



360 HR Services

Privacy Policy

Established April 2004

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Preface

360 HR Services respects the privacy of our customers, applicants, and employees in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA) and we endeavour to safeguard this information to respect and protect the rights and freedom of all stakeholders.

The purpose of the following information is to articulate our privacy principles and our processes for gathering, usage and storage of data. Please review information to ensure clear understanding and consent as to how we may collect, use, and share your personal information. However, sufficient personal information is required so that we may be able to assist you with your staffing or employment requirements.

Our Commitment to Privacy

360 HR Services is committed to ensuring the privacy and security of any personal and/or commercial information we may collect, use and/or store of our customers, applicants, and employees.

Personal Data We Collect/Use/Store

360 HR Services informs our customers, applicants, and employees about the information we collect, how we use it, and whether it will be distributed to third parties. Where possible, we provide individuals with this information prior to their providing information, or as soon thereafter as is practical.

Customers

360 HR Services' goal in collecting your personal and/or commercial data is to provide you with the most personalized service possible. By knowing more about you, 360 HR Services is able to provide professional staffing and employment services benefiting all stakeholders.

In general, personal and/commercial information is requested when you contact us to search for employment opportunities or candidate(s). Our Privacy Officer maintains a list with all the Client data that we handle; the table outlines what data we collect, what it is used for, how it is secured, how it is retained, how it is updated and disposal methods. To learn more, please contact 360 HR Service's [Privacy Officer](#).

For those customers who participate in any of 360 HR Services' various online procurement systems, we will ask for personal information necessary to fulfill the staffing request.

Cookies? A cookie is a piece of data stored on the user's computer tied to information about that user. They also allow us to identify those computers when they return to a site. You can set your browser to notify you before you receive a cookie, giving you the option of whether to accept it. You can also set your browser to turn off cookies. If you do so, however, areas of some sites may not function properly.

Links: This Web site contains links to other 360 sites that adhere to the same privacy principles. For links to non-360 organizations, 360 Services is not responsible for the privacy practices or the content of such Web sites.

Employees (Full-Time)

When hiring employees, we may also request personal information that is considered “sensitive,” such as information necessary to process payroll or administer health benefits such as Social Insurance Number (SIN) and Date of Birth (DOB). 360 HR Services recommends that you do not disclose sensitive information such as your SIN on the initial resume or curriculum vitae (CV) you submit to us.

The amount of personal information we require is ordinarily limited to that which is necessary to provide our services to you.

Contact our [Privacy Officer](#) to find details on the personal information we keep for full-time employees, how we use it, store it, retain it, update it and dispose of it.

Employees (Temporary and Contract)

There are two main drivers for collecting personal information from our temporary and contract employees:

1. Payroll
2. Field Placement

Our [Privacy Officer](#) maintains a document which outlines all of the information that we request from each candidate, how it is used, stored, updated, and disposed of. We will ensure that our collection and processing meets all privacy requirements.

Permanent Placement Candidates

In order to ensure the best match for both our candidates for a permanent position and our customers, we are required to collect certain information. That information is outlined in detail by our [Privacy Officer](#), with detail on it's use, storage, retention, accuracy and disposal.

Web site visitors

Any information you provide through accessing our website will be handled in the manner outlined the Appendices and is based on your intent; whether it is as a customer or candidate. Website visitors must be able to receive cookies to fully utilize our website:

Cookies? A cookie is a piece of data stored on the user's computer tied to information about that user. They also allow us to identify those computers when they return to a site. You can set your browser to notify you before you receive a cookie, giving you the option of whether to accept it. You can also set your browser to turn off cookies. If you do so, however, areas of some sites may not function properly.

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Whom We Share It with

360 HR Services holds its employees, agents, and suppliers accountable for maintaining the trust our applicants, employees, and customers place in us. We educate our employees and periodically verify our compliance with our privacy and security policies. 360 HR Services does not sell or trade personal data to third parties. We will disclose personal information when required by law.

In order to provide our services, personal data you give us may be shared with other 360 HR Services operations that are governed by the same privacy principles and practices. We will send the personal data of our applicants and temporary employees to 360 HR Services' customers and/or agents who are acting on our behalf to provide you an employment opportunity.

For our employees, we occasionally use other companies to provide limited services on our behalf, such as payroll processing services and health-care benefits.

We may also send your personal data to marketing companies who will then contact you to determine your feedback and satisfaction with our services. These companies may also send you information on our services.

