



MANAGING INFORMATION SYSTEMS 3 INC.

Privacy Policy

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Owner	Junior Williams
Contact Information	Title: Director of Cyber Risk Mobile: 437-776-6279 Email: Junior.Williams@mis3.ca



Confidentiality Statement

This document is intended to be used as a guide and reference for the internal use of Managing Information Systems 3 Inc. (MIS3 Inc).

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This document has been revised by:

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This document has been reviewed and Approved by:

Name	Role	Approval Date
Junior Williams	CISO	January 01, 2021
Neil Mistry	CEO	January 05, 2021



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Introduction

MIS3 is committed to maintaining the accuracy, confidentiality, and security of all corporate managed personally identifiable information ("Personal Information"). As part of this commitment, our privacy policy governs our actions as they relate to the collection, use and disclosure of Personal Information.

Our privacy policy is based upon the values set by the Canadian Standards Association's Model Code for the Protection of Personal Information and Canada's *Personal Information Protection and Electronic Documents Act*. By accessing, using or contributing to products or services to/from MIS3 you agree to the terms of this Privacy Policy and consent to the collection, use and disclosure of your personal information as set out herein. If you do not agree to these terms, immediately end and undo your use of MIS3 services.

This Privacy Policy does not apply to any third-party site or service linked to our website or recommended or referred by our website or by our staff, subject to the terms of the Privacy Policy.

The Ten Principles of *PIPEDA*

The ten principles of *PIPEDA* that form the basis of this Privacy Policy are as follows:

1. **Accountability:** organizations are accountable for the Personal information they collect, use, retain and disclose in the course of their commercial activities, including, but not limited to, the appointment of a Chief Privacy Officer;
2. **Identifying Purposes:** organizations are to explain the purposes for which the information is being used at the time of collection and can only be used for those purposes;
3. **Consent:** organizations must obtain an Individual's express or implied consent when they collect, use, or disclose the individual's Personal information;
4. **Limiting Collection:** the collection of Personal information must be limited to only the amount and type that is reasonably necessary for the identified purposes;
5. **Limiting Use, Disclosure and Retention:** Personal information must be used for only the identified purposes, and must not be disclosed to third parties unless the Individual consents to the alternative use or disclosure;
6. **Accuracy:** organizations are required to keep Personal information in active files accurate and up-to-date;
7. **Safeguards:** organizations are to use physical, organizational, and technological safeguards to protect Personal information from unauthorized access or disclosure.
8. **Openness:** organizations must inform their clients and train their employees about their privacy policies and procedures;



9. Individual Access: an individual has a right to access Personal information held by an organization and to challenge its accuracy if need be; and
10. Provide Recourse: organizations are to inform clients and employees of how to bring a request for access, or complaint, to the Chief Privacy Officer, and respond promptly to a request or complaint by the individual.

This Privacy Policy applies to the company's Directors, members, employees and contracted employees and third parties MIS3 works with in relation to the purposes herein.

Purposes of Collecting Personal Information

We may collect Personal information and Business information that is relevant for the purposes of providing services to our clients. The purposes for which we collect Personal Information will be identified before or at the time we collect the information. In certain circumstances, the purposes for which information is collected may be clear, and consent may be implied, such as where your name and address are provided as part of the order process.

Consent

An individual's express, written consent will be obtained before or at the time of collecting Personal information. The purposes for the collection, use or disclosure of the Personal information will be provided to the individual at the time of seeking his or her consent. Once consent is obtained from the individual to use his or her information for those purposes, MIS3 has the individual's implied consent to collect or receive any supplementary information that is necessary to fulfil the same purposes. Express consent will also be obtained if, or when, a new use is identified.

By signing the application and/or other forms, accepting to use an App and/or Software, obtaining products or services from MIS3, or providing products or services to MIS3, you grant implied consent to obtain Personal information or Business information for the purposes set out in this Privacy Policy. Implied consent is also granted by the individual to permit MIS3 to report or otherwise disclose information to Industry Canada.

Limiting Collection

Personal information collected will be limited to the purposes set out in this Privacy Policy.

Limiting Use, Disclosure and Retention

Personal Information may only be used or disclosed for the purpose for which it was collected unless you have otherwise consented, or when it is required or permitted by law. Personal Information will only be retained for the period of time required to fulfill the purpose for which we collected it or as may be required by law.

