

Our Commitment to Protecting Your Privacy

At Wynford, respecting privacy is an important part of our commitment to our clients, our employees and the general public.

When you participate in programs conducted by our organization, you can be confident that any personal information that you share with us will stay with us.

Any time you participate as a client with our registration forms, whether in person or by telephone, mail or Internet, you can be assured:

- That your individual responses will be kept confidential.
- That your personal identifying information will never be sold to anyone.

Wynford maintains strict privacy standards as specified in our Privacy Policy, which are also consistent with the provisions of the Personal Information Protection and Electronic Documents Act (Canada).

Wynford reviews its Privacy Policy regularly to make sure that it is relevant and remains current with changing industry standards, technologies and laws.

If you have any concerns about how your privacy is protected at Wynford, please contact our Privacy Officer by e-mail at privacy@wynfordmotivates.com, or by mail at: 101 Duncan Mill Road, Toronto, Ontario, M3B1Z3.

Wynford Privacy Policy

Scope and Application

The principles that form the basis of Wynford's Privacy Policy are interrelated and Wynford shall adhere to the principles as a whole. Each principle must be read in conjunction with the accompanying commentary. As permitted by the Personal Information Protection and Electronic Documents Act (Canada), the commentary in Wynford's Privacy Policy has been drafted to reflect personal information issues specific to Wynford.

The scope and application of Wynford's Privacy Policy are as follows:

- The Privacy Policy applies to personal information collected, used, or disclosed by Wynford in the course of commercial activities.
- The Privacy Policy applies to the management of personal information in any form whether oral, electronic or written.
- The Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by Wynford:
 - Non-personally identifiable information;
 - The name, title, business address and/or telephone number of an employee of an organization;

- Other information about an individual that is publicly available and is specified by regulation pursuant to the Personal Information Protection and Electronic Documents Act (Canada).
- The application of the Privacy Policy is subject to the requirements and provisions of the Personal Information Protection and Electronic Documents Act (Canada), the regulations enacted there under, and any other applicable legislation or regulation.

Definitions

Collection: The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

Consent: Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of Wynford. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

Disclosure: Making personal information available to a third party.

Employee: An employee of or independent contractor to Wynford.

Personal information: Information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization, and does not include descriptive, factual information about an organization.

Client: A member of the public who provides personal information to Wynford in the course of a registration/program conducted by Wynford. For example, a client is an individual who discloses personal information to Wynford in the course of program being run by Wynford that may or may not include registration.

Third party: An individual or organization outside of Wynford.

Use: The treatment, handling, and management of personal information by and within Wynford or by a third party with the knowledge and approval of Wynford.

Accountability

Wynford is responsible for personal information under its control and shall designate one or more persons who are accountable for Wynford's compliance with the following principles.

Responsibility for compliance with the provisions of Wynford Privacy Policy rests with Wynford Privacy Officer who can be reached by e-mail at privacy@wynfordtwg.com or by mail at: 101 Duncan Mill Rd, Toronto, Ontario, M3B1Z3. Other individuals within Wynford may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.

Wynford is responsible for personal information in its possession or control and shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.

Identifying Purposes for Collection of Personal Information

Wynford shall identify the purposes for which personal information is collected at or before the time the information is collected.

Wynford collects personal information from the customer only for the purposes of executing the program as requested by the customer.

Upon request, persons collecting personal information shall explain this identified purpose or refer the individual to a designated person within Wynford who can explain the purpose.

When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is permitted or required by law, the consent of the client will be acquired before the information will be used or disclosed for the new purpose.

Wynford may provide clients or other third parties with information from any program, in aggregate form. In aggregate form it is impossible to identify an individual client's personal information.

Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual are required for the collection, use, or disclosure of personal information, except where inappropriate.

Participation by clients is always voluntary. When a client agrees to participate in a program, he/she gives consent by participating in the registration of aforementioned program.

Generally, any personal information collected over the course of a program is not disclosed to third parties.