We will only provide these agents and suppliers with the personal information they need to deliver the service we have requested.

This anonymous information is used and analyzed only at an aggregate level to help us understand trends and more precisely determine how to improve our services to you.

Choice: Opt Out/Opt In

360 HR Services offers its customers, applicants, and employees choices about receiving further communications from us, uses of information beyond the purposes for which it was provided, and transferring data to third parties. 360 HR Services obtains consent for any information deemed sensitive.

The amount of personal information you are required to supply will normally be limited to that which is necessary to supply the services you requested.

For example, you can ask us to remove your information from our mailing or marketing lists. You can also contact your local 360 HR Services operation to request your removal from said lists. (See the [How to Contact Us](#) section below.)

We may periodically send you updates via telephone or e-mail to alert you to employment opportunities in our database that match your criteria. We may also contact you by telephone or e-mail regarding other career or promotional

opportunities. Each e-mail notification tells you how to opt out of receiving future e-mails. At the point where we request personal data about you, our site also gives you the opportunity to opt out of receiving communications. The database is automatically updated when you opt out.

Sensitive Data – Opt In: When hiring employees, 360 HR Services may collect "sensitive" data such as information required to provide payroll or health-care services. This collection of data is either compatible with employment law or is vital to the interests of the 360 HR Services employee. The provision of this type of information will be voluntary, unless it is required by law, and will not hinder your employment opportunities. When collecting sensitive information, we will ask you to provide your consent to collect, store, and in some cases, transfer this data to third parties including payroll service companies, health insurance organizations, or government agencies as required by law. 360 HR Services takes all reasonable security measures to protect the confidentiality and integrity of sensitive data collected, stored, and used.

Accuracy and Access

360 HR Services takes the necessary steps to ensure personal information is accurate, complete, and current. We provide individuals with reasonable access to the personal information they have provided so that they can review and correct this information.

360 HR Services endeavours to keep your personally identifiable information accurate. We will afford you the ability to access, review and update the personal information you have provided. Because we offer a wide variety of services the personal information collected by each 360 HR Services operation may not all reside in a single location, such as when you submit your résumé/curriculum vitae (CV) to us via our Website, facsimile or operations in different locations. Consequently, please be aware that the choices and modifications you make to your personal data in one 360 HR Services operation may not automatically be

reflected in other 360 HR Services operations. You may therefore need to contact each 360 HR Services operation to learn how to access and update your information. (See the [How to Contact Us](#) section below.)

There are no fees associated with accessing or updating the personal data previously provided by you.

Security

360 HR Services takes care to secure personal information given to us by our customers, applicants, and employees. We protect this personal information through various security practices and measures in order to prevent loss, misuse, alteration, unauthorized access, destruction, or disclosure.

360 HR Services protects the security of the personal information you provide. This information may be stored in manual or electronic systems with limited access in order to protect this information from loss, misuse, unauthorized access, disclosure, alteration, or destruction.

Privacy Policy Audit Process

We commit to auditing our process at least annually to ensure all of our operations are in compliance. We fully recognize that our success is dependent on our business associates (candidates, employees, customers) trusting that we operate with integrity. This belief ensures that our privacy policy is implemented and maintained by all facets of the organization.

How to Contact Us

360 HR Services provides a means to respond to your privacy questions or handle your disputes. We assign ownership (Privacy Officer) of our data privacy practices to provide open communication and dispute resolution to our customers, applicants, and employees. We abide by the Canadian privacy

legislation. We will fully cooperate with the Canadian Data Protection Authorities when requested to do so.

At 360 HR Services, we strive to protect your privacy while delivering innovative career development and supporting services. Our privacy policy represents a commitment to ensure that your personal information is safeguarded. If you believe that 360 HR Services has not abided by these principles and practices, please contact us at your earliest opportunity and we will determine and remedy the problem any challenges or issues in timely manner. You may also contact the Privacy Commissioner of Canada or provincial data protection authorities to invoke those independent recourse mechanisms. The contact information for these sources is contained in the following section.

Privacy Inquires

How to Contact Us: 360 HR Services

Please contact the following person to receive clarification on this document and for any inquiries regarding privacy.

Privacy Officer: Jason Chan, 905-836-1170

External Inquiries

If we are unable to answer your questions to your satisfaction, you may contact the following government agency for third-party intervention:

Privacy Commissioner of Ontario:

Toronto Area (416 / local 905):

(416) 326-3333

Long Distance:

1-800-387-0073