



Edge Consulting Privacy Policy

Effective Date of Policy: January 1, 2004

Updated: March 17, 2008

Edge respects the privacy of our clients. We do not collect personal information from our clients. Infrequently, there may be instances in which our clients share their employees' or customers' information with Edge, as part of a specific consulting engagement. This information is shared with us to support our analysis of employees' or customers' behaviours or expectations. Edge does not use this information for any other purpose. The personal information is available to only those consultants who require it for the identified business purpose. Edge secures any personal information to a standard commiserate with its sensitivity. Upon the completion of our projects, Edge destroys any personal information collected through the course of our engagements.

IT Security Standards

- » **Data Backup**—A full data backup is performed nightly. The backup is performed, verified and logged by Symantec Backup Exec. Backup is stored offsite to ensure a copy is available for recover if a disaster should occur.
- » **Data Access**—Data access is limited to authorized users through Windows Active Directory system. Internal users must be granted permission to access data stored on the network. Any data that is meant only for specific users is stored in files which those users have permission to view or modify. Consultants are given access to only their project directories.
- » **Firewall**—Edge's network is protected by a current model commercial grade firewall. The firewall includes full UTM (Unified Threat Management) capabilities including Gateway Intrusion Prevention, Gateway Antispyware, Gateway Antivirus, and Content Filtering. All access to the network from the outside is logged on the firewall. The firewall is running current firmware and is checked during Edge's regular routine maintenance cycles to ensure it is up to date with the latest firmware.
- » **Encryption**—Network Access/Firewall Remote access from the outside (OWA, Remote Desktop, VPN) is fully encrypted using IPSEC or SSL encryption.
- » **Virus Protection**—Edge uses three layers of virus protection. All incoming mail is scanned by MacAfee A/V and checked for spam as it passes through the Postini Antispam/Antivirus system. All traffic coming into the network from the outside is checked again at the firewall to ensure there are no viruses, spyware or other malware contained within the data. Finally, all internal systems (Servers, PC's and Notebooks owned by Edge) are running the latest version of Symantec Multi Tier AV protection.
- » **Network Monitoring**—Edge's network is monitored by Netcetera Consulting Inc. using VIA alerts. The network is documented and all service calls are logged and documented.



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Edge Consulting's Ten Privacy Principles

Scope and Application

This Privacy Policy contains ten principles that are observed by Edge Consulting regarding the collection, use and disclosure of personal information. Each principle must be read in conjunction with the accompanying commentary. The commentary in the Edge Consulting Privacy Policy has been tailored to reflect personal information issues specific to Edge Consulting.

The scope and application of the Edge Consulting Privacy Policy are as follows:

- » The Policy applies to personal information about Edge Consulting's customers and other individuals that is collected, used or disclosed by Edge Consulting.
- » The Policy does not apply to information about Edge Consulting's employees; however, such information is protected by other Edge Consulting policies and practices.
- » This Policy is subject to change, and may be supplemented or modified by additional terms applicable between Edge Consulting and an individual.

Definitions

Collection - the act of gathering, acquiring, recording, or obtaining personal information.

Consent - voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express, implied or deemed, and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction. Deemed consent is consent that is deemed to be given pursuant to applicable legislation or other regulations.

Disclosure - making personal information available to a third party.

Personal information - information about an identifiable individual, but does not include aggregated information that cannot be associated with a specific individual. Personal information also excludes certain information as is excluded pursuant to applicable legislation or other regulations, such as publicly available information or business contact information, as and when applicable.

Edge Consulting – is Edge Training & Consulting Ltd.

Third party - an individual or organization outside Edge Consulting.

Use - the treatment, handling and management of personal information by and within an organization.

Principle 1 – Accountability

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

- 1.1. Edge Consulting designates the President as the person accountable for compliance with the Policy. From time to time, the President is entitled to delegate day-to-day responsibility for administration of this Privacy Policy and related privacy policies and practices to other employees and consultants.



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- 1.2. Edge Consulting shall make known, upon request, the title of the person or persons designated to oversee Edge Consulting's compliance with the Policy.
- 1.3. Edge Consulting is responsible for personal information in its possession or under its control. Edge Consulting shall use appropriate means to protect personal information while information is being processed by a third party on behalf of Edge Consulting (see Principle 7).
- 1.4. Edge Consulting shall implement policies and procedures to give effect to the Policy, including:
 - a) implementing procedures to protect personal information and to oversee Edge Consulting's compliance with the Edge Consulting Privacy Policy;
 - b) establishing procedures to receive and respond to inquiries or complaints;
 - c) training and communicating to staff about Edge Consulting's policies and practices; and
 - d) developing public information to explain Edge Consulting's policies and practices.

Principle 2 - Identifying Purposes for Collection of Personal Information

Edge Consulting shall identify and document the purposes for which personal information is collected at or before the time the personal information is collected or, when appropriate, at or before the time the personal information is used for a new purpose.

- 2.1 Edge Consulting may collect personal information for the following purposes:
 - a) as source information for analysis, in response to a client's request for that analysis to be completed;
 - b) as background information for the facilitation of workshops or focus groups, in response to a client's request for that facilitation to be completed.

Further references to "identified purposes" mean the purposes identified in this Principle.

- 2.2 Edge Consulting shall, as appropriate, specify orally, electronically or in writing the identified purposes to the individual at or before the time personal information is collected. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within Edge Consulting who shall explain the purposes.

Principle 3 – Consent

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

Edge Consulting may disclose personal information without knowledge or consent to a lawyer or other advisor representing Edge Consulting, to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required or authorized by law.

