

Privacy Policy

Enviro-Lynx Investigations gathers information and conducts investigations when there are reasonable grounds to believe that a breach of agreement or contravention of the law has taken place. Enviro-Lynx Investigations also gathers information when other circumstances occur that permit us to legally collect this information under the laws of Canada. We are incorporated under the laws of Ontario and are licensed and regulated by the Ontario Ministry of Public Safety & Security of Ontario.

Enviro-Lynx Investigations understands the importance of protecting personal information and cooperates fully with the Federal Personal Information Protection and Electronics Documents Act (PIPEDA). Under PIPEDA, private investigation companies have the designation "Investigative Body" status are required to have a privacy code that is compliant with the Canadian Standards Association's *Model Code for the Protection of Personal Information*. Private investigation companies are also required to be a member in good standing of a professional association that represents the interest of private investigators in their respective jurisdiction.

Accordingly, Enviro-Lynx Investigations is a member of the Council of Private Investigators of Ontario (CPIO) and complies with their Code of Privacy and the CSA Model Code of Personal Information Privacy.

Ten interrelated principles form the basis of the Canadian Standards Association Model Code for the Protection of Personal Information. Each principle is a core element in the Council of Private Investigators - Ontario (CPIO) Code of Privacy and is outlined as follows:

1. Accountability

Enviro-Lynx Investigations is responsible for personal information under its control and we have designated one individual who is accountable for the company's compliance with the following principles.

Enviro-Lynx Investigations is committed to protecting personal information and ensuring that all staff are adequately trained in relevant privacy legislation, our CPIO Code of Privacy and our corporate Code of Ethics. The CPIO's Ethics Committee is accountable for enforcement of the CPIO's Code of Privacy. An annual report of the Ethics Committee will be posted on the CPIO's website.

2. Identifying Purposes

Enviro-Lynx Investigations will identify the purposes for which personal information is collected at or before the time of collection.

The purpose for which Enviro-Lynx Investigations will collect personal information is to facilitate an investigation of contraventions of the law and breaches of agreements.

Personal information collected as part of the investigation of a contravention of the law may include information pertaining to individuals involved in criminal activity, suspected of involvement in criminal activity, individuals with knowledge of criminal activity, and individuals who may advance an investigation by providing information relating to the identity of those involved or suspected of criminal activity.

Personal information collected in the investigation of the breach of an agreement may pertain to individuals who are party to an agreement, individuals who have knowledge of the terms and conditions of an agreement, individuals who have knowledge of the breach of an agreement, or individuals who may advance an investigation by providing information relating to a breach of an agreement.

3. Consent

Enviro-Lynx Investigations will obtain the appropriate consent of the individual as required for the collection, use, or disclosure of personal information, except when PIPEDA allows an exception.

In most instances, obtaining the knowledge and consent of individuals would defeat the purpose of an investigation. Personal information will only be collected, used and disclosed by Enviro-Lynx Investigations without consent in accordance with section 7 of the Personal Information Protection and Electronic Documents Act (PIPEDA), S.C. 2000, c.5 (PIPEDA).

4. Limiting Collection

The personal information that we collect will be limited to that which is necessary for the purposes identified by Enviro-Lynx Investigations. Information shall only be collected by fair and lawful means.

Enviro-Lynx Investigations will collect information about individuals only if there are reasonable grounds to believe that the information relates to dishonest conduct, breaches of agreements or contraventions of the laws of Canada, a province, or a foreign jurisdiction. We will only collect the personal information that is required for the preventative and investigative purposes set out or where circumstances occur that permit us to legally collect this information under the laws of Canada.

5. Limiting Use, Disclosure, and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

Enviro-Lynx Investigations may only use or disclose personal information for the purposes for which it was collected. Enviro-Lynx Investigations may only keep personal information for as long as may be necessary to satisfy such purpose or unless governed by a specific law.

Enviro-Lynx Investigations may disclose personal information only to law enforcement agencies, other Investigative Bodies or our clients for the purpose for which the personal information was collected.

6. Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

Enviro-Lynx Investigations will ensure to the best of our ability that the personal information we collect, use, and disclose is accurate, complete, current, and relevant to the stated purpose.

7. Safeguards

Security safeguards appropriate to the sensitivity of the information shall protect personal information.

Enviro-Lynx Investigations will ensure that personal information is stored in secure electronic and hard copy files. Hard copy files will be stored in locked file cabinets with restricted access. Electronic files will be stored in secure systems that include power-on password protection and a secure firewall. Electronic files will be encrypted with an industry standard encryption program before being transferred electronically. Distribution of personal information will be on a need-to-know basis.

8. Openness

Enviro-Lynx Investigations shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

Enviro-Lynx Investigations will make available to the public easily understandable information about our privacy policy. This information will be available through direct request, through our website at www.enviro-lynx.com or through CPIO's website at www.cpio.org.

9. Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

In accordance with paragraph 9(3)(c.1) of PIPEDA, if such disclosure does not defeat the purposes for which the information was collected, Enviro-Lynx Investigations will, upon request by an individual, advise the individual whether we have personal information concerning him or her, what that information is, what it is being used for and to whom their information has been disclosed.

If the individual can provide proof of an error in the personal information held by Enviro-Lynx Investigations, we will amend the information and send the corrected information to others who have used the incorrect information. If the individual challenges certain information but cannot disprove its accuracy, we will note the challenge so that those using the information will be aware of the unresolved challenge.

If Enviro-Lynx Investigations denies an individual's request for access, we will state the reasons for the denial and advise the individual of his/her right to appeal to the Office of the Privacy Commissioner of Canada or Ontario as the case may be.

The following are a few reasons (but not all) that will prevent us from accommodating an individual's request for access of their personal information:

- Personal information about another individual or third party (either related or non-related to the investigation) might be revealed.
- Commercially confidential information might be revealed.
- The information was collected without consent for the purposes related to an investigation of a breach or an agreement or contravention of a law or other lawful exemption.
- The information is protected by the Solicitor / Client privilege.
- When restricted from providing this disclosure under Section 25(1) of the Private Investigators and Security Guards Act; Revised Statutes of Ontario 1990 Chapter P.25.

10. Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's privacy compliance.

In addition, individuals may send complaints with respect to Enviro-Lynx Investigations' compliance with its own privacy policies and procedures to the CPIO Ethics Committee. The CPIO Ethics Committee will investigate the complaint and respond to the individual. If the CPIO Ethics Committee finds that Enviro-Lynx Investigations is in violation of the CPIO Code of Privacy, we will have thirty days in which to change its policies or procedures. If the individual is still not satisfied, he/she will be advised by the CPIO Ethics Committee of his or her right to appeal to the Office of the Privacy Commissioner of Canada or Ontario as the case may be.

Our Privacy Policy and Personal Information Officer may be reached by telephone at 416-234-8658 or by email at info@enviro-lynx.com. Upon receiving a written inquiry, a response will be made within 30 days.

Proud members of the Council of Private Investigators of Ontario, the Association of Certified Fraud Examiners, ASIS International, World Association of Detectives, the Council of International investigators and the Canadian Private Investigators Resource Center.