



Privacy Statement

For
Authorized Third Parties

Toronto Main Office

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At Pal Personnel Services, two of our most important responsibilities are to safeguard the personal information entrusted to us by individuals and to use this information in a responsible manner.

This privacy statement outlines the privacy policy and practices to be followed by Authorized Third Parties and Pal Personnel Services relating to the collection, use and disclosure of personal information in the course of conducting business.

Defining “personal information”

According to Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA), “personal information” is information pertaining to an individual who can be specifically identified.

Information about an individual is considered personal information for as long as it is possible to trace it to that individual through personal identifiers. Personal identifiers are any pieces of information identifying the individual, such as name, address, email address and telephone number.

Information that cannot be traced to an individual is anonymous information. Removing the personal identifiers from personal information makes the information anonymous. Whenever possible, Authorized Third Parties shall work with anonymous information. This privacy statement does not apply to anonymous information.

Being responsible for personal information

The Parties shall assign an individual in their respective organization who is responsible for ensuring that the personal information communicated between them is collected, accessed, used, disclosed, stored and disposed of in compliance with applicable privacy legislation.

The Parties shall provide the name of that individual upon request.

Understanding why personal information is collected

The Parties shall outline to each other the purpose for which personal information is collected.

Pal Personnel Services primarily collects personal information from its temporary employees and candidates to provide its clients with staffing services; from its permanent employees regarding employment.

Other reasons for collecting personal information are outlined to the individuals at the time of collection.

Collecting personal information

The Parties shall inform individuals at the time their personal information is collected and outline to them its intended use. The personal information may be collected only with the full knowledge of and consent from the individuals who provide it.

The Party that directly obtains the consent from an individual retains the custody of, and remains accountable for, the personal information collected from that individual.

Using and disclosing personal information

The Parties shall use or disclose personal information only for the purpose for which it was collected.

A Party shall disclose or transfer personal information to any parties only with the authorization from the Party having custody of that information, except as required by law.

Whenever possible, the Parties shall work with anonymous information instead of personal information.

Retaining personal information

A Party shall keep the personal information they collect from another Party in the same format—hard copy or electronic—in which it receives the information, unless the Party having custody of that information authorizes its conversion into another format.

The Parties shall keep the personal information only for as long as is necessary. Personal information must be either destroyed or made anonymous as soon as it is reasonably possible.

The Party having custody of personal information can request the other Parties to remove that information from their files. Upon such a request, the Parties shall dispose of the personal information within thirty (30) days of the receipt of the request, except when the law requires that the information be retained. It is understood that the disposal of personal information may hinder or prevent a Party from delivering services.

Safeguarding personal information

The Parties shall apply strict security measures to the personal information they collect from each other. Records kept electronically shall be maintained on a secure network. Hard copy records shall be kept in secure storage facilities. The disposal of records shall be conducted in a secure manner.

The Parties shall provide training to their employees at the time of the implementation of their privacy policy, and instruct them in their responsibilities to protect personal information. Employees shall access only the personal information they need to fulfill their duties.

Individual access to personal information

The Parties shall grant access to an individual's personal information and provide an account of its use and disclosure upon request from that individual. The Parties shall respond within thirty (30) days of the receipt of a written request.

The Parties may charge the individual a nominal fee for processing and handling a request.

Keeping personal information current and complete

Individuals can request corrections or updates to their personal information. When an individual submits a request to one of the Parties, that Party shall inform the Party having custody of the information as soon as is reasonably possible. The latter shall notify the other Parties.

Request for copies of privacy policy

The Parties shall provide a copy of their privacy policy to individuals who request it. A Party shall also make available a copy of its privacy policy to the other Parties upon request.

Responding to complaints, concerns or inquiries

The Parties shall have procedures in place to receive and respond to complaints, concerns or inquiries about their policies and practices relating to the handling of personal information.

The Parties shall investigate complaints and respond within thirty (30) days of the receipt of the correspondence.

The Parties shall take appropriate measures to resolve complaints, and respond to inquiries and concerns.

Contacting our Privacy Office

By mail Attn: Privacy Officer
Pal Personnel Services
200 Consumers Road, Suite 300
Willowdale, ON M2J 4R4

By phone (416) 497-8200

By email privacy@pal.stivers.com
(Do not send sensitive information by email.)

Changes to this privacy statement

We may update this privacy statement from time to time. The Parties shall be notified at that time should they be affected by the changes.

Last update: August 10, 2004.