

# Privacy Policy

IntuitionWorks is committed to protecting the privacy of personal information provided to us. Personal information includes any information that can be used to identify an individual.

It is important that our clients understand that by retaining us to provide consulting services, they are consenting to the collection, use, and disclosure of their personal information for the purpose of enabling us to work with them in relation to the particular matter they have engaged us.

Through a standard form of retainer letter or via our website, we inform our clients about our Privacy Policy, and the purposes for which their personal information may be collected, used or disclosed and we provide contact information for the Privacy Officer at IntuitionWorks.

We provide a copy of this Policy to our employees, including those who work under contract, students and volunteers. The provisions of this Policy apply to the employees/subcontractors of IntuitionWorks as a condition of their employment or association.

Legislation governing the protection of privacy in the private sector is very new, and the IntuitionWorks Privacy Policy may be varied from time to time as we deem necessary.

## Collection of Personal Information

In order to provide high quality consulting services, we need to collect a broad range of personal information from our clients, prospective clients, and other parties. Sometimes, the collection of this information is required by legislation or by order of a Court or tribunal.

Most of the personal information we collect is obtained from clients when they instruct us, and subsequently as we act for them in a consulting matter.

Due to the nature of consulting work, however, it is not always possible to collect information from an individual directly. We may collect personal information from, and about, employees and potential employees, for various purposes including determining appropriate levels of compensation, evaluating performance and administering payroll and benefits.

The personal information we collect may include sensitive financial or health-related information. It may be collected in a variety of ways, for example, in writing, in person, on the telephone, through our website and by other electronic communication.

## Use and Disclosure of Personal Information

The personal information we collect is used for the purpose of advancing our clients needs and interests. We may disclose personal information only on the written permission of the owner of that information unless it is required by law or by order of the Court or tribunal in which case the latter takes precedence.

## Consent

Within reasonable legal limits, any information collected during the process of consulting for clients is disclosed only on the consent of the individual(s) involved. In certain circumstances, privacy legislation authorizes the collection, use or disclosure of personal information without the consent of the individual such as to respond to emergencies or where obtaining consent would be similarly unnecessary or inappropriate.

IntuitionWorks marketing materials and our professional presentations may refer to the types of services we provide, however, we will not disclose our clients' names or personal information for marketing purposes without notifying those clients and obtaining their prior consent.

IntuitionWorks operates a website. Our internet service provider may be a record of the individuals who visit our site and log the following information for statistical purposes: internet address, domain name, date and time of visit to the website, pages and documents downloaded, previous website visited and type of browser used. This information is only used for statistical and website development purposes. If you visit our website, you do so voluntarily and are deemed to consent to our collection of your personal information as specified in this paragraph.

Subject to reasonable and lawful conditions, an individual may withdraw or vary consent for our collection, use, and disclosure of his or her personal information at any time with prior written notice to us.

## Our Employees and Subcontractors

Personal employee information is information relating to an individual who is an employee (including those who work under contract, students and volunteers) or a potential employee and which is collected, used, and or disclosed for the purposes of establishing, managing or terminating an employment relationship. Under provincial privacy legislation, organizations have broader rights to collect, use, and disclose personal employee information without the consent of the individual.

Nevertheless, IntuitionWorks, in its sole discretion, may seek the consent of its employees for the collection, use, and disclosure of sensitive personal employee information.

## Security of Personal Information

Our staff and associates are trained to appreciate the importance of privacy and confidentiality of personal information.

In order to provide reasonable security for personal information which is in electronic form, we implement administrative and technological safeguards to prevent unauthorized access to the company's network and data storage systems.

### Retention of Personal Information

Privacy legislation stipulates that personal information need not be retained longer than is reasonably necessary.

When our consulting services to a client are concluded, we close the file. We may, in our sole discretion, destroy duplicate materials before closing a file.

We will maintain our client file retention practices which mandate that files be closed and stored for periods up to ten (10) years beyond the conclusion of the matter.

We will retain our employees' personal information for at least three (3) years after they leave our employment.

### Access

Under privacy legislation, individuals have a right of access to records containing their personal information, subject to certain legal restrictions, including the privilege which is inherent in the relationship between our consultant(s) and a client. A reasonable fee may be charged but we will provide an advance estimate of any fee we plan to charge.

Access requests for personal information are to be directed to our Privacy Officer, as named by IntuitionWorks. Contact information for the Privacy Officer is provided below.

All access requests are to be in writing and shall set out in sufficient detail the scope of the request.

If there is an error or omission in personal information in our custody or under our control for which a request for correction has been received, we will, subject to legal limitations, correct the information as soon as reasonably possible or annotate it with the correction that was requested but not made.

The Privacy Officer will assist the individual with the access request and respond in a timely manner, advising whether access to the requested records will be granted, and explaining the reasons for the refusal, if any part of the access request is refused. The Privacy Officer will also inform the applicant that he or she may ask the Information and Privacy Commissioner to review the decision.

### More Information

Persons wishing to obtain further information about our Privacy Policy or who wish to make a complaint about our handling of a privacy issue may contact our Privacy Officer at :

IntuitionWorks:                   403.238.5424 or ken@intuitionworks.ca

You may also visit the website of Alberta's Information and Privacy Commissioner who operates a website on private sector privacy. Alternatively, the Office of the Federal Privacy Commissioner may be contacted.