

IndCom Leasing Inc.

“Our Commitment RE: P.I.P.E.D.A”

Privacy Policies

IndCom Leasing Inc. is committed to the safeguarding of your personal information and has developed procedures to ensure continual protection.

Effective January 1, 2004, the Personal Information Protection and Electronic Documents Act requires, an individual's consent to collect, use or disclose personal information.

What is personal information?

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

1. age, name, ID numbers, income, ethnic origin, or blood type;
2. opinions, evaluations, comments, social status, or disciplinary actions; and
3. employee files, credit records, loan records, medical records, existence of a
4. dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs).

Personal information does not include the name, title, business address or telephone number of an employee of an organization.

What is not covered by the Act?

1. The collection, use or disclosure of personal information by federal government organizations listed under the *Privacy Act*
2. Provincial or territorial governments and agents of the crown in right of a province
3. An employee's name, title, business address or telephone number
4. An individual's collection, use or disclosure of personal information strictly for personal purposes (e.g. personal greeting card list)
5. An organization's collection, use or disclosure of personal information solely for journalistic, artistic or literary purposes

In compliance with the P.I.P.E.D. Act, please review how IndCom Leasing Inc. adheres to the TEN Principles summarized on page 2. For further information about federal privacy laws, please visit the Office of the Privacy Commissioner web site at www.privcom.gc.ca

10 PRINCIPALS OF FAIR INFORMATION PRACTICES

1. **Accountability:** All employees are responsible for maintaining and protecting all client information under their control. Our Chief Privacy Officer appointee is Donna Whaling, who will ensure compliance with the act, and will oversee development and implementation of privacy policies and practices.
2. **Identifying Purposes:** (The purpose for which personal information is collected) assess credit worthiness, provided additional credit & financial products, and to administrate our lease, sales contract or loan. This also includes the collecting and processing of payments and to fulfill contractual obligations. IndCom Leasing Inc. may also disclose personal information to third parties such as but not limited to credit reporting agencies, your insurance agent or company, financial institutions, funders agents and securitization organizations. IndCom may also disclose personal information where required or permitted by law to do so.
3. **Consent:** We will only record, use or disclose personal information with your express consent except where required and permitted by law. Subject to legal requirements you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting our office. If you refuse or withdraw your consent, we may not be able to provide or to continue to provide to you, certain services.
4. **Limiting Collection:** We will limit the collection of your personal information to only those details necessary for the purpose expressed.
5. **Limiting Use, Disclosure & Retention:** Your information will only be used for the purposes for which it was collected, or when it is required or permitted by law. The disclosure is limited to reasonable business activities.
6. **Accuracy:** Client Information will be maintained in as accurate, complete and current form as necessary to fulfill the purposes for which it is collected.
7. **Safeguards:** Personal information is protected by security safeguards appropriate for the sensitivity of the information collected. Our office has a monitored comprehensive alarm system, software firewalls, a secure server, (virtual private network), secured storage and password encrypted programs.
8. **Openness:** IndCom has established and will continue to develop and implement policies and practices for the management of personal information and will continually monitor changing provincial laws regarding P.I.P.E.D.A.
9. **Access:** Upon your written request addressed to the Chief Privacy Officer, at the address indicated below, IndCom Leasing Inc. will inform you of the existence, use and disclosure of your personal information and will give you access to that information.
10. **Handling Complaints & Inquiries:** You may direct any complaints or inquiries to our Chief Privacy Officer at the following address:

IndCom Leasing Inc.
Chief Privacy Officer
1350 Provincial Road, Unit # 400
Windsor, Ontario N8W 5W1