

CATHEXIS CONSULTING INC. PRIVACY POLICY

At Cathexis we are committed to protecting the privacy of both clients and research participants. For that reason we have taken and will continue to take measures that protect the privacy of all personal information in our possession.

Using the *Personal Information Protection and Electronic Documents Act* (PIPEDA) as a basis, this policy outlines the ways in which Cathexis actively complies with the ten principles of privacy set out in the PIPEDA.

THE TEN PRINCIPLES OF PRIVACY

1. ACCOUNTABILITY

The privacy officer for Cathexis is Melissa McGuire.

Should you have questions or concerns related to this privacy statement or about the way in which Cathexis protects respondents' information during and after the research process, please contact Melissa McGuire by telephone at (416)469-9954 ext. 242 or by email at Melissa@cathexisconsulting.ca

2. IDENTIFYING PURPOSES

Cathexis gathers information for research purposes only. We maintain strict confidentiality of both client and participant information. We do not sell or trade information that identifies individuals.

3. CONSENT

Cathexis obtains informed consent in the appropriate form from all research participants at the outset. Participation in our research projects is completely voluntary. A participant may refuse to answer certain questions, withdraw consent or discontinue participation at any time they choose. Information from individual participants is not used for any purpose other than that originally specified.

If Cathexis wishes to use personal information for a purpose other than that stated at the outset of the study/project, the express written consent of the participant is obtained.

4. LIMITING COLLECTION

Cathexis makes every effort to limit the amount and type of personal information collected to that which is deemed necessary for the purpose of the project/study. Whenever possible, personal information is collected anonymously and/or in the form of aggregate data, without identifying any individuals.

5. LIMITING USE, DISCLOSURE AND RETENTION

Cathexis limits the use and disclosure of personal information to those purposes identified at the time of collection.

No information that can personally identify an individual participant is provided to anyone outside Cathexis. In the rare event that information that might personally identify individual participants is to be transferred to a third party, explicit permission is obtained from those individual participants.

The only exception to this is if Cathexis is required to disclose information for legal reasons such as a subpoena or other court or government orders.

Personal information is retained only for the purpose for which it was collected, except where required by law. Personal information that is no longer required to fulfill the identified purposes and/or legal requirements is destroyed, erased, or rendered anonymous using secure data destruction methods.

6. ACCURACY

Cathexis updates personal information only if it is necessary for the purposes for which it was collected. For most research projects, contacts are on a one-time basis only and as such are never modified while in the possession of Cathexis.

7. SAFEGUARDS

Cathexis safeguards and protects personal information in its possession or control from loss or theft and from unauthorized access, disclosure, duplication, use or modification. Physical safeguards such as restricted access to the entire office, alarm systems and secure locks on all doors are in use. Passwords and firewalls protect all electronic documents.

8. OPENNESS

Cathexis is open about the procedures used to safeguard and manage personal information. Access to information about these procedures is available through this Privacy Policy, or by contacting the Privacy Officer.

9. INDIVIDUAL ACCESS

Upon request, an individual will be informed of the existence, use or disclosure of any personal information about them that is currently in the possession or control of Cathexis.

Individuals may have access to personal information about themselves upon providing proof of identity and submitting a written request to the Privacy Officer.

Requests to identify the source of an individual's email address or telephone number will be honoured so that the respondent may take action to ensure their removal from the source's list should this be desired.

If a request for access to personal information is denied, a written reply outlining the reasons for refusal will be provided (e.g., information was collected for the purposes of a legal investigation). The individual may then challenge the decision of Cathexis.

10. PROVIDE RECOURSE

If you wish to submit comments concerning this Privacy Statement or its application by us, please convey your suggestions or concerns in writing to Cathexis, 34 Park Road, Toronto, Ontario M4W 2N4. Cathexis will investigate all comments or concerns and attempt to respond quickly to inform you of the steps, if any, that will be implemented in order to address your concerns.

The privacy officer for Cathexis is Melissa McGuire. Should you have questions or concerns related to the company's privacy or about the way in which Cathexis protects respondents' information during and after the research process, please contact Melissa McGuire by telephone at (416)469-9954 ext. 242 or by email at Melissa@cathexisconsulting.ca

If individuals are not satisfied that Cathexis has adequately addressed their comments or concerns, they can contact the Federal Privacy Commissioner.