

Lamothe Approvals Inc. Privacy Policy

Lamothe Approvals Inc. (“Lamothe Approvals”) complies with: (i) Personal Information Protection and Electronic Documents Act (“PIPEDA”), a federally enacted act which protects personal information that is collected, used or disclosed; (ii) other acts which protect personal information and privacy, and (iii) any future provincial protection of privacy legislation as it relates to the rights of customers. For the purposes of this policy, personal information means information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee or an organization. Any reference to a customer within this policy is in reference to personal information and not business information (“customer”).

Lamothe Approvals does receive information from customers, and while it is not personal in nature, it is confidential and is treated in a confidential manner, meaning that the information is only available to persons employed by Lamothe Approvals. Confidential information from clients includes drawings, schematics, samples and any other proprietary documentation. Consent from the customer is assumed upon receipt for this information to be passed onto the safety approval agency(ies), such as CSA, UL, TUV or Entela, on the customer’s behalf. These agencies are also governed by ethics policies which do not allow the divulgence of proprietary information. Information of this type is not covered under this Privacy Policy.

The Canadian Standards Association Model Code (“Code”) for the protection of personal information is a national standard that was developed by the Canadian Standards Association. The Code is a central part of PIPEDA. The Code’s ten privacy principles are identified in PIPEDA as follows:

1. **Accountability**

Lamothe Approvals is responsible for maintaining and protecting the personal information under its control, primarily that of its employees. Lamothe Approvals has designated an individual who is accountable for compliance with the Ten Privacy Principles.

Personal information is only accessible by authorized employees of Lamothe Approvals. The premises that the information is stored in is always either supervised or locked. Personal information is kept for the requisite amount of time prescribed by the government and then, once that obligation has been fulfilled, information is shredded and disposed of.

2. **Identifying Purpose**

Personal information is gathered primarily on employees of Lamothe Approvals. This information is required in order to properly process payment for services rendered and to report earnings to the government.

If Lamothe Approvals intends to use the personal information that has been collected for a new purpose, this new purpose will be identified and consent for such new purpose will be obtained from the individual to which the personal information relates prior to using such personal information.

Lamothe Approvals does not collect and use personal information about customers to sell customer lists to third party agencies.

3. **Consent**

Consent will be assumed when personal information is voluntarily provided at the sole discretion of the individual. Personal information will not be solicited or extracted in any deceptive manner.

Lamothe Approvals reserves the right to disclose personal information to its lawyers, advisors, agents and/or third parties to collect any monies owing or resolve a dispute of which resolution is unattainable without the assistance of one or more of these professionals.

4. Limiting Collection

The collection of personal information will be limited to that which is appropriate in the given circumstances.

The Lamothe Approvals website does not use or capture cookies; a technology that installs a small amount of information on a visitor's computer to permit the website to recognize future visits from that computer.

5. Limiting Use, Disclosure & Retention

Lamothe Approvals will 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 by law. Personal information will not be used or passed on in a manner inconsistent with the identified purpose.

All authorized employees of Lamothe Approvals are trained in the regulations of protection of personal information and are aware of the necessity of protecting this information. All Lamothe Approvals employees are prohibited from disclosing or using any of the confidential or personal information for any purposes other than the stated purposes.

Personal information will be kept only for as long as it is required for M.A. Lamothe & Associate's business purposes or as required by federal or provincial laws. Once this obligation has been fulfilled, the information will be destroyed by means of a paper shredder.

6. Accuracy

Lamothe Approvals will take reasonable steps to ensure that the personal information under its control is as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

Lamothe Approvals will not routinely update personal information, unless such a process is necessary to fulfill the purposes for which the information was collected. Lamothe Approvals will take reasonable steps to ensure that personal information that is used on an ongoing basis, including personal information that is disclosed to third parties, is accurate and up-to-date.

Individuals may, at any time, request to review and amend their personal information, as appropriate.

7. Safeguards

Lamothe Approvals will take reasonable steps to protect personal information through security safeguards appropriate to the sensitivity of the personal information. Employees of Lamothe Approvals who have access to personal information will be made aware of the importance of maintaining the confidentiality of personal information. At all times, information will either be supervised or locked away. Information stored on the computer will be password protected.

8. Openness

Lamothe Approvals will make readily available to customers and individuals specific information about its policy and guidelines relating to the management of personal

information. This policy will be available on our website and all matters relating to the handling and processing of personal information are contained in this document.

9. Individual Access

Upon written request and verification of the authenticity of the request, Lamothe Approvals will provide access at no charge to the individual to any personal information that the individual might want to review. Lamothe Approvals will provide access to this information within the required timeframe of 30 days.

An individual will be able to challenge the accuracy and completeness of the personal information and have it amended (which may involve deletion, correction or addition to information) as appropriate. When an individual's challenge to the accuracy and completeness of their personal information is not resolved to their satisfaction, Lamothe Approvals will record the unresolved challenge and will comply with any further requests received from the Privacy Commissioner in regards to the unresolved challenge.

10. Challenging Compliance

An individual will be able to address a challenge concerning compliance with the above principles to the Privacy Officer (contact info shown below). Lamothe Approvals will handle all complaints or inquiries about the policies and procedures relating to the handling of personal information in line with the processes that are in place.

Lamothe Approvals will inform individuals who make inquiries or lodge complaints of the existence of the relevant complaint procedures. Lamothe Approvals will investigate all complaints, and if a complaint is justified, Lamothe Approvals will take appropriate measures, including amending policies and procedures.

How to contact us

If you have any questions or comments about this Privacy Policy or you feel that your concerns or complaints have not been resolved to your satisfaction, please contact us at:

Lamothe Approvals Inc.
10 Oak Ridge Drive
Georgetown, ON
L7G 5G6

Telephone: 905-877-2203
Fax: 905-877-4811

Privacy Officer: Cherie Forbes
Email: cherie@lamotheapprovals.com
Website: www.lamotheapprovals.com