



CODE OF PRIVACY

The Code of Privacy for *D.E. Rodwell Investigative Services Ltd.* follows and complies with the CSA Model Code of Personal Information Privacy.

1. ACCOUNTABILITY

D.E. Rodwell Investigative Services Ltd. will be responsible for all personal information under our control. We have designated a Chief Privacy Officer, whose responsibility it is to ensure our organization remains privacy compliant.

The Chief Privacy Officer for *D.E. Rodwell Investigative Services Ltd.* is [David Rodwell](#). Any privacy compliance or information management questions should be directed to him. Upon receiving an enquiry, the Chief Privacy Officer will respond within 30 days. *David Rodwell* can be contacted at:

Phone number 780-460-3028
Fax number 780-460-3028
Email dave@daverodwell.com

2. IDENTIFY PURPOSES

D.E. Rodwell Investigative Services Ltd. will identify the purpose for which we collect personal information on affected individuals at or before the time of collection. All assignments received from our clients will be vetted to ensure their requests for information are compliant with PIPEDA.

Subsequent to the collection of personal information, *D.E. Rodwell Investigative Services Ltd.* may identify a new purpose or use for the information. In such an instance, we will seek to obtain prior consent for this new use, even if we have already identified certain initial purposes.

3. CONSENT

D.E. Rodwell Investigative Services Ltd. will obtain the appropriate consent from individuals regarding the collection, use or disclosure of personal information, except where the law provides an exception.

In most incidences, obtaining the knowledge and consent of individuals would defeat the purpose of an investigation, particularly with respect to a contravention

of a law or breach of an agreement. Personal information will only be collected, used and disclosed by *D.E. Rodwell Investigative Services Ltd.* employees without consent in accordance with Section 7 of the Personal Information Protection and Electronic Documents Act, S.C. 2000, c.5 (PIPEDA) or under other lawful means.

4. LIMITING COLLECTION

D.E. Rodwell Investigative Services Ltd. will limit its collection of personal information to that which is necessary for purposes we have identified. We will only collect personal information for specific, legitimate purposes and will not collect personal information indiscreetly.

Our policies and procedures relating to the limitations on collection of personal information will be regularly communicated to our investigators who deal with collection, use and disclosure of personal information.

5. LIMITING USE, DISCLOSURE, AND RETENTION

D.E. Rodwell Investigative Services Ltd. will limit the use, disclosure of personal information to those purposes for which it is initially collected, except with the consent of the individual or as otherwise permitted by law. Information will only be retained for as long as necessary to fulfill those purposes. Personal information that is no longer required to fulfill identified purposes will be destroyed, erased, or made anonymous.

6. ACCURACY

D.E. Rodwell Investigative Services Ltd. will make every effort to ensure that the personal information collected for intended purposes is accurate, complete, and up-to-date.

If a significant error or omission is identified, we will correct or amend the information as appropriate. Where necessary, we will send such corrected or amended information to third parties who have had access to the information in question.

7. SAFEGUARDS

D.E. Rodwell Investigative Services Ltd. will safeguard all personal information under our control in a manner that is appropriate to the sensitivity of the information. To this end we will take all the physical security measures necessary.

Personal information under the control of *D.E. Rodwell Investigative Services Ltd.* may be electronically stored. We will ensure that such records are protected through the application of the latest technical measures as well as physical access restriction.

8. OPENNESS

D.E. Rodwell Investigative Services Ltd. will make available to the public information about our [company](#), our privacy policies, and our Code of Privacy upon request.

This information is available by requesting a hard copy by contacting *D.E. Rodwell Investigative Services Ltd.* at 780-460-3028 or can be accessed through our website at www.daverodwell.com.

9. INDIVIDUAL ACCESS

Upon request, an individual will be informed of the existence, use and disclosure of his / her personal information that is under our control. They may be given access to and be permitted to challenge the accuracy and the completeness of that information.

There are lawful exceptions that will prevent us from providing such access, which may be communicated to the individual as appropriate where access to the information is denied.

10. CHALLENGING COMPLIANCE

An individual may address a challenge concerning compliance with the aforementioned policies and procedures to our Chief Privacy Officer whose details are listed above.