## AIM Professional Services Ltd.

## **PRIVACY STATEMENT**

Effective January 1<sup>st</sup>, 2004, the Federal Government of Canada introduced the *Personal Information Protection and Electronic Documents Act* (PIPEDA) which many businesses across Canada are now governed by, including AIM Professional Services Ltd. This Federal Statute outlines principles to follow in the collection, use and disclosure of personal information collected in the course of doing business. This privacy statement explains our privacy practices.

In this Privacy Statement, the terms "AIM Professional Services Ltd.", "AIM", "we" and "our" refer to AIM Professional Services Ltd., unless otherwise indicated.

## **Privacy Principles:**

- Accountability: AIM is committed to protecting the privacy of the information that we collect. This information is not limited to only our client's information, but also to their customer's information that they provide, whom we are attempting to collect monies from. We responsibly maintain and protect all information that we collect in the normal course of business and have appointed an internal "Privacy Board" to ensure compliance with this new Act.
- 2. <u>Identifying Purposes:</u> Information is collected on our customers only as necessary for the following reasons, but is not limited to:
  - Verifying your identity &/or organization
  - Conflict checks
  - Determining your eligibility for services
  - Processing your requests for services
  - Assessing and updating your creditworthiness, as required
  - Providing you with services including billing and collection services
  - Protecting all parties from error and fraud
  - Complying with legal and regulatory requirements
- 3. <u>Consent:</u> Information is obtained from our customers through their consent by registering with our company to provide services. Personal information may be collected, used or disclosed for any of the "Identified Reasons" set out in privacy principle #2. If your personal information is not needed for one of the "Identified Reasons", we will not use or disclose it without obtaining additional consent from you.
- 4. <u>Limiting Collections:</u> Information will generally be collected for the reasons set out in privacy principle# 2, but not necessarily limited to those reasons. If additional information is required, you will be notified of the reasons for which it will be used.
- 5. <u>Limiting Use, Disclosure, and Retention:</u> In limited circumstances we share personal information with other parties to administer the deliver of services we provide to you. We may share personal information with the following entities: credit bureaus; data storage and exchange providers; software providers; data and payment processors; professional firms or consultants (ie: legal and accounting firms); statement producers; mailing houses (ie: mail collection notices &/or statements). In these circumstances the

personal information that the no-related organization receives is limited only to the personal information held by is that they need in order to render their service to us. The companies that are provided with personal information are obligated to keep the information confidential and secure, and used only for the authorized purpose. We will disclose personal information if a law, regulation, search warrant, subpoena or court order legally authorizes or requires us to do so to protect the rights, property or personal safety of Aim, its customers or employees. Except as set out, we do not share or disclose the personal information we hold to others. Personal information will be retained only for as long as is necessary for the purposes set out above. When no longer required, we will destroy erase, or de-personalize the personal information. Federal or Provincial Legislation or Legal requirements may necessitate our retaining of some or all of the personal information for a period of that is longer them we might otherwise hold it.

- 6. <u>Accuracy:</u> We strive to keep your information as accurate, complete and up to date as possible. To ensure this, we urge you to provides us with updates regarding such information and to inform us of any errors affecting the personal information we hold.
- 7. <u>Safeguards:</u> We protect your information with the appropriate safeguards and security measures and will continue to keep and upgrade as necessary, these security measures in an effort to protect personal information held by us from any unauthorized use, access, disclosure, distribution, loss or alteration. Our employees and service providers only have access to your information for the identification purposes and access is permitted only to the extent necessary for such purposes. In addition, we employ physical, administrative, contractual and technological safeguards to appropriately protect information held by us in the most effective manner possible.
- 8. Openness: Upon your request, we may provide you with specific details about our information handling policies and procedures as appropriate or required by law. Please feel free to contact us at: info@aimproservice.com.
- 9. <u>Individual Access:</u> You may review your personal information we have about you. Accuracy is important to us. If you believe our information needs to be corrected or updated, please let us know and we will try to amend our files as quickly as possible. In response to a formal request, our goal is to respond to your concerns within thirty (30) days of receipt of your written request.
- 10. <u>Challenging Compliance:</u> We will investigate and respond to your concerns about any aspect of our handling of your personal information. If you are not satisfied or wish to submit comments concerning our Privacy Statement or its application by us, we invite you to convey your concerns or suggestions in writing to AIM Professional Services Ltd. 860 University Ave. W., Windsor, ON N9A 5R9
- 11. <u>Attention:</u> Privacy Board. We will reply as quickly as possible and inform you of the steps, if any that have been, or will be taken in order to address the concern or implementation of a suggestion.

## How does PIPEDA apply to debt collection?

Section 7(1)(b) of the act states: an organization may collect personal information without the knowledge or consent of the individual only if it is reasonable to expect that the collection with the knowledge or consent of the individual would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province;

Section 7(2)(a) of the act states: an organization may, without the knowledge or consent of the individual, use personal information only if in the course of its activities, the organization becomes aware of information that it has reasonable grounds to believe could be useful in the investigation of a contravention of the laws of Canada, a province or a foreign jurisdiction that has been, is being or is about to be committed, and the information is used for the purpose of investigating that contravention;

Section 7(3)(b) of the act states: an organization may disclose personal information without the knowledge or consent of the individual only if the disclosure is for the purpose of collecting a debt owed by the individual to the organization;