our clients who do not have loans with Women's Enterprise Centre, our purposes differ in that we are not required to maintain accounting and tax records related to such individuals. For our loan clients, further details regarding our additional purposes are outlined in your Loan Application Form and/or Loan Agreement with Women's Enterprise Centre.

4. KEY PRIVACY PROTECTION PRINCIPLES

For every client, we need your contact information (your name, address and some identification). For loan clients, we require more information than we require from our other business clients. Here is why we need some of the other information we may ask a client to provide.

- Birth Date

This helps us identify you and ensure that no one is trying to impersonate you.

- Social Insurance Number (SIN)

We use your SIN to keep your information separate from that of other clients with a similar name and for loan applicants, to obtain information with your consent, through the credit approval process.

- Financial Information

For loan applicants, your financial information is used to assess your eligibility for a business loan.

The Women's Enterprise Centre Privacy Policy adheres to the following key principles, which apply to all aspects of our handling an individual's personal information in the context of a commercial activity, including 1) the collection and use of the information, 2) its release, 3) its protection, 4) the access to and accuracy of such information and 5) response to your concerns.

4.1 COLLECTING AND USING INFORMATION

We collect and use information to establish and serve you as our client, as follows:

- We collect, use, retain and disclose information about you only with your consent, except as outlined in this Privacy Policy.

In obtaining your consent, whether express or implied, our purposes for which we require your information are outlined above. If our purposes differ from those outlined above, we will advise you of our new purposes at the time of collection of your information.

We may depart from this consent principle in accordance with the limited exceptions described in this Privacy Policy, when permitted by other written and posted policies established by Women's Enterprise Centre, or where required or permitted by applicable laws (for instance, we may disclose personal information in an emergency to protect human life or safety).

- We only collect the information we need and only use it for the purposes explained to you.

We will only ask for the information we need for the particular service you requested and only use it for the purposes outlined in this Privacy Policy or, if applicable, outlined to you at the time of collection of your information, such as in the case of a loan applicant. When you apply for a new service, we will indicate how we intend to use your information if our purposes differ from those already outlined. We will advise which information would help us to serve you but is optional for you to provide.

- With your consent, we may obtain information about you from third parties.

Obtaining additional information about you from trustworthy third parties helps us assess your eligibility for our services. For example, for loan applicants we need to know your credit history. For this reason, we may contact other lenders or credit bureaus to give us information on your credit history. We may also contact employers or other personal references to verify information that you have given us. We will not do this without your consent, but please remember that if you do not give your consent we will not be able to process your loan application and extend credit services to you.

4.2 RELEASING INFORMATION

Under no circumstances do we sell client lists or information to others. We release your information to parties outside Women's Enterprise Centre only under the following circumstances:

- Where we have your consent, whether express or implied.

For example, for loan applicants we will disclose your credit history with us to other lenders or credit bureaus in order to support the credit approval process. In such cases, we release the information required to identify you, as well as facts from our credit records about your repayment history.

- To our suppliers and agents who assist us in servicing you and whom we can reasonably trust to respect your privacy.

For example, we will disclose your name and address to a courier company making a delivery to you at our request. In such cases, we only make disclosure to the extent necessary and whenever possible, require that the party receiving this information provides reasonable assurances that they will respect the privacy of your information in accordance with applicable laws.

- When required or permitted by law to do so.

For example, we must give information in response to a valid demand, search warrant or other legally valid enquiry or order. We may disclose information to the authorities to serve a clear public interest and fulfill our public duty - such as to protect against fraud or other criminal activity. We may take action to protect the interests of Women's Enterprise Centre which may result in disclosing information to parties outside Women's Enterprise Centre, such as using agents to collect overdue accounts. We also may disclose information under an exception to the requirement for consent expressly set out in applicable laws, such as the exception for disclosures necessary to protect human life or safety in an emergency.

- When we need to do so to protect our interests in the context of an existing or potential legal or administrative proceeding.

For example, in the event of a proceeding commenced by or against us in connection with you, we may disclose your information to our lawyers and to the court or administrative body involved.

4.3 PROTECTING INFORMATION

- We will protect your information with appropriate safeguards and security measures.

We have reasonable security standards to protect our systems and your information against unauthorized access and use. All employees of Women's Enterprise Centre are familiar with the procedures that must be taken to safeguard client information.

- We retain your information only as long as it is legally or reasonably required by us.