- 3.1. In obtaining consent, Edge Consulting shall use reasonable efforts to ensure that an individual is advised of the identified purposes for which personal information will be used or disclosed. Purposes shall be stated in a manner that can be reasonably understood by the individual.
- 3.2. Generally, Edge Consulting shall seek consent to use and disclose personal information at the same time it collects the information. However, Edge Consulting may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose.



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- 3.3. Edge Consulting will require individuals to consent to the collection, use or disclosure of personal information as a condition of the supply of a product or service only if such collection, use or disclosure is reasonably required to fulfill the identified purposes.
- 3.4. In determining the appropriate form of consent, Edge Consulting shall take into account the sensitivity of the personal information and the reasonable expectations of an individual.
- 3.5. Where consent is required for a particular use or disclosure, an individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Individuals may contact Edge Consulting for more information regarding the implications of withdrawing consent.

Principle 4 - Limiting Collection of Personal Information

Edge Consulting shall limit the collection of personal information to that which is necessary for the purposes identified by Edge Consulting and as permitted by law.

- 4.1 Edge Consulting collects personal information primarily from the individual to whom the information relates or from corporate clients who have collected personal information and consent from the individual to whom the information relates.

Principle 5 - Limiting Use, Disclosure and Retention of Personal Information

Edge Consulting 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 by law. Edge Consulting shall retain personal information only as long as necessary for the fulfillment of those purposes or as required or permitted by law.

- 5.1 Edge Consulting may disclose an individual's personal information to:
 - a) a person who in the reasonable judgment of Edge Consulting is seeking the information as an agent of the individual;
 - b) a company or individual employed by Edge Consulting to perform functions on its behalf, such as but not limited to research or data processing;
 - c) f) a public authority or agent of a public authority, if in the reasonable judgment of Edge Consulting, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information;
 - d) g) another entity as part of a merger, a sale of assets or all or part of a business, or any other corporate change or re-organization;
 - e) h) a third party or parties, where the individual consents to such disclosure or disclosure is required or permitted by law.
- 5.2 Only Edge Consulting employees with a business need to know, or whose duties reasonably so require, are granted access to personal information about individuals.
- 5.3 Depending on the circumstances, where personal information has been used to make a decision about an individual, Edge Consulting shall retain, for a reasonable period of time, either the actual information or the rationale for making the decision.
- 5.4 Edge Consulting 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 or permitted by law to be retained. Such information shall be destroyed, erased or made anonymous.



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5.5 Where appropriate, Edge Consulting may communicate updates of personal information to third parties.

5.6 Edge Consulting may engage affiliates or contractors for the purpose of providing services or processing information on behalf of Edge Consulting, and we may transfer or disclose personal information to such parties in connection with such purposes. Some affiliates or contractors may be located in other jurisdictions, and information in their custody (i) may or may not be subject to privacy legislation similar to that applicable to Edge Consulting, and (ii) may be subject to laws applicable in such jurisdictions that permit access to such information by foreign governments or law enforcement agencies or by others.

Principle 6 – Accuracy

Edge Consulting shall take steps to ensure that personal information is as accurate, complete and up-to-date as is appropriate for its purposes.

6.1 Personal information used by Edge Consulting shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about an individual.

6.2 Edge Consulting shall take all reasonable steps to update personal information about individuals as and when reasonably necessary to fulfill the identified purposes or as reasonably requested by the individual.

Principle 7 - Security Safeguards

Edge Consulting shall protect personal information by security safeguards appropriate to the sensitivity of the information.

7.1 Edge Consulting shall take appropriate and reasonable steps to protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction.

7.2 Edge Consulting shall take appropriate and reasonable steps to protect personal information disclosed to third parties, for example by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

Principle 8 – Openness

Edge Consulting shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

8.1 Copies of the Policy will be made available upon request.

8.2 Edge Consulting shall make information about its policies and procedures easy to understand, including:

- a) the title and addresses of the person or persons accountable for Edge Consulting's compliance with the Policy and to whom inquiries or complaints can be forwarded;
- b) the means of gaining access to personal information held by Edge Consulting; and
- c) a description of the type of personal information held by Edge Consulting, including a general account of its use.



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Principle 9 - Individual Access

Upon request, Edge Consulting shall inform an individual of the existence, use and disclosure of his or her personal information, at a minimal or no cost to the individual. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

- 9.1 In certain situations, Edge Consulting may not be able to provide access to all the personal information that it holds about an individual. For example, Edge Consulting 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 an individual. Also, Edge Consulting may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a law. If access to personal information cannot be provided, Edge Consulting shall, upon request, provide the reasons for denying access.
- 9.2 In order to safeguard personal information, an individual may be required to provide sufficient identification information to permit Edge Consulting to authorize access to the individual's file.
- 9.3 Individuals can seek access to their personal information by contacting the Head Office at Edge Consulting.
- 9.4 Edge Consulting will endeavor to respond to all requests within 30 days or, in any event, as required or permitted by applicable law.

Principle 10 - Handling Inquiries and Challenges

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

- 10.1 Edge Consulting shall maintain procedures for addressing and responding to all inquiries or complaints from individuals about Edge Consulting's handling of personal information.
- 10.2 Edge Consulting shall inform its customers about the existence of these procedures as well as the availability of complaint procedures.
- 10.3 The person or persons accountable for compliance with this Policy may seek external advice where appropriate before providing a final response to individual complaints.

If you have questions or concerns about our privacy policy or practices, or would like changes to the communications we send you, please contact our Head Office.

By email: info@edgetd.com

By phone: 604-683-6466