



BRT Group - Human Resources Policy Manual

Policy Title:	Confidentiality and Privacy	Policy Number:	1.5
Effective Date:	May 1, 2017	Revision Number: Replaces:	New Policy
Prepared By:	Human Resources	Approved By:	President

1.5.1 Personal Information Protection and Electronic Documents Act (PIPEDA)

It is BRT Group's policy that all customers' records, product information and employee records which the employee and the Company accumulate during the course of business will be treated as confidential and remain the property of the Company.

Under the PIPEDA (Personal Information Protection and Electronic Documents Act) we are responsible for the personal information we collect, use, maintain and disclose. We are committed to respecting and safeguarding your right to privacy. This Confidentiality and Privacy Policy applies to personal information collected by BRT Group. Any employee who knowingly discloses, accesses, copies, references, removes or alters, in any way, information they are not authorized to handle will be subject to disciplinary action, including termination of employment.

1.5.2 Information Gathered

In serving your needs it is important to have accurate information about you. We only collect personal information for specific purposes related to your employment by the Company or in order to provide you with benefits or other privileges. Personal information may include details such as your: Name, Age, Income, Social Status (i.e. married, single), Address, Resume, Evaluations, Health & Safety Information and so on. The type of information requested varies based on the service or benefits we are providing to you. We receive some of this information during the Recruitment and Selection process upon being hired.

1.5.3 Disclosure of Personal Information

We collect, disclose and use personal information only for the uses or for the purposes disclosed or that would be reasonable in the circumstances. We do not share personal information about you



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outside of BRT Group, unless required by law or with your consent. We may share information about you with contracted third parties (i.e. our benefit carrier). However, we only do so in circumstances where we have assurances and confidence that your information will be used and protected by that organization in accordance with our own standards and that of applicable legislation.

1.5.4 Release of Information to Third Parties

All requests from outside agencies, banks, etc., for personal information kept in the HR Files of Employees will be forwarded to Payroll.

References to potential employers of previous employees of BRT Group will be handled by the incumbent's Manager. It is our policy only to confirm the employee's position and period of employment. Further information to the potential employer will only be released upon a written detailed request by the potential employer.

1.5.5 Updating Your Information

Since we use your personal information to provide services to you, it is important that the information be accurate and up-to-date. If, during your employment with BRT Group, any of your personal information changes it is your responsibility to inform Payroll so that we can make the necessary changes.

1.5.6 Information Security

We take all reasonable precautions to ensure that your information is kept safe. We maintain strict security standards to protect our systems and your information from unauthorized access and use. Employees with access to your personal information (for example, Payroll personnel) maintain your