

Locke Truss Co. Ltd.

Privacy Policy and Procedures

Background: Beginning January 1, 2004, all private enterprise businesses must be in compliance with the principles set out under the *Personal Information, Protection and Electronic Documents Act (PIPEDA)*. This Act governs the collection, use and disclosure of personal information in all commercial activities of a business. Personal information is defined as specific information about an individual such as Name, Address, Phone Numbers, Age, Gender and Identification Numbers, i.e. Social Insurance Numbers. Also other forms of information about an individual are considered as personal information under this Act such as employee files, customer credit reports.

It is important to distinguish information not covered under the Privacy Act. For example, business names, addresses, phone numbers etc are considered to be public records and therefore are not classified as personal information. Also personal information does not include the name, title, business address or telephone number of an employee of an organization.

Generally, this Act applies to Locke Truss Co. Ltd. in terms of its customers' and employees' personal information.

Principles of the Act

Locke Truss Co. Ltd. must comply with the following ten principles of the Privacy Act:

1. Accountability
2. Identifying Purpose
3. Consent
4. Limiting Collection
5. Limiting Use, Disclosure, and Retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual Access
10. Challenging Compliance

In order to meet the principles of the Act, we must not only adhere to the main objectives of the Act, but also implement a strategic plan for daily business practices, which meets the expectations of our employees and customers.

STRATEGIC PLAN FOR IMPLEMENTATION OF THE PRIVACY ACT'S TEN PRINCIPLES

Accountability	Principle 1
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Our first step in implementing the Privacy Act policies and procedures is announcing the *appointment of our Company Privacy Representative*: Tom LeBlanc. This appointed individual is responsible for ensuring Locke Truss Co. Ltd. is in compliance with the Privacy Act by specifically implementing the other nine principles of the Act as described below.

The Representative must ensure that personal information passed on to other third parties for further processing is properly protected, such as outsourced payroll services, customer receivable information passed on to third party credit agencies, such as Equifax and the Lumbermen's Association and customer third party collection agencies.

The Company representative must train all other company employees who are responsible for handling employee and customer personal information. The Representative will also assist other associated companies with setting up their Privacy Act policies where required.

Identifying Purpose and Consent	Principle 2 and 3
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Next we identify the various forms of personal information we must collect for our customers and employees along with our intended use of the information. The following are the necessary forms of collection and purpose of personal information required by Locke Truss Co. Ltd.:

Customer Information		
Item Number	Form of Information	Customer Category
1.	Name, Address, Phone No., Fax No.	All Non Business Customers
2. a	Banking Information (Branch Name, Address, Account Number, Transit Number)	All Credit Customers
b	Third Party Credit Reports	All Credit Customers
c	Social Insurance Number	New Credit Customers with no trade references or third party credit reports

Intended Purpose of Customer Information:

Customers' names, addresses, phone numbers and fax numbers are collected for all customers for the purposes of selling, delivery of products and billing. Such information is retained on customer contact sheets, order quote sheets, sales invoices and accounting records.

As well, some customers' names and addresses may be used annually for customer appreciation purposes such as holiday greeting mailings and seasonal gift delivery.

Banking Information will be collected through completed Customer Credit Applications. This information may be used alone or in combination with trade references supplied by the customer and third party credit bureau reports for the purpose of deciding customer credit worthiness for both new customers and existing customers. In addition this information may be used in the event of legal action taken against any non-payment customer and court awarded collection judgment for Locke Truss Co. Ltd.

Third Party Credit Reports will be collected for all new credit customers and as warranted for existing credit customers. This information may be used alone or in combination with trade references supplied by the customer for the purpose of deciding customer credit worthiness for both new customers and existing customers.

Social Insurance Number will only be collected and used when a personal credit report is required to decide whether or not to approve a credit application for a customer without any commercial credit history. That is when trade references or third party credit reports are not available.

Employee Information	
Item Number	Form of Information
1.	Social Insurance Number.
2.	Home Address
3.	Social Insurance Number
4.	Birth Date
5.	Home Phone Number
6.	Previous Employers Name and Phone Number
7.	Education Levels
8.	Employment History/Skills
9.	Dependent Names, Birth Dates

Intended Purpose of Employee Information:

Employees home address, Social Insurance Number and Birth Date are required for government payroll remittances and employment reports such as T4 reporting, Records of Employment. In addition this information is also used for Workplace Accident Reporting, Human Resource Department Hiring Reports and Government Wage Subsidy Grants.