The length of time we retain information varies depending on the service and the nature of the information. This period may extend beyond the end of your relationship with us but only for so long as it is legally or reasonably required by us. When your information is no longer needed, we have procedures to destroy, delete, erase or convert it to an anonymous form.

4.4 PROVIDING INFORMATION ACCESS AND ACCURACY

- We will give you access to the information we have about you.

Most of your information is kept in our client file about you. Please contact our Privacy Officer if you wish to access any information we may have about you. We will advise you in advance if a minimal charge will be required for conducting a search, and will do our utmost to respond to your request within 30 days. Please note that we may not be able to provide information about you from our records if it contains references to other persons, is subject to legal privilege, contains information proprietary to Women's Enterprise Centre, is too costly to retrieve, or cannot be disclosed for other legal reasons.

- How to make a request for access to the information we have about you.

Please send your request in writing by mail, fax or e-mail addressed to our Privacy Officer at the address indicated below. In your request, please specify what Information you require.

Examples of what you can request: name, contact details, including whether you wish to view and/or edit information or inquire regarding use and/or disclosure.

- We will make every reasonable effort to keep your information accurate and up-to-date.

Having accurate information about you enables us to give you the best possible service. You can help by keeping us informed of any changes, for instance if you move or change telephone numbers. If you find any errors in our information about you, please send us the correction in writing by mail, fax or e-mail. We will make appropriate corrections immediately and make sure that such corrections are conveyed to anyone we may have misinformed. For information that remains in dispute, we will note your opinion in the file.

4.5 RESPECTING AND RESPONDING TO YOUR PRIVACY CONCERNS

- We will explain your options of refusing or withdrawing consent to the collection, use or disclosure of your information, and we will record and respect your choices subject to any legal or contractual restrictions and reasonable notice.

Please contact our Privacy Officer if you have any questions related to your options. For example, you may refuse consent for Women's Enterprise Centre to do a credit check, but we will not be able to extend credit services to you. Once you have a credit product, you will not be able to withdraw your consent to share your credit experience with other lenders and credit bureaus, as this is necessary to support the credit approval process.

- We will investigate and respond to your concerns about any aspect of our handling of your information.

If you have any concerns or questions about privacy and confidentiality - or any concerns about the way a request for information was handled - you can contact the Women's Enterprise Centre Privacy Officer

Address: 201 - 1726 Dolphin Avenue, Kelowna BC V1Y 9R9

Phone: 250.868.3454 or 1.800.643.7014

FAX: 250.868.2709

E-mail: info@womensenterprise.ca

Our Privacy Officer has the decision-making authority to resolve most concerns. However, if you are unsatisfied with the way your complaint or request was addressed, you may contact the privacy commissioner:

Office of the Information and Privacy Commissioner for British Columbia

PO Box 9038, Stn. Prov. Govt.

Victoria, BC V8W 9A4

5. INFORMATION REGARDING WEBSITE PRACTICES

The principles outlined in the Women's Enterprise Centre Privacy Policy apply to information collected through our website, with the following qualifications:

- E-mail Addresses

We collect and store your e-mail addresses from any communications that you may send to Women's Enterprise Centre by clicking on any of our e-mail or website links specifically marked to help you contact us. We may use your e-mail address to communicate with you, if your e-mail indicates that a response to your inquiry is requested or to address a concern or complaint you may have.

- Cookies

Cookies are an essential part of how the Internet works today, and they allow web servers to recognize your computer's browser when you return. When you enter our site, a cookie is set on your hard drive so that our site can be easily located by your browser on future visits. You may choose not to accept cookies by changing your preferences on your browser. However, some parts of our site and other sites you may visit may not function properly if you disable the use of cookies on your browser.

- Links to External Sites

Links to external sites are provided for you as a convenience and we assume no responsibility or liability for such linked sites. These other sites may send their own cookies to users, collect data or solicit personal information. You should check the privacy policy of any site you visit for information regarding their privacy handling practices.

6. UPDATING THIS PRIVACY POLICY

Women's Enterprise Centre will conduct periodic reviews of this Privacy Policy to make sure that it remains current with changing standards, technologies and laws.

We may add, modify or remove portions of this Privacy Policy when we feel it is appropriate to do so. Any changes to this Privacy Policy or to our information handling practices will be recorded in a timely manner. However, we will not use any information collected prior to such changes for any new purposes without first obtaining your consent.

Effective Date: January 1, 2004