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INTRODUCTION

Quality Management Ltd. Winnipeg is a regional property management company which manages and operates rental properties in the City of Winnipeg.

Quality Management Ltd. has always been committed to maintaining the accuracy, confidentiality, security and privacy of tenant and employee personal information. This policy is created to further explain the policies and procedures that we have put in place to safeguard your privacy and provide you with the information so you are aware of how your personal information is used with Quality Management Ltd.

DEFINITIONS

PERSONAL INFORMATION

“Personal information: is information that can be explicitly used to identify and / or contact you as an individual.

For a tenant, such information includes suite occupancy records, tenant rent rolls and reports, tenant files and it's contents, credit information, account records, phone records, parking records, and any correspondence.

For an employee, such information includes information found in personal employment files, performance evaluations, and medical and benefits information.

TENANT

An individual who leases and / or applies to lease a suite or space managed by Quality Management Ltd.

PAST TENANT

An individual that has leased a suite or space managed by Quality Management Ltd., and has vacated. An individual that has applied to lease a suite or space and has been declined or has canceled the application.

EMPLOYEE

An employee of Quality Management Ltd., and for the purpose of this Code only, includes independent and other contractors performing services within Quality Management Ltd.

THIRD PARTY

An individual other than the tenant, or an organization outside of Quality Management Ltd.

PRINCIPLE 1 – ACCOUNTABILITY

Quality Management Ltd. is responsible for personal information under its control. Quality Management Ltd.'s Privacy Officer is accountable for the Company's compliance with the Quality Management Ltd. Privacy Code.

- 1.1 Other individuals with Quality management Ltd. may be delegated to act on behalf of Quality Management Ltd.'s Privacy Officer or to take responsibility for the day-to-day collection and processing of personal information.
- 1.2 Quality Management Ltd. is responsible for personal information in its possession or custody, including information that has been transferred to a third party for processing or other purposes related to Quality Management Ltd. business and operations.
- 1.3 Quality Management Ltd. shall implement policies and procedures to give effect to the Quality Management Ltd. Privacy Code, including:
 - a. implementing procedures to protect personal information and the oversee the Company's compliance with the Quality Management Ltd. Privacy Code;
 - b. establishing procedures to receive and respond to inquiries or complaints;
 - c. training and communicating to employees about the Company's policies and practices; and
 - d. developing public information to explain the Company's policies and practices.

PRINCIPLE 2 – IDENTIFYING PURPOSES FOR COLLECTION OF PERSONAL INFORMATION

Quality Management Ltd. shall identify the purposes for which personal information is collected at or before the time the information is collected.

- 2.1 Quality Management Ltd. collects personal information only for the following purposes:
 - a. to provide information to qualify for tenancy or employment, with regards to personal income, references, credit bureau records, police records, and / or bank statements.

- b. to establish and maintain responsible relations with tenants and to provide ongoing service;
 - c. to understand tenant needs;
 - d. to develop and enhance tenant services;
 - e. to acquire information for bad debt repayment.
- 2.2 Quality Management Ltd. shall specify orally or in writing the identifies purposes to customer or employee at or before the time personal information is collected. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within Quality Management Ltd. who shall explain the purposes.
- 2.3 Unless required by law, Quality Management Ltd. shall not use or disclose for any new purpose personal information that has been collected without first identifying and documenting the new purpose and obtaining the consent of the tenant or employee.

PRINCIPLE 3 – OBTAINING CONSENT FOR COLLECTION, USE OR DISCLOSURE OF PERSONAL INFORMATION

The knowledge and consent of a tenant or employee are required for the collection, use, or disclosure of personal information, except where inappropriate.

- 3.1 In certain circumstances personal information can be collected, used or disclosed without the knowledge and consent of the individual. For example, Quality Management Ltd. may collect, use or disclose personal information with knowledge or consent if it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is a minor, seriously ill or mentally incapacitated.

Quality Management Ltd. may also collect, use and disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting the information, such as in the investigation of a breach of a lease agreement or a contravention of a federal or provincial law. Quality Management Ltd. may also collect, use and disclose personal information without knowledge or consent if there is an emergency where life, health or security of an individual is threatened.

Quality Management Ltd. may also collect, use and disclose personal information without knowledge or consent if disclosure is to an agent of Quality Management Ltd. representing the Company, to collect a debt, to comply with a subpoena, warrant or other court order, or otherwise required by law.

- 3.2 In obtaining consent, Quality Management Ltd. shall use reasonable efforts to ensure that a tenant or employee is advised of the identified purposes for which personal information will be used or disclosed. Purposes shall be stated in a manner that can be reasonably understood by the tenant or employee.
- 3.3 Generally, Quality Management Ltd. shall seek consent to use and disclose personal information at the same time it collects the information.

- 3.4 Quality Management Ltd. will require signed consent by tenants and employees for the collection, use or disclosure of personal information as a condition of the application process for tenancy, employment, benefits, and supply of services.
- 3.5 In general, the use of Quality Management Ltd. rental spaces and services by a tenant or the acceptance of employment or benefits by an employee, constitutes implied consent for Quality management Ltd. to collect, use and disclose personal information for all identified purposes.
- 3.6 A tenant or employee may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Tenants or employees may contact Quality Management Ltd. for more information regarding the implications of withdrawing consent.

PRINCIPLE 4 – LIMITING COLLECTION OF PERSONAL INFORMATION

Quality Management Ltd. shall limit the collection of personal information to that which is necessary for the purposes identified by the Company.

Quality Management Ltd. shall collect personal information by fair and lawful means.