In obtaining consent, Wynford shall use reasonable efforts to ensure that a client is advised of the identified purposes for which personal information will be used

or disclosed. The identified purpose shall be stated in a manner that can be reasonably understood by the client.

Generally, Wynford shall seek consent to use and disclose personal information at the same time it collects the information. However, Wynford may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.

In determining the appropriate form of consent, Wynford shall take into account the sensitivity of the personal information and the reasonable expectations of its clients.

Limiting Collection of Personal Information

Wynford shall limit the collection of personal information to that which is necessary for the purpose identified by Wynford. Wynford shall collect personal information by fair and lawful means.

We collect only the amount and type of information needed for the purpose identified to individuals.

Wynford will only collect personal information from external sources, such as client organizations, if individuals have consented to such collection.

Limiting Use, Disclosure, and Retention of Personal Information

Wynford shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

Wynford may disclose a client's personal information to a public authority or agent of a public authority if, in the reasonable judgment of Wynford, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information; or to a third party or parties, where the client consents to such disclosure or disclosure is required or permitted by law.

Only Wynford's employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about clients. Wynford shall keep personal information only as long as it remains necessary or relevant for the identified purpose or as required by law.

Depending on the circumstances, where a client may have to be re-contacted for purposes of clarifying responses to a registration, or to seek additional responses, Wynford shall retain the personal information for a period of time that is reasonably sufficient to allow this re-contact.

Wynford shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

Accuracy of Personal Information

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

Personal information used by Wynford shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a client.

Wynford shall update personal information about clients and employees as necessary to fulfill the identified purpose or upon notification by the individual.

Security Safeguards

Wynford shall protect personal information through security safeguards appropriate to the sensitivity of the information.

Wynford shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held.

Wynford shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purpose for which it is to be used.

All of Wynford's employees with access to personal information shall be required to respect the confidentiality of that information.

Openness Concerning Policies and Procedures

Wynford shall make readily available to individuals specific information about its policies and procedures relating to the management of personal information.

Wynford shall make information about its policies and procedures easy to understand, including:

- a) the title and address of the person or persons accountable for Wynford's compliance with its Privacy Policy and to whom inquiries and/or complaints can be forwarded;
- b) The means of gaining access to personal information held by Wynford;

c) A description of the type of personal information held by Wynford, including a general account of its use; and

d) A description of what personal information is made available to related organizations (e.g. subsidiaries).

Individual Access to Personal Information

Upon request, Wynford shall inform an individual of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Upon written request to the Privacy Officer, Wynford will inform an individual of the existence, use and disclosure of his/her personal information and shall be given access to that information.

In certain situations, Wynford may not be able to provide access to all the personal information that it holds about a client. For example, Wynford may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Wynford may not provide access to information if disclosure would reveal confidential commercial information.

In order to safeguard personal information, a client may be required to provide sufficient identification information to permit Wynford to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.

Wynford shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, Wynford shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

Clients and employees can obtain information or seek access to their individual files by contacting Wynford Privacy Officer.

Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Wynford's compliance with Wynford Privacy Policy.

Wynford shall maintain procedures for addressing and responding to all inquiries or complaints from its clients regarding Wynford's handling of personal information.

Wynford shall, on written request, inform its clients about the existence of these procedures as well as the availability of complaint procedures.

The person or persons accountable for compliance with Wynford Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.

Wynford shall investigate all complaints concerning compliance with its Privacy Policy. If a complaint is found to be justified, Wynford shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. The client shall be informed of the outcome of the investigation regarding his or her complaint.

Additional Information

For more information regarding Wynford Privacy Policy, please contact the Wynford Privacy Officer by e-mail privacy@wynfordtwg.com or by mail at: 101 Duncan Mill Rd, Toronto, Ontario, M3B1Z3.

Please visit the Privacy Commissioner of Canada's website at www.privcom.gc.ca.