

Reed Research Privacy Policy

1.0 Overview

Reed Research adheres to the **Privacy Policy** laid out by the **Council of Private Investigators – Ontario (CPIO)**, as well as the **Canadian Standards Association (CSA) Model Code for the Protection of Personal Information**. These frameworks are based on ten interrelated principles that form the foundation of the CPIO **Code of Privacy**.

We are committed to maintaining privacy, confidentiality, and security of all personal information collected in compliance with **PIPEDA** (Personal Information Protection and Electronic Documents Act) and all relevant privacy laws in Canada.

2.0 Accountability

Reed Research is responsible for the personal information we collect, maintain, or control. We take appropriate measures to safeguard and secure personal information with physical, technological, and organizational security measures.

Our organization has taken steps to:

- Protect personal information.
- Address complaints and inquiries related to privacy concerns.
- Train our employees about policies and practices for protecting personal information.
- Ensure that information about our privacy practices is readily available and communicated effectively.

To coordinate compliance with these principles, we have designated a **Chief Privacy Officer (CPO)**. The CPO is responsible for ensuring our organization's privacy practices are up to date and fully compliant with applicable laws. For any privacy-related concerns, the CPO can be contacted as follows:

Reed Research - Chief Privacy Officer

c/o Mr. Marc Reed

Marc.Reed@ReedResearch.com

416-545-1800

202 – 200 Cachet Woods Court,
Markham ,ON, L6C 0Z8

3.0 Identifying Purposes

Reed Research collects personal information for lawful purposes only. The primary purpose of collecting personal information is to provide professional investigative and research services to clients, which may include businesses, government entities, and other organizations. We ensure that each assignment received is properly vetted to ensure compliance with **PIPEDA** and other applicable privacy regulations.

Additional purposes for which personal information may be used or collected will be identified at the time of collection, and these purposes will be aligned with the investigative goals of Reed Research.

4.0 Consent

Reed Research will obtain consent from individuals for the collection, use, or disclosure of personal information, except where otherwise permitted by law, such as for investigations into potential legal breaches or breaches of agreements.

- **Express Consent:** Where applicable, we will obtain express consent for the collection, use, or disclosure of personal information, either orally or in writing.
- **Implied Consent:** In situations where express consent cannot be reasonably obtained, implied consent may be applied based on the context and the circumstances.

In certain circumstances, obtaining consent may not be possible, such as in the case of an investigation that could be compromised by obtaining consent. Reed Research will adhere to the limitations of **PIPEDA Section 7** when applying implied consent.

If an individual wishes to withdraw their consent at any time, they may do so by contacting the Chief Privacy Officer, subject to any legal or contractual restrictions.

5.0 Limiting Collection

Reed Research limits the collection of personal information to what is necessary for the specific purposes outlined at the time of collection. We ensure that the collection of personal information is done fairly and lawfully in accordance with applicable privacy laws.

We also strive to maintain accurate, complete, and up-to-date records of personal information to serve the intended purposes.

6.0 Limiting Use, Disclosure, and Retention

Personal information collected by Reed Research will not be used or disclosed for purposes other than those originally identified, unless consent is obtained from the individual or as required by law.

We retain personal information only for as long as necessary to fulfill the purposes for which it was collected. The retention period may extend beyond the conclusion of a particular assignment if necessary to resolve future issues or to comply with legal obligations. Once personal information is no longer needed, we have procedures in place to securely destroy, delete, or anonymize the data.

7.0 Accuracy

Reed Research will take reasonable steps to ensure that the personal information we maintain is accurate, complete, and up to date. This will be achieved through:

- Initial verification of information collected from clients.
- Requesting periodic confirmation from clients regarding the accuracy of their personal information.
- Regular reviews of the information we maintain.

If any inaccuracies or omissions are identified, we will correct or amend the information accordingly, and if necessary, we will notify third parties to whom the inaccurate information was disclosed.

8.0 Safeguards

Reed Research employs physical, technological, and organizational safeguards to protect personal information against unauthorized access, disclosure, alteration, or destruction. These safeguards include:

- **Physical Security:** Alarm systems, locked offices, and secure storage for physical records.
- **Technological Safeguards:** Password protections, network security, and encrypted communications.
- **Internal Measures:** Restricted access to personal information, staff training on data protection practices, and internal audits.

We also implement stringent disposal and destruction practices to ensure that personal information cannot be retrieved after it is no longer needed. This includes shredding documents and securely deleting digital information.

9.0 Openness

Reed Research ensures that information about our privacy policies and procedures is readily available to individuals upon request. We strive to provide clear and accessible information about how personal information is managed and protected.

Individuals can contact our **Chief Privacy Officer** for details on our policies. In cases where we cannot provide full access to personal information, we will provide a clear explanation of why access has been denied, in accordance with the relevant legal exceptions.

10.0 Individual Access

Upon request, individuals can inquire about the existence, use, and disclosure of their personal information held by Reed Research. We will provide access to this information and allow individuals to challenge the accuracy and completeness of the data.

Exceptions to this right of access include, but are not limited to:

- Personal information related to another individual.
- Commercially confidential information.
- Information that, if disclosed, could compromise an individual's life or security.
- Data collected without consent for investigative purposes or during formal dispute resolution processes.
- Information protected by solicitor-client privilege.

Access may also be denied in accordance with exceptions outlined under **Section 25(1) of the Private Investigations and Security Guards Act (Ontario)**.

11.0 Compliance

Reed Research is committed to complying with all privacy principles set out by the **Council of Private Investigators - Ontario** and applicable laws. If you believe that Reed Research has not complied with our privacy practices or principles, you may address your concerns to the **Chief Privacy Officer**. We are committed to resolving any issues related to privacy compliance in a fair and transparent manner.

12.0 Amendments to the Privacy Policy

Reed Research reserves the right to amend this Privacy Policy at any time. Any changes will be posted on our website and will comply with applicable privacy laws. Please review this policy periodically to stay informed of any updates.

Contact Information

For any questions or concerns regarding this Privacy Policy or the management of your personal information, please contact:

Reed Research - Chief Privacy Officer
c/o Mr. Marc Reed
Marc.Reed@ReedResearch.com
416-545-1800
202 – 200 Cachet Woods Court,
Markham ,ON, L6C 0Z8

By engaging with Reed Research, you acknowledge that you have read and understood this Privacy Policy, and you agree to the terms and conditions set forth in relation to the handling of your personal information.

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