- 4.1 Quality Management Ltd. collects personal information primarily from its tenants or employees.
- 4.2 Quality Management Ltd. may also collect personal information from other sources including credit bureaus, employers, rental or personal references, or other third parties that represent that they have the right to disclose the information.

PRINCIPLE 5 – LIMITING USE, DISCLOSURE, AND RETENTION OF PERSONAL INFORMATION

Quality Management Ltd. shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

Quality Management Ltd. shall retain personal information only as long as necessary for the fulfillment of those purposes.

- 5.1 In certain circumstances, personal information can be collected, used or disclosed without the knowledge and consent of the individual. (See Principle 3.1)
- 5.2 In addition, Quality Management Ltd. may disclose a tenant's personal information to
 - a. confirm past tenancy information to a landlord with which the tenant has made application for tenancy.
 - b. A person who, in the reasonable judgment of the Company, is seeking information as an agent of the tenant:
 - c. Credit grantors and reporting agencies; and
 - d. Third party or parties, where the tenant consents to such disclosure is required by law.

- 5.3 Quality Management Ltd. may disclose personal information about its employees:
- a. for the normal personnel and benefits administration;
 - b. in the context of providing references regarding current or former employees in response to requests from prospective employers; or
 - c. where disclosure is required by law.
- 5.4 Only those Quality Management Ltd. employees who require access for business reasons are granted access to personal information about tenants and employees.
- 5.5 Quality Management Ltd. shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law.
- 5.6 Past Tenant files shall be kept for Residential Tenancies Branch and Company use for six years from the time of vacating to retain evidence for claims filed by the tenant or the Company.
- 5.7 Past Tenant files shall be kept until a debt owed to the Company has been paid in full.
- 5.8 All other personal information will be retained only for the period as directed by law. Example, Securities Commission, Revenue Canada, etc.
- 5.9 Quality Management Ltd. shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous.

PRINCIPLE 6 – ACCURACY OF PERSONAL INFORMATION

The personal information Quality Management Ltd. maintains shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

- 6.1 Personal information used by Quality management Ltd. shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a tenant or employee.
- 6.2 Quality Management Ltd. shall update personal information about tenants and employees as and when necessary to fulfill the identified purposes or upon notification by the individual.

PRINCIPLE 7 – SECURITY SAFEGUARDS

Quality Management Ltd. shall protect personal information through security safeguards appropriate to the sensitivity of the information.

- 7.1 Quality Management Ltd. shall use appropriate security measures to protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction regardless of the format in which it is held. Quality Management Ltd. shall use care in

disposing of or destroying personal information, to prevent unauthorized parties from gaining access to the information.

- 7.2 Quality Management Ltd. shall protect information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.
- 7.3 All of Quality management Ltd. employees with access to personal information shall be required as a condition of employment to respect the confidentiality of personal information.

PRINCIPLE 8 – OPENNESS CONCERNING POLICIES AND PRACTICES

Quality management Ltd. shall make readily available to tenants and employees specific information about its policies and practices relating to the management of personal information.

- 8.1 Quality Management Ltd. shall make information about its policies and practices easy to understand, including:
- a. the title and address of the person or persons accountable for the Company's compliance with the Quality Management Ltd. Privacy Code and to whom inquiries or complaints can be forwarded;
 - b. the means of gaining access to personal information held by the Company; and
 - c. a description of the type of personal information held by the Company, including a general account of its use.

PRINCIPLE 9 – TENANT AND EMPLOYEE ACCESS TO PERSONAL INFORMATION

Quality Management Ltd. shall inform a tenant or employee of the existence, use, and disclosure of his or her personal information upon request and shall give the individual access to that information, except in certain circumstances.

A tenant or employee shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

- 9.1 Upon request, Quality Management Ltd. shall afford tenants and employees a reasonable opportunity to review the personal information in the individual's file. Personal information shall be provided in understandable form within a reasonable time and at a minimal or no cost to the individual.
- 9.2 In certain situations, Quality Management Ltd. may not be able to provide access to all of the personal information it holds about a tenant or employee. Quality Management Ltd. shall provide the reasons for denying access upon request. For example:
- If doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual;
 - If the disclosure would reveal confidential commercial information;
 - If the information is protected by solicitor-client privilege;

- If the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law; or
- If the information is prohibitively costly to provide.

- 9.3 In order to safeguard personal information, a tenant or employee may be required to provide sufficient identification information to permit Quality management Ltd. to account for the existence, use and disclosure of personal information and the authorize access to the individual's file. Any such information shall be used only for this purpose.
- 9.4 A tenant can obtain information or seek access to his or her individual files by contacting a designated representative at the Regional Office of Quality management Ltd.
- 9.5 An employee can obtain information or seek access to his or her individual files by contacting his or her immediate supervisor.

PRINCIPLE 10 – CHALLENGING COMPLIANCE

A tenant or employee shall be able to address a challenge concerning compliance with the above principles to Quality Management Ltd.'s Privacy Officer, the person accountable for Quality management Ltd.'s compliance with the Quality Management Ltd. Privacy Code.

- 10.1 Quality Management Ltd. shall maintain procedures for addressing and responding to all inquiries or complaints from its tenants and employees about the Company's handling of personal information.
- 10.2 The person or persons accountable for compliance with the Quality management Ltd. Privacy Code may seek external advice where appropriate before providing a final response to individual complaints.
- 10.3 Quality Management Ltd. shall investigate all complains concerning compliance with the Quality Management Ltd. Privacy Code. If a complaint is found to be justified, the Company shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A tenant or employee shall be informed of the outcome of the investigation regarding his or her complaint.