

PRIVACY POLICY
for
Terry Pond
Bookkeeping & Tax Services

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1.0 Purpose of Terry Pond's Privacy Policy:

Terry Pond is a business preparing and filing financial records and other paperwork for small businesses and individuals in the Tillsonburg, Ontario, Canada, and surrounding Tri-County area. In order to prepare these documents information about the individuals and their businesses is collected and stored on location to facilitate preparation of records. This business includes, but is not limited to, filing of income tax returns with the Canada Revenue Agency, computerized financial records, paper financial records, correspondence.

This privacy policy has been developed to comply with Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA"). PIPEDA and sets out rules for the collection, use and disclosure of personal information in the course of commercial activity as defined in the Act.

1.1 The Ten Principles of PIPEDA

The ten Principles of PIPEDA that form the basis of this Privacy Policy are as follows

- 1. Accountability:** organizations are accountable for the personal information they collect, use, retain and disclose in the course of their commercial activities, including, but not limited to, the appointment of a Privacy Officer;
- 2. Identifying Purposes:** organizations are to explain the purposes for which the information is being used at the time of collection and can only be used for those purposes;
- 3. Consent:** organizations must obtain an Individual's express or implied consent when they collect, use, or disclose the individual's personal information;
- 4. Limiting Collection:** the collection of personal information must be limited to only the amount and type that is reasonably necessary for the identified purposes;
- 5. Limiting Use, Disclosure and Retention:** personal information must be used for only the identified

purposes, and must not be disclosed to third parties unless the Individual consents to the alternative use or disclosure;

6. Accuracy: organizations are required to keep personal information in active files accurate and up-to-date;

7. Safeguards: organizations are to use physical, organizational, and technological safeguards to protect personal information from unauthorized access or disclosure.

8. Openness: organizations must inform their clients and train their employees about their privacy policies and procedures;

9. Individual Access: an individual has a right to access personal information held by an organization and to challenge its accuracy if need be; and last but not least;

10. Provide Recourse: organizations are to inform clients and employees of how to bring a request for access, or complaint, to the Chief Privacy Officer, and respond promptly to a request or complaint by the individual. This Privacy Policy applies to all employees and contracted employees of Terry Pond.

1.2 Definitions

"Personal information" means any information about an identifiable individual. It includes, without limitation, information relating to identity, nationality, age, gender, address, telephone number, e-mail address, Social Insurance Number, date of birth, marital status, education, employment health history, assets, liabilities, payment records, credit records, loan records, income and information relating to financial transactions.

"Business information" means business name, business address, business telephone number, name(s) of owner(s), officer(s) and director(s), job titles, business registration numbers (for HST, RST, source deductions), Although business information is not subject to PIPEDA, confidentiality of business information will be treated with the same security measures as is required for individual personal information under PIPEDA.

2.0 Privacy Policy:

2.01 Accountability: Terry Pond, owner, has been appointed as privacy officer

2.02 Purposes of collection: Information is collected solely for the purposes of performing bookkeeping and data preparation and filing as requested by the individual or business.

2.03 Consent: to collect and use personal information is deemed to be given when the customer requests Terry Pond to perform accounting, bookkeeping, or other services on their behalf.

2.04 Limiting Collection: Personal information collected will be limited to the purposes set out in this Privacy Policy, Terry Pond will only collect the information required to perform the tasks you have contracted us to perform.

2.05 Limiting Use, Disclosure and Retention: Use of Personal Information Personal information will be used for only those purposes to which the individual has consented with the following exceptions, as permitted under PIPEDA: Terry Pond has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law and the information is used for that investigation; • an emergency exists that threatens an individual's life, health or security; • the information is publicly available; • the use is clearly in the individual's interest, and consent is not available in a timely way; • knowledge and consent would compromise the availability or accuracy of the information, and • collection is required to investigate a breach of an agreement. PIPEDA permits Terry Pond to disclose personal information to third parties, without an individual's knowledge and consent, to: • a lawyer representing Terry Pond • collect a debt owed to Terry Pond by the individual or client; • comply with a subpoena, a warrant or an order made by a court or other body with appropriate

jurisdiction; • a law enforcement agency in the process of a civil or criminal investigation; • a government agency or department requesting the information; or, • as required by law. PIPEDA permits Terry Pond to transfer personal information to a third party, without the individual's knowledge or consent, if the transfer is simply for processing purposes and the third party only uses the information for the purposes for which it was transferred. Terry Pond will ensure, by contractual or other means, that the third party protects the information and uses it only for the purposes for which it was transferred. Personal information will be retained in client files as long as the file is active and for such periods of time as may be prescribed by applicable laws and regulations. Information contained in a file will be retained for a period of seven (7) years. All non retained information will be securely shredded.

2.06 Accuracy: Terry Pond endeavours to ensure that any personal information provided by the individual in his or her file(s) is accurate, current and complete as is necessary to fulfill the purposes for which the information has been collected, used, retained and disclosed. Individuals are requested to notify Terry Pond of any change in personal or business information.

2.07 Safeguards: Terry Pond will use physical, organizational, and technological measures to safeguard personal information used for the purposes set out in this Privacy Policy. Physical Safeguards: Active files are stored in locked filing cabinets when not in use. Access to work areas where active files may be in use is restricted to Terry Pond employees only and authorized third parties. All inactive files or personal information no longer required are shredded prior to disposal to prevent inadvertent disclosure to unauthorized persons. Technological Safeguards: Personal information contained in Terry Pond's computers and electronic databases are password protected. Terry Pond's Internet router or server has firewall protection sufficient to protect personal and confidential business information against virus attacks and malware software arising from Internet activity.

2.08 Openness: Terry Pond will endeavour to make its privacy policies and procedures known to the individual via this Privacy Policy as well as the Terry Pond Privacy Statement. This document will also be available on Terry Pond's web site, www.terrypondbookkeeping.ca.

2.09 Individual Access: An Individual who wishes to review or verify what personal information is held by Terry Pond or to whom the information has been disclosed (as permitted by the Act), may make the request for access (in writing) to Terry Pond's Privacy Officer. Upon verification of the individual's identity, the Privacy Officer will respond within 90 days.

2.10 Complaints/Recourse: If an individual has a concern about Terry Pond's personal information handling practices, a complaint (in writing) must be directed to Terry Pond's Privacy Officer. Upon verification of the individual's identity, Terry Pond's Privacy Officer will act promptly to investigate the complaint and provide a written report of the investigation's findings to the individual. Where Terry Pond's Privacy Officer makes a determination that the individual's complaint is well founded, the Privacy Officer will take the necessary steps to correct the offending information-handling practice and/or revise privacy policies and procedures. Where Terry Pond's Privacy Officer determines that the individual's complaint is not well founded, the individual will be notified in writing. If the individual is dissatisfied with the finding and corresponding action taken by Terry Pond's Privacy Officer, the individual may bring a complaint to the Federal Privacy Commissioner at the address below: The Privacy Commissioner of Canada Email address: www.privcom.gc.ca. 112 Kent Street, Ottawa, Ontario K1A 1H3 Tel 1-800-282-1376 Questions/Access Request/Complaint Any questions regarding this or any other privacy policy of Terry Pond may be directed to the Privacy Officer. Requests for access to information, or to make a complaint, are to be made in writing and sent to the Privacy Officer at the address below: Terry Pond, 1324 Mall Road, RR#2, Tillsonburg, Ontario N4G 4G7 Attention: Privacy Officer

June 16, 2010 - PRIVACY POLICY