

## Privacy Policy

Pathways to Independence respects your privacy and security both on and offline and thus believes that the responsible use of personal information collected on its web site is integral to its reputation. As part of our commitment to privacy and compliance with PIPEDA and other privacy legislation, we have instituted this Online Privacy and Security statement:

The extent and type of information we receive from you on our web sites depends on the information you voluntarily agree to provide to us via our contact email boxes, forms and/or through the registration processes on our sites.

We only use your personally identifiable information to respond to your requests and to provide you with information about our services, unless we obtain your permission to use your personal information for other purposes.

You may be invited to register and provide information about yourself on our web site. We use the information you provide to personalize and enhance your online experience and to deliver the content most suited to your needs. You will, of course, be permitted at any time, to update your registration information and unsubscribe should you no longer wish to receive information from us.

"Cookies" (i.e., small text files placed on your computer when you first visit a site) are not used on our web site.

The personal information you provide to us will be retained only as long as necessary to fulfill the purposes for which the information was collected or as required by law. We do not share personal information with third parties, except as required by law or other legal processes, and we never sell your personal information.

Pathways to Independence has security policies and procedures in place to protect your personally identifiable information from loss, misuse, alteration or unintentional destruction. Our personnel have access to your data on a need-to-know basis and have been trained to understand and safeguard the confidentiality of such information.

If you have any questions, comments or concerns about our privacy and security policies, please contact our Privacy Officer:

Pathways to Independence  
C/O Christie Swann  
Chief Operating Officer  
289 Pinnacle Street  
Belleville, ON K8N 3B3

613-962-2541 ext. 283  
christies@pathwaysind.com

## Policy on Privacy & Security of Client Information

Pathways to Independence is committed to protecting the privacy and security of your personal information obtained by reason of your relationship with Pathways to Independence. This policy explains the types of information we collect, why it is collected, how it is used, and the steps we take to ensure your personal information is properly handled and safeguarded. Our policies have been designed to comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and corresponding provincial privacy acts.

## What is Personal Information?

Personal information is information that refers to an individual specifically and is recorded in any form. Personal information includes such things as age, income, date of birth, ethnic origin, medical records and credit records. Information about individuals contained in the following documents is not considered personal information:

- public telephone directories, where the subscriber can refuse to be listed;
- professional and business directories available to the public;
- certain public registries and court records; or
- certain other publicly available printed and electronic publications.

## Our commitment to your privacy is governed by the following principles:

### **We are accountable to you:**

Pathways to Independence is responsible for all personal information under its control, including any personal information that is transferred to third parties for processing, storage or other purposes. We have designated a Privacy Officer who is accountable for compliance with these privacy and security principles.

### **We let you know why we collect your personal information:**

Pathways to Independence identifies the purpose for which your personal information is collected. We do this before or at the time the information is actually being collected.

### **We obtain your consent to collect, use or disclose your personal information:**

Pathways to Independence obtains your consent to collect, use or disclose personal information. The method of obtaining consent is appropriate to the type of personal information being collected, used or disclosed:

- Pathways to Independence will obtain your express consent (verbal, written or electronic agreement) to collect, use or disclose sensitive personal information such as personal financial information.
- Pathways to Independence will use implied consent to collect, use or disclose your personal information where one or more of the following apply:
  - a relationship already exists;
  - express consent has previously been given; and/or
  - where the purpose of using the personal information is reasonably apparent to you.

You can change your consent preferences at any time by contacting Pathways to Independence. To change your preferences, refer to the "Contact Us" section below.

### **We limit collection of your personal information:**

Pathways to Independence collects only the information required to provide services to you. If the personal information we require is collected for a reason other than to provide services, your consent will be obtained before or at the time the information is collected.

Pathways to Independence will collect personal information only by clear, fair and lawful means.

Examples of why we collect personal information include:

- Communicating with you;
- Processing your applications;
- Processing and keeping track of transactions and reporting back to you;
- Protecting against fraud or error;

- Providing services requested by you; and/or
- To comply with legal and governmental requirements.

**We limit use, disclosure and retention of your personal information:**

- Pathways to Independence uses and discloses your personal information only for the purposes it was collected.
- Pathways to Independence does not sell or rent personal information to any organization or person for any reason.
- We do not share your personal information with third party organizations except to offer you a service. If your personal information is shared with third parties, these third parties are bound by appropriate agreements with Pathways to Independence to secure and protect the confidentiality of your personal information.
- Pathways to Independence retains your personal information only as long as it is required for our relationship or as required by federal and provincial laws.