In general, we may use and/or disclose your Personal information only in relation to the purposes identified herein. In connection with such identified purposes, we may employ third parties to process Personal information or perform tasks on our behalf. We seek assurances to ensure personal information is similarly protected by these third parties in accordance with all applicable privacy and data security laws.



Use of Personal Information

Personal information will be used for only those purposes to which the individual has consented with the following exceptions, as permitted under *PIPEDA*:

MIS3 will use Personal information *without* the individual's consent, where:

- the organization has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law *and* the information is used for that investigation;
- an emergency exists that threatens an individual's life, health or security;
- the information is for statistical study or research;
- the information is publicly available;
- the use is clearly in the individual's interest, and consent is not available in a timely way;
- knowledge and consent would compromise the availability or accuracy of the information, and
- collection is required to investigate a breach of an agreement.

Disclosure and Transfer of Personal Information

Personal information will be disclosed to only those MIS3 employees, suppliers, members of MIS3 committees, and the Directors that need to know the information for the purposes set out in this Privacy Policy.

Personal information will be disclosed to third parties *with* the individual's knowledge and consent, which may be implied as per this Privacy Policy.

PIPEDA permits MIS3 to *disclose* Personal information to third parties, *without* an individual's knowledge and consent, to:

- a lawyer representing MIS3;
- collect a debt owed to MIS3 by the individual or client;
- comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction;
- a law enforcement agency in the process of a civil or criminal investigation;
- a government agency or department requesting the information; or, □ as required by law.



PIPEDA permits MIS3 to *transfer* Personal information to a third party, *without* the individual's knowledge or consent, if the transfer is simply for processing purposes and the third party only uses the information for the purposes for which it was transferred. MIS3 will ensure, by contractual or other means, that the third party protects the information and uses it only for the purposes for which it was transferred.

Retention of Personal Information

Personal information will be retained in client files as long as the use for which it was collected is active and for such periods of time as may be prescribed by applicable laws and regulations. Personal information contained in an inactive file will be retained for a period of seven (7) years, except in the case where MIS3 has actively rejected the intended use of the Personal information. Where an intended use has been rejected, the file and all Personal information contained in the file will be retained for a period of two (2) years.

Accuracy

MIS3 endeavours to ensure that any Personal information provided by the individual in his or her active file(s) is accurate, current and complete as is necessary to fulfill the purposes for which the information has been collected, used, retained and disclosed. Individuals are requested to notify MIS3 of any change in personal or Business information.

Safeguards

MIS3 will use physical, organizational, and technological measures to safeguard Personal information to only those MIS3 employees, contractors or third parties who need to know this information for the purposes set out in this Privacy Policy and who are subject to reasonable obligations of confidentiality with regard to the Personal information.

Organizational Safeguards: Access to Personal information will be limited to the parties that require it for the purposes herein, and for the duration of that need.

Physical Safeguards: Active files are stored in locked filing cabinets when not in use. Access to work areas where active files may be in use is restricted to MIS3 staff only and authorized third parties. All inactive files or Personal information no longer required are shredded prior to disposal to prevent inadvertent disclosure to unauthorized persons.

Technological Safeguards: Personal information contained in MIS3 managed computers and electronic databases are password protected and are protected in conformance with reasonably prudent industry norms. Access to any of the MIS3 's computers or Cloud control panels also is password protected. MIS3 leverages industry-leading Cloud security technologies and services including XDR, IAM, CASB, Advanced Email Security and Microsegmentation, among other services to protect personal and confidential Business information.

Safeguarding customer information: Personal Information will be protected by security safeguards that are appropriate to the sensitivity level of the information. We take all reasonable precautions to protect your Personal Information from any loss or unauthorized use, access or disclosure.



Openness

MIS3 will endeavour to make its privacy policies and procedures available and known all users, including staff, clients and business partners, with respect to the management of Personal Information.

Individual Access

An Individual who wishes to review or verify what Personal information is held by MIS3, or to whom the information has been disclosed (as permitted by the *Act*), may make the request for access, in writing, to the MIS3 's Chief Privacy Officer.

