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PRIVACY POLICY

This privacy policy has been adopted by and applies to “us” and “we”:

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1. PRIVACY POLICY

1.1 PURPOSE OF THIS PRIVACY POLICY

This privacy policy covers how we treat personal information that we collect and receive, including information received by e-mail or by your use of our website or of any use of our products and services. Specific privacy information concerning our website and internet usage is available in our Website and Internet Disclaimer, Terms of Use and Privacy Policy

We respect and uphold an individual’s right to privacy and to the protection of his/her personal information. We are committed to ensuring compliance with applicable privacy legislation.

This policy does not apply to the practices of companies or websites that we do not own or control or to people that we do not employ or manage.

1.2 PERSONAL INFORMATION

Personal information is any information that can be used to distinguish, identify or contact a specific individual or that a person creates and controls for their own use. This information can include an individual's IDs, passwords, medical information, family history and opinions or beliefs as well as facts about or related to the individual. Exceptions which are not considered personal information include business contact information and other publicly available information, such as names, addresses and telephone numbers as published in telephone directories.

Individuals presenting themselves as doing work as subcontractors are considered to be self-employed and the same as a business. Contact information is therefore considered to be business contact information and is therefore not subject to protection as personal information.

1.3 PURPOSES FOR COLLECTION, USE AND DISCLOSURE

We collect and use the following types of personal information about the following categories of individuals:

- about subcontractors in regard to meeting our contracted obligation to a client, dealing with medical or other emergency situations when necessary and legal or collection actions when deemed necessary;
- about clients and from clients in regard to assessing client needs and providing for these needs,* determining services and product eligibility and legal or collection actions when deemed necessary;
- about applicants in regard to evaluating employment or project suitability, presentation to prospective clients and dealing with medical or other emergency situations when necessary; and
- about employees in regard to issuing paycheques, providing benefits to employees and dealing with medical or other emergency situations when necessary.

We identify the reasons for collecting personal information before or at the time of collection. If any new purpose develops, we will obtain individual consent before using the personal information for this new purpose. Purposes are limited to what a reasonable person would expect under the circumstances.

* Where clients provide us with information required to be kept confidential as per their privacy policy, during the course of carrying out our services to the client this information is also subject to this policy.

1.4 DISCLOSURE OF INFORMATION TO THIRD PARTIES

The only circumstance under which personal information may be disclosed to third parties is for the fulfillment of any purposes identified above or as required by law. If personal information is disclosed for the fulfillment of any purposes identified above, we will ensure that appropriate security undertakings, such as confidentiality clauses in contractual agreements, are employed to protect the transfer and use of personal information. We do not sell, trade, or rent information to third parties.

1.5 CONSENT TO COLLECTION, USE AND DISCLOSURE FOR CLIENTS

(a) For Clients

We will always seek consent when collecting, using or disclosing personal information. Consent may be withdrawn at any time, subject to contractual or legal restrictions and reasonable notice.

(b) For Applicants, Subcontractors and Employees

In certain circumstances (e.g., sending a resume, agreeing to the terms of engagement, or agreeing to the terms of employment) we will assume consent to the collection, use and disclosure of personal information unless notified otherwise.

Consent can be withdrawn at any time, subject to contractual or legal restrictions and reasonable notice.

1.6 LIMITING COLLECTION

We collect client, employee, subcontractor and applicant personal information only for the purposes identified above.

1.7 LIMITING USE, DISCLOSURE AND RETENTION

We do not use or disclose personal information for any purpose other than those for which it was collected, except with consent or as required by law.

Personal information is retained only as long as is necessary for the fulfillment of the purposes for which it was collected or as required by law or best practices.

When you send us a resume or other information regarding job or career opportunities, identifiable information about you may be kept in our resume database.

Backups of our servers and databases occurs daily. Backups are overwritten on a cyclic basis with an occasionally archived backup being kept indefinitely.

1.8 ACCURACY

We will make all reasonable efforts to ensure that personal information is as accurate, complete and current as required for the purposes for which it was collected. We will correct or amend any personal information if its accuracy and completeness is challenged and found to be deficient.

1.9 SAFEGUARDS

We protect personal information against loss or theft with appropriate security safeguards. Safeguards include physical, administrative and electronic security measures. Information is safeguarded from unauthorized access, disclosure, copying, use or modification.

1.10 ACCESS

Applicants, clients, employees and subcontractors have the right to access their personal information under our control.

In certain exceptional situations we may not be able to provide access to certain personal information. If access cannot be provided, we will provide notification, in writing, of the reasons for the refusal.

1.11 ACCOUNTABILITY

We take full responsibility for the management and confidentiality of the client, employee, applicant and subcontractor information under our control. If you have any questions or concerns about this policy or feel that we are not abiding by this policy, please write or send an e-mail message to us and we will inform complainants of avenues of recourse. These include our complaint procedure, regulating bodies and the Privacy Commissioner of British Columbia. We will investigate all complaints received in writing.

We regularly review our information-handling practices to ensure that we are abiding by this policy. Updates to this policy will be made should our information-handling practices necessarily change.

We reserve the right to amend this policy at any time and for any reason. A current policy will always appear on this webpage.

Current as of May 2012