**We keep your personal information up to date and accurate:**

- Pathways to Independence keeps your personal information accurate, up to date and relevant for its intended use.
- You may request access to the personal information we have on record in order to review and amend the information, as appropriate. In circumstances where your personal information has been provided by a third party, we will refer you to that party. To access your personal information, refer to the "Contact Us" section below.

The security of your personal information is a priority for Pathways to Independence. We take steps to safeguard your personal information, regardless of the format in which it is held, including:

- physical security measures such as restricted access facilities and locked filing cabinets;
- electronic security measures for computerized personal information such as password protection, database encryption, SSL Certificates and personal identification numbers;
- organizational processes such as limiting access to your personal information to those individuals who require it to perform their duties; and
- contractual obligations with third parties who need access to your personal information requiring them to protect and secure your personal information.

**We are open about our privacy and security policy:**

We are committed to providing you with understandable and readily available information about our policy and practices related to the management of your personal information. This policy and any related information are available at all times on our web site, [www.pathwaysind.com](http://www.pathwaysind.com) under Privacy Policy or upon request. To contact us, refer to the "Contact us" section below.

**We provide access to your personal information stored by Pathways to Independence:**

You can request access to your personal information stored by Pathways to Independence. To contact us, refer to the "Contact Us" section below. Upon receiving such a request, Pathways to Independence will:

- Inform you about what type of personal information we have on record or in our control, how it is used and to whom it may have been disclosed.
- Provide you with access to your information so you can review and verify the accuracy and completeness and request changes to the information.
- Make any necessary updates to your personal information.

**We respond to your questions, concerns and complaints about privacy:**

Pathways to Independence responds in a timely manner to your questions, concerns and complaints about the privacy of your personal information and our privacy policies and procedures.

**Contact Us:**

If your questions, concerns or complaints have not been resolved to your satisfaction or if you require additional information, please contact our Privacy Officer by mail or phone at:

Pathways to Independence  
C/O Christie Swann  
Chief Operating Officer  
289 Pinnacle Street  
Belleville, ON K8N 3B3  
613-962-2541 ext. 283  
christies@pathwaysind.com

## Terms of Use for [www.pathwaysind.com](http://www.pathwaysind.com)

By accessing and using this site you agree to the following Terms of Use:

### **Disclaimer:**

The information found in this web site is believed to be reliable and accurate at the time it is posted on the web site. While reasonable care and efforts have been taken to protect the site and prevent errors, Pathways to Independence does not guarantee that this site will be uninterrupted or free of delays, errors, omissions or viruses. Please note that all information is provided "as is" and without any warranty, express or implied.

While every effort has been made to be accurate, Pathways to Independence does not warrant the accuracy, completeness, appropriateness or timeliness of the information on this site and reserves the right to make changes at any time without notice.

Pathways to Independence cannot be held liable in any circumstances for any damages whatsoever, including without limitation, damages for loss of profit, real or projected, business interruption, loss of information and data, arising from the use of or inability to use this web site and the information it contains.

### **Copyright:**

The content of this site is copyrighted; any unauthorized use of the materials on this site may violate copyright, trademark and other applicable laws. No one is permitted to reproduce, in whole or in part, in any form, any information found on this site, unless authorized to do so by Pathways to Independence. A user may download the materials on the site for personal or non-commercial use only, however, the user must retain and keep intact all copyright, trademark or other proprietary notices contained in the original materials. Materials on the site may not be modified, reproduced or publicly displayed, performed or distributed or used for any public or commercial purposes.

### **Links to and from third-party sites:**

Third-party links are provided as a convenience to our web site users and do not necessarily imply an endorsement of the linked site by Pathways to Independence. We cannot be held responsible for information and materials found on sites controlled or operated outside of our domain, including any assurance as to the accuracy and reliability of such information. Explicit permission is required to use the Pathways to Independence logo (if applicable) or to include a link to [www.pathwaysind.com](http://www.pathwaysind.com) on your site. To request written approval, please Contact Us for additional information. The following web link activities are explicitly prohibited by Pathways to Independence and may present trademark and copyright infringement issues:

- Links that include unauthorized use of our logo
- Framing, inline links or meta tags
- Hyperlinks or a form of link that masks the URL and bypass our homepage

### **Contact Us:**

Pathways to Independence  
C/O Christie Swann  
Chief Operating Officer  
289 Pinnacle Street  
Belleville, ON K8N 3B3

613-962-2541 ext. 283  
[christies@pathwaysind.com](mailto:christies@pathwaysind.com)