Employee Birth Dates will also be used for sending out Birthday Cards on Employees Birth Dates.

Personal employment history and skills along with education levels and previous employers' references will be used for deciding initial employment suitability and for later consideration of future promotion and advancement.

Employee Home Phone Number is required to contact employee or employee's dependents in event of an emergency.

Employees' addresses, birth date, dependent names and birth dates are required for providing employee benefits.

Consent

Locke Truss Co. Ltd. must ensure that it has consent from all parties for using their personal information. *As such the following actions will be necessary by our Company on or before January 1, 2004:*

All existing customers will be notified in writing of the reasons why we need their information, to whom it is disclosed to and ask them to advise us if they object to this ongoing use and disclosure.

All existing employees will also be notified in writing of the reasons why we need their information, to whom it is disclosed to and ask them to advise us if they object to this ongoing use and disclosure.

Separate Customer Consent will be required when:

Customers refer third party vendors or lending institutions to Locke Truss for credit references. In these circumstances, Locke Truss staff must ask the supplier or institution to forward to us a signed customer credit application indicating the customer's consent.

Separate Employee Consent will be required when:

Employees refer lending institutions to Locke Truss for employment or wage/salary status. Document the employee's consent by having the employee see a consent form designed for that purpose.

A previous Company employee refers an employer to Locke Truss for a job reference. Ask the employer to forward a signed job application showing the employee's consent.

An employee requests Locke Truss provide a letter of reference to a third party. Document the employee's request on a file copy of the letter.

All new customer and employee consent will be obtained upon initial contact as follows:

New Customers will be advised of the uses of their name, address, and phone and fax numbers upon initial order contact. The consent will be verbally transmitted and the response recorded in a check box on the truss designer/salesperson contact sheet.

Customers applying for credit will read and sign a credit application. The credit application's terms and conditions outline Locke Truss's use and disclosure of the personal and credit information.

New Employees will complete and read a job application and then sign the form to show their consent for the use and disclosure of all personal information except their SIN and dependent(s) names and birth dates. This excepted data will be obtained upon hiring. The use and disclosure of this information will be explained in the hiring process. Consent will be implied on TD1 and TD1On Tax forms and the Group Benefit forms signed.

NOTE

Consent may not be required in all circumstances. Some exceptions are:

- No consent required to supply personal information to a lawyer representing Locke Truss Co. Ltd.
- To collect a bad debt of an individual
- To comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction, i.e. Family Support Agency or CCRA

Limiting Collection, Use, Disclosure and Retention, Maintaining Accuracy and Safeguard Data	Principles 4, 5, 6 & 7
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Locke Truss Co. Ltd. shall not collect, use, disclose or retain personal information which is no longer required.

However we are responsible to ensure data is up-to-date and accurate for all personal information which is still required for our use.

The following is a schedule of period of retention for personal information:

- Third Party credit reports will be replaced every 2 years. Out-dated credit reports must be destroyed.
- Sales invoices will be retained in accordance with income tax regulations, i.e. 7 years
- Employee Files must be maintained for as long as the employee is active with Locke Truss Co. Ltd.
- Inactive, Terminated Employee Files must be destroyed after 3 years.

All personal information in paper form retained for use shall be properly stored in locked filing cabinets.

Sensitive Data shall be stored in a separate location, locked metal cabinet, i.e. employee files, customer credit reports and applications.

Electronic data shall be protected with passwords and daily back ups.

Disposed documents must be shredded.

Openness, Individual Access and Compliance	Principles 8, 9 & 10
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Locke Truss will communicate our Privacy Policy to Customers and employees through the following methods:

- Initial letter to employees and customers prior to January 1, 2004
- On our Company Website
- New Customers – Credit Application
- New Employees – Employment Application
- On Quote Document
- Verbally to Customer when Design/Sales Person collects data.

Individuals may seek access to their personnel information by contacting the Company Privacy Representative and submitting a request.

Requests for Access will be actioned as quickly as possible by the Administrative Staff and preferably within 5 working days. In the unlikely event that additional search time is required; responses must not exceed 30 days. This will ensure Locke Truss is within the access response time limitations in accordance with the Act.

The Privacy Representative will investigate all complaints and inquiries promptly and efficiently.

This policy may be reviewed and updated from time to time as required.

Gary Lalonde
President
Locke Truss Co. Ltd.