



## **Our Policy Statement**

**Century 21 Castlewood Agencies (1997) Ltd.** only collects personal information necessary to effectively market and sell the property of sellers, to locate, assess and qualify properties for buyers and to otherwise provide professional and competent real estate services to clients and customers.

This office is a member of the Canadian Real Estate Association (CREA) and adheres to and abides by the principles set out in the CREA Privacy Code. All employees, and real estate associates belonging to this brokerage must sign an acknowledgement that they will comply with this code.

## **Person in Charge**

Bonnie Wegerich Broker/Owner is the person/position responsible for privacy compliance in this office. This name shall be made available to consumers. The responsibilities of the privacy compliance officer shall include:

- a. Establish and update information protection policies.
- b. Ensure policies are implemented by other organizations to which data processing functions are outsourced;
- c. Establish criteria for classification of information;
- d. Evaluate the accessibility of sensitive information and take corrective action where necessary;
- e. Provide education to employees on the importance of information protection.
- f. Attempt to resolve consumer privacy complaints to the satisfaction of the consumer;

## **Collection, Use and Disclosure of Personal Information**

- a. Only the information necessary to facilitate the real estate transaction or otherwise provide professional and competent service to clients and customers will be collected.
- b. No personal information shall be collected from any individual without first obtaining the consent of the individual to the collection, use and dissemination of that information.
- c. Express consent (whether oral or written) must always be obtained except in the following situation. Consent may be implied where the information is not sensitive and where it can be reasonably assumed that the individual would expect the information to be disclosed in this fashion;
- d. The name of the privacy compliance officer will be provided to the individual before or at the time of the collection of personal information to answer any questions
- e. Once the information is collected, it will be used and disclosed only for the purposes disclosed to the individual;
- f. All representation agreements must include the approved privacy clauses.

## **Disclosure for New Purpose**

- a. Anyone using personal information for some new purpose that extends beyond the consent already provided must obtain the express consent of the person for that use;
- b. Requests for information by law enforcement officials, lawyers, private investigators or other agents or subpoenas for documents issued by the court must be referred to the Privacy Officer, Manager or Broker

## **Protecting Information**

Information must be protected in a manner commensurate with its sensitivity, value and criticality. This policy applies regardless of the media on which information is stored, the location where the information is stored, the systems used to process the information or the processes by which information is handled.

- a. **Collection and Disclosure**
  - i. Meetings with customers and clients on these premises must take place in a place and a manner to ensure confidentiality.
  - ii. Mail and faxes must be routed directly to the intended recipient

iii. Information should be available to other persons in the office only on a need to know basis

**b. Storage**

- i. Filing cabinets designated by the office manager to obtain personal, including sensitive information are to be kept secure at all times;
- ii. All personnel are to have computer passwords. These passwords are confidential and are not to be shared with any unauthorized person.

**c. Destructions**

- i. This office has in place a record retention and destruction policy

**Accuracy of Personal Information.**

To ensure the quality of the information collected.

- a. Insofar as possible, personal information should be collected directly from the consumer
- b. Public property information (taxes, assessment data etc) should be verified;
- c. Disclaimers of accuracy in the form approved by the Brokerage should always be attached to any disclosure of information.

**Access to Personal Information**

- a. Copies of any privacy brochure approved by this office will always be available to the public in the reception area of the office.
- b. The individual set out in Section 3 as being responsible for privacy compliance is the person responsible for responding to access requests and all such requests will be referred to that person. All staff and associates will co-operate fully with the privacy compliance officer in responding to requests.
- c. On written request and appropriate identification satisfactory to the organization, an individual will be advised of personal information about him/her retained in the brokerage records and whether they can access all, part or none of their personal information.
- d. Where information cannot be disclosed (for example the information contains references to other individuals or is subject to solicitor-client privilege. The individual will be given reasons for non disclosure and the provision of PIPA that applies;
- e. A minimal administrative fee may be charged to supply the information. An estimate of the cost will be supplied the individual requesting access to the information before access is actually given.
- f. This brokerage will respond to a request from an individual to access information within 30 days unless the organization has been granted an extension by the Information and Privacy Act Commissioner.

**Corrections to Personal Information and Changes to Consent**

- a. On written request, an individual may have corrections made to his/her personal information that is retained in the Brokerage's records
- b. If information is not corrected, the individuals record must be annotated with their request to correct the information.
- c. Corrections to information that has been disclosed to other organizations will be forwarded to the affected organization.
- d. Corrections to information that has been disclosed to other organization to correct information within 30 days unless the organization has been granted an extension by the Information and Privacy Commissioner.
- e. Individuals can at any time withdraw or change their consent to the collection, use and disclosure of personal information. Individuals will be advised of the consequences of any withdrawal or change in consent.

**Compliance**

- a. Any complaints from an individual concerning the collection, use or disclosure of their personal information or concerning the individual's ability to access their personal information must be referred to the Privacy Officer who will attempt to resolve the complaint to the individual's satisfaction.
- b. In the event the complaint cannot be resolved internally to the individual's satisfaction, he or she will be advised of where to direct the complaint.