Upon verification of the individual's identity, the Chief Privacy Officer will respond within 60 days. MIS3 is entitled to request sufficient Personal information to allow us to confirm whether or not we have Personal information relating to the individual making the request. We reserve the right to charge a minimal fee for copies of documents requested under this Privacy Policy. Please advise us if you need any help in preparing your request and we will ensure you are provided with such assistance. Additionally, for those with a sensory disability, we will endeavour to provide you with access to your personal information in an alternate format, if so requested. Please contact our Chief Privacy Officer for such requests and assistance. There may be circumstances where we are unable to provide the requested access. Those circumstances include if the cost of providing access would be prohibitive, the information contains references to other individuals, disclosure is prohibited for legal, security or commercial proprietary reasons, and/or the information is subject to solicitor client or litigation privilege.

If the individual finds that the information held by MIS3 is inaccurate or incomplete, upon the individual providing documentary evidence to verify the correct information, MIS3 will make the required changes to the individual's active file(s) promptly.

Complaints/Recourse

If an individual has a concern about MIS3 's Personal information handling practises, a complaint, in writing, may be directed to the MIS3 Chief Privacy Officer.

Upon verification of the individual's identity, MIS3 's Chief Privacy Officer will act promptly to investigate the complaint and provide a written report of the investigation's findings to the individual.

Where MIS3 's Chief Privacy Officer makes a determination that the individual's complaint is well founded, the Chief Privacy Officer will take the necessary steps to correct the offending information handling practise and/or revise MIS3 's privacy policies and procedures.

Where MIS3 's Chief Privacy Officer determines that the individual's complaint is *not* well founded, the individual will be notified in writing.

If the individual is dissatisfied with the finding and corresponding action taken by MIS3 's Chief Privacy Officer, the individual may bring a complaint to the Federal Privacy Commissioner at the address below:



The Privacy Commissioner of Canada
112 Kent Street, Ottawa,
Ontario K1A 1H3
Tel 1-800-282-1376

Email address: www.privcom.gc.ca.

Questions/Access Request/Complaint

Any questions regarding this or any other privacy policy of MIS3 may be directed to the Chief Privacy Officer. Requests for access to information, or to make a complaint, are to be made in writing and sent to the Chief Privacy Officer at the address below:

C/O Chief Privacy Officer
MIS3 INC.
FIRST CANADIAN PLACE
100 KING STREET WEST SUITE 5700
TORONTO ON M5X 1C7
CANADA

Amendment to MIS3 's Privacy Policies

This MIS3 's Privacy Policy is in effect and is retroactive to January 1, 2004. This policy is subject to amendment in response to developments in the privacy legislation. The Chief Privacy Officer will review and revise the Privacy Policy from time to time as required by changes in privacy law. Notification of any changes in the Privacy Policy will be posted on MIS3 's website. Any changes in the Privacy Policy will apply to Personal information collected from the date of the posting of the revised Privacy Policy.

Disclaimers

Notwithstanding that we take the security precautions set out herein to protect your privacy and confidentiality, we cannot guarantee the security of your Personal information or company information. E-mails or forms sent via the Internet are neither confidential nor secure and can be viewed and modified by third parties. MIS3 will not be liable for damages arising from messages sent to it via unsecured e-mail or other messages sent electronically (SMS, etc.).

Transactions

Financial transactions may be processed through a payment provider and/or the App or Software. Such financial transactions may include Personal information and/or Business information. Such third parties may access, process, and store, Personal information and/or Business information as may be required to process transactions.

Cookies

MIS3 may use cookies to help understand and save users' preferences for future visits, compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our



behalf. Cookies may be turned off, but if you turn cookies off, some of the features that make your site experience more efficient may not function properly.

Other Websites

Our website may contain links to other third-party sites that are not governed by this privacy policy. Although we endeavour to only link to sites with high privacy standards, our privacy policy will no longer apply once you leave our website. Additionally, we are not responsible for the privacy practices employed by third party websites. Therefore, we suggest that you examine the privacy statements of those sites to learn how your information may be collected, used, shared and disclosed.

CASL

MIS3 complies with the Canada Anti-Spam Law with respect to all commercial electronic messages we send out. At any time if you would like to unsubscribe from receiving future emails, you can email us at admin@mis3.ca and we will promptly remove you from ALL correspondence.